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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 26, 2019

Glenn Floyd, VP, Principal
Bodine Enterprises
11105 Steele St. S, Suite 101
Tacoma, WA 98444

Re: Notice of Periodic Review Conducted at the following Hazardous Waste Site:

- **Site Name:** Pierce Transit Sprague Avenue
- **Site Address:** 1279 South Sprague Avenue, Tacoma, Pierce County, WA 98405
- **Facility/Site No.:** 17111391
- **Cleanup Site ID No.:** 3890

Dear Glenn Floyd:

Under the Model Toxics Control Act (MTCA), chapter 70.105D RCW, which governs the cleanup of hazardous waste sites in Washington State, the Department of Ecology (Ecology) must conduct a periodic review of all sites with institutional controls and Environmental Covenants every five years. This letter serves to inform you that a periodic review has been conducted at the Pierce Transit Sprague Avenue Site.

The periodic review process includes the following steps:


- Confirmation that the Environmental Covenant is still active and recorded with the Title to the property.
- A review of any monitoring data collected since the cleanup was completed or since the last review was conducted.
- A Site visit to confirm the institutional controls and conditions of the Environmental Covenant are being followed.
- A 30-day public comment period on the draft periodic review report.

Based on the information collected during this periodic review, the Pierce Transit Sprague Avenue Site appears to meet the requirements of chapter 173-340 WAC, and the selected remedy continues to be protective of human health and the environment. The 30-day public comment period on the draft periodic review report was ended on February 17, 2019. We received no public comments on the draft report. Enclosed is a copy of the final periodic review report for your information.

A periodic review will continue to be required every five years as long as institutional controls and/or an environmental covenant are required to protect human health and the environment. The next periodic review will be due in February 2024.

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of hazardous waste sites, please call me at (360) 407-6335. Thank you for your cooperation.

Sincerely,



Panjini Balaraju, P.E.
Southwest Regional Office
Toxics Cleanup Program

Enclosure: Final Periodic Review Report

By certified mail: 9489 0090 0027 6066 6647 01

cc: Ecology Site File



**PERIODIC REVIEW REPORT
FINAL**

**Pierce Transit Sprague Avenue
Facility Site ID#: 17111391
Cleanup Site ID# 3890**

**1279 South Sprague Avenue
Tacoma, Washington 98405**

Southwest Regional Office

TOXICS CLEANUP PROGRAM

February 2019

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1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Pierce Transit Sprague Avenue site (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). The cleanup actions resulted in concentrations of petroleum hydrocarbons remaining at the Site in soil and groundwater that exceed MTCA Method A cleanup levels. The MTCA Method A cleanup levels for soil and groundwater are established under WAC 173-340-740(2), and WAC 173-340-720(2), respectively. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

- (a) Whenever the department conducts a cleanup action.
- (b) Whenever the department approves a cleanup action under an order, agreed order or consent decree.
- (c) Or, as resources permit, whenever the department issues a no further action (NFA) opinion
- (d) And one of the following conditions exists:
 - 1. Institutional controls or financial assurance are required as part of the cleanup.
 - 2. Where the cleanup level is based on a practical quantitation limit.
 - 3. Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the Site.
- (b) New scientific information for individual hazardous substances of mixtures present at the Site.
- (c) New applicable state and federal laws for hazardous substances present at the Site.
- (d) Current and projected Site use.
- (e) Availability and practicability of higher preference technologies.
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Pierce Transit Sprague Avenue Site is located at 1279 South Sprague Avenue, Tacoma, Washington. It occupies approximately 3.56 acres that is entirely occupied by an office and self-storage units. The Site is located among urban commercial and businesses properties at the corner of South 15th Street and South Sprague Avenue. Offices, retail, food services businesses and residential area occupy the properties surrounding the Site. A location map and the current and previous Site Plans are available as Appendix 6.1 and Appendix 6.2, respectively.

The Site was previously occupied by the former Pierce Transit Vehicle Maintenance and Repair, and Operational Facility from 1948 until 1987. The Facility included underground storage tanks (USTs), a fueling station, a bus washing area, two oil-water separators, six service pits, hydraulic hoists and chemical storage areas. The former Pierce Transit Maintenance Facility Site Plan and maintenance building features are shown on Figure 2 and Figure 3, respectively in Appendix 6.3. During its operation, the facility had documented releases of petroleum hydrocarbons which had impacted soil and groundwater below the site near the UST area.

In 1995, the Site was redeveloped into the current-self storage facility and is currently owned by Bodine Enterprises. In addition, the southwest corner of the Site was developed as a Shell gas station and convenience store with four pump islands and three USTs.

2.2 Regional Geology/Hydrology

The Site is located within the Puget Sound basin in western Washington. The Puget Sound basin is a north-south trending trough between the Olympic Mountains to the west and the Cascade Mountains to the east. The topography is dominated by north-south trending valleys and low, nearly flat-topped highlands cut by streams. The topographic surface of Pierce County is largely the result of erosion and deposition during and since the last glaciations (during the last 15,000 years). The United States Department of Agriculture as published in the Soil Survey for the Pierce County Washington Area, 1995, classified the soils in the area of the Site as Alderwood gravelly sandy loam. This soil was developed on glacial drift materials. The site and vicinity area is underlain by Quaternary age glacial till deposits that typically consist of unsorted, unstratified, highly compacted mixture of clay, silt, sand, gravel, and boulders deposited directly by glacial ice, and locally contain outwash sand and gravel both within and overlying till. The compact underlying till slows down internal draining which can cause a temporary perched water table. Based on the well logs for the subject area, depth to the first significant groundwater in this area is reported at approximately 140 feet below ground surface.

2.3 Site Geology/Hydrology

The subsurface Site investigations revealed the disturbance of much of the native material with extensive site filling and grading. The subsurface conditions at the Site consists of fill underlain by outwash sediments and glacial till deposits. Fill, observed to be approximately 6 feet below ground surface (bgs), consisted of medium dense silty sand with wood debris. The out wash deposits consisted of silty sand, from approximately 6 to 10 feet bgs in areas, to predominantly silt and clay, from approximately 10 to 14 feet bgs. These deposits were underlain by weathered

glacial till that consisted of medium dense to dense gray clayey sand with gravel to the maximum depth explored, at 15.5 feet bgs. The sediments above the till contain a perched groundwater system that is discontinuous in all directions. Groundwater under the site appears to be seasonal and varies both in depth and flow direction. The depth to groundwater in the perched system has been observed ranging from 7 to 12 feet bgs. During the product line replacement, groundwater was not encountered in significant quantities and minor seepage was noted at approximately 10 feet bgs.

2.4 Site Investigations

1987 Waste Oil Line Leak and Oil Recovery

In December 1986, seeping up of waste oil through the floor of the maintenance facility boiler room was observed. A tightness test was conducted on the USTs system to determine the integrity of the system. The test results indicated the UST was intact, however, the fill line was not. The line had likely been damaged while cutting the maintenance building floor slab as part of an exhaust vent renovation. The assessment conducted by the Applied Geotechnology, Inc. (AGI) concluded that waste oil contamination was likely perched on the glacial till soil that generally underlies the Site and was restricted to the aggregate base below building floor slabs, and in the backfill soil along foundations and utility trenches excavated into the till. A product recovery trench was installed and a total of 400 gallons of product was recovered leaving only hydrocarbon contaminated soil in place below the structure.

January 1988 Preliminary Assessment

The Pierce Transit ceased their operations at the Site in fall of 1987. In January 1988, as part of the property transaction, AGI performed a preliminary assessment of hazardous substances use and waste management practices in the former maintenance facility. The assessment report concluded that assorted paints, solvents, and petroleum products had been used on the Site. In addition, 12 underground storage tanks (USTs) were identified on the facility. Based on the records, 10 USTs were removed in June 1998. The two remaining USTs were oil/water separators built into the Site storm and internal floor drain system. Figure 2 in Appendix 6.3 shows the locations of all the USTs.

1989 Contamination Assessment

To assess the remaining soil contamination associated with the leaking waste oil lines in 1989, five hand-angled soil borings were drilled adjacent to and near the waste oil lines for collecting soil samples. Results of this investigation indicated that the contamination is likely limited to the aggregate base below the boiler room and service bay and pit floor slabs, and in the backfill soils around foundation footings and underground utilities.

Applied Technology, Inc. Investigation and Remediation

During the excavation of petroleum contaminated soil inside the maintenance building, a supplemental assessment was performed by the Applied Technology, Inc. (AGI) to evaluate the petroleum hydrocarbon contamination under the remainder of the building. Two test pits (Pit 12 and Pit 13) were excavated and composite soil samples were collected for the laboratory analysis. Results of soil samples indicated petroleum hydrocarbon concentrations exceeding the Model Toxics Control Act (MTCA) cleanup levels near the Hoist. Approximately 3,700 cubic

yards of petroleum hydrocarbons contaminated soil was excavated from six areas at the site (the boiler room, leaking waste oil line, catch basins, hydraulic Hoist 1, parts cleaning room, and oil/water separator) and disposed of at Olympic View Landfill. The original wall and foundations were left in place and petroleum contaminated soil remains at the site beneath the footings of the maintenance building along the north wall and beneath portions of the west and east walls at the northwest and northeast corners of the maintenance building. In addition, an estimated 45,000 gallons of oily water was pumped from on-site excavations and disposed of off-site by Airo Services of Tacoma and Northwest Enviroservices of Seattle. Supplemental assessment and post excavation soil sampling locations and soil sample results are included as Appendix 6.4.

Columbia Environmental Investigation

In 1995, the Site was developed into a self-storage facility. In addition, the southwest corner of the Site was developed as a Shell gas station and convenience store with four pump islands and three underground storage tanks (USTs). During the process of installing a sign on the northwest corner of the site, petroleum impacted soil and groundwater was encountered in the approximate area of one of the previous Pierce Transit Facility oil/water separators. Columbia Environmental, Inc. collected one soil and one grab groundwater samples for the laboratory analysis. Results of soil and groundwater samples showed a total petroleum hydrocarbons (TPH) concentration of 160 milligrams/kilogram (mg/kg) and diesel concentration of 1.2 milligrams per liter (mg/L), respectively.

Adapt Engineering Phase I Environmental Site Assessment

In March 2007, Adapt Engineering conducted a Phase I Environmental Site Assessment (ESA)/Limited Phase II ESA at the Site at the request of a potential buyer. Six geoprobe borings were advanced to a depth of up to 12 feet bgs and soil and groundwater samples were collected from each borings. Groundwater results from a geoprobe boring located in the northwest corner of the Site (GP-1) showed elevated levels of gasoline-range total petroleum hydrocarbons [TPH-G: 3,100 micrograms per liter ($\mu\text{g/L}$)], diesel-range TPH (TPH-D: 29,000 $\mu\text{g/L}$), and heavy oil-range TPH (TPH-O: 63,000 $\mu\text{g/L}$). These concentrations are above MTCA Method A groundwater cleanup levels of 800 $\mu\text{g/L}$, 500 $\mu\text{g/L}$, and 500 $\mu\text{g/L}$, respectively. The boring was near the former oil/water separator and sign excavation mentioned previously. The geoprobe boring locations and soil and groundwater sample results are available as Appendix 6.5. As a result of this investigation, on April 22, 2008 Ecology rescinded the previously issued No Further Action Letter (dated November 4, 2002) and the Site re-entered the Voluntary Cleanup Program for conducting the necessary additional and final cleanup at this Site to address the MTCA substantive requirements for the petroleum hydrocarbons.

Robinson Noble Saltbush Investigations

In April 2007, Robinson Noble Saltbush, Inc. (RNS) advanced eight soil borings (B1 through B8) near the location GP-1 where previously TPH exceedances were detected. At the same time, three groundwater monitoring wells (RNS MW-1 through RNS MW-3) were installed adjacent to and surrounding GP-1. Groundwater samples were collected from each of the three wells and none of the tested petroleum constituents were found above their respective MTCA Method A cleanup levels.

In April 2007, as a follow-up to the above investigation, an additional seven soil borings (B1B through B7B) were completed around the UST tank nest and around the perimeter of the fueling islands. A total of thirteen soil and seven groundwater samples were collected and analyzed in an on-site laboratory for TPH-G, TPH-D, TPH-O, and benzene, toluene, ethylbenzene and xylenes (BTEX) and total lead. Results indicated the elevated concentrations of TPH-G and benzene in some of the groundwater samples. Groundwater samples were also submitted for carcinogenic polycyclic aromatic hydrocarbons (cPAHs) analysis to an off-site laboratory. No cPAHs were detected above the laboratory detection limits.

In May 2007, based on the above investigation results the RNS completed another eleven soil borings (B8B through B20B) around the UST tank nest and around the perimeter of the fueling islands for defining a more precise nature and extent of petroleum releases at the Site. In addition to the soil and groundwater samples collected, a soil vapor sample was also collected from the borehole at a depth of four feet. All the samples were analyzed for TPH-G, TPH-D, TPH-O, BTEX and lead in an on-site laboratory. The results indicated elevated concentrations of TPH-G, benzene, ethylbenzene and total xylenes in groundwater samples and slight exceedances of benzene in some of the soil samples.

