

January 14, 2019

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Drive
Lacey, Washington 98504

Attention: Mr. Timothy Mullin, L.G.

Re: **Request for No Further Action**
14610 Purdy Dr. NW
Gig Harbor, Washington 98332
Facility/Site No.: 11876
Cleanup Site No.: 1952
VCP Project No.: SWI590

Mr. Mullin:

In May 2017, EcoCon Inc. (ECI) submitted to Ecology an application to enter the Voluntary Cleanup Program (VCP) for the Gig Harbor Transmission Site located at 14610 Purdy Dr. NW, Gig Harbor, WA. Along with that application ECI submitted two reports for Ecology review and an opinion on the work conducted. Those reports were:

- Focused Subsurface Investigation-14610 Purdy Drive NW prepared by ECI and dated February 3, 2017; and
- Cleanup Action Report (CAR) prepared by ECI and dated April 26, 2017.

Those reports describe the investigation and cleanup activities related to two apparent heavy oil releases at the Site, where the first one occurred prior to March 12, 2009 (ERTS #609920) and a second release which occurred between February 2010 and January 2017. These releases were identified at the Site by the Tacoma Pierce County Health Department and during Phase 1 and Phase 2 Environmental Assessments conducted at the Property.

On September 27, 2017 Ecology issued a “*No Further Remedial Action Likely*” opinion based on the work performed at the Site. In that letter, Ecology expressed concerns regarding the detection of metals in a groundwater grab sample from boring B2 that was located near the former exterior hoist at the Site. As a result of those concerns, Ecology requested:

“...installation of one monitoring well at boring location B2.

i. For example, the monitoring well could be installed with an approximately 10 foot screen over an interval which ensures that:

1. *A representative groundwater sample can be collected from the perched groundwater layer during all seasons of the year.*
2. *The same interval which was sampled in February 2010 at boring B2 is accessible for sampling from the new monitoring well.*
3. *The top of the monitoring well screen will not be submerged."*

Ecology also requested:

"...Groundwater samples collected from the new monitoring well should be analyzed for: Heavy oil, cPAHs, total and dissolved cadmium, total and dissolved chromium, hexavalent chromium, and total lead and dissolved lead."

On October 5, 2017, ECI mobilized to site with a push-probe drilling rig operated by Standard Probe of Tumwater, Washington to install one well at the Site. ECI drilled four borings at the Site in an attempt to install a monitoring well. In each attempt, water was not encountered in the boring. Therefore, a well was not installed. This was reported to Ecology in a letter dated October 24, 2017.

In a "Further Action" letter dated January 16, 2018, Ecology reiterated that they needed a "properly constructed" groundwater monitoring well installed at the Site near boring B2 and that it needed to be monitored for four consecutive quarters. In addition, Ecology requested a map showing the locations of the October 5, 2017 boring locations. A copy of ECI's October 24, 2017 letter along with a figure showing the October 5, 2017 boring locations is attached to this letter.

On January 30, 2018, ECI mobilized to the site with a combination push-probe/hollow-stemmed auger drilling rig operated by ESN Northwest of Olympia, Washington to install one well at the Site. ESN used the hollow-stemmed auger to drill to a depth of 15 feet below the ground surface (bgs). Groundwater was encountered at a depth of eight feet bgs and a one-inch diameter well with 10 feet of screen was installed in the boring. The boring log for this well is attached to this letter.

Following installation and development of the monitoring well, ECI commenced quarterly groundwater monitoring on February 5, 2018. ECI has performed groundwater monitoring at the Site for four consecutive quarters as required by Ecology. The fourth quarterly groundwater monitoring report is enclosed with this letter as a separate submittal. Reports for the previous quarterly sampling events have been previously submitted to Ecology.

The analytical results from the groundwater monitoring have not revealed the presence of the Site constituents of concern above the laboratory reporting levels which are below the MTCA Method A Cleanup Levels. Therefore, it is ECI's opinion that the groundwater at the Site has not been impacted by the historical releases at the Site.

