PERIODIC REVIEW REPORT
FINAL

Golden State Foods
Facility Site ID#: 95968134
Cleanup Site ID# 6938

1409 Puyallup Street
Sumner, Washington 98390

Southwest Regional Office
TOXICS CLEANUP PROGRAM

December 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 Golden State Foods 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 as an independent remedial action. The cleanup actions resulted in concentrations of petroleum hydrocarbons remaining at the Site in soil that exceed MTCA Method A cleanup levels. The MTCA Method A cleanup levels for soil are established under WAC 173-340-740(2). 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 Golden State Foods (Current Martin Brower) property (Site) is located in Pierce County, at 1409 Puyallup Street, Sumner in the Pierce County, Washington. The Site was originally constructed in 1980/1981 in a newly established business/industrial park located adjacent to the White River. Initial construction included the warehouse structure (with large refrigeration capacity) and offices; and truck maintenance, fueling, and truck wash facilities. During the initial construction, two 10,000-gallon diesel, two dispensers, and two 500-gallon waste oil underground storage tanks (USTs) were installed. In January/February 1990, the two 10,000-gallon USTs and associated piping were removed and replaced with a 15,000-gallon fiberglass-coated steel diesel UST, double-wall fiberglass reinforced plastic product lines and three fuel dispensers located in an enclosed canopy adjoining the maintenance building. In January 2019, the 15,000-gallon UST was decommissioned and replaced with a new upgraded 15,000-gallon UST and the associated piping system. The two 500-gallon waste oil USTs were permanently decommissioned and removed in October 1992. Because of releases from the UST system, soils surrounding the UST appeared to have been impacted.

Currently the Site consists of a food warehousing and distribution center. The Site includes 5.98-acres of land (Pierce County Parcel Number 0420138005) developed with an approximately 86,900-square-foot distribution warehouse with office space, an approximately 5,740 square-foot maintenance shop, associated paved parking, drive lines, and landscaping. The Site adjoins several light industrial facilities: Pacific Northwest Baking Company and Sefnco Communications to the west; Sessler, a construction company, to the north; Shining Ocean Inc., a seafood wholesale company to the east; and Pasquier Panel Product, Plywood Components Inc., and Marine View Beverage to the south. A vicinity map and old and new Site Plans are available in Appendix 6.1 and 6.2, respectively.

2.2 Regional and Site Geology and Hydrogeology

Sumner is located in the Puget Sound Lowland, a geomorphic province lying between the Cascade Range to the east and the Olympic Mountains and Vancouver Island to the west. The Puget Lowland is underlain by a large thickness of semi-consolidated sediments that partly fill a large north south trending structural basin known as the Puget Trough. The near-surface deposits consists largely of glacial drift laid down the Vashon period of the Fraser glaciation (late Pleistocene time). The Vashon till covers much of the hilly areas east and west of Sumner. Most of Sumner, however, resides in the flat-lying valley of the White River.

Native soils in the vicinity of the Site is classified as Snohomish silty clay loam, a poorly drained soil formed in alluvium and decaying plant remains. Typical profile shows a surface layer of dark grayish brown silty clay loam about 17 inches thick. Between depths of 17 and 29 inches, it is dark reddish brown peat and thin strata of mineral material. Between depths of 20 and 80 inches, it is gray and greenish gray clay and silty clay.

Based on the on-site soil borings and soils encountered during excavations, the Site geology consists of approximately 6 to 12 inches of asphalt/concrete pavement (varies along the property), followed by 2 to 6 feet of gray clay and silt. This is underlain by brown silt and fine sand to a depth of approximately 16 feet.

Unconfined groundwater beneath the Site is shallow based on the groundwater monitoring data. Groundwater depths depend upon seasonal precipitation and may fluctuate between approximately 2 and 7 feet below ground surface (bgs). The groundwater flow direction also varies with the season, and ranges about 90 degrees, from northwest to southwest.

2.3 Diesel Release

In January 1989, the first indications of a subsurface release of fuel from the diesel UST system occurred. A tightness test was conducted by the Joe Hall Construction to evaluate the integrity of the UST system. Results of the tests were inconclusive and tightness could not be demonstrated. Several months later, recurrent water contamination was noted in fuel from the dispenser called the C pump (a self-contained suction pump). The dispenser was subsequently shut down until the cause of the problem could be determined. In July 1989, B & C Equipment Company (B & C) conducted additional tightness testing, which indicated a probability of leakage from the dispenser system suction line. On August 18, 1989, B & C uncovered the lines and found that the C pump's 1.5-inch steel line was badly corroded and it was leaking near the west end of dispenser island.

2.4 Soil Investigations and Cleanup Activities

Three phases of investigations and/or cleanup were conducted because of the diesel release at the Site.

2.4.1 Phase 1: Initial Site Assessment and Soil Cleanup

On August 22, 1989, B & C collected a number of soil samples to assess the extent of diesel contamination in soil around the leaking dispenser system suction line. A total of eight initial assessment samples (A through H) was collected from the dispenser trench and from two test pits that were excavated north and south of the dispenser lines. These samples were analyzed for total petroleum hydrocarbons (TPH) using USEPA Method 418.1. In addition, at least one soil sample was analyzed by USEPA Method 8015 to confirm that diesel was the only fuel present. Results of initial samples collected at A and B locations indicated elevated levels of TPH concentrations of 22,814 and 4,177 milligrams per kilogram (mg/kg), respectively. As a result, an additional 25 soil samples were collected to define the extent of soil contamination. The TPH concentrations of several of these samples were above the Model Toxics Control Act (MTCA) Method A cleanup level of 200 mg/kg existed at that time [the current MTCA Method A cleanup levels for diesel-and-oil-range total petroleum hydrocarbons (TPH-D and TPH-O) is 2,000 mg/kg]. In November and December 1989, a total of approximately 600 cubic yards of TPH contaminated soil was excavated and transported to Fife Sand and Gravel for aeration/biological treatment. The average depth of excavation was 4.5 feet. In addition to the soil excavation activities, B & C installed five groundwater monitoring wells (GS-1 through GS-5) in September 1989 at the Site. The approximate extent of soil excavation, soil sample locations and results are available in Appendix 6.3.

2.4.2 Phase 2: Underground Storage Tanks Decommissioning

Following the Phase I soil excavation activities, in January 1990, the two existing 10,000-gallon diesel underground storage tanks (USTs) were removed and a new system was installed that consisted of a single 15,000-gallon, fiberglass-coated, steel UST and double-wall fiberglass dispenser lines. No decommissioning report was prepared to document the removal activities. The notes from the files indicated that about five cubic yards of TPH-D contaminated soil were removed around the fill pipe of one of the USTs and transported to Fife Sand and Gravel for

aeriation/biological treatment. According to the filed notes, five soil samples were collected from the sidewalls and bottom of the excavation and observation of samples showed no evidence of diesel contamination. However, analytical results for this sampling could not be located in the available Golden State Foods files to confirm the clean closure. Reportedly, the tanks and piping were also hauled to Fife Sand and Gravel for disposal. All excavation resulting from the Phase 1 soil cleanup and Phase 2 USTs decommission were backfilled with gravel and paved with either asphalt or concrete, as appropriate. The approximate location of two decommissioned USTs is shown on Figure 5 in Appendix 6.4.

2.4.3 Phase 3: Additional Soil Cleanup

Results of three soil samples (B & C, samples #18, #24 and #25) showed that additional TPH contamination was present beneath the southwest corner of the maintenance shop concrete floor. A section of concrete-slab flooring, measuring 20 feet X 20 feet was removed from the southeast corner of the shop interior and contaminated soil was excavated to an average depth of 6.5 feet below the floor using a small backhoe. An on-site laboratory was used to perform TPH analysis as a means of rapidly assessing the limits of contamination. However, residual contamination exceeding the 200 mg/kg cleanup level (1990 MTCA Method A cleanup level) remained beneath the building foundation footing (to the south and west) and in parts of the excavation sidewalls (to the north and east). Additional soil samples (CS-1 through CS-4) were collected by Harding Lawson and Associates to investigate the northern and eastern extent of soil contamination. In addition, three of the existing groundwater monitoring wells were also sampled to determine the presence of petroleum contamination. Soil sample results for TPH were all below 200 mg/kg cleanup level.

On March 20 and April 13, 1990, additional soil samples were collected from the open excavation. The analytical results confirmed the presence of residual diesel contamination (TPH-D: 300 mg/kg to 500 mg/kg) in the excavation sidewalls and below the foundation footings. The excavation bottom sample had a TPH concentration of 50 mg/kg. Based on the findings of the soil sampling, the estimated volume of soil remaining in place beneath the shop floor exceeding 200 mg/kg was approximately 25 to 50 cubic yards. Additional soil removal was considered impractical because of the existing structural impediments presented by the shop building, the limited extent and volume of contamination, the low permeability of the affected soil, and the protected location of the soil beneath the building. The excavation was backfilled with gravel and the concrete slab was replaced. Approximately 256 cubic yards of diesel contaminated soil were excavated and transported to Fife Sand and Gravel for aeriation/biological treatment during these activities. The approximate extent of soil excavation, soil sample locations and results are available in Appendix 6.5.

2.4.4 Results of Soil Aeriation/Biological Treatment

A total of approximately 860 cubic yards of diesel contaminated soil was removed from the Site and treated at Fife Sand and Gravel by aeriation/biological treatment. The treatment process was completed in October 1990. On October 9, 1990, three confirmation soil samples were collected by the Tacoma Pierce County Health Department (TPCHD) and analyzed for TPH and for benzene, toluene, ethylbenzene, and xylenes (BTEX). The soil sample results met all the TPCHD's disposal criteria. A Waste Disposal Authorization was subsequently issued and the treated soil was transported to the City of Tacoma Landfill for disposal.

2.4.5 Groundwater Investigation

In September 1989, because of early concerns about the potential groundwater contamination, five groundwater monitoring wells (GS-1 through GS-5) were installed around the apparent zone of contamination. These monitoring wells were sampled in September 1989 and groundwater samples were analyzed for TPH by USEPA Method 418.1M. The results indicated that the water sample collected from the monitoring well GS-4 had a TPH concentration of 15 milligram per liter (mg/L) and other samples were all below the laboratory method detection limits. However, the high method detection limit of 5 mg/L precluded the use of this data to determine if diesel was present in lower concentrations in wells GS-1, GS-2, GS-3 and GS-5. The groundwater monitoring well GS-4 was located within the zone of contamination and was removed during the contaminated soil excavation activities.

In early 1990, three groundwater monitoring wells (GS-1, GS-3 and GS-5) were sampled. In this process, the monitoring well designations were changed; GS-1 was changed to MW-3, GS-3 to MW-2, and GS-5 to MW-1. All the groundwater samples were analyzed for TPH by USEPA Method 418.1M and the results were all below the laboratory method detection limit of 5 mg/L. In April 1990, an additional groundwater monitoring well was installed immediately west of the zone of contamination, beneath the shop building, to monitor for potential downgradient migration of diesel. Approximate locations of initial monitoring wells (including the proposed downgradient well) are shown in Figure 5 in Appendix 6.4.

2.5 Used Oil Underground Storage Tanks Decommissioning

In October 1992, two 500-gallon used oil storage tanks were decommissioned. A subsurface release of petroleum hydrocarbons was identified during the decommissioning process. All the petroleum contaminated soil was excavated and a total of five confirmation soil samples (B-1 through B-5; four sidewall and one excavation bottom) was collected from the tank cavity. All the soil samples were analyzed for TPH by USEPA Method 418.1M. The results of all the soil samples were below the method detection limit of 30 mg/kg. In addition, one soil sample (SP-6) was collected from the excavated stockpile. This sample was analyzed for TPH (USEPA Method 418.1M), volatile organic compound (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs) and toxicity characteristic leaching procedure for lead (TCLP). The results indicated that only TPH was detected at 610 mg/kg and all other analytes were less than the practical quantitation limits. The approximate extent of soil excavation, soil sample locations, and results are shown on Figure 6 in Appendix 6.6.