In addition, the RNS installed five groundwater monitoring wells (MW-1B through MW-5B) to further quantify the soil and groundwater impacts. The analytical results indicated significant concentrations of TPH-G and benzene in groundwater samples and limited impact of benzene in soil samples. Groundwater monitoring well locations, soil boring locations, and soil and groundwater sample results of all of the above RNS investigations are available as Appendix 6.6.

In October 2008, the RNS installed thirteen borings (B1B through B13B) and four additional groundwater monitoring wells (MW-6B through MW-9B) to fully characterize the down-gradient portion of the soil and groundwater plumes. These borings were drilled to a depth of approximately 20 feet in the vicinity of pump islands and on Sprague Avenue and South of 15th Street within the City of Tacoma's right-of-way. Most of the soil samples were collected at the groundwater interface. All soil and groundwater samples were analyzed for TPH-G, BTEX, total naphthalene, 1,2 dichloroethane (EDC), 1,2 dibromoethane (EDB), and methyl tertiary butyl ether (MTBE). The soil sample results indicated exceedances of benzene (0.036 mg/kg – 1.18 mg/kg) and TPH-G (131 mg/kg) concentrations to their MTCA Method A cleanup levels of 0.03 mg/kg and 30 mg/kg, respectively. The TPH-G (866 µg/L – 6,191 µg/L) and benzene (54.8 µg/L – 200 µg/L) concentrations in groundwater samples also exceeded their MTCA Method A cleanup levels of 800 µg/L and 5 µg/L, respectively. The soil boring and groundwater monitoring well locations and soil and groundwater sample results are available as Appendix 6.7.

2.5 Remedial Actions

In December 1986, as a result of waste oil seeping up through the floor of the maintenance facility boiler room, an oil recovery trench and sump was installed to recover the seeping oil. Approximately, 400 gallons of waste oil was recovered and disposed of off-site, leaving the hydrocarbon contamination in place below the structure. During a supplemental assessment in 1989, concrete vaults associated with three hydraulic hoists in the maintenance building were

found to contain oil that was assumed to be automatic transmission fluid or hydraulic fluid from the hoists. Approximately 800 gallons of this fluid were removed and disposed of off-site by Airo Services of Tacoma. During the remedial activities conducted from March 1990 to March 1991, approximately 3,700 cubic yards of petroleum contaminated soil were excavated from six areas at the Site and transported to Olympic View Landfill in Kitsap County for disposal. Additionally, an estimated 45,000 gallons of oil water was pumped from the on-Site excavations. However, approximately 750 cubic yards of petroleum contaminated soil was left in place at three locations beneath the foundation footings of the maintenance building along the north wall, beneath portions of the west and east walls and the area just north of hoist 1. In June 1998, a total of 10 USTs were removed. Approximate extent of contaminated soil excavation and approximate extent of areas still require excavation are available as Appendix 6.8.

2.6 Long Term Groundwater Monitoring

As per the requirements of no further action letter, the long term groundwater monitoring is being conducted at the Site since Jul 2012. As a part of this three groundwater monitoring wells (MW-1, MW-2 and MW-3) are being monitoring on 18 months frequency. All the groundwater monitoring samples are analyzed for TPH-G, TPH-D, TPH-O, BTEX, cPAHs, and naphthalene. Results of groundwater samples indicate that none of the targeted compounds were detected above the laboratory detection limits. The groundwater monitoring will continue on the same frequency in the future. The groundwater monitoring well locations and sample results are available as Appendix 6.9.

2.7 Cleanup Levels

WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for this Site. The cleanup actions conducted at the Site were determined to be 'routine', few hazardous substances were found at the Site, and numerical standards were available for each hazardous substance. The table below presents the current MTCA Method A cleanup levels.

Table-1: MTCA Method A Soil and Groundwater Cleanup Levels

Chemical	Soil Cleanup Level (mg/kg)	Groundwater Cleanup Level (µg/L)
TPH-Gas	30/100*	800/1000*
TPH-Diesel	2,000	500
TPH-Oil	2,000	500
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000
Lead	250	15

Note: mg/kg: milligrams per kilogram
µg/L: micrograms per liter
*benzene present/benzene not present

2.8 Environmental Covenant

The remedial activities at the Site comprised excavation of the majority of the contaminated soil. However, because of inaccessibility, some contaminated soil was left-in-place at four areas (Figure 2 in Appendix 6.10). As a result, an Environmental Covenant (EC) was recorded for the Site on December 12, 2012 and a no further action letter was issued on March 20, 2013. The EC imposes the following limitations:

Section 1: A portion of the property contains diesel-, and oil-range petroleum hydrocarbons contaminated soil located beneath footings along the north wall and beneath portions of the east and west walls at the northeast and northwest corners of the exiting building. Additional areas are located near the center of the north room or the former maintenance building near the vicinity of the hydraulic hoist shown in the figures of the final report filed by Applied Geotechnology, Inc. (April 1991) along with a limited amount of contaminated soil in the vicinity of the sign located on the northwest corner of the property. The owner shall not alter, modify, or remove the existing structure(s) in a manner that may result in the release or exposure to the environment of that contaminated soil or create a new exposure pathway without prior written approval from Ecology.

In addition, long-term groundwater monitoring has been and is being implemented at the Property to ensure that the implemented Remedial Action remains protective of groundwater. Groundwater is being monitored for gasoline, diesel, oil, carcinogenic polycyclic aromatic hydrocarbons, benzene, toluene, ethylbenzene, xylenes, and naphthalene on a schedule consistent with the Ecology-approved Long Term Groundwater Monitoring Plan (Robinson Noble, Inc. February 2012) which is included as Attachment A.

Section 2: Any activity on the property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3: Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4: The owner of the Property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5: The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6: The owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7: The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action, to take samples, to inspect remedial actions conducted at the Property, and to inspect records that are related to the Remedial Action.

Section 8: The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The Environmental Covenant is available as Appendix 6.10.

3.0 PERIODIC REVIEW

3.1 Effectiveness of Completed Cleanup Actions

Based upon the Site visit conducted on August 20, 2018 the asphalt cap and the building concrete flooring at the Site continue to eliminate exposure pathways (ingestion, contact) to contaminated soils. The asphalt cap and concrete flooring are in satisfactory condition and no repair, maintenance or contingency actions have been required. Currently the Site consists of an office and self-storage units. A photo log is available as Appendix 6.11.

The EC for the Site was recorded and is in place. This EC prohibits activities that will result in the release of contaminants contained as part of the cleanup without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. This EC serves to assure the long term property use and integrity of the property surface.

3.2 New Scientific Information for Individual Hazardous Substances for Mixtures Present at the Site

Cleanup levels at the Site were based on regulatory standards rather than calculated risk for chemicals and/or media. These standards were sufficient to be protective of Site-specific conditions.

3.3 New Applicable State and Federal Laws for Hazardous Substances Present at the Site

The Model Toxics Control Act cleanup levels have not changed since the no further action determination letter was issued for the Site on March 20, 2013.

3.4 Current and Projected Site Use

The Site is currently used for commercial purposes. This use is not likely to have a negative impact on the risk posed by hazardous substances contained at the Site.

3.5 Availability and Practicability of Higher Preference Technologies

The remedy implemented included the excavation of majority of the contaminated soils and containment of remaining residual hazardous substances and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of Improved Analytical Techniques to Evaluate Compliance with Cleanup Levels

The analytical methods used at the time of the remedial actions were capable of detection below MTCA Method A cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

- The cleanup actions completed at the Site are continue to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, under WAC 173-340-740(6)(f), the cleanup action is determined to comply with cleanup standards, since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- The groundwater monitoring is being conducted at the Site on an 18 months frequency and results of all the target contaminants are below the laboratory detection limits. The groundwater monitoring will be continued on the same frequency.
- The EC for the property is in place and will be effective in protecting public health from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this review, Ecology has determined that the requirements of the Environmental Covenant have been satisfactorily completed. No additional remedial action is necessary at this time. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the Site cover is maintained.

4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

Robinson Noble Saltbush, Inc. Long –Term Groundwater Monitoring Report, Bodine Sprague Sign Area, 1401 Sprague Avenue, Tacoma, Washington. October 2012.

Department of Ecology. No Further Action Letter, 1279 S Sprague Avenue, Tacoma, Washington. March 20, 2013.

Environmental Covenant. Number 201212120236 dated 12/12/2012, Pierce County, Washington. Grantor: Sprague Maxi-Space LLC.

Robinson Noble Saltbush, Inc. Sign Area Quarterly Monitoring Report, 1401 Sprague Avenue, Tacoma, Washington. November 24, 2008.

Robinson Noble Saltbush, Inc. Groundwater Sampling Report and Additional Investigation Work Plan, 1401 Sprague Street Shell, Tacoma, Washington. September 8, 2008.

Robinson Noble Saltbush, Inc. Additional Site Characterization Investigation Report, Bodine Enterprises, 1401 Sprague Avenue, Tacoma, Washington. November 2008.

Robinson Noble Saltbush, Inc. Site Investigation Activities, 1401 Sprague Avenue, Preliminary Report of Findings. April 17, 2007.

Robinson Noble Saltbush, Inc. Subsurface Investigation Activities Report, 1401 Sprague Avenue, Tacoma, Washington. June 7, 2007.

Adapt Engineering, Inc. Phase I/Limited Phase II Environmental Site Assessment Automall Property, 1401 Sprague Avenue, Tacoma, Washington. March 19, 2007.

Applied Geotechnology, Inc. Final Report Site Remediation, Former Pierce Transit Maintenance and Operations Facility, 1235 South Sprague Avenue, Tacoma, Washington. April 1, 1991.

Department of Ecology. Site Visit August 20, 2018.

