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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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July 26, 2019

Aaron Reding
PetroCard, Inc.
730 Central Avenue South
Kent, Washington 98032

Re: Rescission of No Further Action (NFA) Status for the following Site:

- **Site Name:** Fife Metroplex Cardlock
- **Site Address:** 3200 20th Street East, Fife, WA 98424
- **Facility/Site ID:** 35377551
- **Cleanup Site ID:** 5931
- **VCP Project No.:** SW0610
- **ERTS No.:** 687970

Dear Aaron Reding:

The Department of Ecology (Ecology) issued a No Further Action (NFA) determination for the Fife Metroplex Cardlock (Site) (Enclosure A, Figure 4) on March 11, 2008. A subsequent May 16, 2019, *Cardlock Upgrade Sampling Activities and Interim Remedial Action Report*, completed by Maul Foster & Alongi, Inc.,¹ provided additional information that significant contamination remains at this Site. Contamination was identified at concentrations greater than Model Toxics Control Act Method A cleanup levels for the following constituents:

- Gasoline-range petroleum hydrocarbons, diesel-range petroleum hydrocarbons, benzene, toluene, ethylbenzene, and total xylenes in soil (Enclosure B, Table 2).

Based on this information, Ecology rescinds the March 11, 2008, NFA determination under Voluntary Cleanup Program (VCP) project SW0610. The effective date of the rescission is the date of this letter.

¹ <https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=4201>

Next Steps

Ecology will update its records to reflect that Ecology has rescinded the NFA determination for this Site. The Site will be listed in future publications of the Confirmed and Suspected Contaminated Sites List.²

If you have any questions about the rescission or next steps, please contact me at (360) 407-6241 or rebecca.lawson@ecy.wa.gov.

Sincerely,



Rebecca S. Lawson, P.E., LHG
Section Manager
Toxics Cleanup Program
Southwest Regional Office

NMA: tm

Enclosures (2): A – Figure 4: Sample Results Map
B – Table 2: Analytical Results

By certified mail: 9489 0090 0027 6066 6678 25

cc: Merideth D'Andrea, Maul Foster & Alongi, Inc.
Nick Acklam, Ecology (by email)
Sean Chisholm, (by email)
Carol Johnston, Ecology (by email)
Kirsten Wecker, Ecology (by email)
Ecology Site File

² Available at: <https://apps.ecology.wa.gov/tcpwebreporting/reports/cleanup/contaminated>

Enclosure A

Figure 4 – Gasoline and Diesel Exceedances

(From Maul Foster & Alongi, Inc., *Cardlock Upgrade Sampling Activities and Interim Remedial Action*, May 16, 2019)

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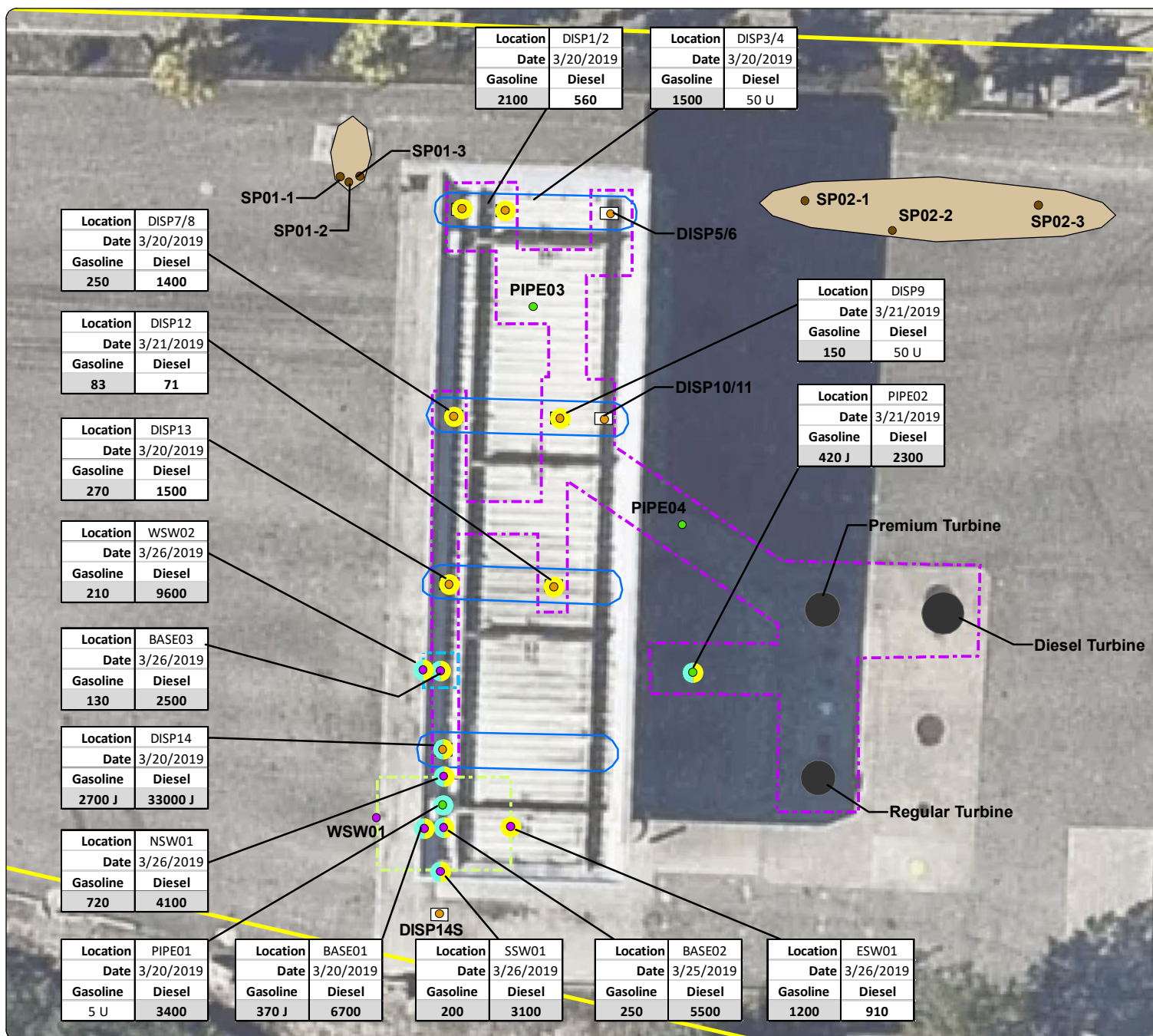
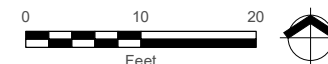