With the attachments to this letter, it is ECI's opinion that the Site has complied with the requirements of the Ecology letters of September 27, 2017 and January 16, 2018 and is requesting that Ecology issue at "No Further Action" determination for the Site. Enclosed is a completed VCP "Request for Option Form"

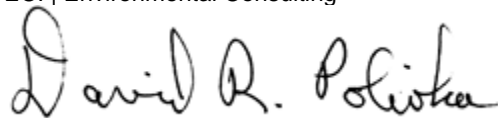
Request for No Further Action

14610 Purdy Dr. NW
Gig Harbor, Washington 98332

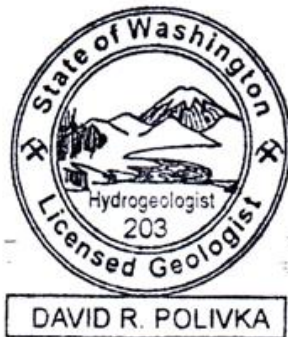
January 14, 2019

If there are any questions or you wish to discuss this or any other matter regarding the Site, please do not hesitate to call.

Sincerely,
ECI | Environmental Consulting



David R. Polivka L.G./L.Hg.
Senior Hydrogeologist
Direct: 360-349-0851



Attachments:

VCP Request for Opinion Form

ECI letter to Ecology dated October 24, 2017 with boring location figure

Boring Log MW1



Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

REQUEST FOR OPINION FORM

Use this form to request a written opinion on your planned or completed independent remedial action under the Voluntary Cleanup Program (VCP). Attach to this form the plans or reports documenting the remedial action. Please submit only one form for each request.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are requesting a written opinion under the VCP. This information may be found on the VCP Agreement.

Facility/Site Name: Gig Harbor Transmission

Facility/Site Address: 14610 Purdy Drive Northwest Gig Harbor, Washington 98332

Facility/Site No: 11876

VCP Project No.: SW1590

Step 2: REQUEST WRITTEN OPINION ON PLAN OR REPORT

What type of independent remedial action plan or report are you submitting to Ecology for review under the VCP? Please check all that apply.

- Remedial investigation plan
- Remedial investigation report
- Feasibility study report
- Property cleanup* plan (* cleanup of one or more parcels located within the Site)
- Property cleanup* report
- Site cleanup plan
- Site cleanup report
- Other – please specify: Fourth Consecutive quarter Groundwater monitoring report and NFA request letter

Do you want Ecology to provide you with a written opinion on the planned or completed independent remedial action?

Yes No

Please note that Ecology's opinion will be limited to:

- Whether the planned or completed remedial action at the site meets the substantive requirements of the Model Toxics Control Act (MTCA), and/or
- Whether further remedial action is necessary at the site under MTCA.

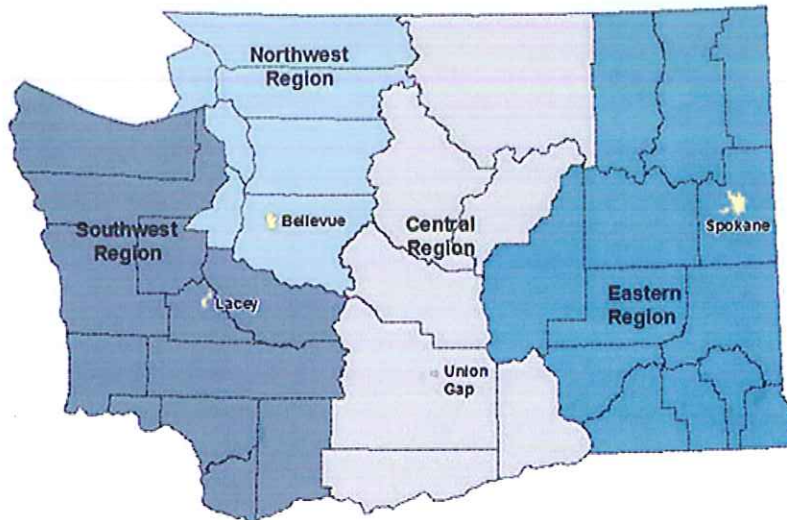
Step 3: REPRESENTATIONS AND SIGNATURE

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to request services from Ecology under the Agreement for this VCP Project.

Name: David R. Polivka		Title: Senior Hydrogeologist
Signature: <i>David R. Polivka</i>		Date: January 14, 2019
Organization: EcoCon Inc.		
Mailing address: P.O. Box 153		
City: Fox Island	State: WA	Zip code: 98333
Phone: 360-349-0851	Fax:	E-mail: david@ecocon.us

Step 4: SUBMITTAL

Please mail your completed form and the independent remedial action plan or report that you are requesting Ecology review to the site manager Ecology assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<p>Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452</p>	<p>Central Region: Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009</p>
<p>Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p>	<p>Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p>

October 24, 2017

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Drive
Lacey, Washington 98504

Re: **Groundwater Monitoring Gig Harbor Transmission**
14610 Purdy Dr. NW
Gig Harbor, Washington 98332
Facility/Site No.: 11876
Cleanup Site No.: 1952
VCP Project No.: SWI590

Attention: Mr. Timothy Mullin, L.G.

