



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

July 24, 2012

Scalara Associates LLC
PO BOX 1533
Tacoma WA 98401

Dear Sir:

RE: Early Notice Letter Regarding the Release of Hazardous Substances at the Cascade Millwork & Supply - Tacoma (existing site name),
AKA: Ballard Refinishing & Loyola Stripping Services
Located at: 6220 S. Tacoma Way, Tacoma WA 98409
Facility Site Identification Number: 16169643 (existing)
ISIS Cleanup Site ID No.: 11925

Under Chapter 70.105D Revised Code of Washington (RCW) the Department of Ecology (Ecology) is required to conduct an Initial Investigation, of properties where we have received a report that there has been a release or threatened release of hazardous substance that could pose a threat to human health or the environment.

Ecology maintains a list of sites where an initial investigation has found that further testing and possible cleanup is needed. We call this our "database of Confirmed or Suspected Contaminated Sites". As a result of the initial investigation conducted by the Tacoma PierceCounty Health Department, this property has been added to the database as a State Cleanup Site. The Facility Site Identification number assigned to this site is 16169643. Please note that inclusion in this database does not mean Ecology has determined you liable for cleanup of the site, as that is a separate determination under the law.

This site has been added to our database because a furniture stripping and refinishing business has been operating at this location for many years, perhaps under different names or ownership. Our records indicate this site was listed in our facility site database in 1989 as Cascade Millwork & Supply Tacoma. This site recently came to our attention in February of 2011 due to a routine inspection by the local fire department where they noted vats of stripping chemicals and 55 gallon drums of Flo-Strip in the floor sump and believed these chemicals were discharging to the ground. This property is located in the environmentally sensitive South Tacoma Groundwater Protection District. We are aware that our Hazwaste staff and county staff oversaw some cleanup efforts through much of the 2011 year; which focused on interior cleanup and did not focus on impacts to soil and groundwater. A complete history of site use is unknown and while cleanup efforts thus far are appreciated, a complete site assessment has not been performed in order to rule out soil and groundwater contamination. Therefore, there is not enough information



Scalara Associates LLC

July 24, 2012

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regarding this site to issue a No Further Action determination at this time. The purpose of the initial investigation is to confirm or deny the possibility of contamination on site.

In the future, Ecology may conduct a more detailed inspection of this property including testing for possible contamination. This inspection is called a "Site Hazard Assessment". At that time, Ecology will assess whether action will be needed and if necessary establish a priority for the work.

Ecology's policy is to work cooperatively with individuals to accomplish prompt and effective cleanups. Your cooperation with Ecology in planning or conducting a remedial action is not an admission of guilt or liability. Please be aware of state laws that must be adhered to if you decide to proceed with cleanup work on your own. The primary law is Chapter 70.105D RCW and the implementing regulations, the Model Toxics Control Act Cleanup Regulation (MTCA or Chapter 173-340 WAC). These laws can be found at Ecology's Toxics Cleanup Program website, <http://www.ecy.wa.gov/toxicscleanup/policy>.

If you would like a printed copy of the MTCA regulations or if you have questions call me at (360) 407-6240. These rules and how they impact each site can be confusing and complicated. There are Environmental Consultants that can be employed to assist property owners with the cleanup and site assessment process.

Ecology's Voluntary Cleanup Program is designed to provide technical assistance, for a fee, to cleanup sites that qualify. If you would like additional information regarding this program you can find information on our website at <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm> or you can contact Scott Rose at 360-407-6347.

