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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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August 3, 2020

Erin Dilworth
Policy & Technical Program Manager
Citizens for a Healthy Bay
535 Dock Street Suite 213
Tacoma, WA 98402
edilworth@healthbay.org

Re: X2P Marc Land Associates Site Proposed Removal from a Restrictive Covenant

- **Site Name:** X2P Marc Land Associates
- **Site Address:** 1650 E 18th St, Tacoma, Pierce County, WA 98421
- **Facility/Site No:** 94310
- **Cleanup Site No:** 14722

Dear Erin Dilworth:

The Department of Ecology (Ecology) thanks you for your review of the Restrictive Covenant (RC) removal documents for the X2P Marc Land Associates (MLA) Site, and for providing Ecology with your comments (Enclosure F).

Ecology understands the Citizens for a Healthy Bay's (CHB) concerns regarding the likelihood that the MLA Site is within the boundaries of the historic Tacoma Tideflats Landfill (TTL). Based on CHB's concerns, Ecology consulted a number of documents to determine whether the historic TTL's boundaries extend onto MLA property.

Based on the information gathered from historical documents/aerial photographs and number of soil boring logs from prior on-site subsurface explorations, Ecology believes that the MLA parcel does not fall within the boundaries of the historical TTL. Each of the above referenced documents are discussed in detail in the following subsections.

Site Location

The subject site is located within the Tacoma Tidelands Industrial district, east of downtown Tacoma, Washington at the approximate location depicted on Plate 1, Vicinity/Topographic Map, on Plate 2, Area Overview, and on Plate 3, Current Site Layout (Enclosure A).

The subject parcel #0320036003 (Parcel) was formerly part of the larger adjacent Fred Tebb & Sons Inc. lumber mill Site. Several years ago, the subject parcel was segregated out and sold to the current property ownership. The buildings that had been located on this Parcel were removed and the site was leased to Associated Petroleum for use as propane truck terminal.

Tacoma Tideflats Landfill

The Closed Landfill Report issued by the Tacoma Pierce County Health Department (TPCHD) was first published in 1993 and has been revised periodically, with the most recent revision being in December 2010.

According to that study, the landfill operated from the “early 1940’s” until its closure in 1964. The original 1993 study included a figure (Enclosure B, Figure 33 on page 142) that suggests the subject site may lie within the boundaries of this landfill. However, a revised figure added to the December 2010 updated study provided a more detailed estimation of the landfill boundary (Enclosure B, Figure, page 144, green outline). This revised figure depicts the subject site as being outside the inferred boundaries of the landfill.

The TPCHD’s report further noted that where present, the landfill deposits are fairly shallow and only extend to depths of approximately 8 to 10 feet.

Aerial Photograph Review

To reconcile TPCHD’s 1993 approximation of the landfill boundaries with the revised approximation as provided in 2010, historical aerial photographs from the years 1941, 1957, and 1968 were reviewed. These photos are presented as Plates 4, 5, and 6 (Enclosure C). For each photo, a yellow outline depicting the subject parcel and the historically associated Fred Tebb & Sons Inc. Lumber parcels and a green outline depicting the TPCHD’s estimate of the landfills boundaries has been added.

1941 Aerial Photo

The 1941 photo, (Enclosure C, Plate 4) indicates that the Tacoma tideflats are largely unmodified. The Puyallup River to the south-southwest of the property is free flowing and had not yet been “channelized.” Deltaic tributary channels are also present to the northeast of the main Puyallup River channel and two such tributaries appear to exist within the boundaries of the subject parcel. Also of note as a useful reference is the presence of Lincoln Avenue along the south side of the larger Fred Tebb & Sons Inc. parcels (which includes the future subject X2P parcel).

1957 Aerial Photo

By the time of the 1957 photograph, (Enclosure C, Plate 5), the Puyallup River to the southwest had been channelized and its course modified slightly when compared to the prior 1941. Landfill operations appear to be occurring along the east bank of the Puyallup River, and most notable the former tributary channels that were formerly present east of the main channel are no longer visible south of Lincoln Avenue.