Petroleum-like staining was noted in the crushed rock fill immediately underlying the floor of the truck wash bay. This staining was exposed in the upper portion of the east sidewall of the tank excavation. The apparent zone of contamination was about five feet wide and about 2.5 feet deep. To assess the extent of stained soil identified in the east sidewall of the UST cavity, a shallow test pit was excavated through the concrete floor, about five feet inside the truck wash bay. A soil sample was collected from the bottom of the test pit at a depth of about three feet below the surface and analyzed for TPH (USEPA 418.1M). The result indicated that the TPH concentration was below the laboratory detection limit of 25 mg/kg, which was below the MTCA cleanup level. Based on this data, it was concluded that the extent of oil contamination was limited to an area between the sidewall of the UST excavation and the test pit. As a result, in December 1992, the upper 3 feet of the east sidewall was excavated an additional 2.5 feet to the east into the truck wash bay to remove all the stained soil. Two confirmation soil samples

were collected from the east edge of the new excavation. The analytical results indicated TPH concentrations of 28 mg/kg and 140 mg/kg, both were below the 200 mg/kg cleanup level. In January 1993, all the contaminated soil removed from the UST excavation (20.5 tons) was transported to the Regional Disposal Company in Roosevelt in Washington for disposal. The approximate extent of over-excavation and soil sample locations are shown on Figure 7 in Appendix 6.7.

In addition, two new monitoring wells (MW-1A and MW-2A) were installed to determine potential effects of the oil release on the groundwater. In December 1992, these wells were sampled and the water samples were analyzed for TPH using USEPA Method 418.1M. Results showed that TPH concentrations were less than the method detection limit of 0.5 mg/L, below the current MTCA Method A cleanup level of 0.5 mg/L.

2.6 Long-Term Groundwater Monitoring

In December 1992, the Golden State Food Company (GSFC) implemented long-term groundwater monitoring to evaluate the potential effects of the diesel and oil releases on groundwater. The planned monitoring program, however, did not establish a consistent quarterly regimen. As a result, the ensuing monitoring events for all on-Site wells were conducted on:

- December 19, 1992.
- February 26, 1994.
- January 28, 1995.

Following consultation with Ecology, three additional rounds of quarterly monitoring were conducted from December 1995 through September 1996. All the groundwater samples were analyzed for TPH-D, TPH-O, BTEX, volatile organic compounds and metals. The results indicated that all the detected contaminant concentrations were either below the MTCA Method A cleanup levels and/or below the laboratory reporting limits. However, not all the contaminants/parameters required by Table 830-1 of MTCA were analyzed for demonstrating compliance. Locations of all the groundwater monitoring wells and groundwater sample results are available in Appendix 6.8.

2.7 Underground Storage Tank Site Assessment and Decommissioning

Underground Storage Tank Site Assessment: In October 2018, a pre-UST removal soil and groundwater investigation was conducted around the 15,000-gallon UST system. Four direct push borings (B-1 through B-4) were advanced to a depth of 15 feet in the native soil adjoining the UST nest to the south, west, north, and east, respectively. The UST nest extent was approximately 10 to 15 feet in each direction from the edge of the UST. Soil samples were field screened every five feet by visual observation, olfactory methods and photoionization detector. Results of field screening did not indicate any adverse impact. Therefore, soil samples were collected at the static groundwater surface to soil interface (ranging from three to five feet) and the bottom of each boring (ranging from 14 to 15 feet). Based on the field screening results, one groundwater sample was collected from the down-gradient boring, to the west of the UST basin. All the samples were analyzed for BTEX, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), diesel- and oil-range total petroleum hydrocarbons (TPH-D and TPH-O). Only TPH-D and TPH-O were detected in one of the soil sample at 10.9 mg/kg and 48.9 mg/kg, respectively, which are below the MTCA Method A cleanup level of 2,000 mg/kg. None of the contaminants were detected in the groundwater sample above the laboratory reporting limits. Soil boring

locations (Figure 2B and Figure 3) and soil and groundwater sample results (Table 1A and Table 2) are included in Appendix 6.9.

Underground Storage Tank Decommissioning: In January 2019, the 15,000-gallon UST was decommissioned. The concrete pad and the soil around the UST were removed and inerting the UST with dry ice prior to its removal. After the UST was removed from the excavation, hydrocarbons odors were noted from the soil in the northwestern corner of the excavation (near the former fuel line trench). A composite soil sample (COMP-1) was collected from two separate locations within the western portion of the UST excavation, which showed a TPH-D concentration of 8030 mg/kg exceeding the MTCA Method A cleanup level of 2,000 mg/kg. Additional excavation was conducted to remove the contaminated soil and five discrete confirmation soil samples [four sidewall (EXN, EXS, EW, and WW) and one bottom (EXBTTM)] were collected. All these samples were analyzed for BTEX, TPH-D, TPH-O, and cPAHs. The results indicated that all the concentrations were below the laboratory reporting limits, which were below the respective MTCA Method A cleanup levels. The excavated soil was screened with the PID and directly loaded onto trucks for disposal. Approximately 480 tons of soil were hauled off-Site and disposed of at the LRI Landfill in Puyallup, Washington. Confirmation soil sample locations (Figure 2A and Figure 3) and results (Table-1B) are available in Appendix 6.9.

During the UST removal, groundwater was encountered at approximately 9 to 10 feet below ground surface (bgs) with no sheen observed. The groundwater was pumped into 20,000-gallon frac tanks on-Site, which were periodically pumped and transported via vacuum extraction tanker truck by Emerald Services. Approximately 34,757-gallons of groundwater were disposed of at Emerald Recycling Services in Seattle, Washington. In addition, approximately 20,000-gallons of groundwater were discharged into the Site's storm sewer system at the end of the project meeting the discharge requirements of Ecology's Stormwater Construction Permit No. WAR307345.

2.7.1 Product Piping and Fuel Dispenser Removal

The soils around the product piping and fuel dispensers were excavated and removed. Four confirmation soil samples (T1-4', T2-2.5', T3-3.5', and T4-2') were collected beneath the product piping every 30 linear feet targeting piping elbows and joints from the former UST to each dispenser island. Three confirmation soil samples were collected from beneath each fuel dispensers (D1-2.5', D2-2.5', and D3-3'). All confirmation soil samples were analyzed for BTEX, TPH-D, TPH-O, and cPAHs.

The results of product line soil samples (T1 through T4) indicated TPH-O concentrations ranged from 5.55 mg/kg to 12.0 mg/kg, which is well below the MTCA Method A cleanup level of 2,000 mg/kg. TPH-D, BTEX, and cPAHs were not detected above the laboratory reporting limits.

Soil samples collected from beneath the fuel dispenser D1 and D3 had detections of TPH-D concentrations at 318 mg/kg and 4.96 mg/kg, respectively, and TPH-O concentrations at 24.5 mg/kg and 7.34 mg/kg, respectively. These concentrations are well below the MTCA Method A cleanup level of 2,000 mg/kg. The soil sample collected from beneath fuel dispenser D2 had a TPH-D concentration of 8,500 mg/kg, which exceeded the MTCA Method A cleanup level of 2,000 mg/kg. Approximately, six inches of soil was over excavated and confirmation soil

samples were collected from the bottom of the excavation (D2-3.0'), from the southern sidewall (D2S-3.0'), and from the eastern sidewall (D2E-3.0'). The concentrations of TPH-D in the dispenser 2 confirmation samples ranged from 6.53 mg/kg to 950 mg/kg, and TPH-O ranged from non-detect to 25.3 mg/kg, which are below the MTCA Method A cleanup level. BTEX and cPAHs were not detected above the laboratory reporting limits. Confirmation soil sampling locations (Figure 3 and 4) and sample results (Table 1B) are included in Appendix 6.9.

2.7.2 1989 Release Assessment Sampling

In October 2018, the contractor collected additional samples to assess the soil condition at select locations where the highest TPH concentrations were historically identified during the 1989 release investigation and subsequent voluntary cleanup sampling along the former UST product piping (samples A through H and 1 through 25; Figure 3, Appendix 6.3). The initial assessment samples A and B had a TPH concentration of 22,814 mg/kg and 4,177 mg/kg, respectively. Even though additional excavation was conducted to remove the contaminated soil, it appears that the excavation confirmation samples were not collected. Soil samples C3-2.5' and C2-4.5' were collected approximately at the same locations of former soil samples A and B, respectively. One additional soil sample, C1-3.5' was collected at the approximate location of voluntary cleanup confirmation soil sample 6, which had the highest TPH concentration of 2,755 mg/kg. All the soil samples were analyzed for BTEX, TPH-D, TPH-O, and cPAHs. Confirmation sample C1 had a detection of TPH-D (377 mg/kg), TPH-O (8.39 mg/kg), and naphthalene (0.637 mg/kg) all below their respective MTCA Method A cleanup levels. Additionally, confirmation soil sample C2 had a detection of TPH-D at 8.23 mg/kg, which is well below the MTCA Method A cleanup level of 2,000 mg/kg. The other analyzed compounds were not detected at concentrations above their respective laboratory reporting limits. Soil removed from the trench was transported to LRI's landfill in Puyallup for disposal. Soil sampling locations shown on Figure 4 and Table 1B provides a summary of the analytical results in Appendix 6.9.

2.7.3 Current Site Conditions

During the January 2019 Site Assessment and UST decommissioning process, all the TPH contaminated soil was excavated and disposed off-site. The results of all the confirmation soil samples were either below the current MTCA Method A cleanup levels or below the laboratory reporting limits.

As discussed in section 2.7.2, during the 1989 and 1992 UST decommissioning and soil cleanup activities, some TPH-D contaminated soil was left in place exceeding the old MTCA cleanup level of 200 mg/kg (the current cleanup level for TPH-D and TPH-O is 2,000 mg/kg). Results of soil samples collected at three sampling locations (A, B and sample 6) exceeded the current TPH-D cleanup of 2,000 mg/kg. Even though additional excavation was conducted at A and B locations, no confirmation soil samples were collected. To fill-in this data gap, in January 2019 two soil samples (C2 and C3) were collected at the same locations as former samples A and B. In addition, one soil sample (C1) was collected at the sample 6 location to document the condition of the soil in that area. Results of all these soil samples were either below the MTCA cleanup levels or below the laboratory reporting limits.

As part of long-term groundwater monitoring, six rounds of groundwater sampling were conducted at the Site. However, the first three rounds of monitoring conducted from December 1992 through January 1995 were not established on a consistent quarterly schedule. Therefore, three more additional rounds of quarterly groundwater monitoring were conducted from

December 1995 through September 1996. In addition, during January 2019 UST decommissioning one groundwater sample was collected from a down-gradient boring from the UST excavation. The results of all the contaminants of concern were either below the MTCA cleanup levels or below the laboratory detection limits. However, all the parameters required by the Table 830-1 of MTCA were not analyzed and there is lack of groundwater data in the vicinity of former USTs for demonstrating the groundwater compliance.

Based on the above soil information, no soil contamination is currently present on the Site exceeding MTCA Method A cleanup levels in the vicinity of the current and previous USTs and piping system areas. However, there is insufficient groundwater monitoring data for demonstrating the compliance per MTCA requirements. As a result, the property owner, Martin Brower is planning on installing four new groundwater monitoring wells in the vicinity of the UST system and the maintenance building. Four rounds of quarterly groundwater monitoring will be conducted to gather the additional groundwater data.

2.8 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 for the contaminant of concern (COCs).

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

Chemical	Soil Cleanup Level (mg/kg)	Groundwater Cleanup Level (µg/L)
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
cPAHs	0.1*	0.1*

Note: mg/kg: milligrams per kilogram
µg/L: micrograms per liter
*based on toxicity equivalent methodology

2.9 Restrictive Covenant

Following remedial activities, an Environmental Covenant (EC) was recorded for the Site on July 28, 1997, and a no further action (NFA) letter was issued on August 14, 1997. The EC imposes the following limitations:

Section 1: A portion of the property contains diesel-range petroleum hydrocarbons in soil at two locations beneath the maintenance shop: (1) beneath the footings of the foundation at the southeast corner of the building, and (2) beneath the concrete floor near the southeast corner

of the building. The Owner shall not alter, modify, or remove the existing structures 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.