Sincerely,

Kim Cross
Toxics Cleanup Program
Southwest Regional Office

ksc:ENL Loyola Stripping SVCS AKA Ballard Refinishers 07242012

by certified mail: (7010 0780 0002 3403 1905)

cc: Jamie Welch, Manager Scalara Associates LLC
Jason Ghaffari, Blue Environmental
J. Seger, Tacoma Pierce County Health Department
Cris Matthews, Department of Ecology
Scott Rose, Department of Ecology



INITIAL INVESTIGATION FIELD REPORT

ERTS Number: 624792

Parcel #: 4875000050

COUNTY: PIERCE

SITE INFORMATION

Site Name (e.g., Co. name over door): Scalara Associates, LLC	Site Address (including City and Zip+4): 6220 South Tacoma Way Tacoma, WA 98409	Site Phone: None
Site Contact and Title: Jamie Welch, Manager	Site Contact Address (including City and Zip+4): 1245 S. Geiger St Tacoma, WA 98465-1522	Site Contact Phone: 253-752-4518
Site Owner: Scalara Associates, LLC	Site Owner Address (including City and Zip+4): PO Box 1533 Tacoma, WA 98401	Site Owner Phone: 253-686-8505
Site Owner Contact: Jason Ghaffari, Certified Hazardous Materials Manager	Site Owner Contact Address (including City and Zip+4): Blue Environmental PO Box 3752, Seattle, WA 98124	Owner Contact Phone: 425-785-4771 cell 206-669-5965 office
Alternate Site Name(s):	Comments:	Is property > 10 acres? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Previous Site Owner(s):	Comments:	

Location: Quarter-Quarter: 4-4 Section: 24 Township: 20 N Range: 02 E
Latitude: Degrees: 47 Minutes: 12 Seconds: 1.45 N 47.20040
Longitude: Degrees: 122 Minutes: 29 Seconds: 5.39 W -122.48482

INSPECTION INFORMATION

Inspection Date: 2/3/11	Inspection Time: 10:00 am	Entry Notice: Announced <input checked="" type="checkbox"/> Unannounced <input type="checkbox"/>
Photographs Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Weather: Clear <input checked="" type="checkbox"/> Rain <input type="checkbox"/>	Temperature: ~45 °F
Samples Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Wind Direction:	Wind Speed:

RECOMMENDATION

No Further Action (Indicate NFA in box below):	LIST on ISIS (Indicate in box below):
Release or threatened release does not pose a threat <input type="checkbox"/>	Site Hazard Assessment <input checked="" type="checkbox"/>
No release or threatened release <input type="checkbox"/>	Interim Action <input type="checkbox"/>
Educational mailing <input type="checkbox"/>	Emergency Action <input type="checkbox"/>
Refer to program/agency (Name: _____) <input type="checkbox"/>	Independent Cleanup Action In progress <input type="checkbox"/>
Independent Cleanup Action Completed (i.e., contam, removed) <input type="checkbox"/>	

COMPLAINT (Brief Summary of ERTS):

A furniture stripping & refinishing business was discovered operating in a warehouse utilizing hazardous chemicals without proper handling and safety practices in place. Chemicals may have breached a floor sump and elevator shaft to the ground beneath.

SITE STATUS (Brief Summary of site condition(s) after investigation):

Structural testing and conclusions did not indicate integrity of the sump pit and elevator base enough to preclude the release of hazardous chemicals to the ground beneath. Soil sampling was not conducted.

Investigator: J. Seger	Date Submitted: 1/23/12
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On 8/29/11, (post integrity test), a drum of water from the elevator pit was sampled to determine the appropriate disposal method. The analytical result for methylene chloride was below method detection limit, and RCRA metals levels indicated that the wastewater was non-hazardous. On 11/14/11, approximately 650 gallons of water was pumped out of the elevator pit by MSI Sweepers and disposed of at Marine Vacuum Services, Inc (Mar Vac) of Seattle.

4) Summary:

Ecology's Spill Response handled the initial phase of this case. Ecology completed their review of the hazardous materials removal and interior cleanup, and issued a Return to Compliance letter dated 11/9/11. TPCHD reviewed the analytical results and integrity reports for the sump hole and elevator base/pit, the bore-hole soil analysis results, and the disposal documentation, which are contained in the consultant's Site Closure Report dated November 29, 2011, by Jason Ghaffari, Blue Environment. The Site Closure Report assumes integrity of both the sump and elevator pit and does not discuss the possible release of the contaminants of concern into the ground, nor suggest any further sampling.

Bore-holes – The methylene chloride analysis results were near the laboratory PQL which was close to the Method A clean up level for soils. No other constituents were sampled. It is unknown when or why the holes were bored in the floor and what other contaminants may have been released to the ground beneath.