These observations suggest that considerable land modifications (potentially related to landfilling) had occurred south of Lincoln Avenue. The subject property and adjacent Fred Tebb & Sons Inc. parcels still appear to be natural unmodified lands and the remnants of the formerly active tributary channels are still visible within the bounds of these parcels (yellow highlighted area).

1968 Aerial Photo

The 1968 photo, (Enclosure C, Plate 6) depicts the subject and adjacent Fred Tebb & Sons Inc. parcels as having been filled, graded, and undergoing the first phases of development of the Fred Tebb & Sons Inc. lumber mill. Industrial development to the east and southeast has also occurred. While it is clear that some type of filling and grading has occurred at the property since the 1957 photograph, the nature of the fill cannot be determined by examination of aerial photographs. However, as will be discussed below, this uncertainty was resolved by review of boring logs.

Review of Prior Subsurface Boring Logs – X2P Marc Land Associates Parcel

In March 2013, Environmental Associates Inc. (EAI) completed eight soil borings across the northern two parcels of the Fred Tebb & Sons Inc. facility (which included the parcel that would become X2P Marc Land Associates). These borings were designated B1 through B8 and are depicted on the Exploration Plan (dated April 2013) included in Enclosure D, Plate 2. Copies of the boring logs (B1 through B8, dated March 1, 2013) associated with this exploration are also included in Enclosure D.

In September 2017, as part of the current effort to remove the Environmental Covenant (EC) on the X2P parcel, seven soil borings (B3 through B9) were completed in the vicinity of prior borings B1 and B2. These additional borings are depicted on the Study Area/Exploration Plan, provided in Enclosure E, Plate 3. Copies of the boring logs (B3 through B9, dated September 29, 2017) associated with this exploration are included in Enclosure E.

As apparent through examination of the numerous boring logs, no evidence of landfill deposits such as those associated with the Tacoma Tidelands Landfill were encountered on the subject Parcel and/or the adjacent Fred Tebb & Sons Inc. parcel explored by EAI. Subsurface soils appeared to consist of an upper few feet of compacted sand and gravel that overlies black sands. No observations were noted in any of these borings that would be considered consistent with landfill materials, such as deposits of glass, porcelain, metals debris, wood debris, ash, degrading organic matter, and/or other artifacts classically associated with municipal landfill activities.

Review of Fred Tebb & Sons Inc. Site Subsurface Investigation Boring Logs

In 2019, as part of Fred Tebb & Sons Inc. property (located south and southeast of MLA Parcel) transaction, a due-diligence investigation (DDI) was conducted on two parcels (Parcel A and Parcel B). During this DDI, 15 soil borings were installed to a depth of 15 feet on Parcel A and Parcel B. In addition, eight Geotechnical Borings (40 feet deep) and five groundwater monitoring wells were installed. No observations were noted in any of these borings that would be

considered consistent with landfill materials. This further demonstrates that the old Tacoma Landfill boundaries did not extend onto MLA parcel that is located north and northwest of Parcel A and Parcel B.

In consideration of the totality of above information reviewed herein, it appears reasonable to conclude that the historic operations associated with the Tacoma Tideflats Landfill had not extended onto the subject property. On this basis, Ecology will proceed with the removal of MLA's environmental covenant.

Contact Information

If you have any questions, please call me at (360) 999-9603.