Mr. Mullin:

In May 2017, ECI submitted to Ecology an application to enter the Voluntary Cleanup Program (VCP) for the Gig Harbor Transmission Site. Along with that application ECI submitted two reports for Ecology review and an opinion on the work conducted. Those reports were:

- Focused Subsurface Investigation-14610 Purdy Drive NW prepared by ECI and dated February 3, 2017; and
- Cleanup Action Report (CAR) prepared by ECI and dated April 26, 2017.

Those reports describe the investigation and cleanup activities related to two apparent heavy oil releases at the Site, where the first one occurred prior to March 12, 2009 (ERTS #609920) and a second release which occurred between February 2010 and January 2017. These releases were identified at the Site by the Tacoma Pierce County Health Department and during Phase 1 and Phase 2 Environmental Assessments conducted at the Property.

In an e-mail dated July 12, 2017, you requested that before Ecology could complete a review of the Site information that the previous reports prepared by ECI and other consultants regarding the Site be submitted to Ecology. Those reports were submitted to Ecology on July 31, 2017.

On September 27, Ecology issued a *“No Further Remedial Action Likely”* opinion based on the work performed at the Site. In that letter, Ecology expressed concerns regarding the detection of metals in a groundwater grab sample from boring B2 that was located near the former exterior hoist at the Site. As a result of those concerns, Ecology requested:

“...installation of one monitoring well at boring location B2.

i. For example, the monitoring well could be installed with an approximately 10 foot screen over an interval which ensures that:

- 1. A representative groundwater sample can be collected from the perched groundwater layer during all seasons of the year.*
- 2. The same interval which was sampled in February 2010 at boring B2 is accessible for sampling from the new monitoring well.*
- 3. The top of the monitoring well screen will not be submerged.”*

Ecology also requested:

“...Groundwater samples collected from the new monitoring well should be analyzed for: Heavy oil, cPAHs, total and dissolved cadmium, total and dissolved chromium, hexavalent chromium, and total lead and dissolved lead.”

On October 5, 2017, ECI mobilized to site with a push probe drilling rig operated by Standard Probe of Tumwater, Washington to install one well at the Site. ECI drilled four borings adjacent to boring B2 at the Site in an attempt to install a monitoring well. In each attempt, water was not encountered in the boring. Therefore, a well was not installed.

The borings were drilled until refusal was reached by the push-probe. The depths drilled were 22 feet below ground surface (bgs), 13 feet bgs, 13 feet bgs, and 15½ feet bgs. All of these depths were similar or deeper than the depth drilled for boring B2 which was 14 feet bgs.

The soils encountered were silty sands and gravels. These sands and gravels were noted as being dry to the total depth of each boring. In addition, the soils did not appear to have any staining or odor.

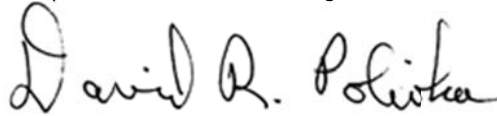
In boring B2, the soils were of similar composition and were noted as being wet at depths of 10½ to 14 feet bgs and moist at a depth of 4 to 7 feet bgs. The material above 4 feet was considered fill. Boring logs for boring B2 drilled in February 2010 and each attempt to install a well in October 2017 are attached to this letter.

Boring B2 was drilled in February of 2010, during the “rainy season” and it was raining at the time of the drilling. It is ECI’s opinion that the water that was observed in boring B2 was a “wetting front” as a result of surface water infiltration and was not actually a perched zone that is able to be monitored. Therefore, we are requesting that no further action be required at this site.

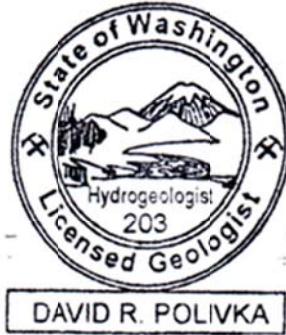
14610 Purdy Dr. NW
Gig Harbor, Washington 98332

If there are any questions or wish to discuss this or any other matter regarding the Site, please do not hesitate to call.