Sump and Elevator Base/pit – Both contained liquids having concentrations of hazardous substances. The integrity reports indicate that neither are approved containment structures for problem wastes. The frequency, duration, and concentration of materials that may have repeatedly impacted these structures is unknown. The integrity of the sump below the rim was shown to be fairly watertight according to the testing; however it is unknown what contaminants may have breached the gap at the floor-sump interface prior to the varnish seal. Corrosion of the steel supports in the elevator base indicates ongoing or repeated periods of exposure to moisture and or chemicals. Many questions remain about the integrity of the sump and elevator base.

A complete history of site use is unknown, and may have contributed to suspected site contamination. Even though the involved parties were proactive in conducting the interior clean up and assessments, a complete site assessment has not been performed in order to rule out soil contamination. This site requires empirical soil and groundwater data to determine actual site environmental conditions. There is not enough information to support an NFA at this time, particularly given the sensitivity of its location in the STGPD.

Due to suspected soil and groundwater contamination, the TPCHD recommends including this site on Ecology's Confirmed and Suspected Contaminated Sites List.

Description of past practices likely to be responsible for contamination:

Painting & stripping (varnishes and solvents). Other unknown historic uses.

ACTIVITIES OR PRACTICES RESPONSIBLE FOR CONTAMINATION:

Spill	<input type="checkbox"/>	LUST	<input type="checkbox"/>
Pesticide disposal	<input type="checkbox"/>	Tank	<input type="checkbox"/>
Landfill	<input type="checkbox"/>	Improper handling	<input checked="" type="checkbox"/>
Drums	<input checked="" type="checkbox"/>	Improper disposal	<input type="checkbox"/>
Other – Describe: Historic industrial uses			

Are discharges permitted (if yes, describe): No Yes Standard Industrial Code(s)

Sump hole:

The City of Tacoma obtained three water samples from the sump hole on 2/2/11. Two samples were each analyzed for metals and SVOCs, the third (sump floor) was analyzed for only VOCs. A fourth sample, sump sludge (soil) was obtained on 2/4/11 and analyzed for metals and SVOCs. The samples were analyzed at the City of Tacoma's Environmental Services Laboratory, and the analytical results are contained in the laboratory report dated 3/17/11. Chemicals of concern in the report include: zinc, lead, copper, methylene chloride, toluene, phenols, and phthalates.

March 2011, Michael Johnson, PE, of Lean Environment performed an integrity test of the sump hole. The assessment included visual inspection, hydrostatic testing and ground penetrating radar. Mr. Johnson concluded that the sump pit is mechanically sound but not adequate to contain any regulated material. Historical overspray of coatings and varnishes may have created an additional seal between the sump and surrounding slab which may have precluded a bulk release of material from the sump in the recent past. However, the results do not conclude that material (other than water) will not diffuse through the walls and floor of the sump. The report, Lean Environment, Sump Assessment, March 7-8, 2011, is included in the Blue Environmental Site Closure Report dated November 29, 2011.

4/11/11: Ecology e-mail to Blue Environmental summarizing the status of managing the hazardous materials and determining the integrity of the floor sump. The review of the elevator pit and two bore holes in the floor were referred to TPCHD for follow up.

On 5/16/11, Ecology conducted a site inspection of the work space with TPCHD and Jason, Blue Environmental. All equipment and drums had been removed from the facility. The surfaces of the walls and floors had been cleaned. A metal pole was used to probe the murky water covering the floor of the elevator pit. The floor sounded and felt to be concrete, but of unknown integrity. The source of the water was unknown.

On 6/14/11, the property owner was notified by letter that TPCHD would be the lead agency for follow up of the remaining two issues, contaminated water found in the elevator pit, and two bore-holes in the basement floor, either of which could have allowed contamination to enter the ground. Loyola retained Blue Environmental and Lean Environment to conduct an assessment of the elevator pit (similar to the sump assessment), sample the bore-holes, and dispose of any contaminated materials removed during the process.