6.0 APPENDICES

6.1 Location Map



Applied Geotechnology Inc.
Geotechnical Engineering
Geology & Hydrogeology

LOCATION MAP

Shurgard/Pierce Transit
Tacoma, Washington

FIGURE

1

JOB NUMBER

DRAWN

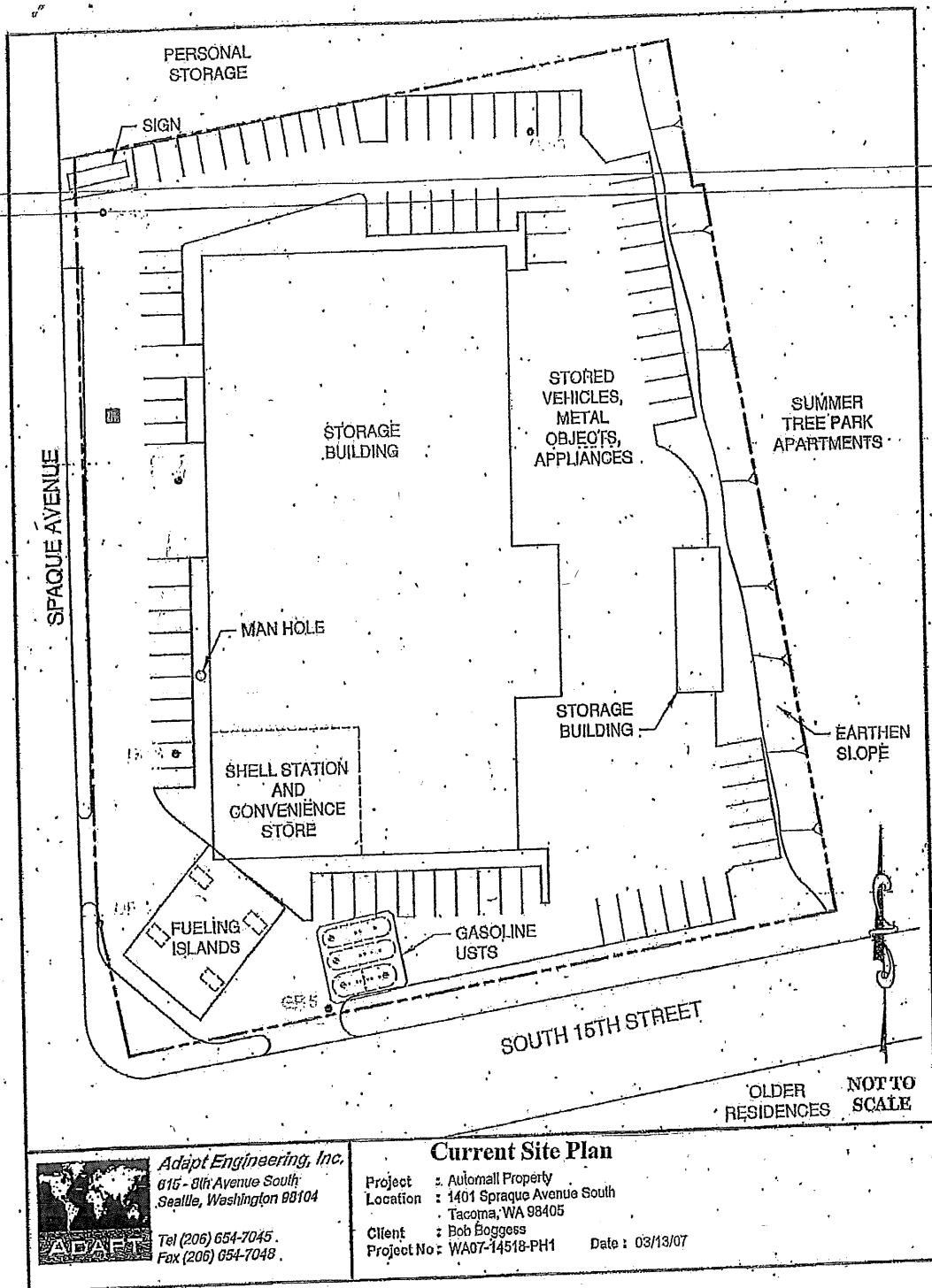
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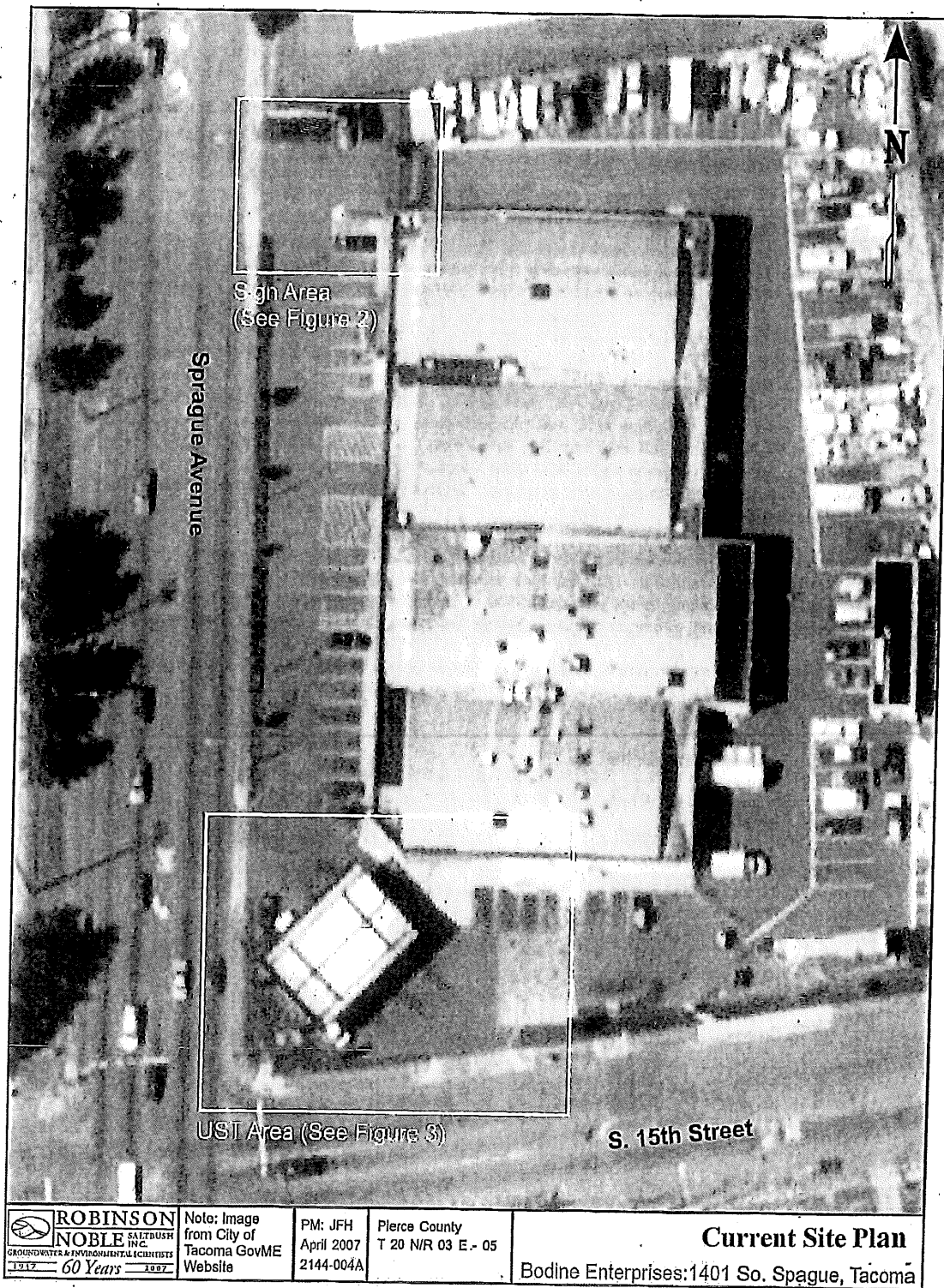
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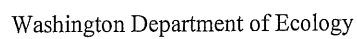
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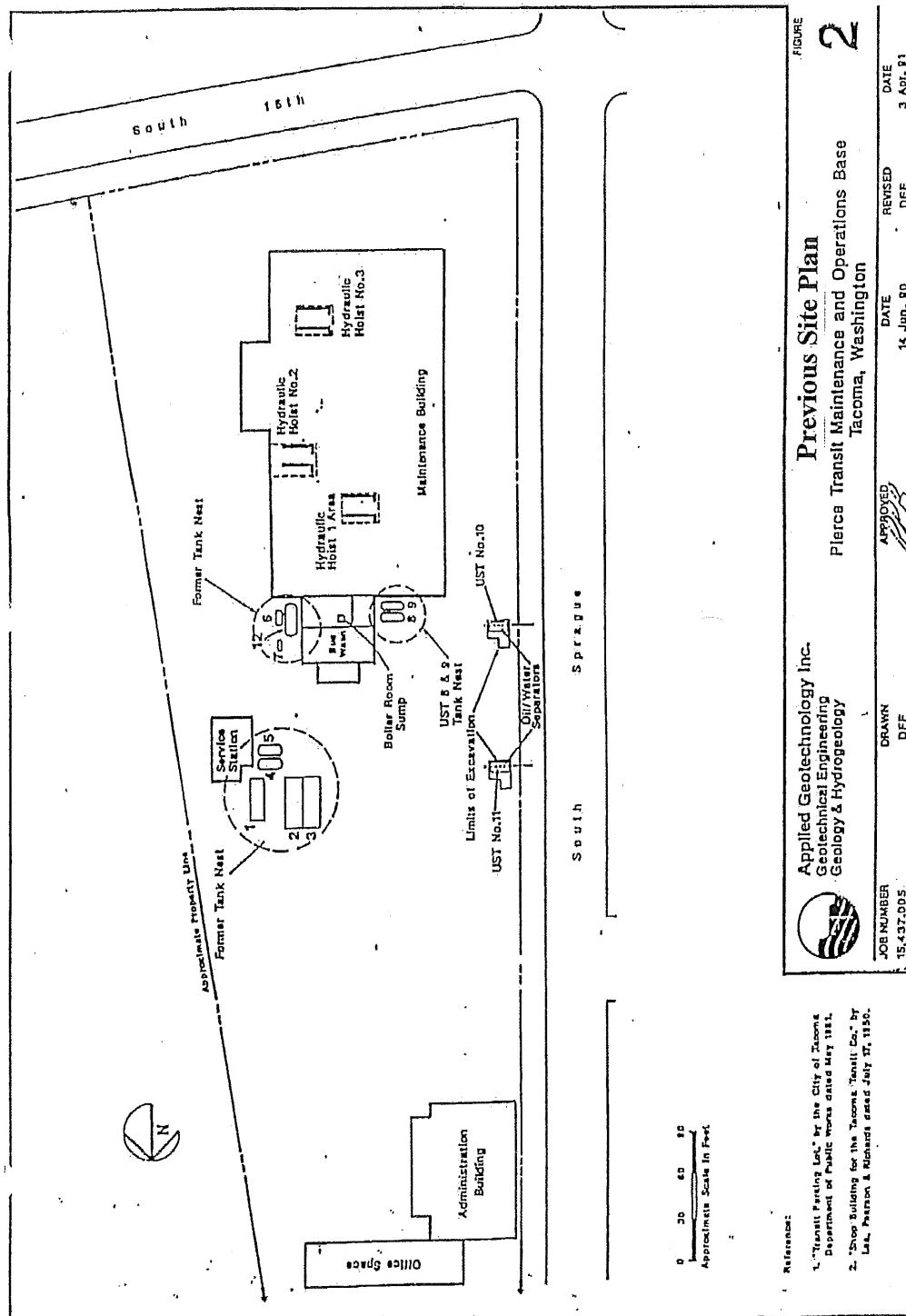
6.2 Current and Previous Site Plans