Sincerely,
ECI | Environmental Consulting





David R. Polivka L.G./L.Hg.
Senior Hydrogeologist
Direct: 360-349-0851



Attachments:

Boring Logs: Boring B2, MW1 attempts (4)

 Anchorage Tacoma Portland				Project: Monitoring Well Installation		Boring ID: Attempt 1					
				Location: 14610 Purdy Drive Northwest, Gig Harbor, Washington 98332							
				Client: Tracey Larson		Project Number: 0359-01-05					
Date Start/Finish: 10/5/2017		Drilling Method: Direct Push		Unified Soil Classification System <small>NON-COHESIVE SOILS</small> GW WELL-GRADED GRAVEL, FINE TO COARSE GRAVEL GP POORLY-GRADED GRAVEL GM SILTY GRAVEL GC CLAYEY GRAVEL SW WELL-GRADED SAND, FINE TO COARSE SAND SP POORLY-GRADED SAND SM SILTY SAND SC CLAYEY SAND <small>COHESIVE SOILS</small> ML SILT CL CLAY OL ORGANIC SILT, ORGANIC CLAY MH SILT OF HIGH PLASTICITY, ELASTIC SILT CH CLAY OF HIGH PLASTICITY, FAT CLAY OH ORGANIC CLAY, ORGANIC SILT PT PEAT							
Logged By: Kaden Reed		Auger ID/OD: --									
Checked By:		Borehole ID/OD: 2 inches									
Contractor: Standard Environmental Probe		Sampler: Macro Core 5									
Operator: Russel		Hammer Wt./Fall: --									
Boring Location: See Boring Locations Map		Ground Elevation: --									
Coordinates: --		Water Depth: --									
Weather: Sunny		Boring Depth: 22.5 feet									
Depth (ft.bgs)	Sample Number	Time	PID Reading					Remarks	Soil and Rock Description	Unified Classification	Graphical Representation
1								No odor	 Brown, dry, coarse, dense, silty sand with gravel	SM	
2											
3											
4				No odor							
5				No odor							
6				No odor							
7											
8				No odor							
9				No odor							
10											
11											
12											
13				No odor							
14											
15											
16				No odor							
17											
18											
19											
20											
21											
22											
23					Termination of boring due to refusal						
24											
25											
26											
27											
28											
29											
30											
Notes:											



Project: Monitoring Well Installation
Location: 14610 Purdy Drive Northwest, Gig Harbor, Washington 98332
Client: Tracey Larson

Boring ID: Attempt 2
Project Number: 0359-01-05

Date Start/Finish: 10/5/2017
Logged By: Kaden Reed
Checked By:
Contractor: Standard Environmental Probe
Operator: Russel
Boring Location: See Boring Locations Map
Coordinates: --
Weather: Sunny

Drilling Method: Direct Push
Auger ID/OD: --
Borehole ID/OD: 2 inches
Sampler: Macro Core 5
Hammer Wt./Fall: --
Ground Elevation: --
Water Depth: --
Boring Depth: 13 feet

Unified Soil Classification System	
NON-COHESIVE SOILS	GW WELL-GRADED GRAVEL, FINE TO COARSE GRAVEL
	GP POORLY-GRADED GRAVEL
	GM SILTY GRAVEL
	GC CLAYEY GRAVEL
	SW WELL-GRADED SAND, FINE TO COARSE SAND
	SP POORLY-GRADED SAND
	SM SILTY SAND
COHESIVE SOILS	SC CLAYEY SAND
	ML SILT
	CL CLAY
	OL ORGANIC SILT, ORGANIC CLAY
	MH SILT OF HIGH PLASTICITY, ELASTIC SILT
	CH CLAY OF HIGH PLASTICITY, FAT CLAY
	OH ORGANIC CLAY, ORGANIC SILT
PT PEAT	

Depth (ft.bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Graphical Representation		
1				No odor	Brown, dry, coarse, dense, silty sand with gravel	SM			
2									
3									
4				No odor				Brown, dry, coarse, very dense, silty sand with large cobble	SM
5									
6				No odor				Light brown, dry, large grained, very dense, silty sand with cobble	SM
7									
8									
9				No odor				Light brown, dry, large grained, very dense, sand with cobble and silt	SW
10									
11				No odor				Light brown, dry, large grained, very dense, sand with large cobble and silt	SW
12									
13									
14					Termination of boring due to refusal				
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									

Notes:



Project: Monitoring Well Installation
Location: 14610 Purdy Drive Northwest, Gig Harbor, Washington 98332
Client: Tracey Larson