Bore-holes in floor:

On 6/23/11, Jason Ghaffari obtained a soil sample from each of the two bore-holes in the floor. The exact sample depths were not stated, only that the samples were obtained after removing 8 inches of sawdust from the bore-holes. Methylene chloride was the only analyte. The analytical results were 0.0162 mg/kg and 0.0188 mg/kg, below the MTCA Method A cleanup level of 0.02 mg/kg for methylene chloride, however, below the PQL's of 0.021 and 0.0191 mg/kg, respectively. The laboratory qualified the results as the "estimated concentration above the adjusted method detection limit and below the adjusted reporting limit".

Elevator base :

The City of Tacoma obtained a water sample from the elevator base on 2/3/11. The sample was analyzed for metals, SVOCs, and VOCs at the City of Tacoma's Environmental Services Laboratory. The analytical results for the elevator water sample is included in a laboratory document dated 3/17/11, pages 19 to 22. Chemicals of concern in the lab report include: methylene chloride, toluene, benzenes, phenol, xylenes, arsenic, lead, and zinc.

Michael Johnson, PE, Lean Environment was contracted to conduct an integrity evaluation of the elevator base/pit, similar to that of the sump hole. In August, after L&I approved that the lift was locked out, the elevator base was pumped and cleaned, and the materials stored for later disposal. Mr. Johnson performed the assessment during the week of August 24-30, 2011 and utilized similar methods as those used during the floor sump assessment. The hydrostatic test equilibration period commenced on August 24 and the base was filled with water to a level of approximately 23 inches above the floor. After 24 hours, the water level had dropped 7.5 inches to 15.5 inches, a loss of approximately 405 gallons, a significant drop for the test method. The formal assessment period began August 25. After a 24-hr period, the water level dropped a reported 0.25 inches, down to 14.25 inches. (It appears that the drop was incorrectly stated and should have been reported as 1.25 inches). The engineer repeated the hydrostatic test on August 29, and after a 24 hour period, the water level dropped 0.03 inches. The engineer states that these results suggest the elevator pit hydrostatic test is inconclusive below the 14 inch level, and that the pit will not meet any known standards for containment or storage of liquids. The report, Lean Environment, Elevator Pit Integrity Assessment, August 24-30, 2011, is included in the Blue Environmental Site Closure Report dated November 29, 2011.

3) Waste Disposal:

Uniform Hazardous Waste Manifests dated 3/24/11 and 3/28/11, indicate that Savannah Transport, Inc transported a total of 41 drums and 4 cubic yard boxes of hazardous waste for disposal to RINECO Chemical Industries, Inc located in Benton, Arkansas. The load contained: hazardous waste liquids, waste flammable liquids, F-listed water, and contaminated sludge.

June 2011, Jason, Blue Environmental, stated in an e-mail that prior to the elevator integrity test, two drums of wastewater and one drum of solids were removed from the elevator base/pit. These materials were to be later removed by Rineco. Jason's final report does not document (receipt) this disposal.

OBSERVATIONS

Description:

1) Background:

The subject site is located in the city limits of Tacoma, one-half block west of South Tacoma Way, and lies within the South Tacoma Groundwater Protection District (STGPD), an area consisting mostly of business and industrial uses. The building, constructed in the early 1900's is comprised of a basement level under the south half of the building, and an upper level running the full length of the building. It was commented that the military used the basement during the early years for storage of ammunition. This seems plausible as the structure has thick concrete walls and numerous rooms; appearing similar to a military bunker. A defunct railway spur lies along the west exterior wall of the structure. Other historic documented uses listed in the Tacoma-Pierce County Building Index were: furniture manufacturing, a pre-fab plant for homes, and general warehousing. Currently the building houses Benchmark Custom Cabinets, Inc and Genesis Automotive and RV Repair, both on the upper level. This property and four adjacent parcels are owned by Scalara Associates, LLC.

This report contains a summary of the actions first led by Ecology regarding dangerous waste associated with a furniture refinishing business located in the basement, and subsequent follow up by TPCHD.