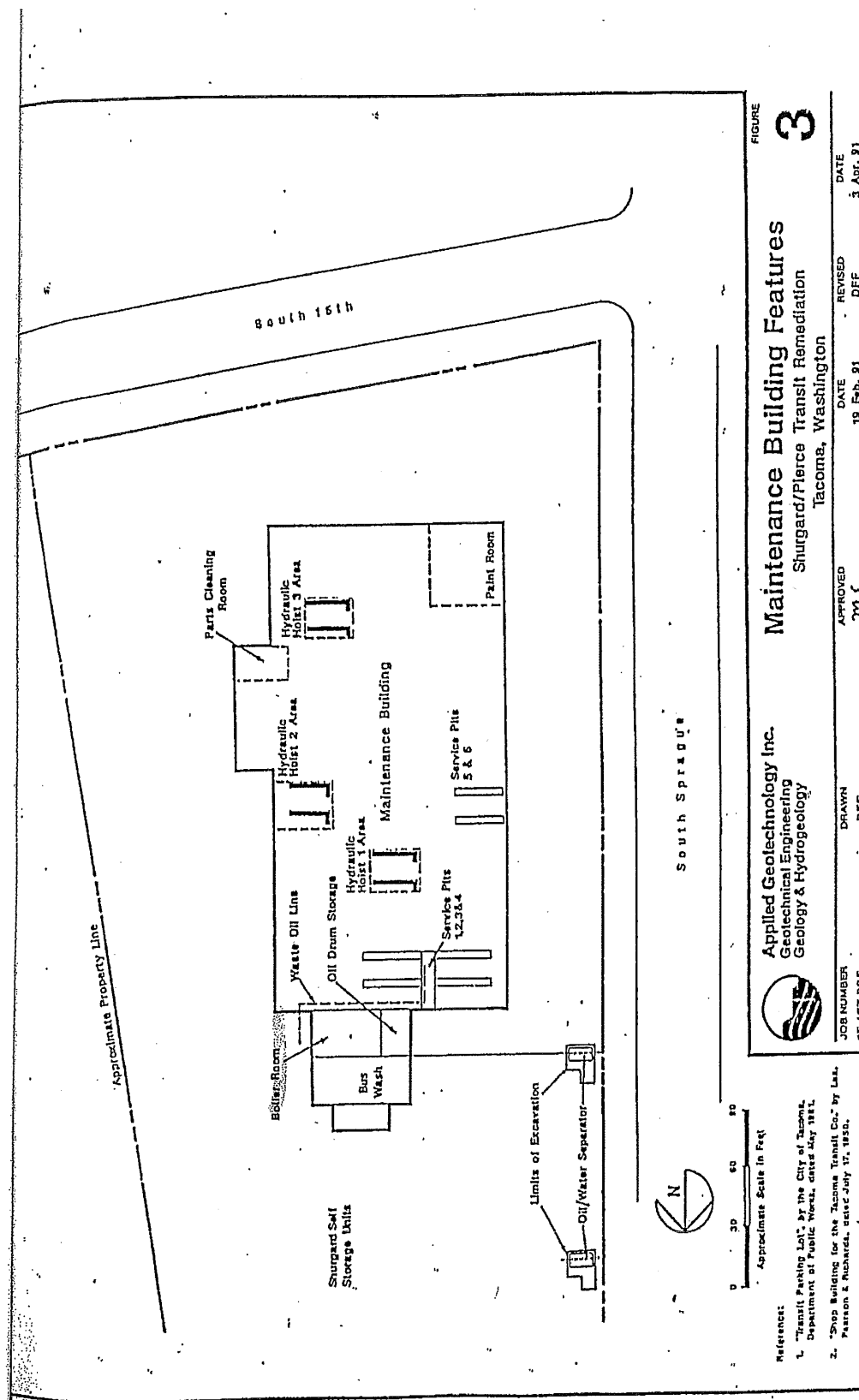




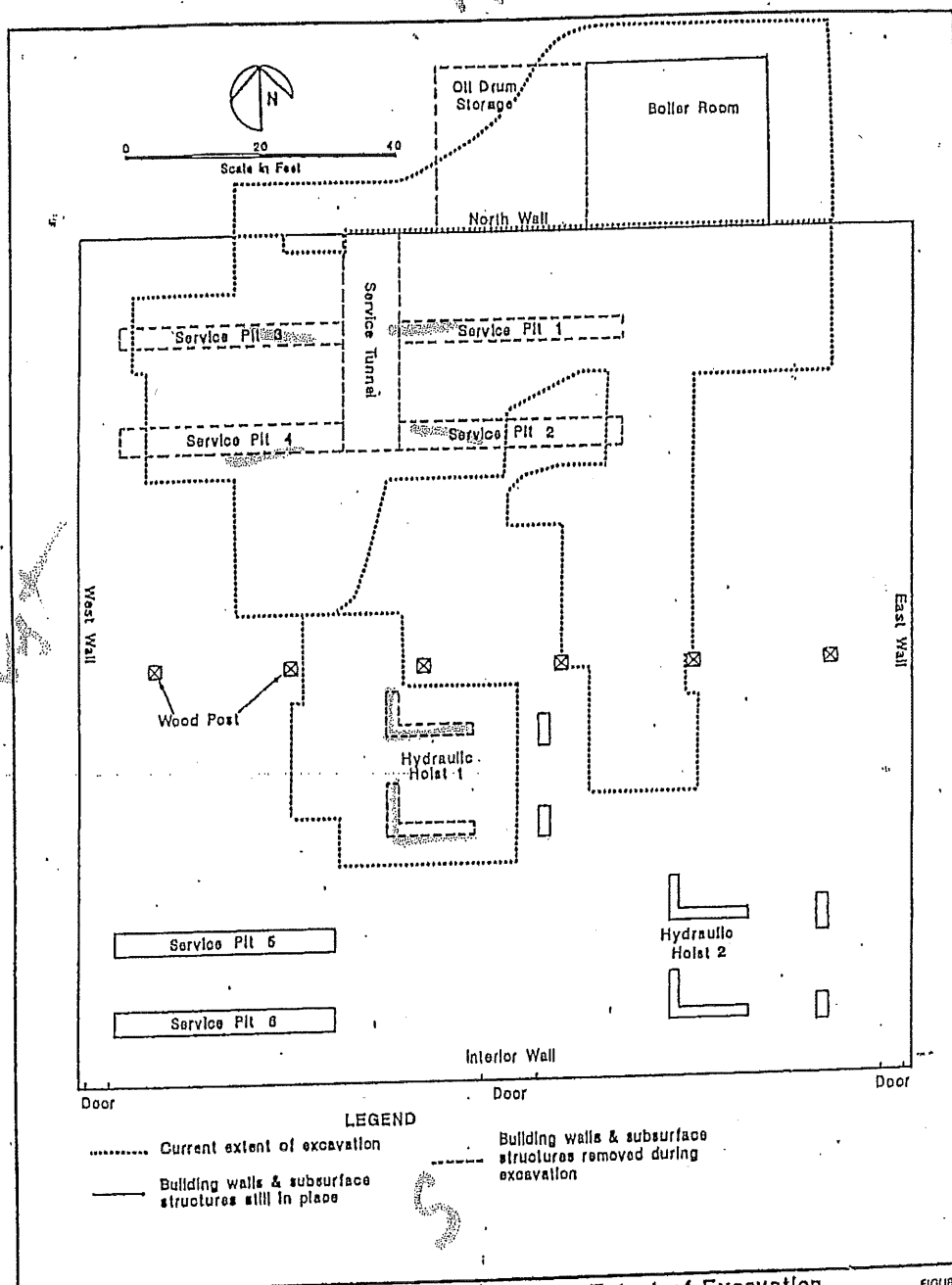


6.3 Former Pierce Transit Maintenance Facility Site Plan and Maintenance Building Features





6.4 Approximate Extent of Contaminated Soil Excavation, Test Pits Locations, and Soil Sample Results



Applied Geotechnology Inc.
Geotechnical Engineering
Geology & Hydrogeology

Approximate Extent of Excavation
as of 1/18/91
Shurgard/Pierce Transit Remediation
Tacoma, Washington

FIGURE

4

JOB NUMBER
16-427-006

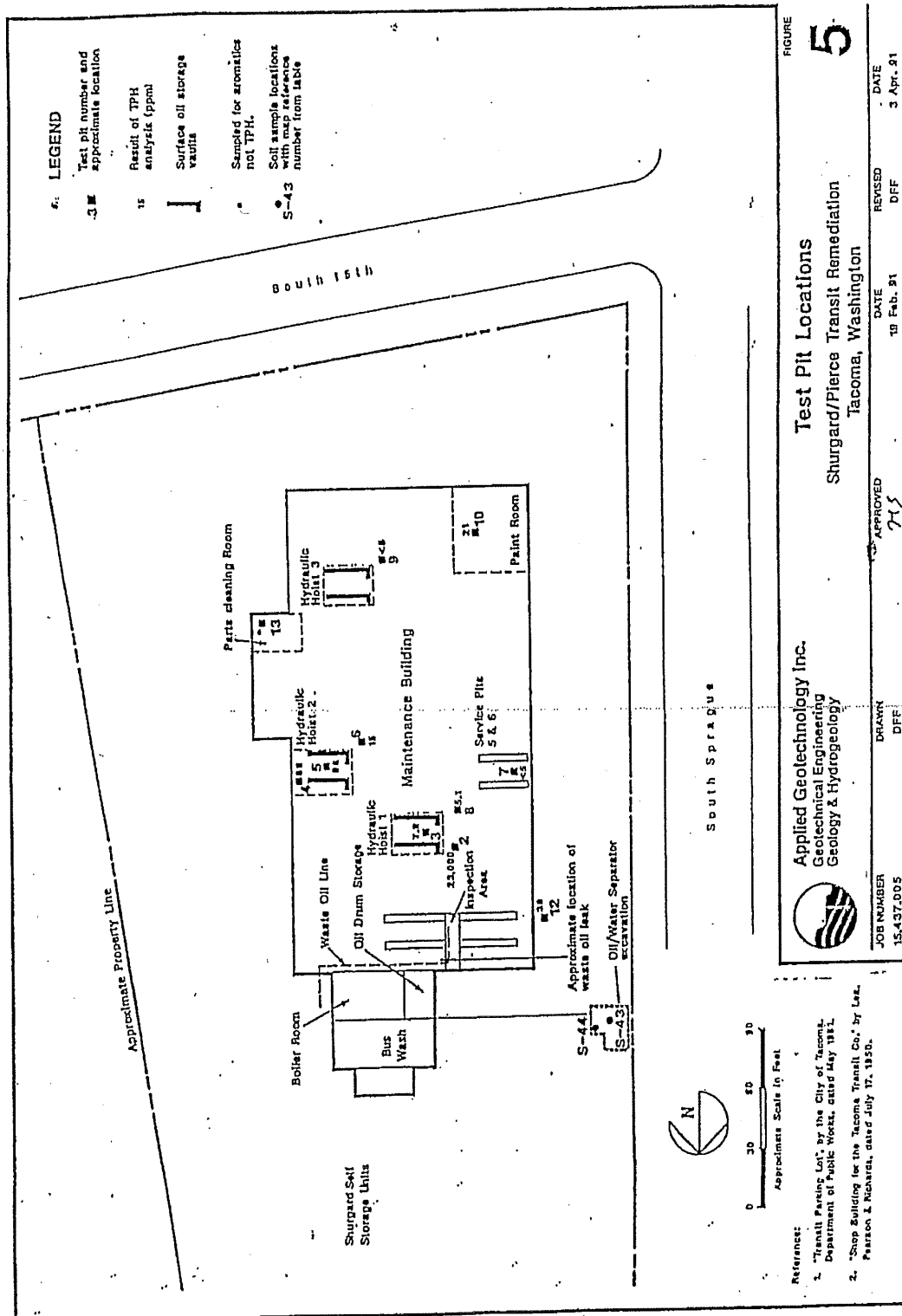
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APPROVED
MJS

DATE
18 Feb. 91

REVISED
DFF

DATE
3 Apr. 91



Applied Geotechnology Inc.

Table 1
TPH in Soil
Quantified by EPA Method 418.1 or EPA Method 8015M
Pierce Transit Maintenance Facility

Location	Sample I.D.	Map No.	TPH (ppm)		Status
			418.1	8015M	
Boiler Room Excavation	BRE-BOT	S1	100	NA	R
	BRE-WALL	S2	260	NA	R
	BRE-FOOTING	S3	3600	NA	R
	BRE-SUMP-14.0	S33	NA	560	E
	BREASTWALL-11-12-1/91	S39	40	NA	E
	SUMPBOT-20-1/90	S40	ND	ND	R
	SECORN-17-19-1/91	S41	8.4	ND	R
	SUMPNWCORN-17-1/91	S42	16	ND	R
North End Interior	SERV-COMP	S4	3100	NA	E
	ST-COMP-7.0	S5	190	NA	E
	BAY1-10.0	S6	94	NA	R
	NWEX-BOT-5.0	S7	3700	NA	R
	SE3-8.0	S8	48	NA	R
	NECOR-COMP-10.5	S9	130	NA	R
	NESOWALL-COMP	S10	7.3	NA	R
	MIDBOT-COMP-10.0	S11	630	NA	E
	MIDBOTS-10.5-11.0	S12	14	NA	R
	SERV-TUNNEL-N13'	S13	6.3	NA	R
	CBP-NBOT-8.5	S14	15	NA	R
	CBP-SBOT-8.5	S15	11	NA	R
	CBP-WALLCOMP-3.5	S16	26	NA	R
	SWCOR-COMP-6-12	S17	ND	NA	R
	SWCOR-BOTCOMP-11.5	S18	47	NA	R
	NWCOR-BOT-12.5-13.0	S19	13000	NA	R
Hydraulic Holst #1	PIT1-NWOT-10.5	S20	2600	NA	E
	SWCOR-PIT2-4-9	S21	71	NA	R
	PIT2-WWALL-6-9	S22	380	NA	E
	PIT2-EWALL-6-10	S23	560	NA	E
	SEBOT-11-12	S24	120	NA	R
	NWBOT-15-12/90	S34	570	ND	R
	SWCOR-6-10	S35	36	ND	R
	NWCORN-6-15	S36	630	ND	E
	SOUTHWALL-6-10	S37	110	ND	R
Oil/Water Separator	EASTWALL-6-10	S38	120	ND	R
	O/WBOT-10	S43	<5	NA	R
	O/WSIDE-5-6	S44	48	NA	R

Notes:

NA - Not analyzed.
ND - TPH below detection limit of 5 ppm.
E - Soil excavated and resampled.
R - Soil remains in place.

Shaded areas indicate TPH value greater than Ecology Cleanup Criteria remaining in place.

Table 2
TPH Values in Soil Samples Collected
During Supplemental Assessment
Quantified by EPA Method 418.1
Pierce Transit Maintenance Facility

Sample I.D.	Map No.	TPH (ppm)	Comments
Exp-2-7.5-8.0	S25	28,000	E
Pit 6-8.0	S26	15	R
Pit 8-7.0-8.0	S27	5.1	R
Pit 3-COMP	S28	7.9	R
Pit 4-COMP	S29	86	R
Pit 5-COMP	S30	96	R
Pit 7-COMP	S31	<5	R
Pit 9-COMP	--	<5	R
Pit 10-COMP	--	21	R
Pit 12-COMP	S32	39	R
Current Ecology Guideline (Diesel and Oil)		200	

Notes:

- Sample locations are shown on Figure 5.
- Pit 9 and Pit 10 are located on Figure 4.
- E - Excavated.
- R - Remains in place.