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 Restrictive 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 Restrictive 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 Restrictive 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 May 8, 2019 the asphalt/concrete cover at the Site eliminated the exposure pathways (ingestion, contact) to the contaminated soils. However, additional cleanup was conducted in January 2019 as a part of the UST system upgrade and all of the contaminated soil exceeding the MTCA Method A cleanup level was removed and disposed of off-Site. The asphalt and/or concrete pavement are in satisfactory condition and no repair or maintenance are required. Currently the Site is an active warehouse distribution center. A photo log is available as Appendix 6.11.

The EC for the Site was recorded and is still in place. Currently there is no soil contamination present on the Site. However, there is insufficient groundwater monitoring data to demonstrate the compliance. Additional groundwater monitoring will be conducted to gather the necessary groundwater data. The EC prohibits the use of the property that is inconsistent with the Covenant without Ecology's approval.

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 MTCA Method A cleanup levels have changed since the NFA determination letter was issued on August 14, 1997. However, the Site meets the updated cleanup levels of 2001. A comparison of historical and current cleanup levels for petroleum related compounds in soil and groundwater are presented in the table below.

Table-2: MTCA Method A Soil and Groundwater Cleanup Levels

Chemical	1991 Soil Cleanup Level (mg/kg)	Current Soil Cleanup Level (mg/kg)	1991 Groundwater Cleanup Level (µg/L)	Current Groundwater Cleanup Level (µg/L)
TPH	NA	NA	1000	NA
TPH-Gas	100	100	NA	800/1,000
TPH-Diesel	200	2,000	NA	500
TPH-Oil	200	2,000	NA	500
Benzene	0.5	0.03	5	5
Toluene	40	7	40	1,000
Ethylbenzene	20	6	30	700
Xylenes	20	9	20	1,000

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 original remedy implemented included the excavation and off-Site disposal of majority of the contaminated soil and containment of a small quantity of remaining contaminated soil. However, in January 2019, all the remaining contaminated soil exceeding the MTCA Method A cleanup levels was removed. However, there is lack of groundwater monitoring data for demonstrating compliance per MTCA requirements. Additional groundwater monitoring will be conducted to gather additional groundwater data.

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 continue to be protective of human health and the environment.
- During the original cleanup, soil cleanup levels had not been met at the Site; however, during the UST system upgrade activities in January 2019, all the contaminated soil exceeding MTCA Method A cleanup levels was removed and transported off-Site for disposal. Currently no contaminated soil is present at the Site that exceeds the MTCA Method A cleanup levels.
- There is insufficient groundwater monitoring data for demonstrating the compliance per MTCA requirements. The property owner is planning on conducting additional quarterly groundwater monitoring to gather additional groundwater data.
- 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 actions.

Based on this review, Ecology has determined that the requirements of the EC have been satisfactorily met. No additional remedial action is necessary at the Site 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

GHD. UST Site Assessment and Decommissioning Report, Golden State Foods, 1409 Puyallup Street, Washington, April 30, 2019.

Department of Ecology. No Further Action Determination Letter, Golden State Foods Facility, Sumner, Washington, August 14, 1997.

Restrictive Covenant, Golden State Foods Facility, 1409 Puyallup Street, Sumner, Washington 98390, July 27, 1997.

Lance Environmental Services. Independent Remedial Action Report, Golden State Foods Facility, Sumner, Washington, March 4, 1997.

Department of Ecology. Response Letter to Information requests from Ecology to Lance Environmental Services, Golden State Foods Facility, Sumner, Washington, July 31, 1997.

Department of Ecology. Opinion Letter to Lance Environmental Services regarding incomplete investigation of the Site, Golden State Foods Facility, Sumner, Washington, June 3, 1997.

Lance Environmental Services. Groundwater Monitoring Report – Third Quarter 1996, Golden State Foods Facility, Sumner, Washington, November 2, 1996.

Lance Environmental Services. Groundwater Monitoring Report – Fourth Quarter 1996, Golden State Foods Facility, Sumner, Washington, December 26, 1995.

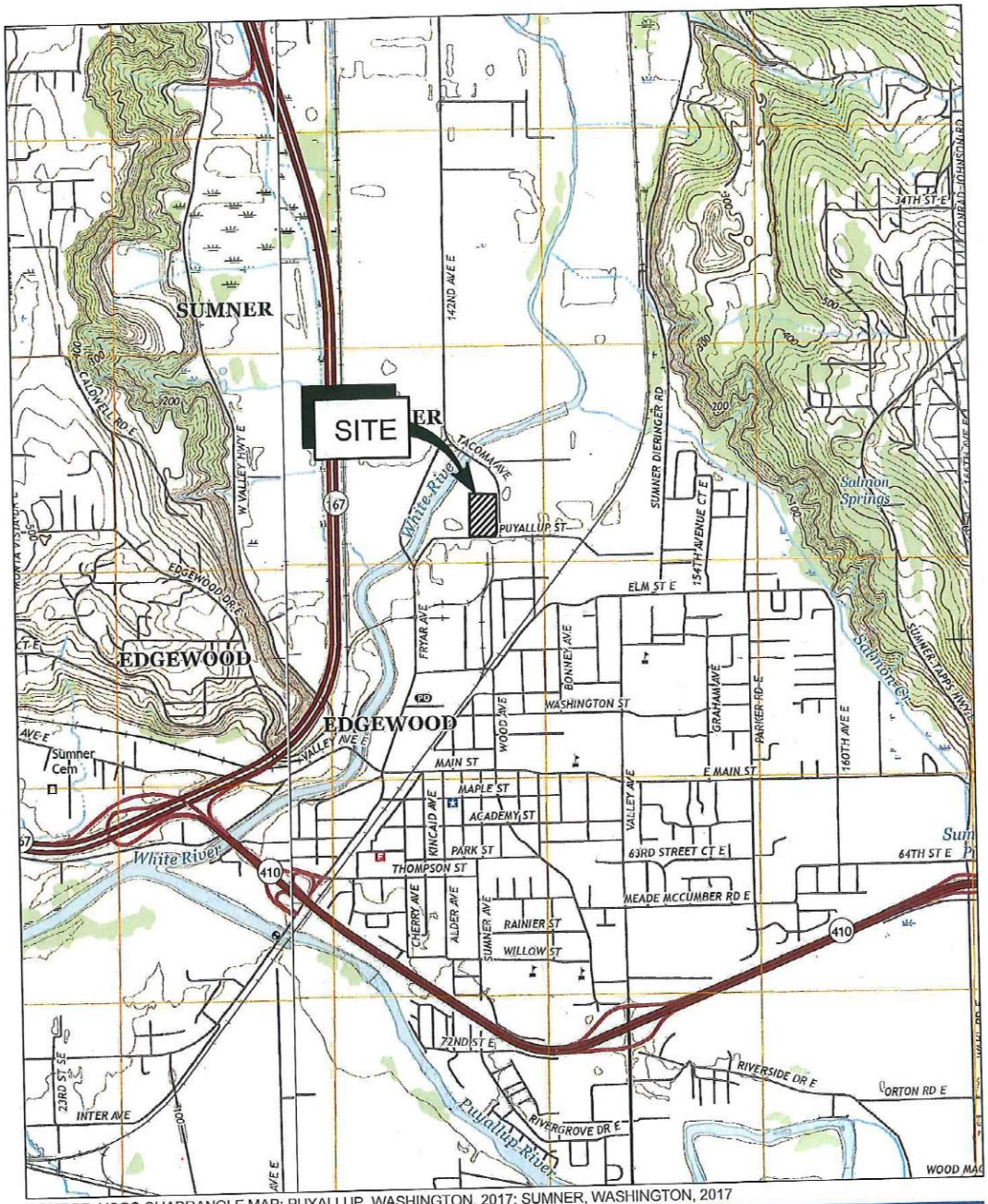
Lance Environmental Services. Groundwater Monitoring Report – Second Quarter 1996, Golden State Foods Facility, Sumner, Washington, June 14, 1995.

Thomas Hill & Associates Consulting Engineers. Groundwater Sampling at 1409 Puyallup Avenue, Sumner, Washington, March 17, 1994.

Department of Ecology. Site Visit, Golden State Foods Facility, May 8, 2019.

