

Governed by a local Board of Health

www.tpchd.org

11.27.12

Petrocard Systems Inc
730 Central Ave S
Kent, WA 98032-6109

Re: CFN Station, 3200 20th Ave E, Fife; APN 0320115006,

The Tacoma-Pierce County Health Department received a request from the Washington State Department of Ecology Toxics Cleanup Program (Ecology) to investigate a complaint about contamination associated with a leaking diesel pump at the CFN fueling station located at the above referenced site. The Health Department functions as Ecology's field agents to investigate complaints regarding potential soil or groundwater contamination.

The Health Department conducted a site visit on 11.27.12 and the following issue was noted at that time:

- Widespread spillage of diesel on the ground around each of the fuel pumps.

The site conditions as reported in the initial complaint, involving diesel pump #3, as well as those observed during today's site inspection, warrant a subsurface investigation for possible diesel contamination of soil. Due to the presence of gasoline pumps at this same location, the possibility of subsurface gasoline contamination should also be investigated.

It is Ecology's and the Health Department's policy to work cooperatively with owners and occupants of contaminated sites by giving them the opportunity to achieve effective and prompt cleanups. Site characterization to determine the full extent and nature of contamination present on a given property is required to accomplish an effective cleanup. Determining the extent of contamination includes defining both the horizontal and vertical limits of contamination. The Health Department recommends you engage the services of an environmental professional to assist you in characterizing the site conditions at the subject property. After characterization has been achieved, the site must be remediated to within the MTCA Method A Cleanup Levels (Chapter 173-340 of the Washington Administrative Code).

Please contact me with information regarding your plans to characterize and address the potential site contamination. Site remediation must be completed to the satisfaction of the Health Department prior to a recommendation submitted to Ecology for no further action (NFA). Any contaminated soil removed for disposal must be taken to a properly permitted facility with soil disposal receipts submitted to the Health Department as proof of proper disposal. I have enclosed a form that details the information required in a site assessment/closure report.

If a response is not received by this office within thirty (30) days, a report will be forwarded to Ecology with a recommendation for the property to be listed on the Confirmed and Suspected Contaminated Sites Report database. This database is used for tracking purposes, and subsequent listing on the State's Hazardous Sites List, which could adversely affect your property value.

3629 South D Street
Tacoma, WA 98418-6813

Anthony L-T Chen, MD, MPH, Director of Health


253 798-6500
800 992-2456

♻️ Printed on recycled paper

TDD: 253 798-6050

If you have questions or comments, or require further clarification, please contact me at (253) 798-2891 or sbell@tpehd.org.

Sincerely,



Sharon A. Bell, R.S.
Environmental Health Specialist

enc (1)

cc: Cris Matthews, Ecology



CONTENT & FORM REQUIREMENTS FOR SITE ASSESSMENT/CLOSURE REPORTS

The following are the minimum requirements for the content and form required for all Site Assessment/Closure Reports submitted to the Tacoma-Pierce County Health Department. Please reference the General Provisions of the Model Toxics Control Act Cleanup Regulation, Chapter 173-340 WAC, Part VIII for additional guidance.

Content and Form Requirements

- 1) **Site diagram:**
 - a) Provide the location of the site and indicate orientation with a North arrow.
 - b) Identify the exact location of the spill or release in relation to structures, property lines, utilities, etc. with a depiction of the affected area.
- 2) **Source removal information:**
 - a) List the dimensions (length, width, depth) of any soil excavation and the volume of soil removed.
 - b) Depict the excavation area on a site map.
 - c) Describe the observed conditions of the excavated material and the resulting excavation.
 - d) Describe the soil type(s) encountered.
 - e) List the depth at which groundwater is encountered, if applicable.
 - f) Describe the proximity of the excavation to groundwater and/or surface water.
- 3) **Sample Information:**
 - a) Indicate the exact location of all samples, including depth, and depict the sample locations together with sample identification on a site map.
 - b) Provide information on field instrument readings, odors noted, sheen or discoloration observed.
 - c) Indicate and describe sampling method (e.g. backhoe, hand tool, etc.) and procedure. **Please note required changes in soil sampling methodology for gasoline and volatile organic compounds as detailed in Ecology's Implementation Memorandum #5, effective June 22, 2004.**
 - d) Indicate the type of samples (composite or discrete) and matrix (soil or water).
 - e) Describe quality control and chain of custody procedures.
 - f) Indicate parameters sampled for and provide rationale.