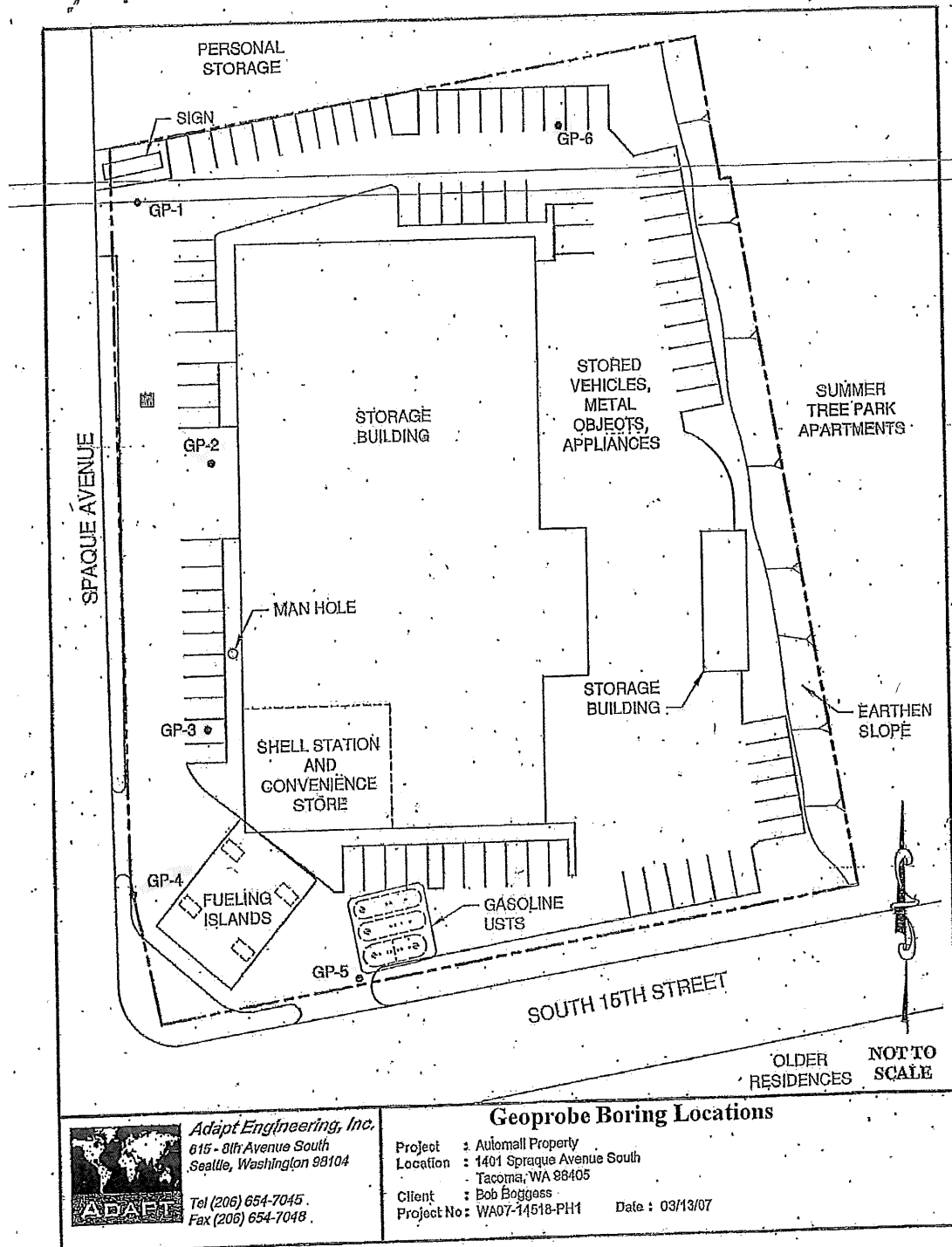
Table 3
Volatile Organic Compounds in Soil - Pit 13
Quantified by EPA Methods 8010 and 8020
Pierce Transit Maintenance Facility

Constituent	Detection Limit (mg/kg)	PIT13-WALLCOMP-2.5-4.0 (Sample #34) (mg/kg)	PIT13-BOTCOMP-4.5-5.0 (Sample #35) (mg/kg)
1,2-Dichlorobenzene	0.02	0.40	ND
1,3-Dichlorobenzene	0.02	0.2	ND
1,4-Dichlorobenzene	0.02	0.24	ND
Methylene Chloride	0.1	0.419 B	0.26 B
Ethylbenzene	0.02	0.054 J	ND
Total Xylene	0.02	0.33 J	ND

Note:

One milligram per kilogram (mg/kg) is approximately equivalent to one part per million (ppm).
This table lists only those analytes which were detected in at least one sample.
See Table 4 for complete list of analytes.
B - Found in blank.
J - Estimated concentration.
ND - Not detected.

6.5 Adapt Engineering: March 2007 Geoprobe Boring Locations and Soil and Groundwater Sample Results



Adapt Engineering, Inc.

Table 1 : Summary of Analytical Results: Soil

Sample ID	Sample Depth (ft)	TPH-G (ppb)	TPH-D (ppb)	TPH-HO (ppb)	TPH-MO (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)
GP-1/11-12	11 to 12	<20	<50	<100	<100	NT	NT	NT	NT
GP-2/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-3/9-10	9 to 10	<20	<50	<100	<100	NT	NT	NT	NT
GP-4/9-10	9 to 10	<10	NT	NT	NT	0.42	<0.05	<0.05	<0.05
GP-5/11-12	11 to 12	<10	NT	NT	NT	<0.02	<0.05	<0.05	<0.05
GP-6/6-7	6 to 7	<20	<50	<100	<100	NT	NT	NT	NT
MTCA		30/100	2,000	2,000	4,000	0.03	7	6	9

ppm = All concentrations reported in parts per million (ppm)
 TPH = Total Petroleum Hydrocarbons -- gasoline, diesel and heavy oil and Mineral oil-range TPH by Ecology Methods
 NWTPH-G and NWTPH-Dx
 BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
 MTCA = Model Toxics Control Act (Method A Cleanup levels shown)

Table 2 : Summary of Analytical Results: Groundwater

Sample ID	TPH-G (ppb)	TPH-D (ppb)	TPH-O (ppb)	B (ppb)	T (ppb)	E (ppb)	X (ppb)	Other VOCs (ppb)
GP-1/W-1	3,100	29,000	63,000	1.1	5.6	1.1	4.4	* See below
GP-2/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-3/W-1	<250	<400	<400	<1.0	<1.0	<1.0	<1.0	ND
GP-4/W-1	670	NT	NT	330	16	24	82	NT
GP-5/W-1	890	NT	NT	530	60	<1.0	22	NT
GP-6/W-1	<100	<200	<400	<1.0	1.1	<1.0	2.6	ND
MTCA	800/1,000	500	500	5	1,000	700	1,000	varies

ppm = All concentrations reported in parts per billion (ppb)
 TPH = Total Petroleum Hydrocarbons -- gasoline, diesel and oil-range by Ecology Methods NWTPH-G and NWTPH-Dx
 BTEX = Benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
 MTCA = Model Toxics Control Act (Method A Cleanup levels shown)
 * = sample also exhibited detectable concentrations of chlorobenzene (9.2 ppb), n-Propylbenzene (1.1 ppb), 1,2,4 Trimethylbenzene (6.1 ppb), and sec-Butylbenzene (1.9 ppb).

Legend:

- Monitor Well Location
- Boring Location
- Product Trench

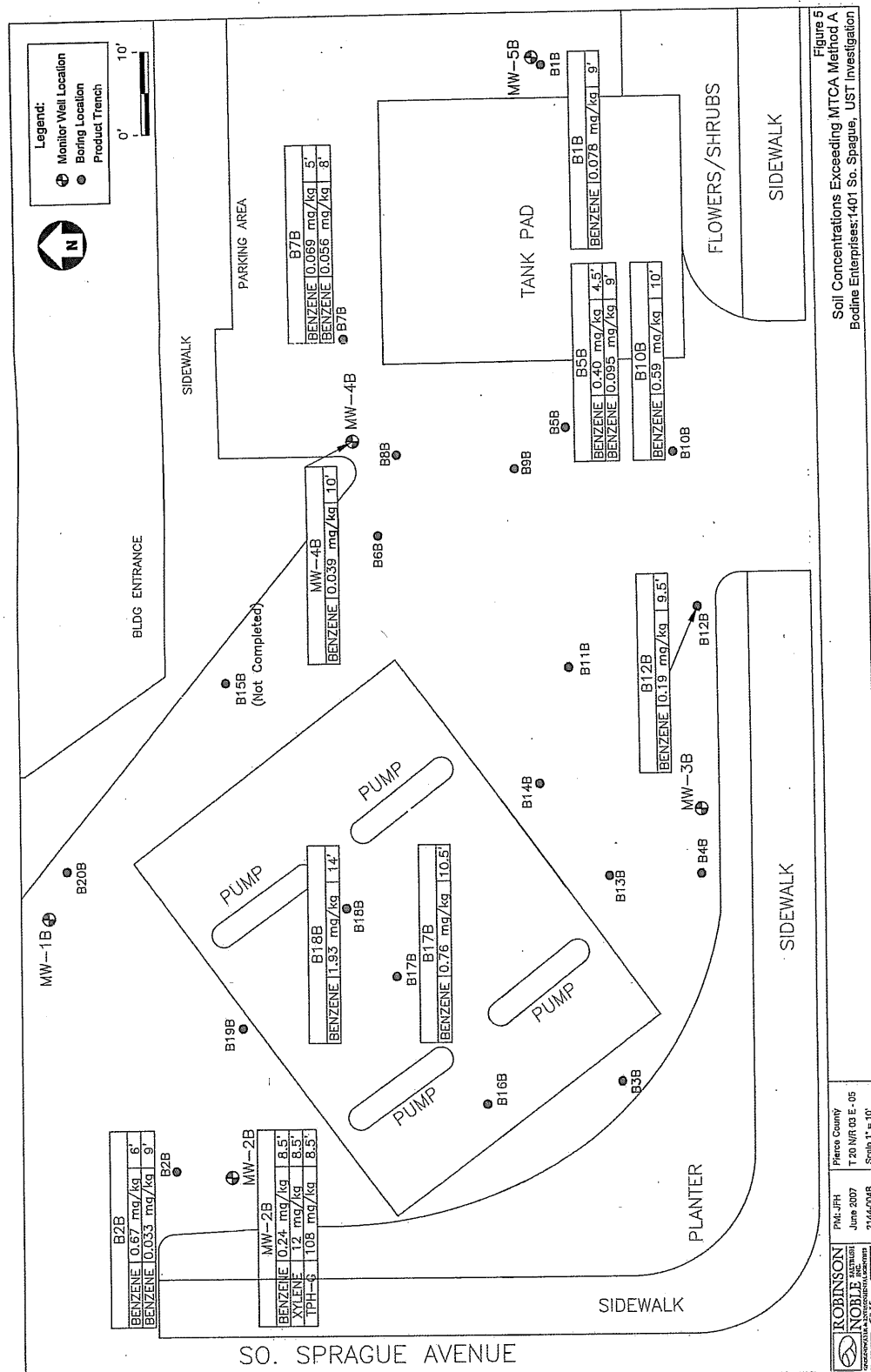
Map Labels:

- MW-1B
- B20B
- B2B
- MW-2B
- B19B
- PUMP
- B17B
- B18B
- PUMP
- B16B
- B3B
- B13B
- B4B
- MW-3B
- B12B
- SIDEWALK
- PLANTER
- B11B
- B9B
- B8B
- MW-4B
- B7B
- TANK PAD
- FLOWERS/SHRUBS
- SIDEWALK
- MW-5B
- B1B
- BLDG ENTRANCE
- PARKING AREA
- SIDEWALK
- SO. SPRAGUE AVENUE

Scale: 0' 10'

Figure 1
Monitor Well and Boring Location Map
Bodine Enterprises: 1401 So. Sprague, UST Investigation

ROBINSON NOBLE INVESTIGATION	PHC-JPH	Felton County	T20 NR 03 E - 05 Scale 1" = 10'
	June 2007		
	2144 QDB		