6.0 APPENDICES

6.1 Vicinity Map

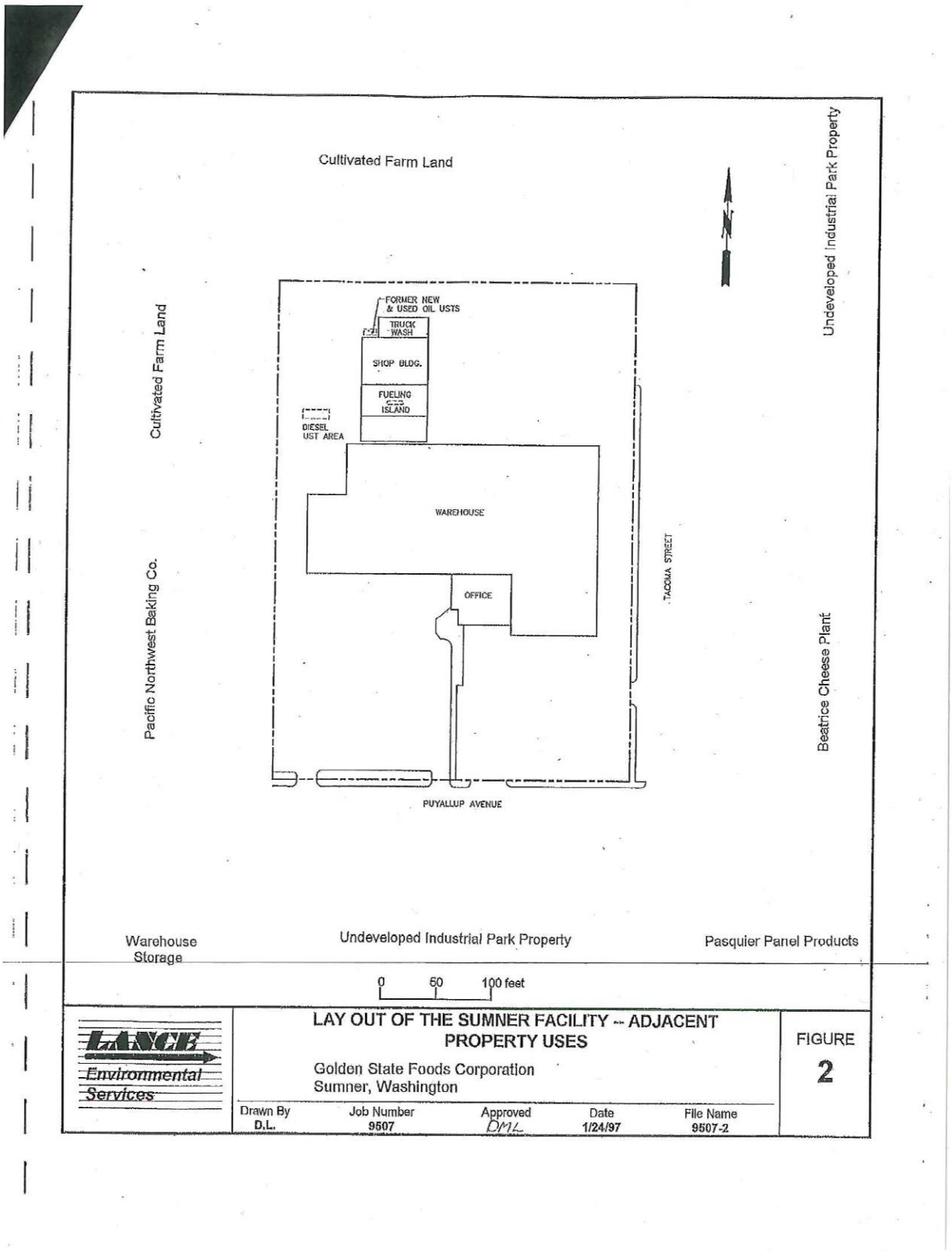


SOURCE: USGS QUADRANGLE MAP; PUYALLUP, WASHINGTON, 2017; SUMNER, WASHINGTON, 2017

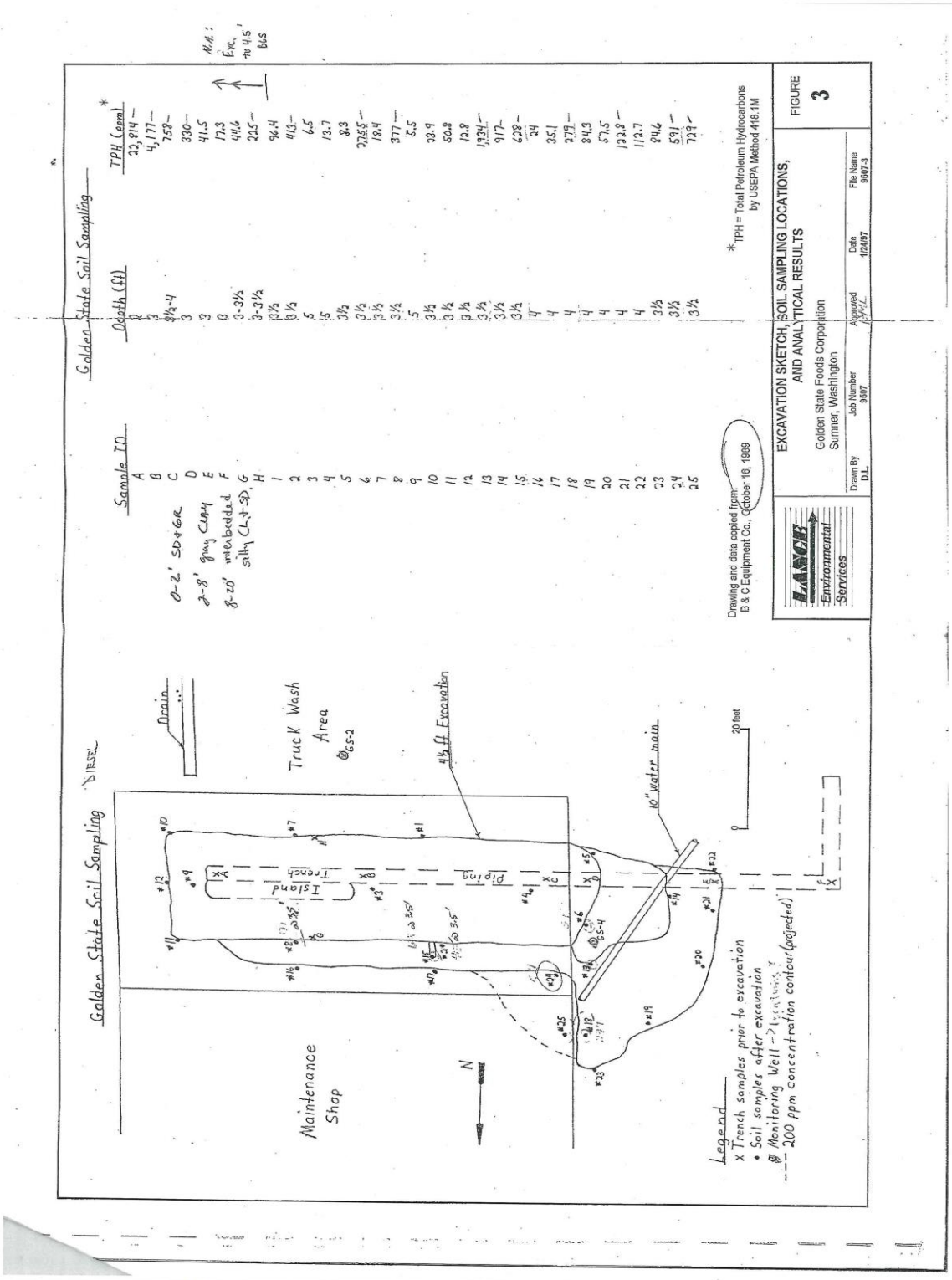
CAD File: I:\drawings\11180000s\11187451\11187451-REPORTS\11187451-01(001)\11187451-01(001)GN\11187451-01(001)GN-DE001.dwg

6.2 Current Site Plan

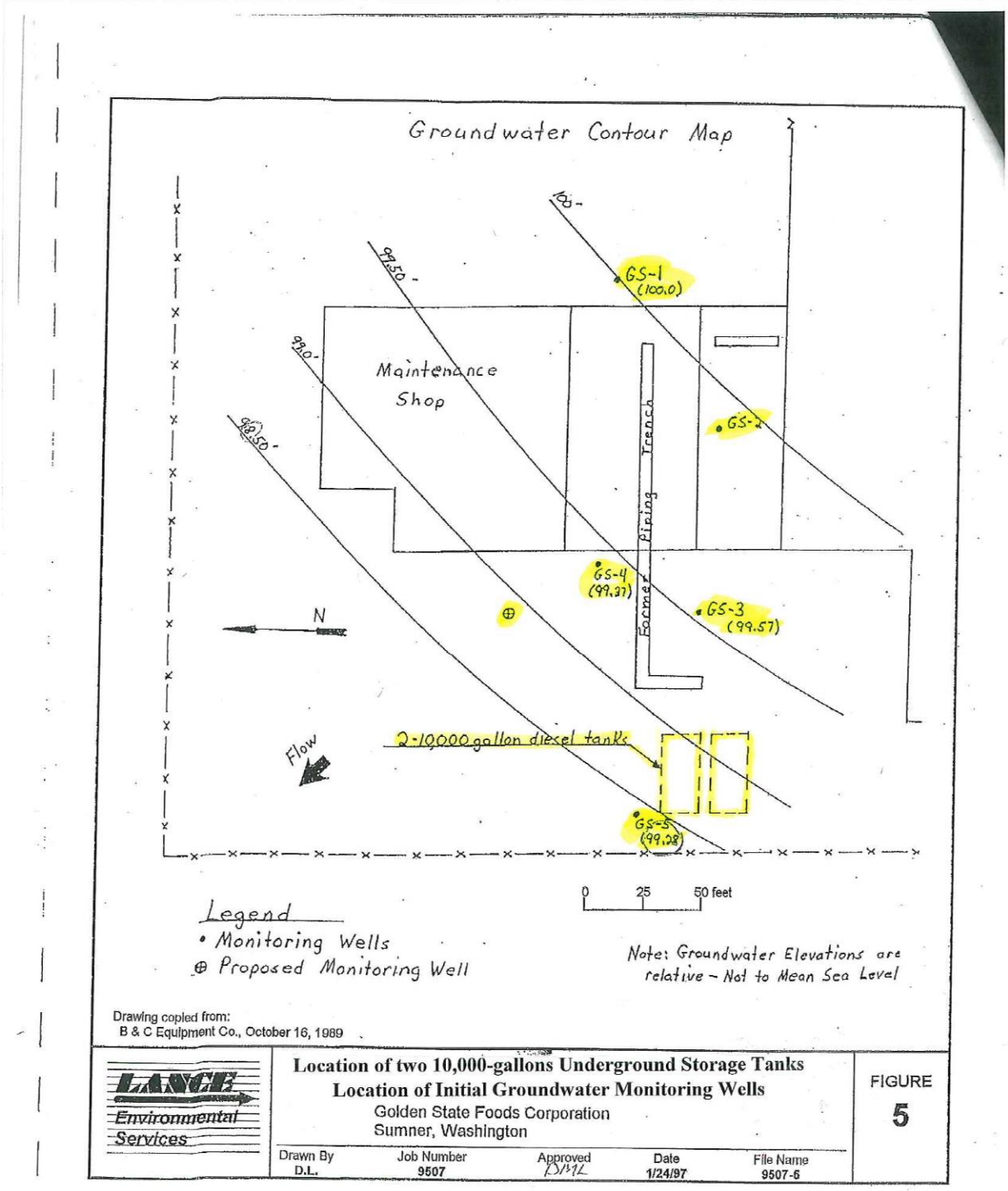
Previous Site Plan



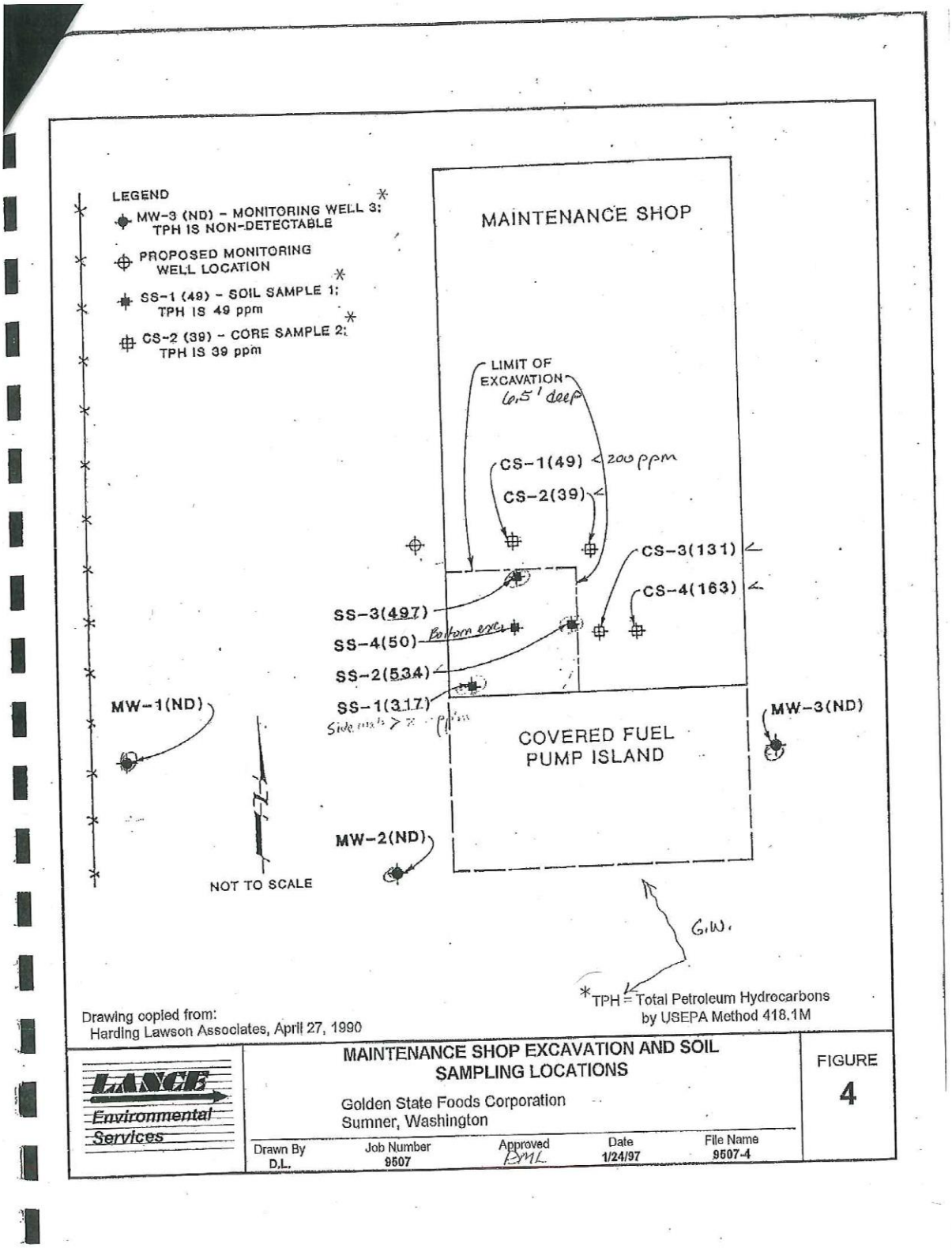
6.3 August 1989 Initial Soil Investigation: Soil Sample Locations and Approximate Extent of Contaminated Soil Area of Excavation and Soil Sample Results