Boring ID: Attempt 3
Project Number: 0359-01-05

Date Start/Finish: 10/5/2017
Logged By: Kaden Reed
Checked By:
Contractor: Standard Environmental Probe
Operator: Russel
Boring Location: See Boring Locations Map
Coordinates: --
Weather: Sunny

Drilling Method: Direct Push
Auger ID/OD: --
Borehole ID/OD: 2 inches
Sampler: Macro Core 5
Hammer Wt./Fall: --
Ground Elevation: --
Water Depth: --
Boring Depth: 13 feet

Unified Soil Classification System	
NON-COHESIVE SOILS	GW WELL-GRADED GRAVEL, FINE TO COARSE GRAVEL
	GP POORLY-GRADED GRAVEL
	GM SILTY GRAVEL
	GC CLAYEY GRAVEL
	SW WELL-GRADED SAND, FINE TO COARSE SAND
	SP POORLY-GRADED SAND
	SM SILTY SAND
COHESIVE SOILS	SC CLAYEY SAND
	ML SILT
	CL CLAY
	OL ORGANIC SILT, ORGANIC CLAY
	MH SILT OF HIGH PLASTICITY, ELASTIC SILT
	CH CLAY OF HIGH PLASTICITY, FAT CLAY
	OH ORGANIC CLAY, ORGANIC SILT
PT PEAT	

Depth (ft.bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Graphical Representation
1				No odor	Brown, dry, coarse, dense, silty sand with gravel	SM	
2							
3							
4				No odor			
5							
6				No odor			
7							
8							
9							
10				No odor			
11							
12							
13				No odor			
14					Termination of boring due to refusal		
15							
16							
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28							
29							
30							

Notes:



Project: Monitoring Well Installation
Location: 14610 Purdy Drive Northwest, Gig Harbor, Washington 98332
Client: Tracey Larson

Boring ID: Attempt 3
Project Number: 0359-01-05

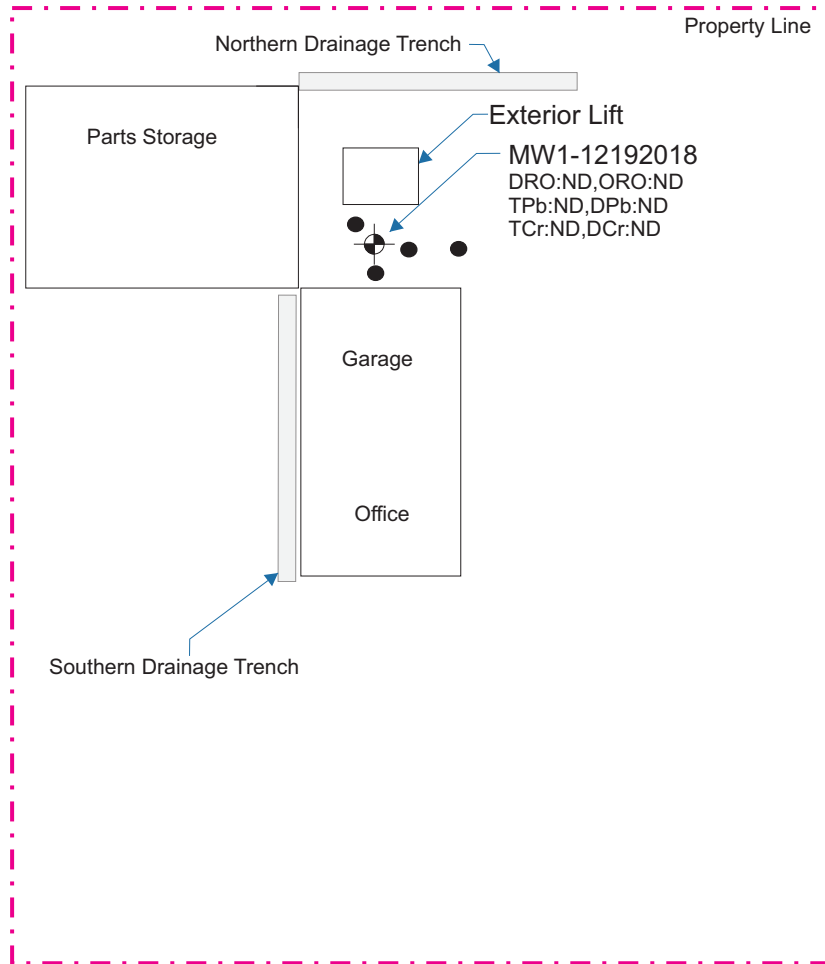
Date Start/Finish: 10/5/2017
Logged By: Kaden Reed
Checked By:
Contractor: Standard Environmental Probe
Operator: Russel
Boring Location: See Boring Locations Map
Coordinates: --
Weather: Sunny