Sincerely,



Panjini Balaraju, P.E.
Toxics Cleanup Program
Southwest Regional Office

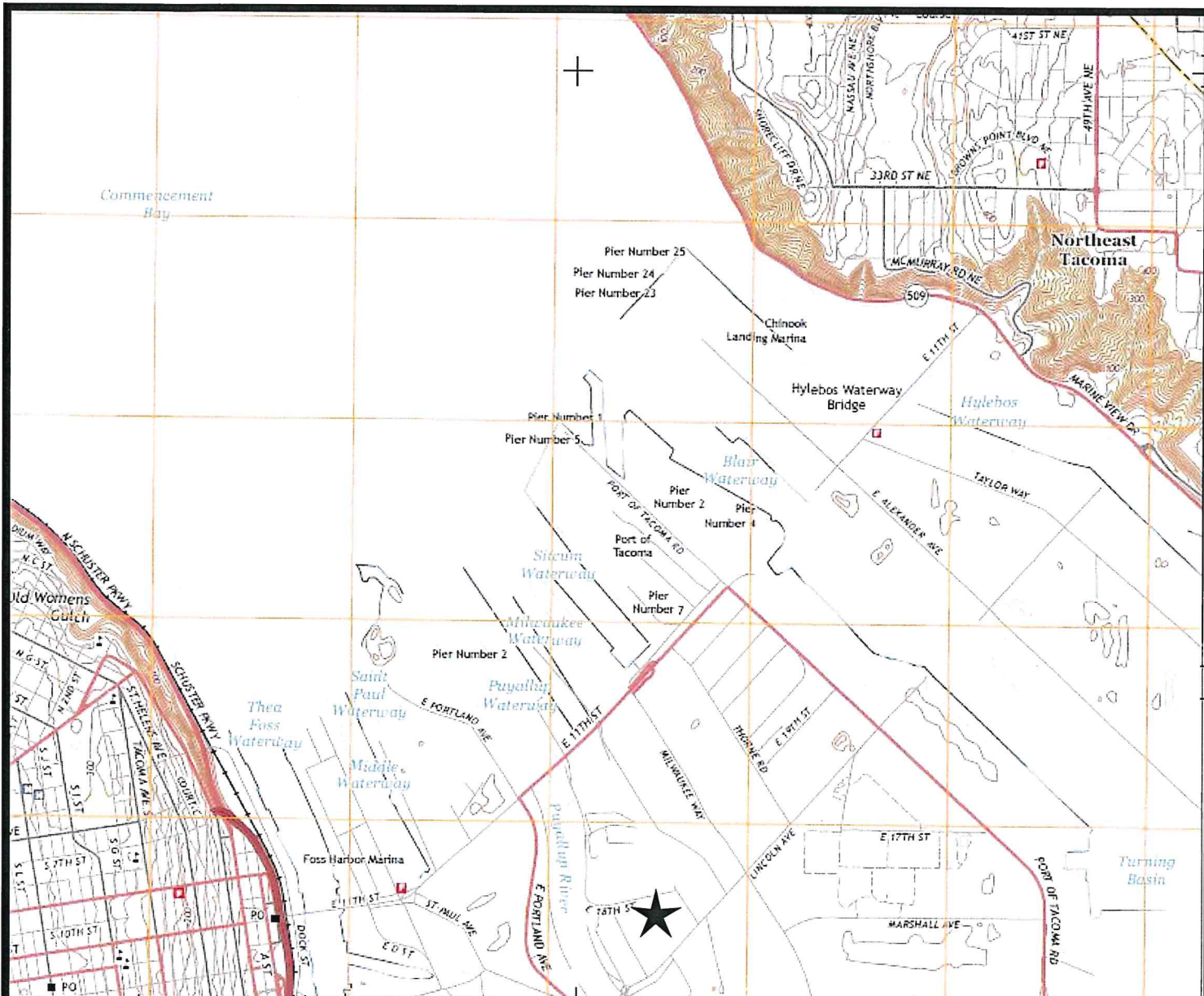
Enclosures: A – Vicinity/Topographic Map, Area Overview, and Current Site Layout
B – Old Tacoma Landfill Approximate Boundaries – 1993 and 2010
C – Old Tacoma Landfill Approximate Boundaries – 1941, 1957, and 1968
D – Prior Site Exploration Maps and Boring Logs – March 2013
E – Study Area/Exploration Plan and Boring Logs – September 2017
F – CHB's Comments on Proposed Removal of Restrictive Covenant

cc by email: Melissa Malott, CHB, Executive Director mmalott@healthybay.org
Ecology Site File

Enclosure A

Vicinity/Topographic Map, Area Overview, and Current Site Layout

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Approximate location of the subject property.



Inferred direction of groundwater flow in vicinity of the subject site, based upon local topographic gradient.