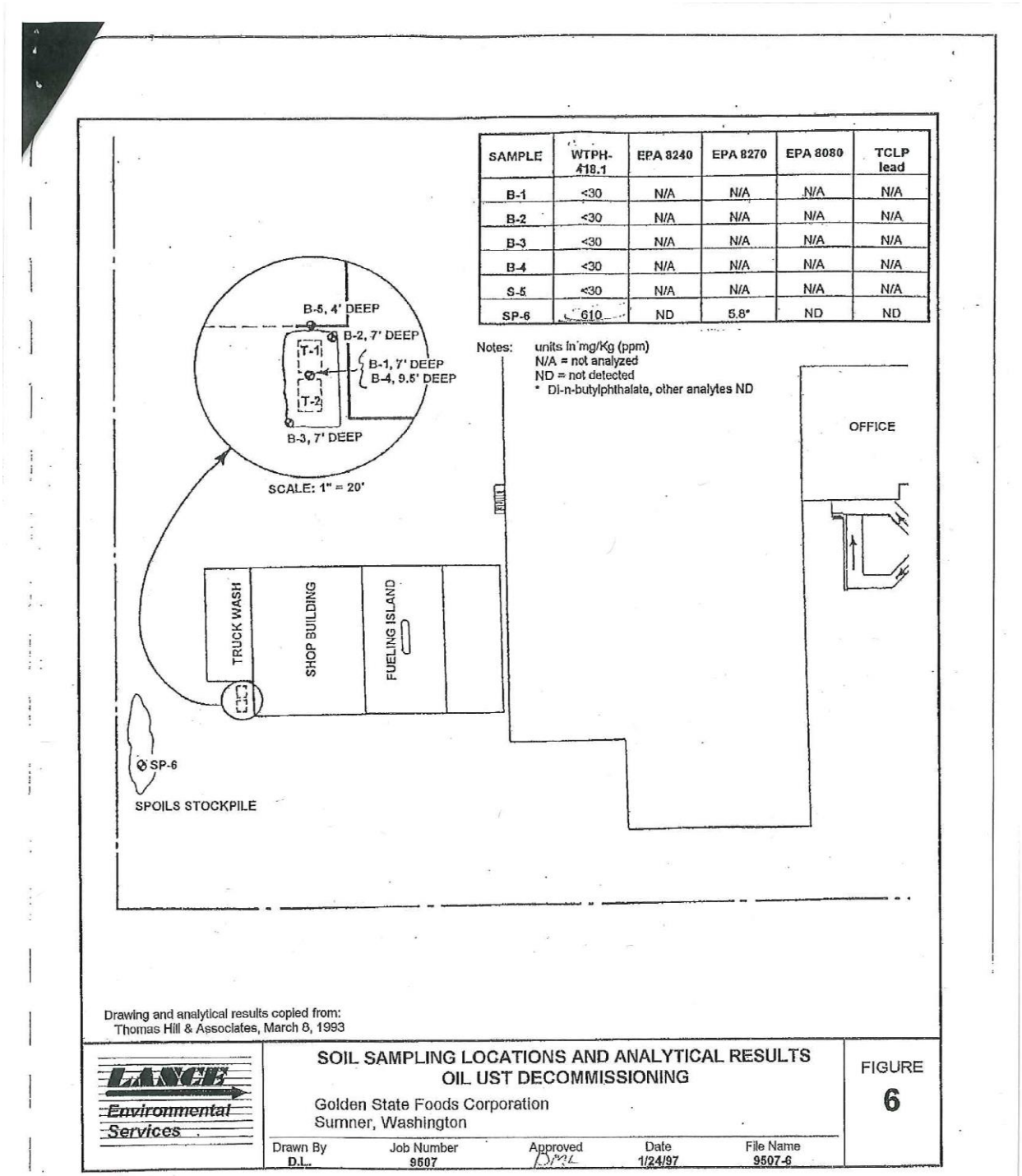
6.4 Location of Two 10,000-Gallon Underground Storage Tanks and Locations of Initial Groundwater Monitoring Wells



6.5 Approximate Extent of Maintenance Shop Excavation and Soil Sampling Locations

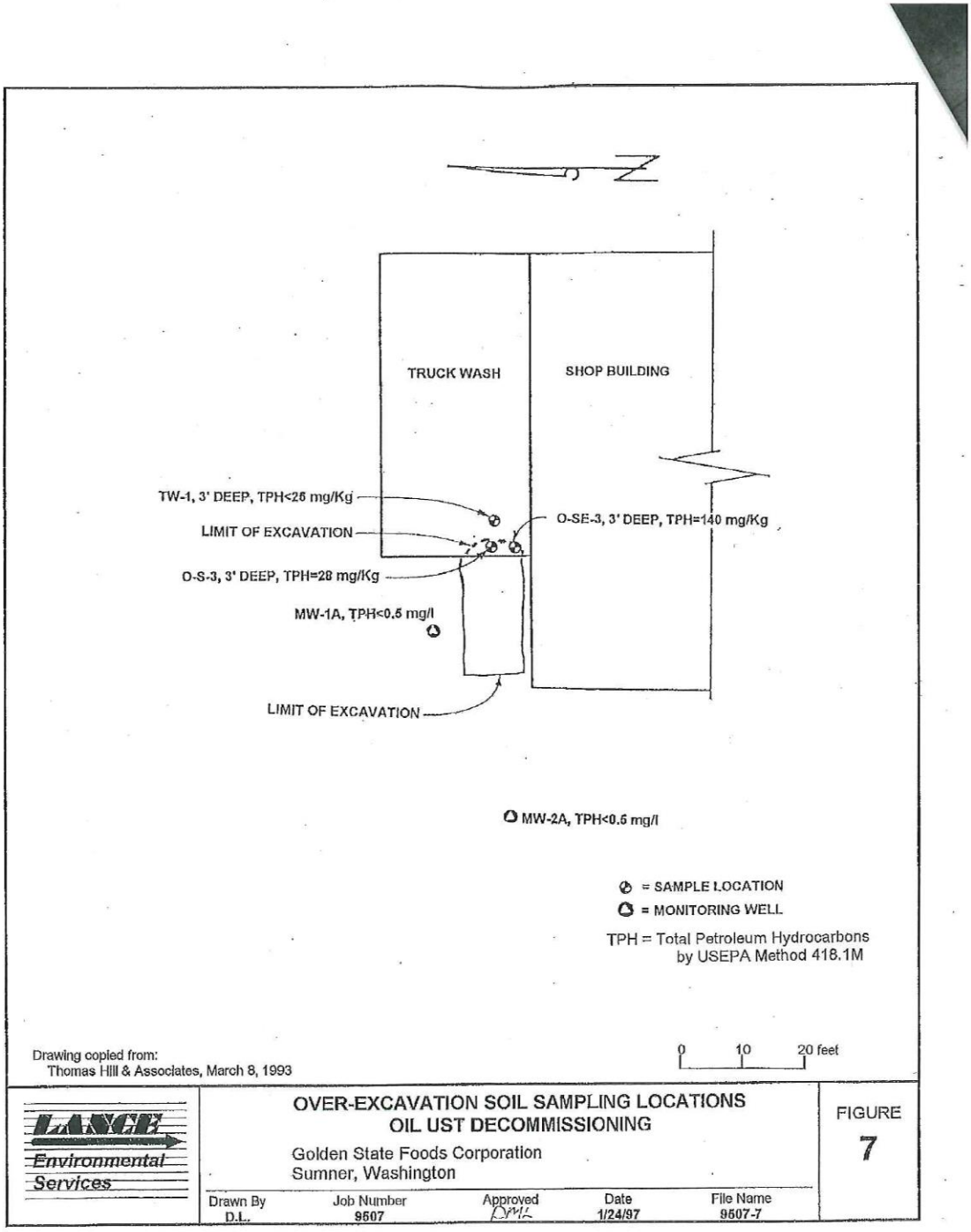


6.6 Two 500-Gallon Waste Oil Underground Storage Tanks Decommissioning in October 1992: Approximate Extent of Soil Excavation and Soil Sampling Locations and Results



SAMPLE	WTPH-418.1	EPA 8240	EPA 8270	EPA 8080	TCLP lead
B-1	<30	N/A	N/A	N/A	N/A
B-2	<30	N/A	N/A	N/A	N/A
B-3	<30	N/A	N/A	N/A	N/A
B-4	<30	N/A	N/A	N/A	N/A
S-5	<30	N/A	N/A	N/A	N/A
SP-6	610	ND	5.8*	ND	ND

6.7 Two 500-Gallon Waste Oil Underground Storage Tanks Decommissioning in October 1992: Approximate Extent of Soil Over-Excavation in the Truck Wash Bay and Soil Sampling Locations



6.8 Groundwater Monitoring Well Locations and Groundwater Monitoring Results

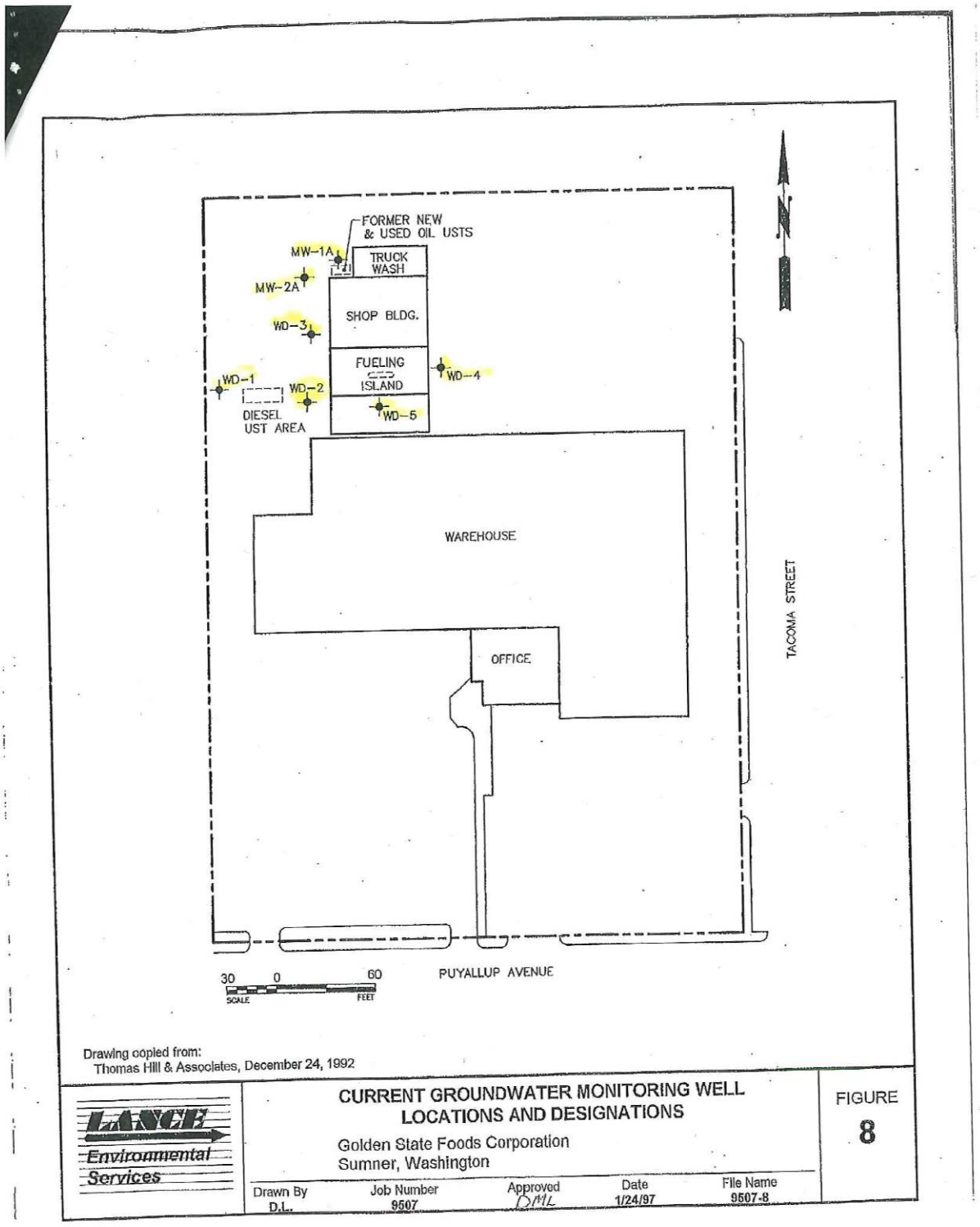


TABLE 1
Groundwater Analytical Summary - Total Petroleum Hydrocarbons
Golden State Foods Facility
Sumner, Washington