Drilling Method: Direct Push
Auger ID/OD: --
Borehole ID/OD: 2 inches
Sampler: Macro Core 5
Hammer Wt./Fall: --
Ground Elevation: --
Water Depth: --
Boring Depth: 13 feet

Unified Soil Classification System	
NON-COHESIVE SOILS	GW WELL-GRADED GRAVEL, FINE TO COARSE GRAVEL
	GP POORLY-GRADED GRAVEL
	GM SILTY GRAVEL
	GC CLAYEY GRAVEL
	SW WELL-GRADED SAND, FINE TO COARSE SAND
	SP POORLY-GRADED SAND
	SM SILTY SAND
COHESIVE SOILS	SC CLAYEY SAND
	ML SILT
	CL CLAY
	OL ORGANIC SILT, ORGANIC CLAY
	MH SILT OF HIGH PLASTICITY, ELASTIC SILT
	CH CLAY OF HIGH PLASTICITY, FAT CLAY
	OH ORGANIC CLAY, ORGANIC SILT
PT PEAT	

Depth (ft. bgs)	Sample Number	Time	PID Reading	Remarks	Soil and Rock Description	Unified Classification	Graphical Representation
1				No odor	Brown, dry, coarse, dense, silty sand with gravel	SM	
2							
3							
4				No odor			
5							
6				No odor			
7							
8							
9							
10				No odor			
11							
12							
13				No odor			
14					Termination of boring due to refusal		
15							
16							
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30							

Notes:



State Hwy 302

Explanation

-  Monitoring Well Location
-  October 5, 2017 Attempted Monitoring Well Installation Locations



Groundwater Sample Location Map
 Quarterly Groundwater Sampling
 14610 Purdy Dr NW
 Gig Harbor, WA 98332

Date: December 28, 2018
 Completed By: K. Spencer
 Reviewed By.: S. Spencer
 Version: ECI-001
 Project No.: 0359-01-04

03
 Sheet 03 of 03



Practical Environmental Compliance Solutions

Offices in: Anchorage | Tacoma | Portland

Project: Monitoring Well Installation
Location: 14610 Purdy Dr. NW
 Gig Harbor, Washington 98332
Client: Gig Harbor Transmission

Boring ID:

MW1

Project Number:

0359-01-06

Date Start/Finish: 1/30/2018
Logged By: Kyle Spencer
Checked By: David Polivka
Contractor: ESN
Operator:
Boring Location:
Coordinates: --
Weather: Overcast

Drilling Method: Hollow-stemmed Auger
Auger ID/OD: --
Borehole ID/OD: 4 inch
Sampler:
Hammer Wt./Fall: --
Ground Elevation: --
Water Depth: 8 feet bgs
Boring Depth: 15' feet bgs

Unified Soil Classification System	
NON-COHESSIVE SOILS	GW WELL-GRADED GRAVEL, FINE TO COARSE GRAVEL
	GP POORLY-GRADED GRAVEL
	GM SILTY GRAVEL
	GC CLAYEY GRAVEL
	SW WELL-GRADED SAND, FINE TO COARSE SAND
COHESIVE SOILS	SP POORLY-GRADED SAND
	SM SILTY SAND
	SC CLAYEY SAND
	ML SILT
	CL CLAY
	OL ORGANIC SILT, ORGANIC CLAY
	MH SILT OF HIGH PLASTICITY, ELASTIC SILT
	CH CLAY OF HIGH PLASTICITY, FAT CLAY
	OH ORGANIC CLAY, ORGANIC SILT
	PT PEAT

Depth (ft bgs)	Sample No.	Time	PID Reading	Remarks: Odor, Sheen, Etc	Soil and Rock Description	Unified Classification	Well Construction Detail	
1				No odor	Asphalt gravel		Concrete	
2							Bentonite	
3				No odor	Medium brown, dense silty sand with gravel	SM		
4			No odor					
5								
6								
7			▽ ATD	No odor	Medium brown, dense silty sand with gravel	SM		
8								
9				No odor				
10					Medium brown, dense silty sand with gravel, wet	SM		
11								
12								
13								
14					Medium brown, dense silty sand with gravel wet	SM		
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								

Notes: Well Tag ID: Bkx694