2) Inspections, sampling and structural testing:

On 2/1/11, the City of Tacoma Fire Department (TFD) conducted an inspection of the building and encountered a furniture stripping and refinishing business operating without permits in the northern end of the basement. There were numerous violations including electrical, ventilation and safety issues. There were also open vats and drums of chemicals used for furniture stripping and finishing. TFD contacted the City of Tacoma's, Public Works - Source Control Program, to notify them of a sump hole in the floor containing unknown liquids. TFD posted a stop work notice and order to remove flammable liquids. The power was turned off to the building for safety.

On 2/3/11, the basement was deemed safe to enter and inspectors from numerous agencies conducted a joint inspection. The business operating at the site was Loyola Stripping Services (Loyola); they had been operating at this location for approximately six months. Loyola was a subcontractor of Ballard Refinishers, Inc.

Present during the group inspection:

Dee Williams, Ecology

Joyce Seger & Keith Johnston, South Tacoma Groundwater Protection Dist (STGPD), both with TPCHD

Larry Dunn & John Sunich, City of Tacoma Source Control

Phil Ferrell & Dave Gutierrez, Tacoma Fire Prevention Bureau

Sharon Skaggs, Tacoma Power Utilities

Brian Sahli, Industrial Hygiene Compliance, Labor and Industries

Dan O'Malley, Special Agent, US EPA, Criminal Investigation Division

Bernardo Gonzelez-Loyola, Loyola Stripping Services

Lorin Emtage, Ballard Refinishers, Inc

Jason Ghaffari, Blue Environmental (prev: Aces Environmental), consultant representing Ballard Refinishers and Loyola Stripping Services

Greg Welch, Scalara Associates LLC, property owner

The group entered the basement at the south entrance and walked a concrete hallway to the north end of the basement where there are several partitioned rooms. Loyola had already begun cleanup and removal of their equipment after the Fire Department inspection. Metal table vats were present but had been emptied of chemicals and were dry. Approximately forty 50-gallon sized drums were present, most contained chemicals, and were not properly labeled. A white granular product ("Suck-It-Up"), still present and swept into piles had been used on the concrete floor. City inspectors commented that the floor had been very sticky during their initial inspection; possibly due to the combination of old varnish layers and the stripping solvents. A two foot diameter sump hole located in the floor near the rinse table contained a brown liquid with a septic odor. A City inspector stated that they had obtained a liquid sample from the sump hole the day before and noted that the liquid level in the sump hole had dropped about 18 inches from the previous day. There is an inoperable service elevator located in a separate room, approximately forty feet from the sump hole. The floor of the elevator shaft was partially visible by looking through a hole in the wall with flashlights. Water and debris were visible on the elevator shaft floor. Approximately midway between the elevator and sump hole were two 4 inch diameter bore-holes cut through the concrete floor, which were filled with sawdust. There was no lighting in the basement during this inspection due to the power being turned off; therefore some of the photos are of poor quality. The group met in the parking lot for discussion after the inspection of the interior workspace where it was decided the following roles would be undertaken:

1) Ecology, the lead role requiring proper removal and disposal of the hazardous chemicals, and evaluating the equipment and work space after cleanup, and 2) Bernardo Loyola and consultant Jason Ghaffari, Blue Environmental, responsibility for removal and proper disposal of the chemicals, and cleaning of the interior work space. The chemicals of concern were those commonly used for furniture stripping and refinishing, primarily solvents such as methylene chloride and toluene.

SITE INFORMATION

Soil type Unknown	Slope Generally flat
Site vegetation/cover present:	Pasture/open field <input type="checkbox"/>
Forest <input type="checkbox"/>	Wetlands <input type="checkbox"/>
Bare soil <input type="checkbox"/>	Pavement <input checked="" type="checkbox"/>
Brush <input type="checkbox"/>	Surface water <input type="checkbox"/>
Landscaped <input type="checkbox"/>	
Other – Describe:	

Are there any drinking water systems affected?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Municipal, private, or both? (Circle one)		
How many people are estimated to be affected? _____		
Is there a potential for a release or threatened release to affect a drinking water source?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Are there monitoring wells in the vicinity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Are there dry wells in the vicinity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