		Total Petroleum Hydrocarbons (mg/L)	
Sample I.D.	Sample Date	WDOE Method WTPH-D	WDOE Method WTPH-418.1 or USEPA Method 418.1M
WD-1	9/25/96	ND (0.50)	NA
	5/31/96	ND (0.50)	NA
	12/1/95	ND (0.50)	NA
	1/28/95	ND (0.5)	NA
	2/26/94	ND (0.25)	NA
	12/16/92	ND (0.20)	NA
(MW-1)	3/14/90	NA	ND (5.0)
(GS-5)	9/12/89	NA	ND (5.0)
WD-2	9/25/96	ND (0.50)	NA
	5/31/96	ND (0.50)	NA
	12/1/95	ND (0.50)	NA
	1/28/95	ND (0.5)	NA
	2/26/94	1.3	NA
	12/16/92	ND (0.20)	NA
(MW-2)	3/14/90	NA	ND (5.0)
(GS-3)	9/12/89	NA	ND (5.0)
WD-3	9/25/96	ND (0.50)	NA
	5/31/96	ND (0.50)	NA
	12/1/95	ND (0.50)	NA
	1/28/95	ND (0.5)	NA
	2/26/94	ND (0.25)	NA
	12/16/92	ND (0.20)	NA
WD-4	9/25/96	ND (0.50)	NA
	5/31/96	ND (0.50)	NA
	12/1/95	ND (0.50)	NA
	1/28/95	ND (0.5)	NA
	2/26/94	1.4	NA
	12/16/92	0.42	NA
(MW-3)	3/14/90	NA	ND (5.0)
(GS-1)	9/12/89	NA	ND (5.0)
WD-5	9/25/96	NA	NA
	5/31/96	NA	NA
	12/1/95	NA	NA

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LANCE Environmental Services

		Total Petroleum Hydrocarbons (mg/L)	
Sample I.D.	Sample Date	WDOE Method WTPH-D	WDOE Method WTPH-418.1 or USEPA Method 418.1M
	1/28/95	ND (0.5)	NA
	2/26/94	ND (0.25)	NA
	12/16/92	ND (0.20)	NA
(GS-2)	9/12/89	NA	ND (5.0)
MW-1A	9/25/96	NA	NA
	5/31/96	NA	NA
	12/1/95	NA	NA
	1/28/95	ND (0.5)	ND (0.5)
	2/26/94	ND (0.25)	NA
	12/19/92	NA	ND (0.5)
MW-2A	9/25/96	ND (0.50)	NA
	5/31/96	NA	NA
	12/1/95	NA	NA
	1/28/95	ND (0.5)*	ND (0.5)
	2/26/94	ND (0.25)	NA
	12/19/92	NA	ND (0.5)
MTCA Method A Groundwater Cleanup Levels:		1.0	1.0

Notes:

- Analytical results that are bolded and shaded exceed the MTCA Method A groundwater cleanup level.
- Sample I.D. numbers in parentheses represent a previous designation assigned to that monitoring well during a previous investigation.
- A monitoring well installed by B & C, designated as GS-4, was sampled once for TPH (USEPA Method 418.1M) before being removed during soil excavation activities. The sample was collected on 9/12/89 and yielded a TPH concentration of 15.0 ppm.
- mg/L = milligrams per liter; equivalent to parts per million (ppm)
- ND = not detected at or above detection, quantitation or reporting limit; the limits are shown in parentheses
- NA = not sampled or analyzed
- MTCA = Model Toxics Control Act
- WTPH-D = analysis of total petroleum hydrocarbons in the diesel range
- WTPH-418.1 = analysis of total petroleum hydrocarbons through heavy fuels and oils
- USEPA Method 418.1M = analysis of total petroleum hydrocarbons through heavy fuels and oils

* Results of this sample analysis indicated the potential presence of trace levels of toluene-range (C7) hydrocarbons

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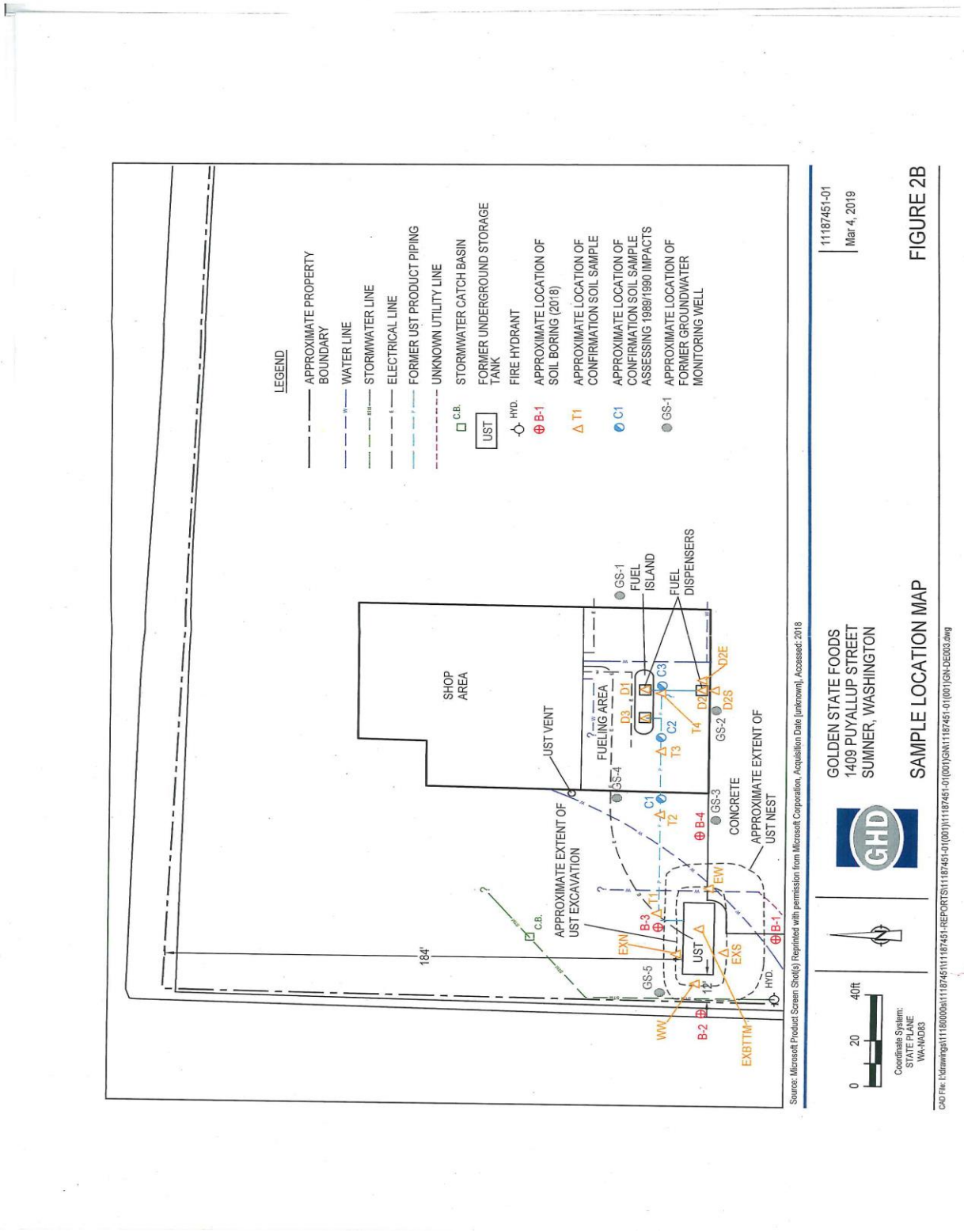
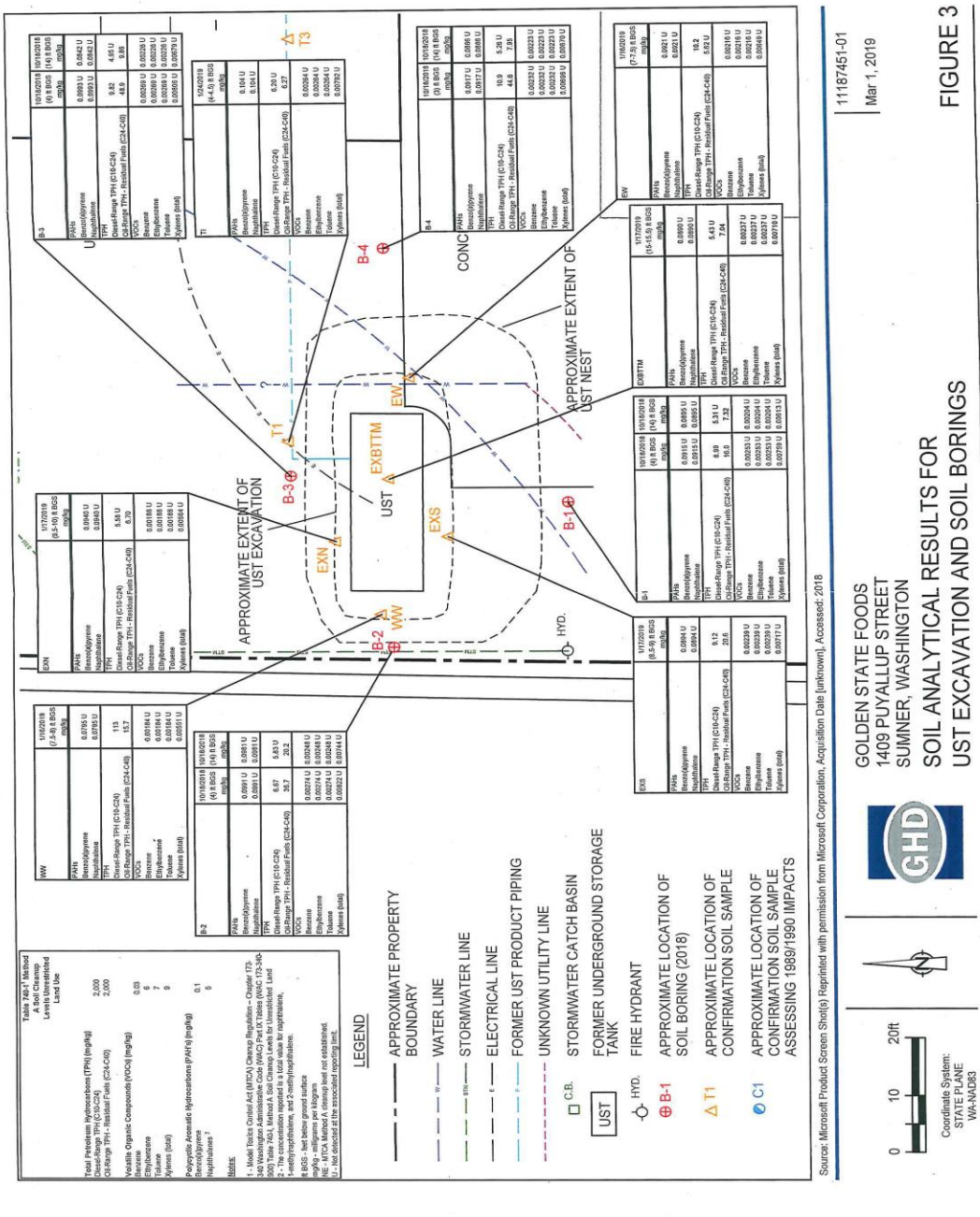
LANCE Environmental Services

6.9 January 2019 10,000-Gallon Underground Storage Tank (UST) Site Assessment and UST Decommissioning: Confirmation Soil Sampling Locations and Results