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VICINITY / TOPOGRAPHIC MAP

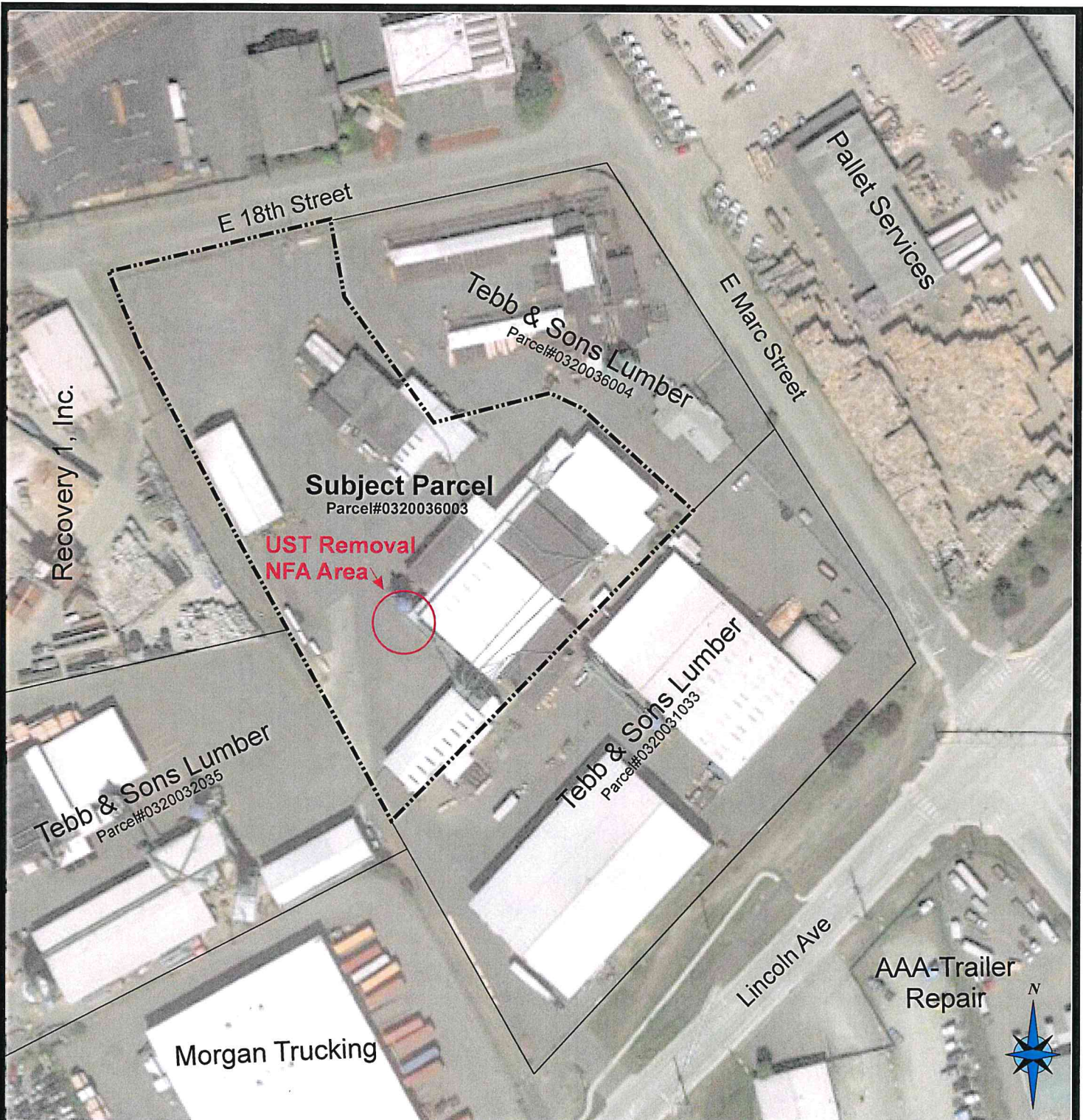
X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354

Job Number:
JN 33035-1

Date:
June 2020

Plate:
1

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2013 Google Earth Image



ENVIRONMENTAL ASSOCIATES, INC.

