



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

CERTIFIED MAIL

March 11, 2008

Mr. Craig Hultgren
PNG Environmental, Inc.
1339 Commerce Avenue, Suite 313
Longview, WA 98632

Re: No Further Action Determination under WAC 173-340-515(5) for the following Hazardous Waste Site:

- Name: Fife Metroplex Cardlock
- Address: 3200 20th Street East, Fife
- Facility/Site No.: 35377551
- VCP No.: SW0610

Dear Mr. Hultgren:

Thank you for submitting your independent remedial action report for the Fife Metroplex Cardlock facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Groundwater Monitoring Report – December 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated January 9, 2008 by PNG Environmental, Inc.
2. Groundwater Monitoring Report – August 30, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated September 12, 2007 by PNG Environmental, Inc.
3. Groundwater Monitoring Report – June 4, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated June 21, 2007 by PNG Environmental, Inc.
4. Groundwater Monitoring Report – March 5, 2007, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated March 26, 2007 by PNG Environmental, Inc.
5. Groundwater Monitoring Report – December 4, 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated February 13, 2007 by PNG Environmental, Inc.
6. Fourth ORC Injection and Groundwater Monitoring Report, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated September 14, 2006 by PNG Environmental, Inc.
7. Quarterly Groundwater Monitoring Report – May 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated June 6, 2006 by PNG Environmental, Inc.
8. Quarterly Groundwater Monitoring Report – February 16, 2006, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated March 6, 2006 by PNG Environmental, Inc.
9. Quarterly Groundwater Monitoring Report – November 14, 2005, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated November 20, 2005 by PNG Environmental, Inc.
10. Third ORC Injection and Groundwater Monitoring Report, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated October 18, 2005 by PNG Environmental, Inc.

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11. Quarterly Groundwater Monitoring Report – May 9, 2005, Fife Metroplex Card Lock Fuel Sales Facility, 3200 20th Street East, Fife, Washington, dated May 26, 2005 by PNG Environmental, Inc.
12. Letter to Mr. Craig Hultgren (PNG Environmental) from Mr. Panjini Balaraju (Ecology), RE: Fife Metroplex Site, Opinion Letter, dated April 29, 2005.

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at (360) 407-6365.

The Site is defined by the extent of contamination caused by the following release(s):

- Petroleum hydrocarbons and related constituents in soil.
- Petroleum hydrocarbons and related constituents in groundwater.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, confirmation soil sample results seem to document that the injection of oxygen release compound (ORC) has successfully remediated impacts to soil. In addition, four consecutive quarters of groundwater data below MTCA cleanup levels has been achieved. As a result, **Ecology has determined that the independent remedial action(s) conducted at the Site are sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **no further remedial action is necessary** at the Site under MTCA.

Based on this no further action determination, Ecology will update the status of the Site on its site database and remove the Site from the Confirmed and Suspected Contaminated Sites List and the Leaking Underground Storage Tank (LUST) List.

This no further action determination does not apply to any other release(s) or potential release(s) of contaminant(s) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by PetroCard Systems, Inc.

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Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in successfully completing cleanup under the Voluntary Cleanup Program (VCP). If you have any questions regarding this opinion, please contact me at (360) 407-6347.

Sincerely,



Scott Rose, L.G.
Site Manager
SWRO Toxics Cleanup Program

SR/ksc:Fife Metroplex Cardlock NFA

Enclosures: Site Summary
Figure 1 – Site Location Map
Figure 2 – Groundwater Elevation Contour Plot – December 12, 2007

Cc: Rob Grenley – Grenley Stewart Resources
Rob Olsen – Tacoma-Pierce County Health Dept
Carol Johnston – Ecology
Dolores Mitchell – Ecology

Enclosure A

Site Summary

The Fife Metroplex Cardlock site is located at 3200 20th Street East in Fife, Pierce County, Washington. The site consists of an asphalt-paved Cardlock fueling station. The site is about 1.2 acres and contains a pump island and canopy, weigh scale, and scale house. Two underground storage tanks (USTs) serve the site. The USTs consist of one 20,000-gallon diesel tank and one 15,000-gallon gasoline tank.

Soil beneath the site consists of medium-grained sand with some gravel and silt. The depth to groundwater ranges from about 5 to 9 feet below ground surface (bgs), and the direction of groundwater flow is to the south and southwest.