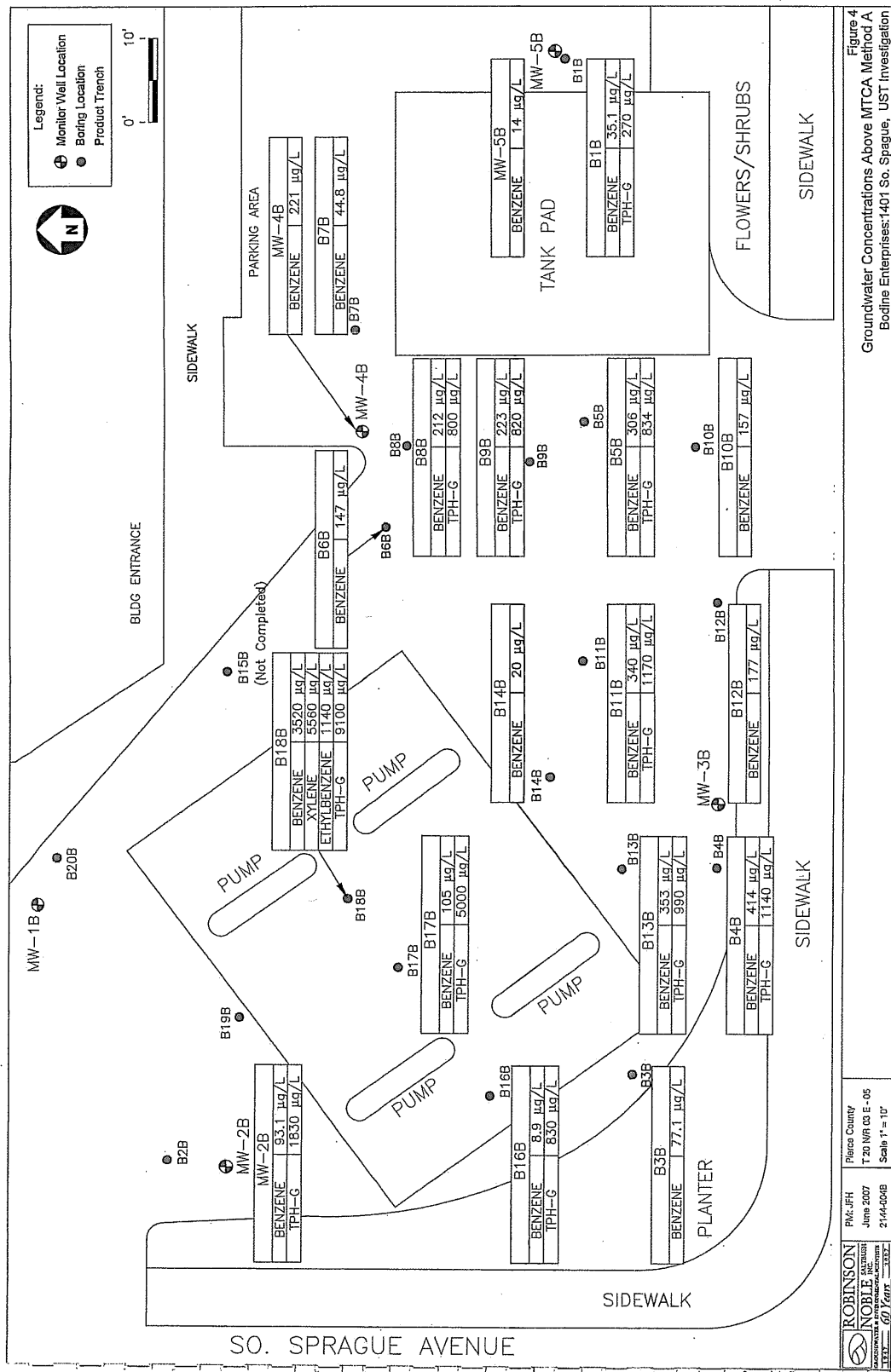
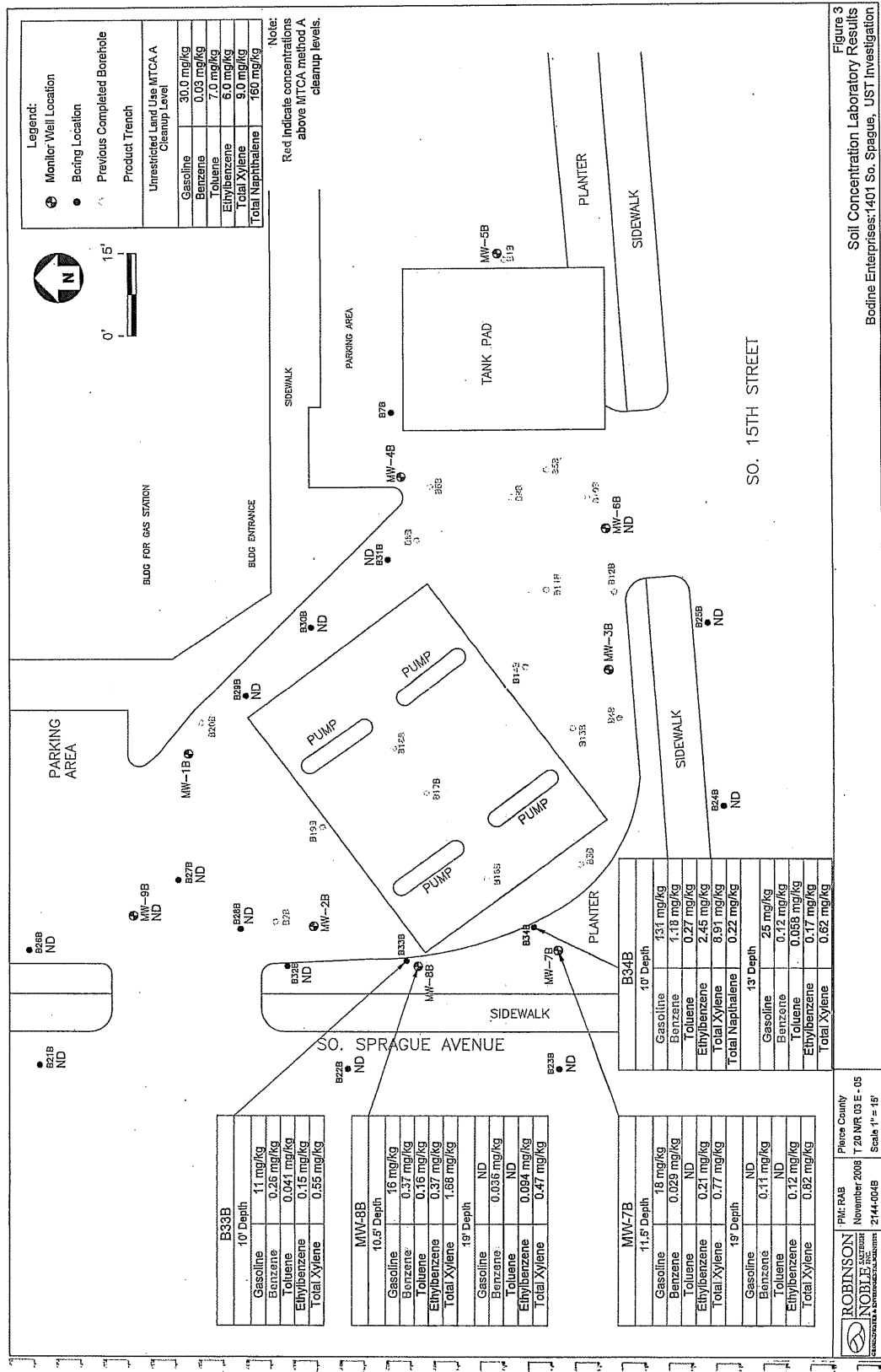
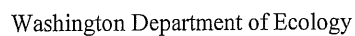


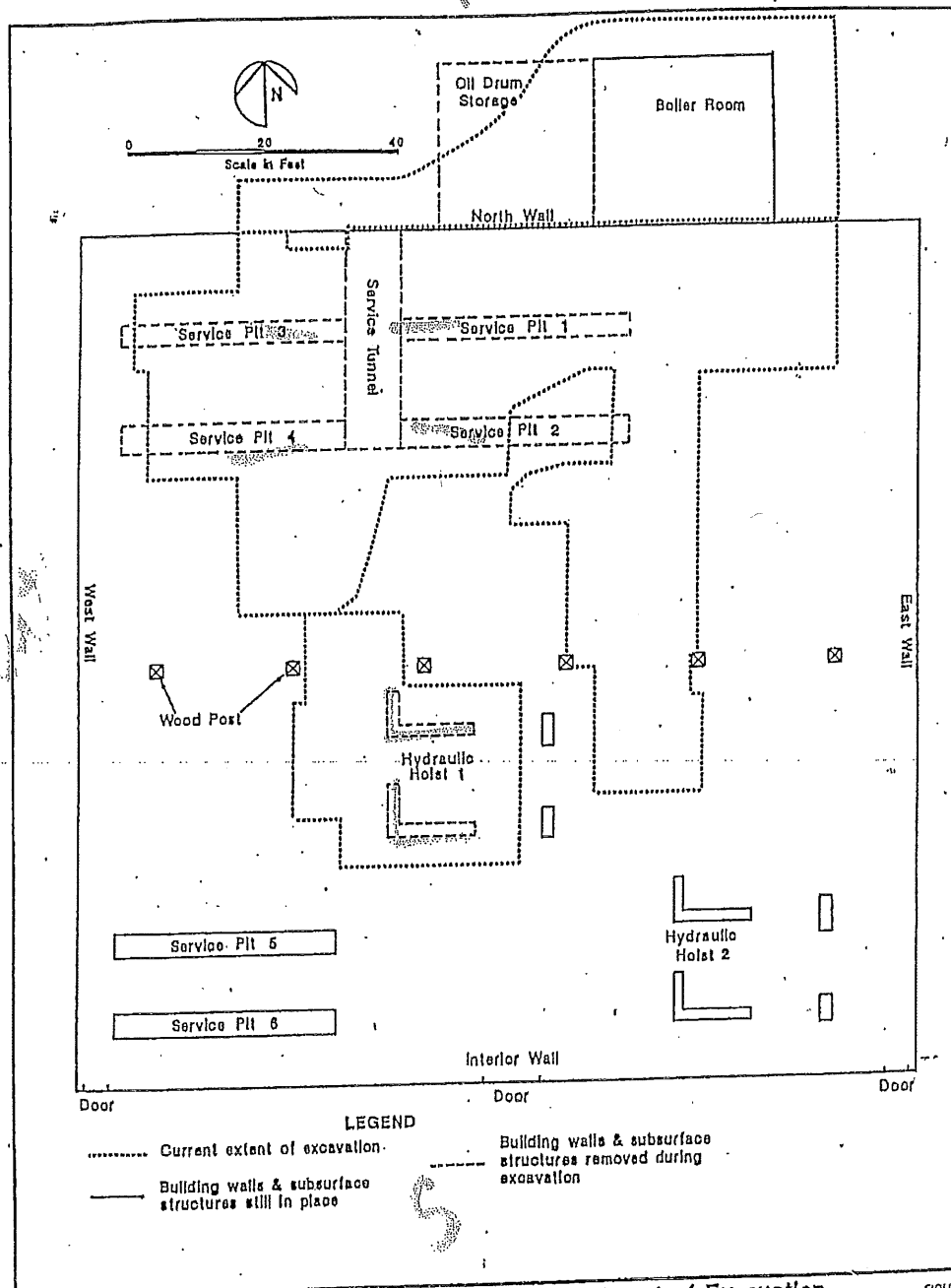
Figure 4
Groundwater Concentrations Above MTCA Method A
Bodine Enterprises: 1401 So. Sprague, UST Investigation

ROBINSON
INNOVATIVE
TECHNOLOGIES
PMT-JFH
June 2007
2144-0048
Scale 1" = 10'





6.8 Extent of Contaminated Soil Excavation Areas and Areas Still Requiring Excavation



Approximate Extent of Excavation
as of 1/18/91
Shurgard/Pierce Transit Remediation
Tacoma, Washington

FIGURE
4



Applied Geotechnology Inc.
Geotechnical Engineering
Geology & Hydrogeology

JOB NUMBER
16-497-ANC

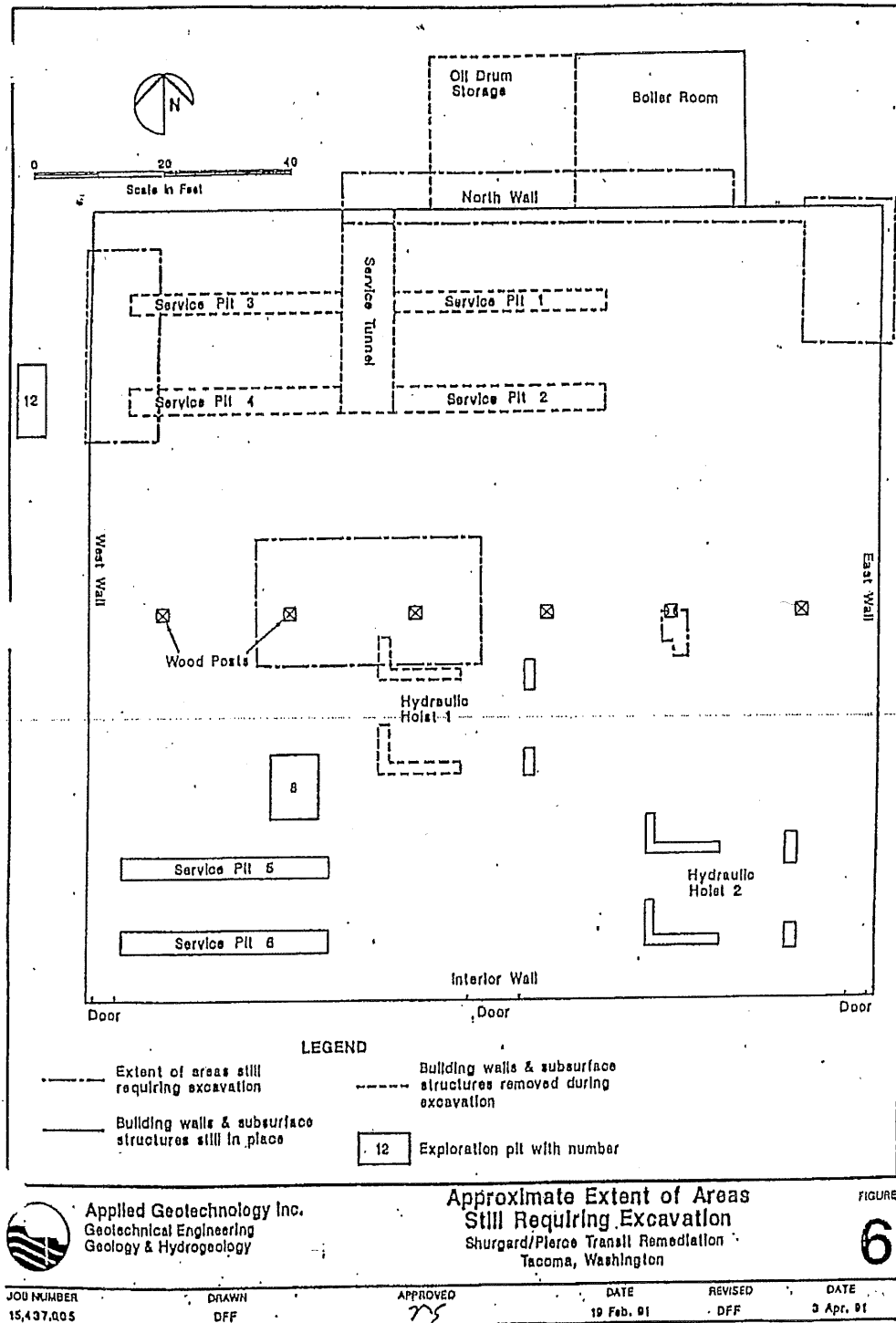
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3 Apr. 91