Figure 4 Gasoline and Diesel Exceedances

PetroCard Fife CFN Property
PetroCard, Inc.
Fife, Washington

Legend

- Dispenser Sample
- Documentation Sample
- Pipe Sample
- Stockpile Sample
- Gasoline Exceedance
- Diesel Exceedance
- Cardlock Upgrade Excavation
- Overexcavation (11.0' bgs)
- Overexcavation (4.5' bgs)
- Property Parcel



Notes:
All features are approximate.
All values are shown in mg/kg.
Bold values indicate analyte detection.
Bold and highlighted values indicate a
MTCA Method A CUL exceedance.
Gasoline CUL = 30 mg/kg.
Diesel CUL = 2000 mg/kg.
MTCA Method A CUL for gasoline is when benzene
is present.
bgs = below ground surface.
CUL = cleanup level.
J = estimated value.
mg/kg = milligram per kilogram.
MTCA = Model Toxics Control Act.
U = non-detect.

Source: Aerial photograph obtained from Esri,
ArcGIS Online.
Tax parcel obtained from the Pierce County
Assessor's office.

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consult the primary data and information sources to ascertain the usability of the information.

Enclosure B

Table 2 – Analytical Results

(From Maul Foster & Alongi, Inc., *Cardlock Upgrade Sampling Activities and Interim Remedial Action*, May 16, 2019)

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Table 2
Analytical Results
PetroCard Fife CFN Property
PetroCard, Inc.
Fife, Washington

Sample Type: Location: Sample Name: Collection Date: Collection Depth (ft bgs):	MTCA Method A CUL	Cardlock Upgrade						
		DISP1/2	DISP3/4	DISP5/6	DISP7/8	DISP9	DISP10/11	DISP12
		DISP 1/2-S-3.0	DISP3/4-S-3.0	DISP5/6-S-3.0	DISP 7/8-S-3.0	DISP9-S-3.0	DISP10/11-S-3.0	DISP12-S-3.5
		03/20/2019	03/20/2019	03/20/2019	03/20/2019	03/21/2019	03/21/2019	03/21/2019
		3.0	3.0	3.0	3.0	3	3	3.5
VOCs (mg/kg)								
Benzene	0.03	0.31	1 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ethylbenzene	6	25	16	0.02 U	0.3	0.02 U	0.02 U	0.19
Toluene	7	27	18	0.02 U	0.042	0.19	0.02 U	0.12
Xylenes, Total	9	220	130	0.06 U	0.94	0.74	0.06 U	0.55
TPH (mg/kg)								
Gasoline-Range Hydrocarbons	30 ^a	2100	1500	5 U	250	150	15	83
Diesel-Range Hydrocarbons	2000	560	50 U	50 U	1400	50 U	140	71
Motor-Oil-Range Hydrocarbons	2000	250 U	250 U	250 U	250 U	250 U	250 U	250 U

Table 2
Analytical Results
PetroCard Fife CFN Property
PetroCard, Inc.
Fife, Washington