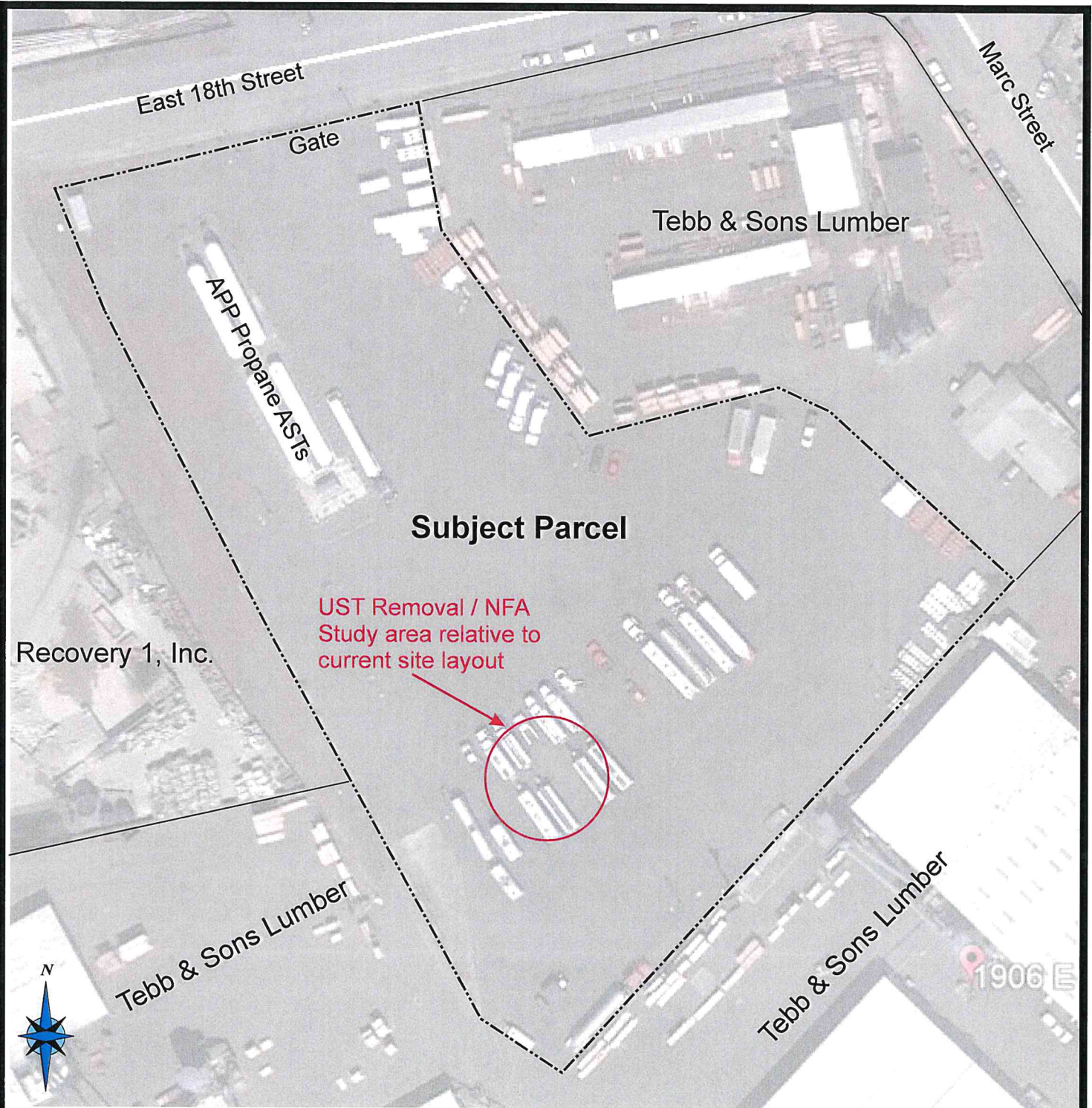
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Bellevue, Washington 98004

AREA OVERVIEW

**X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354**

Job Number:	Date:	Scale:	Plate:
JN 33035-1	June 2020		2

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CURRENT SITE LAYOUT

X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354

Job Number:

JN 33035-1

Date:

June 2020

Scale:

Plate:

3

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Enclosure B

Old Tacoma Landfill Approximate Boundaries – 1993 and 2010

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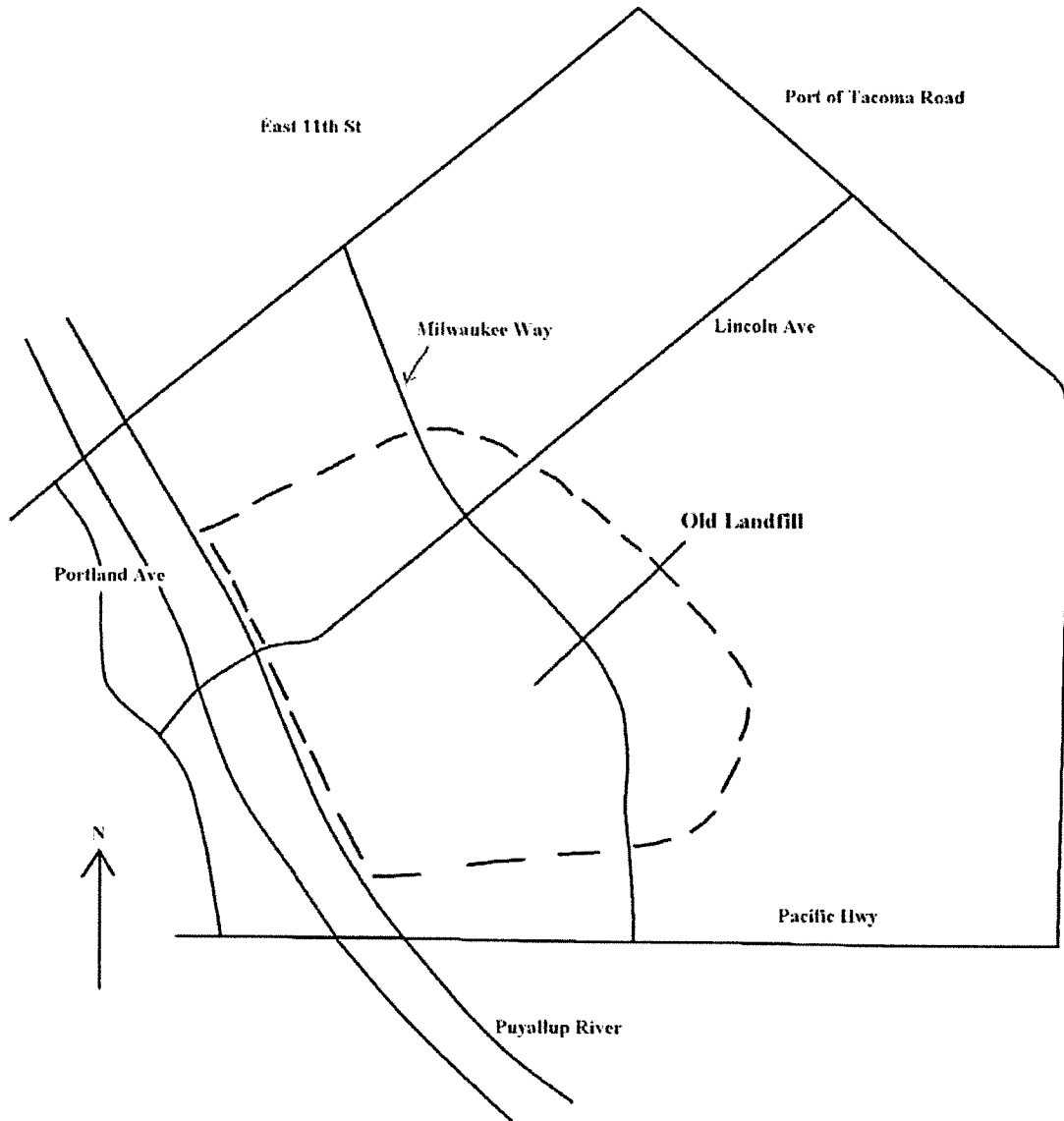