6.9 Groundwater Monitoring Well Locations, Groundwater Flow Direction, and Groundwater Sample Results

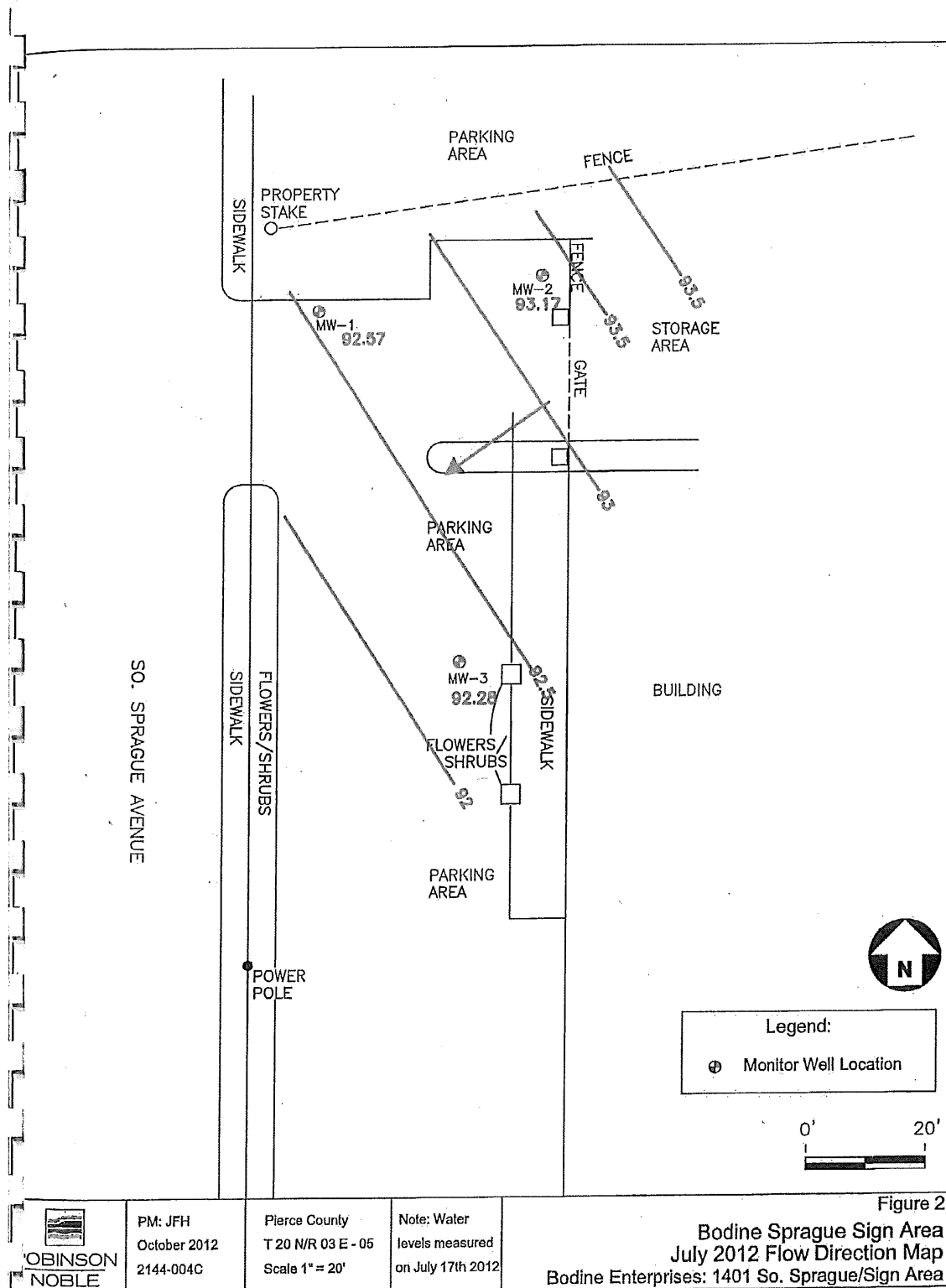


Table 2. Water level data

Monitoring Well	TOC Elevation (feet)*	Depth to Water (feet)	Water Elevation (feet)
MW-1	100	7.43	92.57
MW-2	100.9	7.73	93.17
MW-3	100.04	7.76	92.28

*Elevations are based on a relative benchmark of 100 feet above sea level.

Table 3. Contaminants of concern

Analyte	MTCA Method A Cleanup Levels (µg/L)
Gasoline	800
Diesel	500
Oil	500
cPAH	0.1
Benzene	5
Toluene	1,000
Ethylbenzene	700
Xylenes	1,000
Naphthalene	160

Table 4. Analytical results

Analyte Concentration	MTCA Method A Cleanup Limit (µg/L)	MW-1	MW-2	MW-3
TPH as gasoline (µg/L)	800	nd	nd	nd
TPH as diesel (µg/L)	500	nd	nd	nd
TPH as oil (µg/L)	500	nd	nd	nd
Total cPAH (µg/L)	0.1	nd	nd	nd
Benzene (µg/L)	5	nd	nd	nd
Toluene (µg/L)	1,000	nd	nd	nd
Ethylbenzene (µg/L)	700	nd	nd	nd
Total xylenes (µg/L)	1,000	nd	nd	nd
Total naphthalenes (µg/L)	160	nd	nd	nd

nd = not detected above laboratory detection limits.

6.10 Restrictive (Environmental) Covenant and Areas of Residual Contaminated Soil Left on the Site (Figure 2)

201212120236 CCOMITA 14 PGS
12/12/2012 10:43:17 AM \$85.00
AUDITOR, Pierce County, WASHINGTON

RECEIVED

DEC 26 2012

WA State Department
of Ecology (SWRO)

Name & Return Address:

Tom Middleton, WA. Dept. of Ecology, SWRO

PO Box 47775

Olympia, WA 98504-7775

AUDITOR'S NOTE
LEGIBILITY FOR RECORDING AND COPYING UN-
SATISFACTORY IN A PORTION OF THIS INSTAN-
MENT WHEN RECEIVED

Please print legibly or type information.

Document Title(s)	Environmental Covenant
Grantor(s)	Sprague Maxi-Space LLC
____ Additional Names on Page ____ of Document	
Grantee(s)	State of Washington , Department of Ecology
____ Additional Names on Page ____ of Document	
Legal Description (Abbreviated: i.e., lot, block & subdivision name or number OR section/township/range and quarter/quarter section) Section 05, Township 20N, Range 03 E Quarter 3 2	
Complete Legal Description on Page 2-3 of Document	
Auditor's Reference Number(s)	
Assessor's Property Tax Parcel/Account Number(s) 0320057006	
<p>The Auditor/Recorder will rely on the information provided on this cover sheet. The Staff will not read the document to verify the accuracy or completeness of the indexing information provided herein.</p> <p>I am requesting an emergency nonstandard recording for an additional fee as provided in RCW 36.18.010. I understand that the recording processing requirements may cover up or otherwise obscure some part of the text of the original document.</p> <p>_____ Signature of Requesting Party (Required for non-standard recordings only) Gpcovst.doc rev 4/02</p>	

RECEIVED

OCT 04 2012

Restrictive (Environmental) Covenant WA State Department
of Ecology (SWRO)

After Recording Return to:
Tom Middleton
Toxic Cleanup Program
Southwest Regional Office
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

RECEIVED

DEC 26 2012

WA State Department
of Ecology (SWHO)

Environmental Covenant

Grantor: SPRAGUE MAXI-SPACE LLC

Grantee: State of Washington, Department of Ecology

Legal: The tax legal description is Section 05 Township 20 Range 03 Quarter 32 : PARCEL D
OF DBLR 90-02-26-0171 BEG AT SE COR L 4 SP 88-07-12-0354 TH ALG SLY LI OF SD
LOT 4 S 80 DEG 59 MIN 00 SEC W 297.55 FT TO SWLY MOST COR SD L 4 TH N 09
DEG 51 MIN 15 SEC W 68.82 FT TH N 00 DEG 44 MIN 49 SEC W 157.25 FT TH N 00
DEG 00 MIN 00 SEC E 137.15 FT TH N 81 DEG 17 MIN 44 SEC E 251.56 FT TH S 08
DEG 00 MIN 53 SEC W 60.03 FT TH N 81 DEG 00 MIN 53 SEC E 4.00 FT TH S 08 DEG
50 MIN 22 SEC E 298.50 FT TO POB FORMERLY POR LOT 4 SP 88-07-12-0354 OUT OF
3-001 SEG A0545BL5-17-90AT

The Real Property or its address is commonly known as 1401 S. Sprague Avenue, Tacoma,
WA 98405. The Real Property tax identification number is 032005-7-006

Tax Parcel No.: 0320057006

Grantor, **SPRAGUE MAXI-SPACE LLC**, hereby binds Grantor, its successors and
assigns to the land use restrictions identified herein and grants such other rights under this
environmental covenant (hereafter "Covenant") made this day of _____, 2012 in
favor of the State of Washington Department of Ecology (Ecology). Ecology shall have full
right of enforcement of the rights conveyed under this Covenant pursuant to the Model Toxics
Control Act, RCW 70.105D.030(1)(g), and the Uniform Environmental Covenants Act, 2007
Wash. Laws ch. 104, sec. 12.

This Declaration of Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and
WAC 173-340-440 by **SPRAGUE MAXI-SPACE LLC**, its successors and assigns, and the
State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

A remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Covenant. The Remedial Action conducted at the property is described in the following document[s]:

1. Final Report, Site Remediation, Former Pierce Transit Maintenance Facility, Applied Geotechnology, April 1991
2. Letter Reports, Columbia Environmental, Inc. April 1991, September 1995 and October 1995
3. Letter re: preliminary investigation findings, Robinson Noble, Inc., April 2007
4. 1401 Sprague Street Groundwater Sampling Report and Additional Investigation Work Plan, Robinson Noble inc., September 2008
5. Groundwater Monitoring Report, Robinson Noble, Inc., November 2008
6. Long-term groundwater monitoring Plan, Robinson Noble, Inc, February 2012
(Attachment A)

These documents are on file at Ecology's Southwest Regional Office.

This Covenant is required because the Remedial Action resulted in residual concentrations of oil-range petroleum hydrocarbons which exceed the Model Toxics Control Act Method A Cleanup Level for SOIL established under WAC 173-340-740.

The undersigned, **SPRAGUE MAXI-SPACE LLC**, is the fee owner of real property (hereafter "Property") in the County of Pierce, State of Washington, that is subject to this Covenant. The Property is legally described AS FOLLOWS:

Beginning at the southeast corner of Lot 4, City of Tacoma Short Plat Number 8807120354, according to the Plat thereof, recorded July 12, 1988, in Pierce County, Washington:

Thence along the southerly line of said Lot 4 south 80 59' 00" west, 297.55 feet to the southwesterly most corner of said Lot 4:

- Thence north 09 51' 15" west, 68.82 feet;
- Thence north 00 44' 49" west, 157.25 feet;
- Thence north 00 00' 00" east, 137.15 feet;
- Thence north 81 17' 44" east, 251.56 feet;
- Thence south 08 50' 22" east, 60.03 feet;
- Thence north 81 00' 53" east, 4.00 feet;

Thence south 08 50' 22" east, 298.50 feet to the point of beginning, being a portion of Lot 4 of Short Plat 8807120354

(ALSO KNOWN AS Parcel D of Boundary Line Adjustment recorded under Recording Number 9002260171.) The Real Property or its address is commonly known as 1401 S. Sprague Avenue, Tacoma, WA 98405. The Real Property tax identification number is 032005-7-006

SPRAGUE MAXI-SPACE LLC makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

Section 1. A portion of the Property contains diesel-, and oil-range petroleum hydrocarbons contaminated soil located beneath footings along the north wall and beneath portion of the east and west walls at the northeast and northwest corners of the existing building. Additional areas are located near the center of the north room or the former maintenance building near the vicinity of the hydraulic hoist shown in the figures of the final report filed by Applied Geotechnology, Inc. (April 1991) along with a limited amount of contaminated soil in the vicinity of the sign located on the northwest corner of the property. The Owner shall not alter, modify, or remove the existing structure[s] in any manner that may result in the release or exposure to the environment of that contaminated soil or create a new exposure pathway without prior written approval from Ecology."