Sampling related to petroleum releases must comply with Table 830-1 in the Model Toxics Control Act Cleanup Regulation, Chapter 173-340 WAC, as amended February 12, 2001. The number of samples required to establish achievement of clean limits in an excavation are dependent on site conditions and size of the excavation, standard protocol includes 4 sidewall and 1 bottom sample. Discrete soil samples are required. Soil samples should be collected from areas where contamination is most likely to remain.

- 4) Provide name and address of analytical laboratory used. Please note that only results from laboratories accredited to perform the pertinent analyses will be accepted. In addition, the practical quantitation limit must be below the MTCA Cleanup Level for the results to be useful.
- 5) Provide table of analytical results, combined with a discussion of the significance of the data. Include analytical methods used. Attach copies of lab reports including any discussion of data quality.
- 6) Specify if the excavation was backfilled and/or the disposition of the excavated soils.
- 7) Proof of proper soil disposal must be provided in the form of receipts from the receiving facility; include any analytical results for the excavated soil used in justification of the soil's waste classification.
- 8) Provide both conclusions and recommendations on any further action needed.
- 9) The report should be written so it can stand alone.

Reports that do not meet these minimum requirements will be considered insufficient to recommend **No Further Action** to the Department of Ecology. Additional requirements may be issued, depending on the technical nature of the site being assessed.

NOTE: Site Assessment/Closure Reports must be submitted within 60 days of the completion of site work.

If you have any questions, please contact Sharon Bell at (253) 798-2891.

Sharon Bell

From: Sharon Bell
Sent: Tuesday, November 27, 2012 4:30 PM
To: 'sabounader@petrocard.com'
Subject: Photos 11-27-12
Attachments: ERTS 637532 photos.docx

Attached are today's site photos; please note that pumps # 13 and satellite #11 were also leaking, but were not included in the photos taken today.

ERTS 637532, Petrocard CFN Fuel Station, 3200 20th St E, Fife
Photos taken by S. Bell, 11.27.12

First row of pumps on north side of site, adjacent to 20th Street E, diesel pump 3 leaking:



ERTS 637532, Petrocard CFN Fuel Station, 3200 20th St E, Fife
Photos taken by S. Bell, 11.27.12



Next row of pumps, Pump #8 and Satellite #12 (back side of #8) leaking:



ERTS 637532, Petrocard CFN Fuel Station, 3200 20th St E, Fife
Photos taken by S. Bell, 11.27.12



Note: Pump #12 satellite is in right background of photo.

Next row of pumps, #11 (see above) and #12 leaking:



ERTS 637532, Petrocard CFN Fuel Station, 3200 20th St E, Fife
Photos taken by S. Bell, 11.28.12

Last pump island, on south side of site, pump #13/11 satellite leaking:



ERTS 637532, Petrocard CFN Fuel Station, 3200 20th St E, Fife
Photos taken by S. Bell, 11.28.12



Sharon Bell

From: Sharon Bell
Sent: Tuesday, November 27, 2012 4:36 PM
To: 'sabounader@petrocard.com'
Subject: More photos
Attachments: 637532, 11-09-12 photos.pdf

The attached photos were submitted with the original report of diesel pump #3 leaking at this location; that report went to Ecology on 11.09.12. Together with the observations and photos collected today at the site, there is evidence of an on-going issue with poor maintenance and continued release of diesel at this site contributing to potential site contamination.





730 central avenue s.
kent, wa 98032-0038
800.950.3835
fax 253.854.7936
www.petrocard.com



December 27, 2012

Tacoma – Pierce County Health Department
3629 South D Street
Tacoma, WA 98418-6813

Re: CFN Station 3200 20th Ave. E, Fife; APN 0320115006

PetroCard has received your letter dated November 27, 2012, and appreciates the opportunity to comment and provide additional information that we feel should alleviate much of the Health Department's concerns.