Environmental investigations at the site were initiated in August 2002 to assess the extent of a known gasoline release related to periodic overfilling of a product overflow tank in the UST cavity area of the site. The investigation results indicated that groundwater beneath the site was contaminated with gasoline constituents above Model Toxics Control Act (MTCA) Method A cleanup levels.

In October 2002, a follow-up investigation was conducted that consisted of advancing 10 soil borings on site, six of which were completed as monitoring wells (MW-1 through MW-6). Benzene was detected in four soil samples from the three of the borings at concentrations exceeding the MTCA Method A cleanup level of 0.03 milligrams per kilogram (mg/kg). Concentrations of benzene ranged from 0.08 mg/kg to 1.1 mg/kg. Analytical results of the groundwater samples identified concentrations of gasoline-range petroleum hydrocarbons (TPH-G), benzene, and methyl tert-butyl ether (MTBE) in MW-3 and benzene and MTBE in MW-4 above MTCA Method A cleanup levels.

In 2003, quarterly groundwater monitoring was initiated at the site. In addition, to promote bioremediation, oxygen release compounds (ORC) was injected into the subsurface. A total of four ORC injections were performed at the site between 2003 and 2006.

In April 2005, Ecology generated an Opinion Letter for the site, which indicated the following:

- Soil and groundwater at the site needed to be analyzed for diesel-range petroleum hydrocarbons (TPH-D).
- Quarterly groundwater monitoring needed to continue until all parameters were below MTCA cleanup levels for four consecutive quarters.
- An additional monitoring well needed to be installed downgradient of MW-3.
- Sampling of the surface water and sediment in a ditch along the southern property boundary.
- Re-sampling of soil where benzene was previously detected to confirm whether the ORC injections were successful in remediating these areas.

In July 2005, four soil borings were advanced on site, and soil, sediment, surface water, and groundwater samples were collected from the site. Three soil borings were advanced in areas where benzene was previously detected in soil, and one boring was advanced downgradient of MW-3 and completed as

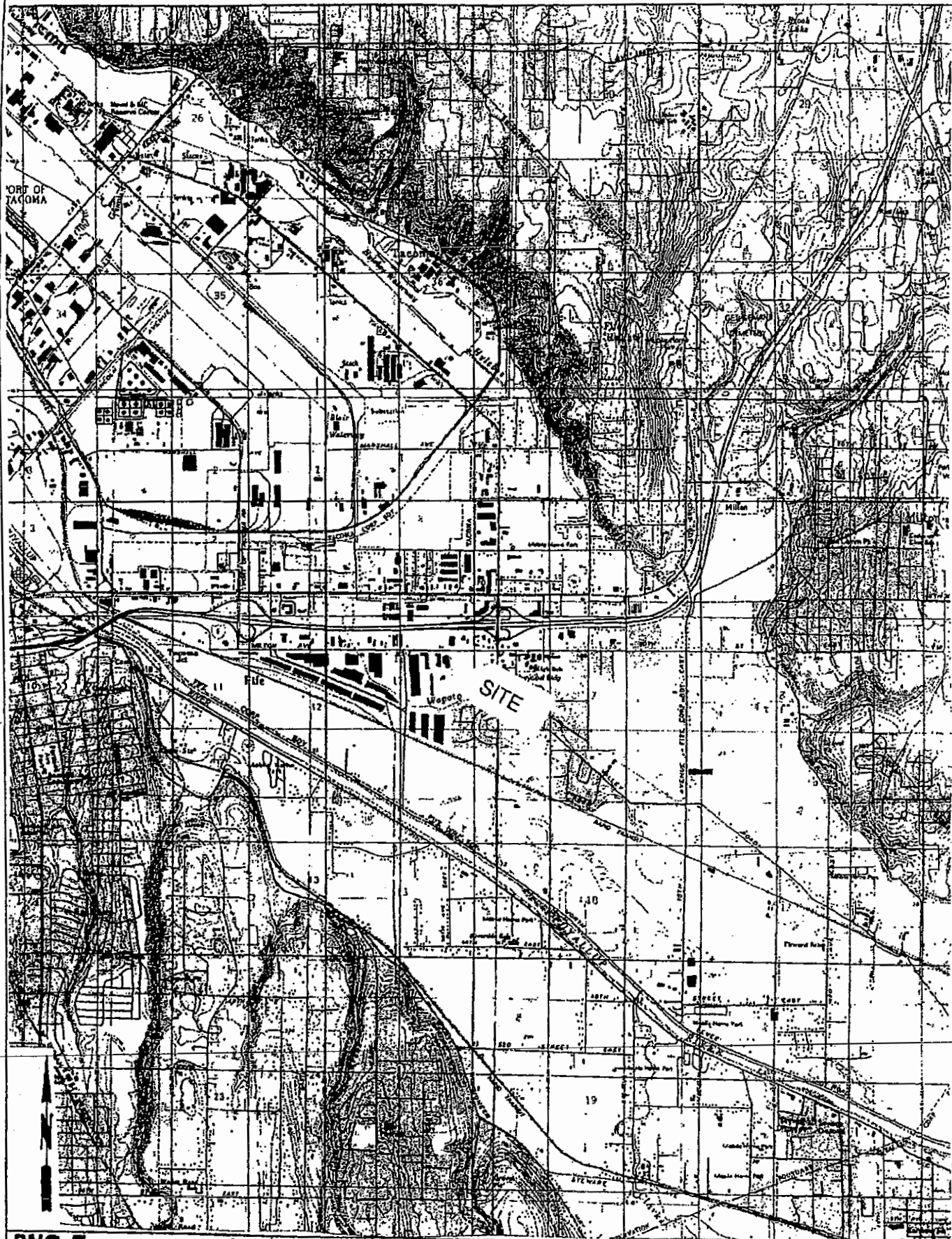
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monitoring well MW-7. Soil samples from the first three borings were collected from the same depths where benzene was previously detected. Benzene was not detected in any of these samples above laboratory detection limits. No contaminants were detected in the soil sample collected from MW-7.