CONTAMINANT PATHWAYS AND TARGETS

	Ingestion	Inhalation	Contact
Ground Water	X	X	X
Surface Water	X	X	X
Drinking Water	X	X	X
Soil	X	X	X
Sediment			
Air		X	
Targets possible:		Residential <input type="checkbox"/>	
Human, adult <input checked="" type="checkbox"/>		Industrial <input checked="" type="checkbox"/>	
Human, children <input checked="" type="checkbox"/>		Commercial <input checked="" type="checkbox"/>	
Sensitive environments (See WARM Scoring Manual for definition):			
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe:			
This site lies within Tacoma's South Tacoma Groundwater Protection District (STGPD). Within a two mile radius: An EPA Sole Source Aquifer and the Clover-Chambers Creek Aquifer both lie beneath the site. There are approximately 7-Group A, 2-Group B, and 2-Individual wells. Two salmon bearing streams, Flett Creek and Leach Creek. Approximately 15 parks.			
General Comments:			

CONTAMINANT(S)

AFFECTED MEDIA	CONTAMINANTS (#1-16: See contaminants key) Enter letter designating status of contaminant: C = Confirmed (above cleanup levels); S = Suspected; R= Remediated															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Ground Water		S	S				S	S	S							
Surface Water																
Drinking Water		S	S				S	S	S							
Soil		S	S				S	S	S							
Sediment																
Air																
1 Base/neutral organics			7 Petroleum products					13 Corrosive wastes								
2 Halogenated organic compounds			8 Phenolic compounds					14 Radioactive wastes								
3 Metals - Priority pollutants			9 Non-halogenated solvents					15 Conventional contaminants, organic								
4 Metals - Other			10 Dioxin					16 Conventional contaminants, inorganic								
5 Polychlorinated biPhenyls (PCBs)			11 Polynuclear aromatic hydrocarbons (PAHs)													
6 Pesticides			12 Reactive wastes													