LEGEND
APPROXIMATE PROPERTY BOUNDARY
WATER LINE
STORMWATER LINE
ELECTRICAL LINE
FORMER UST PRODUCT PIPING
UNKNOWN UTILITY LINE
STORMWATER CATCH BASIN
FORMER UNDERGROUND STORAGE TANK
FIRE HYDRANT
APPROXIMATE LOCATION OF SOIL BORING (2018)
APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE
APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE ASSESSING 1989/1990 IMPACTS
APPROXIMATE EXTENT OF UST EXCAVATION
APPROXIMATE EXTENT OF UST NEST
UST A
EXBTTM
EXS
EXN
EW
WW
HYD.
Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date [unknown], Accessed: 2018
0
10
20ft
Coordinate System:
STATE PLANE
WA-NAD83
GOLDEN STATE FOODS
1409 PUYALLUP STREET
SUMNER, WASHINGTON
SOIL ANALYTICAL RESULTS FOR
UST EXCAVATION AND SOIL BORINGS
111187451-01
Mar 1, 2019
FIGURE 3
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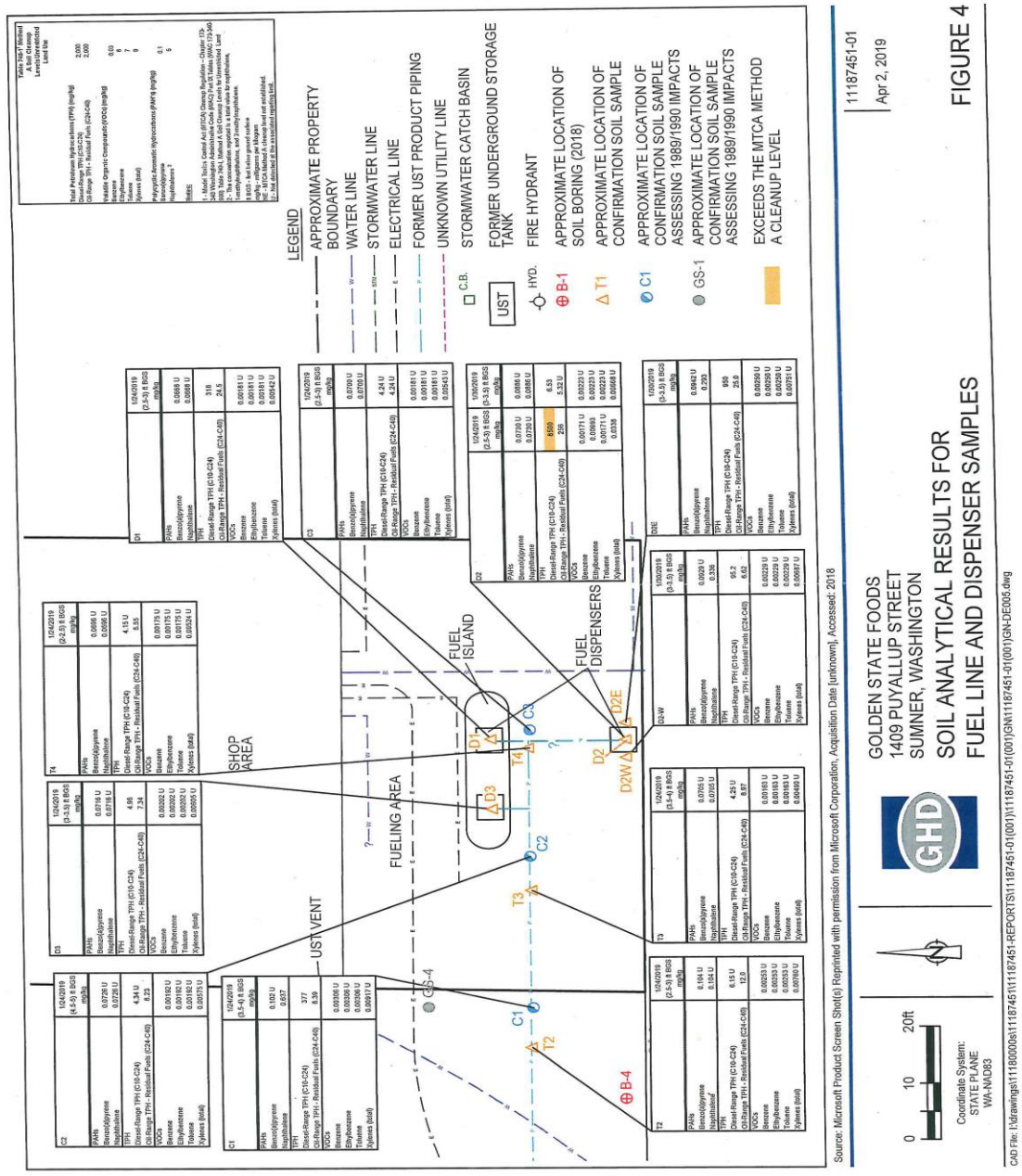
LEGEND
APPROXIMATE PROPERTY BOUNDARY
WATER LINE
STORMWATER LINE
ELECTRICAL LINE
FORMER UST PRODUCT PIPING
UNKNOWN UTILITY LINE
STORMWATER CATCH BASIN
FORMER UNDERGROUND STORAGE TANK
FIRE HYDRANT
APPROXIMATE LOCATION OF SOIL BORING (2018)
APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE
APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE ASSESSING 1989/1990 IMPACTS
APPROXIMATE LOCATION OF CONFIRMATION SOIL SAMPLE ASSESSING 1989/1990 IMPACTS
EXCEEDS THE MTCA METHOD A CLEANUP LEVEL
SHOP AREA
FUELING AREA
FUEL ISLAND
FUEL DISPENSERS
UST VENT
Source: Microsoft Product Screen Shot(s) Reprinted with permission from Microsoft Corporation, Acquisition Date: [unknown], Accessed: 2018
0 10 20ft
Coordinate System: STATE PLANE WA-NAD83
GOLDEN STATE FOODS
1409 PUYALLUP STREET
SUMNER, WASHINGTON
SOIL ANALYTICAL RESULTS FOR
FUEL LINE AND DISPENSER SAMPLES
11187451-01
Apr 2, 2019
FIGURE 4
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Page 1 of 1

Table 1A

Soil Analytical Results - 2018 UST Site Assessment
Golden State Foods
1409 Puyallup Street
Sumner, Washington

Sample Location:			B-1	B-1	B-2	B-2	B-2	B-3	B-3	B-3	B-4	B-4	B-4
Sample Identification:		Table 740-1[1] Method A Soil Cleanup Levels for Unrestricted Land Uses	S-11183991-101818-EB-B-1-4'	S-11183991-101818-EB-B-1-14'	S-11183991-101818-EB-B-2-4'	S-11183991-101818-EB-B-2-14'	S-11183991-101818-EB-B-3-4'	S-11183991-101818-EB-B-3-14'	S-11183991-101818-EB-B-4-3'	S-11183991-101818-EB-B-4-14'	S-11183991-101819-EB-B-4-14'		
Sample Date:			10/18/2018	10/18/2018	10/18/2018	10/18/2018	10/18/2018	10/18/2018	10/18/2018	10/18/2018	10/18/2018		
Sample Depth:			(4) ft BGS	(14) ft BGS	(4) ft BGS	(14) ft BGS	(4) ft BGS	(14) ft BGS	(3) ft BGS		(14) ft BGS		
Parameters	Units												
Total Petroleum Hydrocarbons (TPH)	mg/kg	2,000	8.99	5.31 U	6.67	5.63 U	9.82	4.95 U	10.9		5.26 U		
Diesel-Range TPH (C10-C24)	mg/kg	2,000	16.0	7.32	39.7	20.2	48.9	9.86	44.6		7.95		
Oil-Range TPH - Residual Fuels (C24-C40)	mg/kg												
			0.00253 U	0.00204 U	0.00274 U	0.00248 U	0.00269 U	0.00226 U	0.00232 U		0.00223 U		
Volatile Organic Compounds (VOCs)	mg/kg	0.03	0.00253 U	0.00204 U	0.00274 U	0.00248 U	0.00269 U	0.00226 U	0.00232 U		0.00223 U		
Benzene	mg/kg	6	0.00253 U	0.00204 U	0.00274 U	0.00248 U	0.00269 U	0.00226 U	0.00232 U		0.00223 U		
Ethylbenzene	mg/kg	7	0.00253 U	0.00204 U	0.00822 U	0.00744 U	0.00808 U	0.00679 U	0.00696 U		0.00670 U		
Toluene	mg/kg	9	0.00759 U	0.00613 U									
Xylenes (total)	mg/kg												
					0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Polycyclic Aromatic Hydrocarbons (PAHs)	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Benzo(a)anthracene	mg/kg	0.1	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Benzo(a)pyrene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Benzo(b)fluoranthene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Benzo(k)fluoranthene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U		0.0898 U		
Chrysene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U	0.0917 U				
Dibenz(a,h)anthracene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U					
Indeno(1,2,3-cd)pyrene	mg/kg	NE	0.0915 U	0.0895 U	0.0991 U	0.0981 U	0.0993 U	0.0842 U					
Naphthalenes[2]	mg/kg	5											

Notes:

1 - Model Toxics Control Act (MTCA) Cleanup Regulation – Chapter 173-340 Washington Administrative Code (WAC) Part IX Tables (WAC 173-340-900) Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses, October 12, 2007

2 - The concentration reported is a total value for naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene.

ft BGS - feet below ground surface

mg/kg - milligrams per kilogram

NE - MTCA Method A cleanup level not established.

U - Not detected at the associated reporting limit.

111B7461-Rpt-1 (T1A)

Table 1B

Soil Analytical Results - UST Decommissioning
Golden State Foods
1409 Puyallup Street
Sumner, Washington

			Product Piping Confirmation Samples				Confirmation Soil Samples Assessing 1989 Impacts		
Sample Location:			Fuel Piping Trench	Fuel Piping Trench	Fuel Piping Trench	Fuel Piping Trench	Confirmation Sample 1	Confirmation Sample 2	Confirmation Sample 3
Sample Identification:		Table 740-1 Method A Soil Cleanup Levels Unrestricted Land Use	S.11187451.HG.012418.T1-4'	S.11187451.HG.012418.T2-2.5'	S.11187451.HG.012418.T3-3.5'	S.11187451.HG.012419.T4-2'	S.11187451.HG.012419.C1-3.5'	S.11187451.HG.012418.C2-4.5'	S.11187451.HG.012418.C3-2.5'
Sample Date:			1/24/2019	1/24/2019	1/24/2019	1/24/2019	1/24/2019	1/24/2019	1/24/2019
Sample Depth:			(4-4.5) ft BGS	(2.5-3) ft BGS	(3.5-4) ft BGS	(2-2.5) ft BGS	(3.5-4) ft BGS	(4.5-5) ft BGS	(2.5-3) ft BGS
Parameters	Units								
Total Petroleum Hydrocarbons (TPH)									
Diesel-Range TPH (C10-C24)	mg/kg	2,000	6.20 U	6.15 U	4.25 U	4.15 U	377	4.34 U	4.24 U
Oil-Range TPH - Residual Fuels (C24-C40)	mg/kg	2,000	6.27	12.0	8.97	5.55	8.39	8.23	4.24 U
Volatile Organic Compounds (VOCs)									
Benzene	mg/kg	0.03	0.00264 U	0.00253 U	0.00163 U	0.00175 U	0.00336 U	0.00192 U	0.00181 U
Ethylbenzene	mg/kg	6	0.00264 U	0.00253 U	0.00163 U	0.00175 U	0.00336 U	0.00192 U	0.00181 U
Toluene	mg/kg	7	0.00264 U	0.00253 U	0.00163 U	0.00175 U	0.00336 U	0.00192 U	0.00181 U
Xylenes (total)	mg/kg	9	0.00792 U	0.00760 U	0.00490 U	0.00524 U	0.00917 U	0.00575 U	0.00543 U
Polycyclic Aromatic Hydrocarbons (PAH's)									
Benzo(a)anthracene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Benzo(a)pyrene	mg/kg	0.1	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Benzo(b)fluoranthene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Benzo(k)fluoranthene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Chrysene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Dibenz(a,h)anthracene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Indeno(1,2,3-cd)pyrene	mg/kg	NE	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.102 U	0.0726 U	0.0700 U
Naphthalenes [2]	mg/kg	5	0.104 U	0.0795 U	0.0656 U	0.0656 U	0.837	0.0726 U	0.0700 U

Notes:
Bold values equal or exceed MTCA Method A cleanup level

1 - Model Toxics Control Act (MTCA) Cleanup Regulation - Chapter 173-340 Washington Administrative Code (WAC) Part IX Tables (WAC 173-340-900) Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses, October 12, 2007

2 - The concentration reported is a total value for naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene.

3 - Matrix spike (MS) and/or matrix spike duplicate (MSD) recovery is outside acceptance limits, and MS/MSD relative percent difference (RPD) exceeds control limits.

ft BGS - feet below ground surface
mg/kg - milligrams per kilogram
NE - MTCA Method A cleanup level not established.
TCLP - Toxicity Characteristic Leaching Procedure
U - Not detected at the associated reporting limit.