Two sediment samples (Seds East and Seds West) and one surface water sample were collected from the ditch and analyzed for TPH-G by Ecology Method NWTPH-Gx, TPH-D and oil-range petroleum hydrocarbons (TPH-O) by Ecology Method NWTPH-Dx, volatile organic compounds (VOCs) by EPA Method 8260B, and total lead by EPA Method 6010. No contaminants were detected in the sediment samples above laboratory method detection limits, except for lead, which was detected at 13 mg/kg and 15 mg/kg, respectively, in the two samples. These concentrations are below their respective sediment management standards. Only toluene was detected in the surface water sample. Toluene was detected at 5 micrograms per liter ($\mu\text{g/L}$), which is well below Ecology surface water criteria.

MW-7 and the ditch surface water were added to the quarterly monitoring events beginning in August 2005. Also at this time, all monitoring wells and the ditch were analyzed for TPH-G by Ecology Method NWTPH-Gx, TPH-D and TPH-O by Ecology Method NWTPH-Dx, VOCs by EPA Method 8260B, and total lead by EPA Method 200.8. By this time, only MTBE was still being detected in the wells. During the August 2005 sampling event, MTBE was detected at or above the MTCA Method A cleanup level of 20 $\mu\text{g/L}$ in MW-3 (33 $\mu\text{g/L}$), MW-4 (50 $\mu\text{g/L}$), and MW-7 (20 $\mu\text{g/L}$).

MTBE was not detected in MW-7 during subsequent quarterly monitoring events, and by December 2007, MTBE was below MTCA cleanup levels for four consecutive quarters in MW-3 and MW-4.



PNG ENVIRONMENTAL INC.

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DATE: 10-03
 FILE NAME: Pg 1
 DRAWN BY: AA
 APPROVED BY: CH