In addition, long-term groundwater monitoring has been and is being implemented at the Property to ensure that the implemented Remedial Action remains protective of groundwater. Groundwater is being monitored for gasoline, diesel, oil, carcinogenic polycyclic aromatic hydrocarbons, benzene, toluene, ethylbenzene, xylenes, and naphthalene on a schedule consistent with the Ecology-approved Long Term Groundwater Monitoring Plan (Robinson Noble, Inc, February 2012) which is included as Attachment A.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

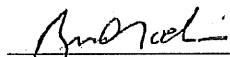
Section 5. The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

SPRAGUE MAXI-SPACE LLC



Bruce Bodine

Dated: June 10, 2012

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY



[Rebecca S. Lawson, P.E., LHG]
Section Manager, Toxics Cleanup Program, SWRO

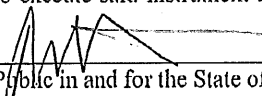
Dated: 10/29/12

[CORPORATE ACKNOWLEDGMENT]

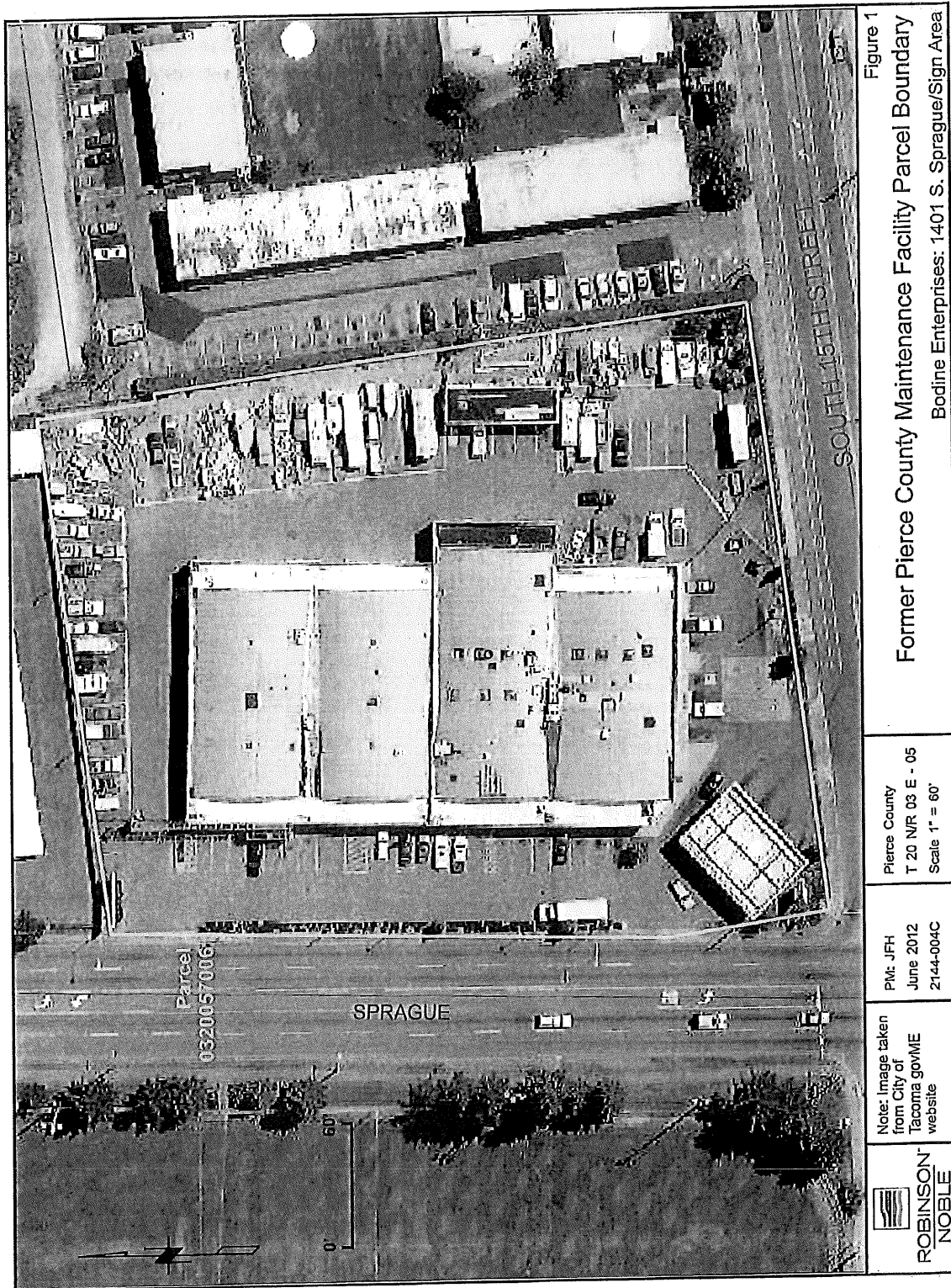
STATE OF WASHINGTON
COUNTY OF PIERCE

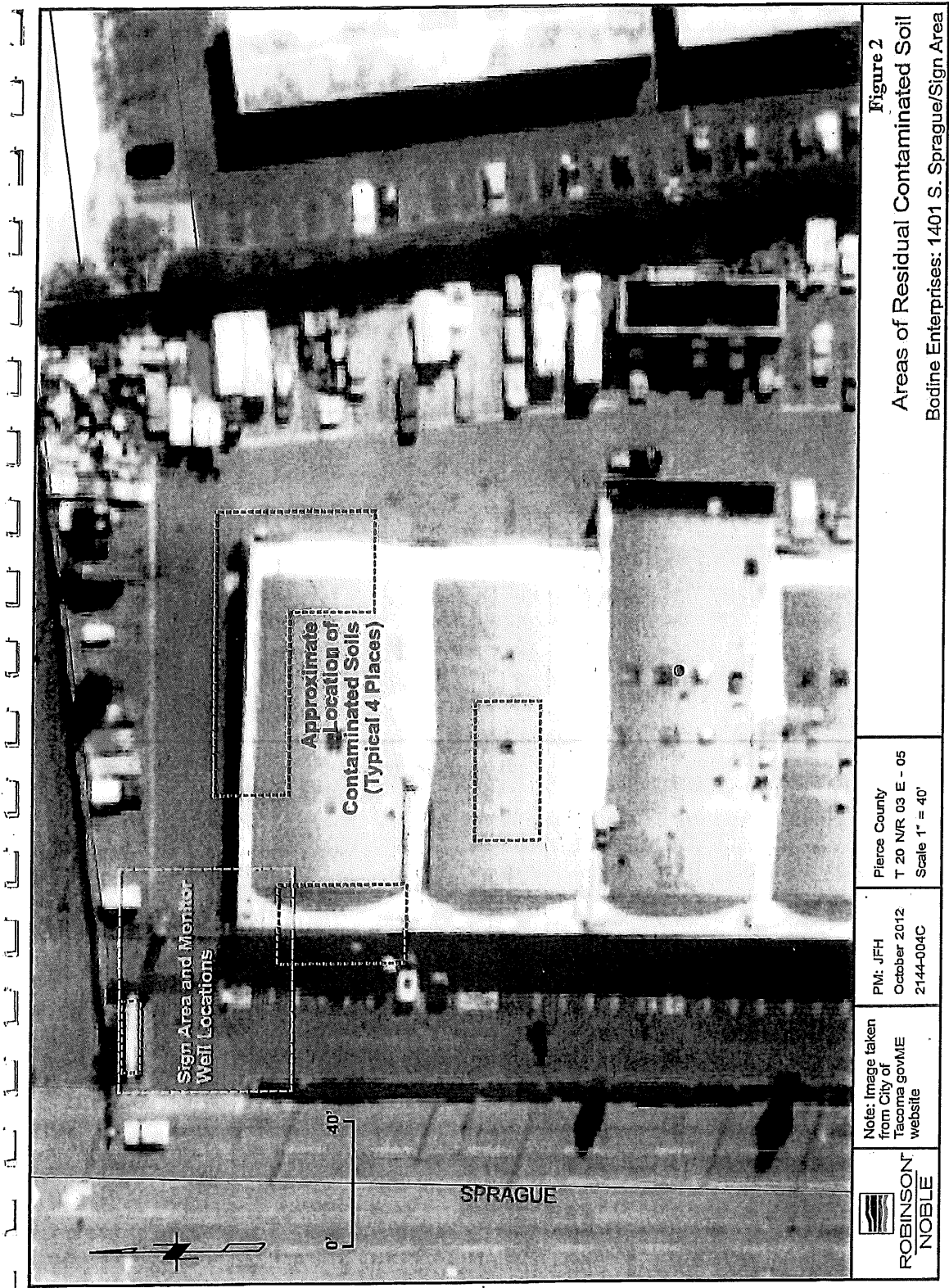
On this 18th day of JUNE, 2012, I certify that BRUCE DOWNS personally appeared before me, acknowledged that he/she is the MANAGING MEMBER of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument for said corporation.




Notary Public in and for the State of
Washington, residing at

TACOMA WA.
My appointment
expires 7-18-15.





6.11 Photo Log

Photo 1: Eastern Front Side of the Current Self-Storage Building (Former Pierce Transit Maintenance Building): Asphalt Cap on the Contaminated Soil Left-in-place (Northeast Corner of the Building)—From the Northeast



Photo 2: Eastern Front Side of the Current Self-Storage Building (Former Pierce Transit Maintenance Building): Asphalt cap—From the Southeast



Photo 3: Sign Board Area: Contaminated Soil Left-in-place Below the Sign Board—From the Southwest



Photo 4: Groundwater Monitoring Well MW-1 Near the Sign Board—From the South

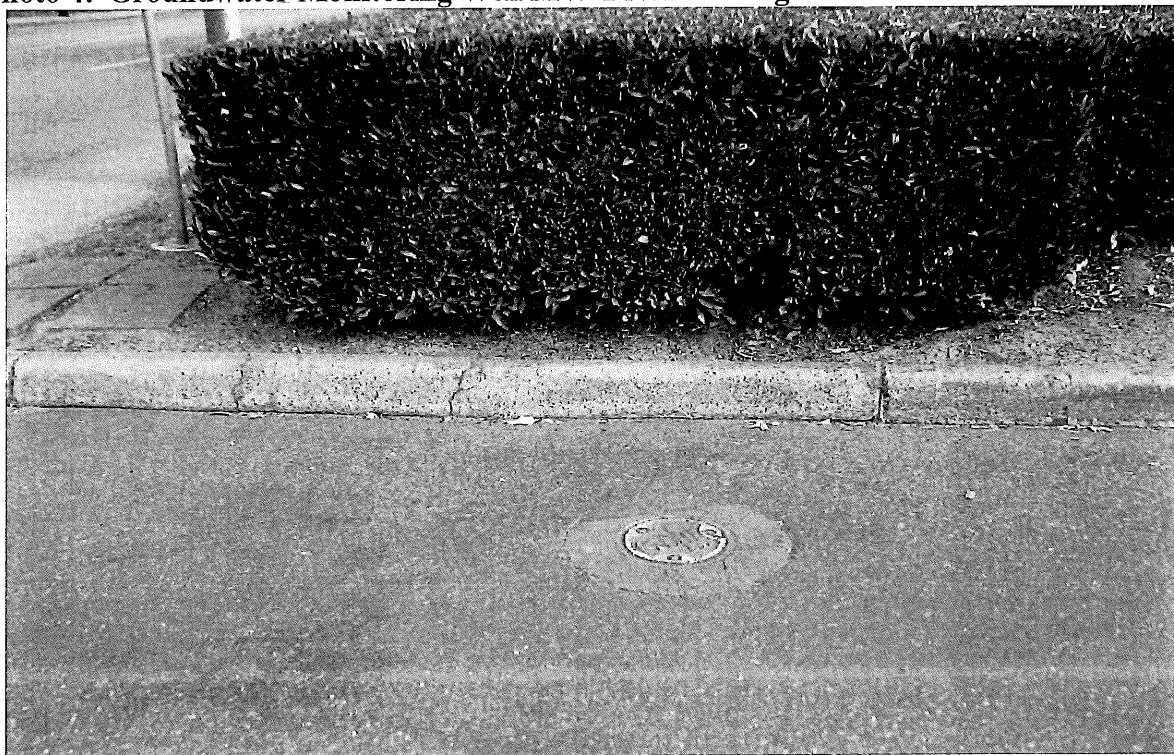


Photo 5: Western Back Side of the Current Self-Storage Building (Former Pierce Transit Maintenance Building): Asphalt Cap on the Contaminated Soil Left-in-place (in Front of the First Three Rolling Doors)—From the Northeast



Photo 6: Northern Side of the Current Self-Storage Building (Former Pierce Transit Maintenance Building): Contaminated Soil Left-in-place Below the Wall Foundation—From the Northeast