11187451-1-Table 1B.xlsx - 2/9/2019

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Table 1B

Soil Analytical Results - UST Decommissioning
Golden State Foods
1409 Puyallup Street
Sumner, Washington

			Underground Storage Tank (UST) Excavation Confirmation Samples						Fuel Dispenser Confirmation Samples					
Sample Location:		Composite from Western Portion of UST Excavation	UST Excavation, West Sidewall	UST Excavation, East Sidewall	UST Excavation Bottom	UST Excavation, North Sidewall	UST Excavation, South Sidewall	Fuel Dispenser 1	Fuel Dispenser 2	Fuel Dispenser 2, East Sidewall	Fuel Dispenser 2, West Sidewall	Fuel Dispenser 3
Sample Identification:	Table 740-1[1] Method A Soil Cleanup Levels Unrestricted Land Use	S-111874451-011615-NT-comp-1	S-111874451-011615-NT-WW-7.5'	S-111874451-011615-NT-EW-7'	S-111874451-11719-EB-Endtns-15'	S-111874451-11719-EB-End-9.5'	S-111874451-11719-EB-ES-8.5'	S-111874451-WD-013418-D1-5.5'	S-111874451-WD-013418-D2-2.5'	S-111874451-DT-013018-D2-E-3.0'	S-111874451-DT-013018-D2-W-3.0'	S-111874451-HG-012419-D3-3'
Sample Date:		1/16/2019	1/16/2019	1/16/2019	1/17/2019	1/17/2019	1/17/2019	1/24/2019	1/24/2019	1/30/2019	1/30/2019	1/24/2019
Sample Depth:		-	(7.5-8) ft BGS	(7-7.5) ft BGS	(16-16.5) ft BGS	(9.5-10) ft BGS	(8.5-9) ft BGS	(2.5-3) ft BGS	(2.5-3) ft BGS	(3-3.5) ft BGS	(3-3.5) ft BGS	(3-3.5) ft BGS
Parameters	Units											
Total Petroleum Hydrocarbons (TPH)												
Diesel-Range TPH (C10-C24)	mg/kg	2,000	113	10.2	5.43 U	5.58 U	9.12	318	8,800	6.53	950	95.2 [3]	4.96
Oil-Range TPH - Residual Fuels (C24-C40)	mg/kg	2,000	15.7	5.62 U	7.04	6.70	20.6	24.5	266	5.32 U	25.0	6.62	7.34
Volatile Organic Compounds (VOCs)												
Benzene	mg/kg	0.03	0.00161 U	0.00216 U	0.00237 U	0.00189 U	0.00239 U	0.00181 U	0.00771 U	0.00223 U	0.00250 U	0.00229 U	0.00202 U
Ethylbenzene	mg/kg	6	0.00169 U	0.00226 U	0.00237 U	0.00198 U	0.00239 U	0.00189 U	0.00809 U	0.00223 U	0.00250 U	0.00229 U	0.00202 U
Toluene	mg/kg	7	0.00169 U	0.00216 U	0.00237 U	0.00189 U	0.00239 U	0.00181 U	0.00771 U	0.00223 U	0.00250 U	0.00229 U	0.00202 U
Xylenes (total)	mg/kg	9	0.00508 U	0.00649 U	0.00710 U	0.00564 U	0.00717 U	0.00542 U	0.0338	0.00668 U	0.00751 U	0.00687 U	0.00605 U
Polycyclic Aromatic Hydrocarbons (PAH's)												
Benzo(a)anthracene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Benzo(a)pyrene	mg/kg	0.1	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Benzo(b)fluoranthene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Benzo(k)fluoranthene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Chrysene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Dibenz(a,h)anthracene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Indeno(1,2,3-cd)pyrene	mg/kg	NE	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.0942 U	0.0929 U	0.0716 U
Naphthalenes [2]	mg/kg	5	0.0795 U	0.0921 U	0.0990 U	0.0940 U	0.0894 U	0.0898 U	0.0730 U	0.0886 U	0.293	0.336	0.0716 U

Notes:
Bold values equal or exceed MTCA Method A cleanup level

1 - Model Toxics Control Act (MTCA) Cleanup Regulation - Chapter 173-340 Washington Administrative Code (WAC) Part IX Tables (WAC 173-340-900) Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses, October 12, 2007

2 - The concentration reported is a total value for naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene.

3 - Matrix spike (MS) and/or matrix spike duplicate (MSD) recovery is outside acceptance limits, and MS/MSD relative percent difference (RPD) exceeds control limits.

ft BGS - feet below ground surface
mg/kg - milligrams per kilogram
NE - MTCA Method A cleanup level not established.
TCLP - Toxicity Characteristic Leaching Procedure
U - Not detected at the associated reporting limit.

11187451-1-Table 1B.xlsx - 2/8/2019

Table 2

Groundwater Sample Analytical Results
Golden State Foods
1409 Puyallup Street
Sumner, Washington

Sample Location:			B-2
Sample Identification:		Table 740-1 [1] Groundwater Method A	W:11183991-101818-EB-B-2
Sample Date:			10/18/2018
Sample Location:			Soil Boring B-2
	Units		
Total Petroleum Hydrocarbons (TPH)			
Diesel-Range TPH (C10-C24)	ug/L	500	680 U
Oil-Range TPH - Residual Fuels (C24-C40)	ug/L	500	680 U
Volatile Organic Compounds (VOCs)			
Benzene	ug/L	5	1.00 U
Ethylbenzene	ug/L	700	1.00 U
Toluene	ug/L	1,000	1.00 U
Xylenes (total)	ug/L	1,000	3.00 U
Polycyclic Aromatic Hydrocarbons (PAH's)			
Benzo(a)anthracene	ug/L	NE	0.112 U
Benzo(a)pyrene	ug/L	0.1	0.112 U
Benzo(b)fluoranthene	ug/L	NE	0.112 U
Benzo(k)fluoranthene	ug/L	NE	0.112 U
Chrysene	ug/L	NE	0.112 U
Dibenz(a,h)anthracene	ug/L	NE	0.112 U
Indeno(1,2,3-cd)pyrene	ug/L	NE	0.112 U
Naphthalene	ug/L	160	0.112 U

Notes:

1 - Model Toxics Control Act (MTCA) Cleanup Regulation - Chapter 173-340 Washington Administrative Code (WAC) 173-340-900 Table 720-1 Method A Cleanup Levels for Groundwater, May 2014.

NE - MTCA Method A cleanup level not established.

U - Not detected at the associated reporting limit.

ug/L - micrograms per liter.

11187451-Rpt-1 (T-2)

6.10 Restrictive Covenant/Environmental Covenant

9707290296

Return Address
GOLDEN STATE FOODS
1409 Puyallup Street
Sumner, Washington 98390

Please print legibly or type information.

Document Title(s) (Or transactions contained therein):
1. Restrictive Covenant
2.
3.
4.

Grantor(s) (Last name first, then first name and initials):
1. Golden State Foods Corp.
2.
3.
4.
5. ☐ Additional Names on Page _____ of Document

Grantee(s) (Last name first, then first name and initials):
1. Washington State Department of Ecology
2.
3.
4.
5. ☐ Additional Names on Page _____ of Document.

Legal Description (Abbreviated: i.e., lot, block, plat; or section, township, range):
Lot 4 S.P. 8212300493

Legal Description is on Page 1 of Document.

Reference Number(s) (Of documents assigned or released):

☐ Additional Reference Numbers on Page _____ of Document

Assessor's Property Tax Parcel/Account Number

R04-20-13-8-005

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.

RESTRICTIVE COVENANT

GOLDEN STATE FOODS CORP.

GOLDEN STATE FOODS SUMNER DISTRIBUTION CENTER

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

An independent remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the property is described in the following reports:

a. Lance Environmental Services, 1997
Independent Remedial Action Report, Cleanup of Petroleum Hydrocarbons
Golden State Foods Facility, Sumner, Washington
March 4, 1997

b. Lance Environmental Services, 1996b
Groundwater Monitoring Report - Third Quarter 1996
Golden State Foods Facility, Sumner, Washington
November 2, 1996

c. Lance Environmental Services, 1996a
Groundwater Monitoring Report - Second Quarter 1996
Golden State Foods Facility, Sumner, Washington
June 14, 1996

d. Lance Environmental Services, 1995
Groundwater Monitoring Report - Fourth Quarter 1995

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Golden State Foods Facility, Sumner, Washington
December 26, 1995

e. Thomas Hill & Associates, 1995
Groundwater Sampling at 1409 Puyallup Avenue, Sumner, Washington,
February 8, 1995

f. Thomas Hill & Associates, 1994
Groundwater Sampling at 1409 Puyallup Avenue, Sumner, Washington,
March 17, 1994

g. Thomas Hill & Associates, 1993b
UST Closure - Site Assessment Phase 2 Groundwater Monitoring, Over-Excavation
Golden State Foods, Sumner, Washington
March 8, 1993

h. Thomas Hill & Associates, 1993a
UST Closure - Site Assessment
Golden State Foods, Sumner, Washington
March 8, 1993

i. Thomas Hill & Associates, 1992
Groundwater Sampling at 1409 Puyallup Avenue, Sumner, Washington,
December 24, 1992

j. Harding Lawson and Associates, 1990
Closure Report for Soil Removal Activities
Golden State Foods Corporation, Sumner, Washington
April 27, 1990

k. Shannon & Wilson, 1990
Soil Quality Analysis
Golden State Foods Corporation, Sumner, Washington
March 21, 1990

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l. B & C Equipment, 1989
Soil and Groundwater Investigation
Letter report to Mr. Rick Thomas (Golden State Foods)
October 16, 1989

m. Pacific Inspection and Research Laboratory, 1989
Fuel Line Leak/Corrosion
Golden State Foods Corp.
October 13, 1989

These documents are on file at Ecology's SWRO.

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of diesel-range petroleum hydrocarbons which exceed the Model Toxics Control Act Method A Residential Cleanup Levels for soil established under WAC 173-340.

The undersigned, **GOLDEN STATE FOODS CORP.**, is the fee owner of real property (hereafter "Property") in the County of Pierce, State of Washington, that is subject to this Restrictive Covenant. The Property is legally described as follows: Lot 4, as shown on SHORT PLAT NO. 8212300493, filed with the Pierce County Auditor, in Pierce County, Washington, which Short Plat amends Short Plat No. 8104290271.

GOLDEN STATE FOODS CORP. 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-range petroleum hydrocarbons in soil at two locations beneath the maintenance shop: (1) beneath the footings of the foundation at the southwest corner of the building, and (2) beneath the concrete floor near the southwest corner of the building. The Owner shall not alter, modify, or remove the existing structures 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.

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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 Restrictive Covenant and notify all lessees of the restriction 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 Restrictive 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 after public notice and comment and the consent of Ecology.

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GOLDEN STATE FOODS CORP.

Walter E Kersten — 7/28/97

By: Walter E. Kersten
Senior Vice President of Distribution

Date

[NOTARIAL ACKNOWLEDGMENT ATTACHED]

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STATE OF CALIFORNIA }
}
COUNTY OF ORANGE }

On July 28, 1997, before me, Kathleen A. Chabala, Notary Public, personally appeared **Walter E. Kersten**, personally known to me (~~or proved to me on the basis of satisfactory evidence~~) to be the person whose name is subscribed to the within instrument and acknowledged to me that **he** executed the same in **his** authorized capacity, and that by **his** signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Kathleen A. Chabala

KATHLEEN A. CHABALA
Commission #1066190
Notary Public — California
Orange County
My Comm. Expires Oct 2, 1999

[SEAL]

6.11 Photo Log

Photo 1: Westside of the Golden State Foods (GSF) Building – From the North

Photo 2: Truck Wash Building and Northside of GSF Building – From the Northeast

Photo 3: Approximate Location of Former 500-Gallon Waste Oil USTs Location and Soil Cleanup Area – From the East

Photo 4: Former 10,000-Gallon USTs Location and Soil Cleanup Area/Current 10,000 Upgraded UST Location – From the West

Photo 5: Current 10,000-Gallon UST Location and New Pump Island Building – From the Southwest

Photo 6: New Pump Island Building – From the West