SITE MAP/DIAGRAM

Site Name **Scalara Associates, LLC**

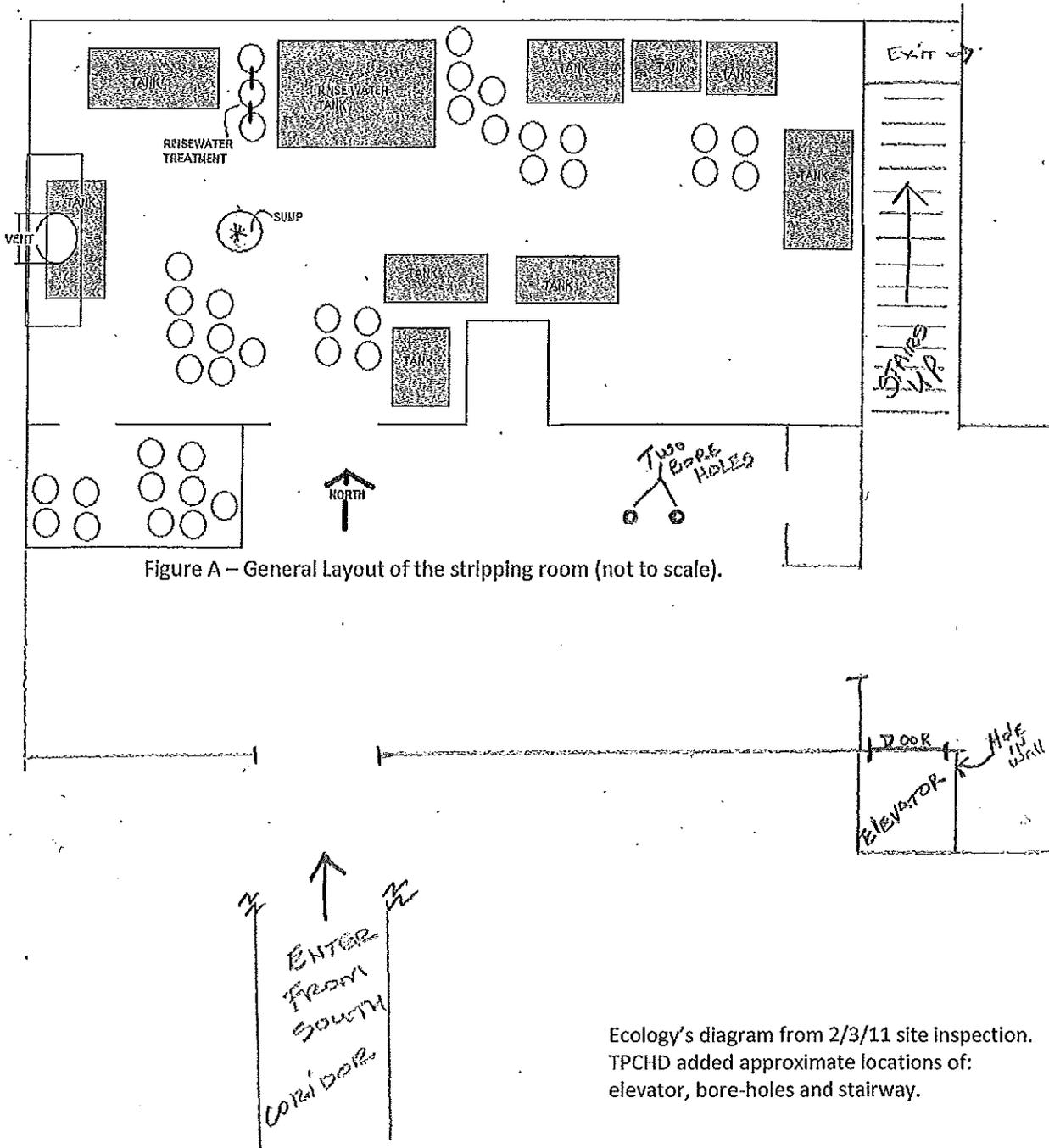


Figure A - General Layout of the stripping room (not to scale).

Ecology's diagram from 2/3/11 site inspection.
 TPCHD added approximate locations of:
 elevator, bore-holes and stairway.



Approximate scale: NTS inch = ___ feet

ERTS Number 624792

County PIERCE

Inspector J. Seger

Date

Parcel Summary for 4875000050

02/04/2011 11:16 A

Property Details

Parcel Number: 4875000050
Site Address: 6220 S TACOMA WY
Account Type: Real Property
Category: Land and Improvements
Use Code: 6310-GEN WAREHOUSING STORAGE

Taxpayer Details

Taxpayer Name: SCALARA ASSOCIATES LLC
Mailing Address: 1245 S GEIGER ST
TACOMA WA 98465-1522

Appraisal Details

Value Area: PI4
Appr Acct Type: Industrial
Business Name: ADVANCE CABINETS/CENTURY
RV/GILCHRIST SERVICE CENT
Last Inspection: 06/20/2007 - New Construction

Tax/Assessment

Current Tax Year: 2011
Taxable Value: 1,544,200
Assessed Value: 1,544,200

Related Parcels

Group Account Number: n/a
Mobile/MFG Home and Personal Property 2096004885 2098002290
parcel(s) located on this parcel:
Real parcel on which this parcel is located: n/a

Tax Description

Section 24 Township 20 Range 02 Quarter 44 KALENBORNS PARK: KALENBORNS PARK L 1 THRU 17 B 2 TOG/W 1/2 ALLEY VA

I acknowledge and agree to the prohibitions listed in RCW 42.56.070(9) against releasing and/or using lists of individuals for commercial purposes. Neither Pierce County nor the Assessor-Treasurer warrants the accuracy, reliability or timeliness of any information in this system, and sh not be held liable for losses caused by using this information. Portions of this information may not be current or accurate. Any person or entity who relies on any information obtained from this system does so at their own risk. All critical information should be independently verified.

"Our office works for you, the taxpayer"

Pierce County Assessor-Treasurer
Dale Washam
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www.piercecountywa.org/atr

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