File Conduct Facility
 Ft. Washington
 Granley Street

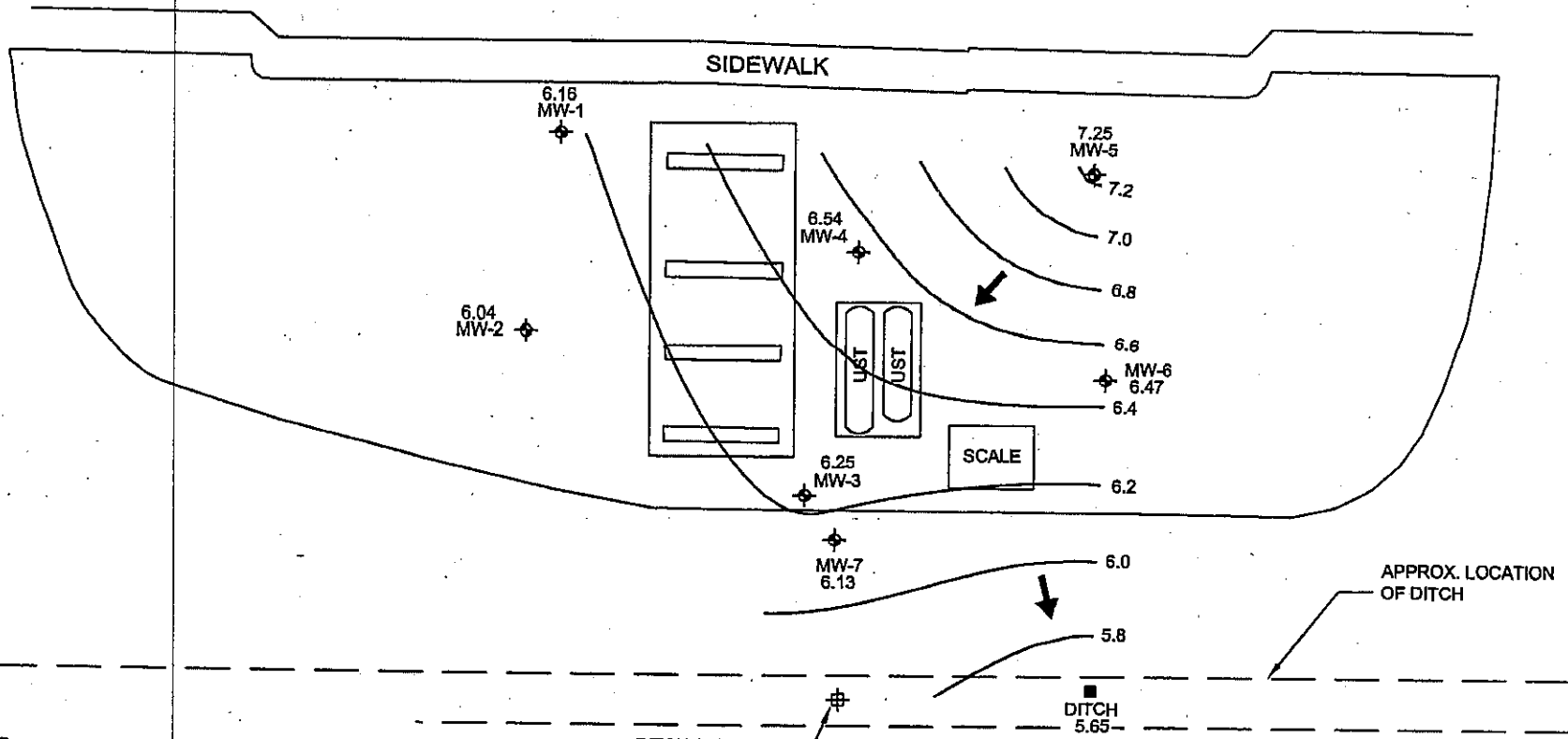
Site Location Map

Project No. 1052-01
 Page No.

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20TH STREET EAST

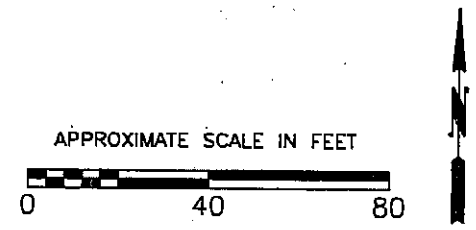
SIDEWALK



LEGEND

- MW-1-⊕ MONITORING WELL
- ~ 6.2 GROUNDWATER ELEVATION CONTOUR
- 6.54 GROUNDWATER ELEVATION
- ▭ PUMP ISLAND
- DITCH (MONITORING POINT)
- ↙ GROUNDWATER FLOW DIRECTION

NOTE:
 BASE MAP FROM BLUHM & ASSOCIATES
 LAND SURVEYORS, INC. JUNE 13, 2003.



PNG ENVIRONMENTAL INC.
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DATE: 1-4-08
 FILE NAME: 1052-01
 DRAWN BY: JJT
 APPROVED BY: CH

FIFE CARDLOCK FUEL FACILITY
 3200 20TH ST. EAST
 FIFE, WASHINGTON

GROUNDWATER ELEVATION
 CONTOUR PLOT
 DECEMBER 12, 2007

Project No.
 1052-01
 Figure No.
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