Sample Type: Location: Sample Name: Collection Date: Collection Depth (ft bgs):	MTCA Method A CUL	Cardlock Upgrade						
		DISP13	DISP14	DISP14S	PIPE01	PIPE02	PIPE03	PIPE04
		DISP13-S-3.0	DISP14-S-3.0	DISP14S-S-3.0	PIPE01-S-3.5	PIPE02-S-3.5	PIPE03-S-3.0	PIPE04-S-3.5
		03/20/2019	03/20/2019	03/20/2019	03/20/2019	03/21/2019	03/21/2019	03/26/2019
		3.0	3.0	3.0	3.5	3.5	3.0	3.5
VOCs (mg/kg)								
Benzene	0.03	0.02 U	0.17 J	0.02 U	0.02 U	0.02 UJ	0.02 U	0.02 U
Ethylbenzene	6	0.02 U	11 J	0.02 U	0.02 U	0.95 J	0.02 U	0.02 U
Toluene	7	0.052	1.9 J	0.02 U	0.02 U	0.43 J	0.02 U	0.02 U
Xylenes, Total	9	2.4	70 J	0.06 U	0.06 U	2.2 J	0.06 U	0.06 U
TPH (mg/kg)								
Gasoline-Range Hydrocarbons	30 ^a	270	2700 J	5 U	5 U	420 J	5 U	5 U
Diesel-Range Hydrocarbons	2000	1500	33000 J	1100	3400	2300	50 U	50 U
Motor-Oil-Range Hydrocarbons	2000	250 U	790 J	250 U	250 U	250 U	250 U	250 U

Table 2
Analytical Results
PetroCard Fife CFN Property
PetroCard, Inc.
Fife, Washington

Sample Type: Location: Sample Name: Collection Date: Collection Depth (ft bgs):	MTCA Method A CUL	Documentation							
		BASE01	BASE02	BASE03	NSW01	ESW01	SSW01	WSW01	WSW02
		BASE01-S-4.0	BASE02-S-11.0	BASE03-S-4.5	NSW01-S-5.5	ESW01-S-5.5	SSW01-S-5.5	WSW01-S-5.5	WSW02-S-2.0
		03/20/2019	03/25/2019	03/26/2019	03/26/2019	03/26/2019	03/26/2019	03/26/2019	03/25/2019
		4.0	11.0	4.5	5.5	5.5	5.5	5.5	2.0
VOCs (mg/kg)									
Benzene	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ethylbenzene	6	1.6 J	0.85	0.13	1.7	3.5	0.46	0.02 U	0.02 U
Toluene	7	0.023 J	0.02 U	0.02 U	0.1 U	0.1 U	0.02 U	0.02 U	0.02 U
Xylenes, Total	9	2.9 J	2.1	0.47	4	11	1.6	0.06 U	1.5
TPH (mg/kg)									
Gasoline-Range Hydrocarbons	30 ^a	370 J	250	130	720	1200	200	6.4	210
Diesel-Range Hydrocarbons	2000	6700	5500	2500	4100	910	3100	280	9600
Motor-Oil-Range Hydrocarbons	2000	250 U	250 U	250 U	250 U	250 U	250 U	250 U	360

Table 2
Analytical Results
PetroCard Fife CFN Property
PetroCard, Inc.
Fife, Washington

Sample Type: Location: Sample Name: Collection Date: Collection Depth (ft bgs):	MTCA Method A CUL	Stockpile					
		SP01	SP01	SP01	SP02	SP02	SP02
		SP01-01	SP01-02	SP01-03	SP02-01	SP02-02	SP02-03
		03/26/2019	03/26/2019	03/26/2019	03/26/2019	03/26/2019	03/26/2019
		1.0	2.0	3.0	1.0	2.0	3.0
VOCs (mg/kg)							
Benzene	0.03	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ethylbenzene	6	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Toluene	7	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Xylenes, Total	9	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U	0.06 U
TPH (mg/kg)							
Gasoline-Range Hydrocarbons	30 ^a	15	12	6.6	5 U	5 U	5 U
Diesel-Range Hydrocarbons	2000	1100	530	410	50 U	50 U	50 U
Motor-Oil-Range Hydrocarbons	2000	250 U	250 U	250 U	250 U	250 U	250 U

Table 2
Analytical Results
PetroCard Fife CFN
PetroCard, Inc.
Fife, Washington

NOTES:

CUL exceedances are highlighted.

Detected concentrations were screened against MTCA Method A CULs for unrestricted land use.

Detections are **bolded**.

CUL = cleanup level.

ft bgs = feet below ground surface.

J = estimated value.

mg/kg = milligrams per kilogram.

MTCA = Model Toxics Control Act.

TPH = total petroleum hydrocarbons.

U = not detected at or above method reporting limit.

UJ = result is estimated and non-detect.

VOC = volatile organic compound.

^aThe screening level for gasoline-range hydrocarbons is the MTCA Method A CUL when benzene is present.