PetroCard feels that there has been a misunderstanding regarding the cardlock operations and PetroCard's consistent use of industry Best Management Practices, and that your recommendation for a subsurface investigation for diesel contamination due to minor surface spills from our customers is unwarranted. The use of terms such as "widespread spillage" and "leaking diesel pump" are inaccurate and misleading. This is a very busy commercial fueling station and what you observed is daily drips from truck drivers using our nozzles to activate and de-activate diesel dispensers, as well as drips from drivers topping off their tanks, and not from faulty nozzles (all of which are working properly). In addition, PetroCard has a maintenance technician assigned to that station who visits the site on a daily basis for cleaning such drips, replacing hoses and nozzles as required, and other maintenance duties assigned. During this past year PetroCard has passed a Department of Ecology (Ecology) inspection, tank and line testing, as well as a Weights & Measures inspection. PetroCard operates 68 stations in the state of Washington and Oregon and we work closely with Ecology, our environmental consultants, and consider ourselves good stewards of the environment. When we do projects requiring underground excavation or soil removal, we do secure the services of our consultants, and do take samples for analysis when required. Until such time, we do not anticipate conducting a site characterization in the immediate future.

Best Regards,

A handwritten signature in black ink, appearing to read "Selim", followed by a long, horizontal, slightly wavy line that extends to the right.

Selim Abounader
Cardlock Manager

Sharon Bell

From: Selim B. Abounader [sabounader@petrocard.com]
Sent: Tuesday, November 27, 2012 4:55 PM
To: Sharon Bell
Subject: RE: More photos

Hello Sharon,

I am in receipt of the 3 emails that you sent me. I will call you tomorrow to discuss.

Best Regards,

Selim Abounader
Cardlock Manager
PetroCard
Direct 253.867.3281
Fax 253.854.7936
Office 800.950.3835
www.petrocard.com

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From: Sharon Bell [mailto:SBell@tpchd.org]
Sent: Tuesday, November 27, 2012 4:36 PM
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Subject: More photos

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This email was scanned by BitDefender.

Sharon Bell

From: Sharon Bell
Sent: Wednesday, November 28, 2012 5:03 PM
To: 'Matthews, Cris (ECY)'
Subject: Petrocard station in Fife
Attachments: ERTS 637532 photos.docx; 637532, Petrocard CFN at 3200 20th St E.pdf; 637532, 11-09-12 photos.pdf

Selim with Petrocard called a short while ago and told me that he would be going out to inspect this station tomorrow. Any leaking/faulty nozzles will be repaired/replaced and he will get back to me about whether he agrees a subsurface investigation is warranted. From my perspective, on-going leaks from nozzles around pump islands are one of the weak points at a fuel station, where seams and cracks in the pavement allow continued accumulation of contamination to occur in the subsurface. There does seem to be a problem at this site over the last month or so, based on the original complaint combined with yesterday and today's observations.

Let me know what you think.

Sharon Bell

From: Selim B. Abounader [sabounader@petrocard.com]
Sent: Thursday, December 27, 2012 11:02 AM
To: Sharon Bell
Subject: RE: Fife Petrocard CFN station
Attachments: 20121227102933065.pdf

Hello Sharon,

Attached is a response to your letter dated November 27th, 2012.

Best Regards,

Selim Abounader
Cardlock Manager
PetroCard
Direct 253.867.3281
Fax 253.854.7936
Office 800.950.3835
www.petrocard.com

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From: Sharon Bell [mailto:SBell@tpchd.org]
Sent: Tuesday, November 27, 2012 3:45 PM
To: Selim B. Abounader
Subject: Fife Petrocard CFN station

Good afternoon,

As requested, I have attached a letter describing the issues found at this fueling station as well as the investigative requirements. I will send photos of today's site conditions in a separate email.

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December 27, 2012

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Selim Abounader
Cardlock Manager