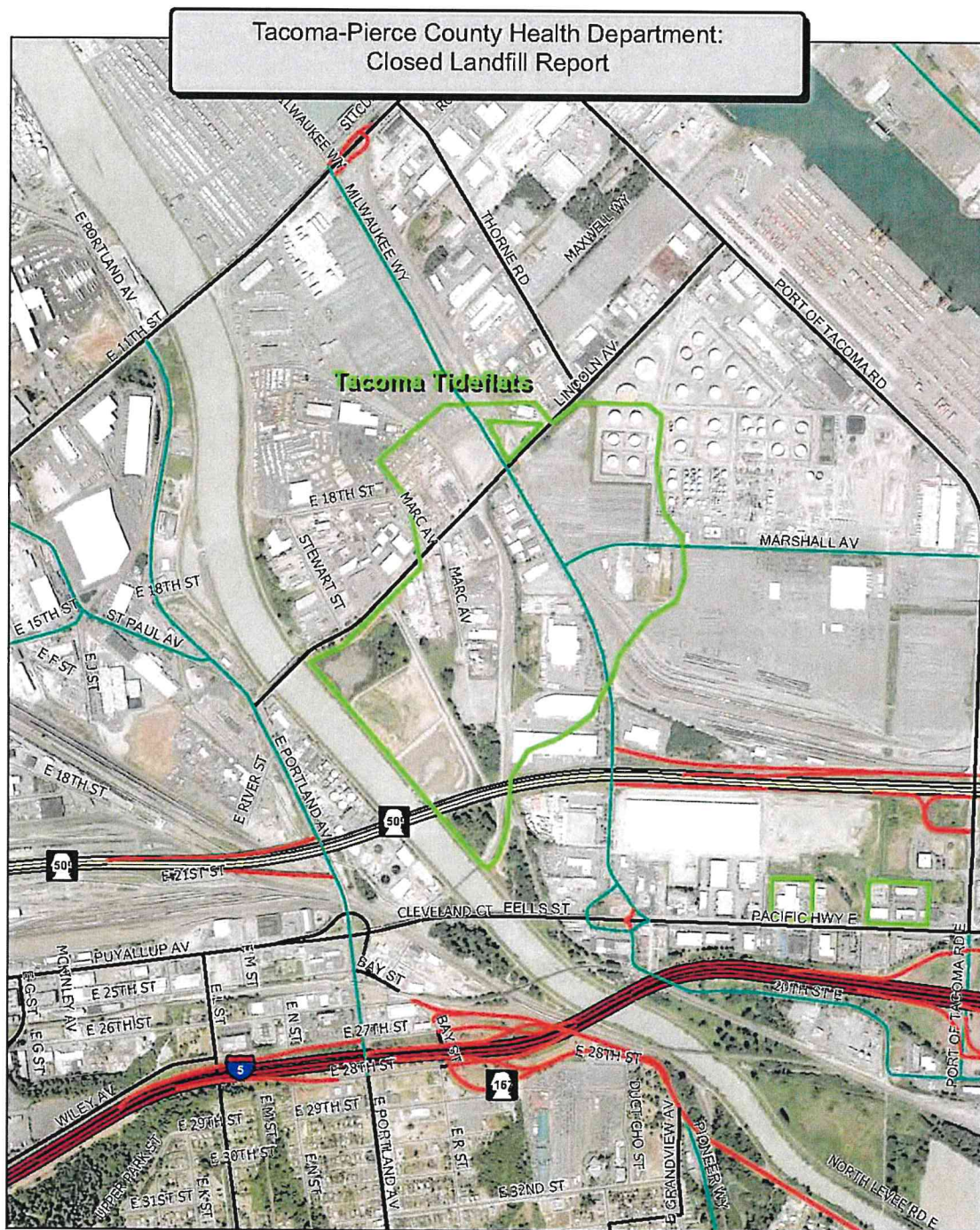


Figure 33. Tacoma Tideflats Landfill (approximate area)

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October 29, 2010



0 625 1,250 2,500 Feet



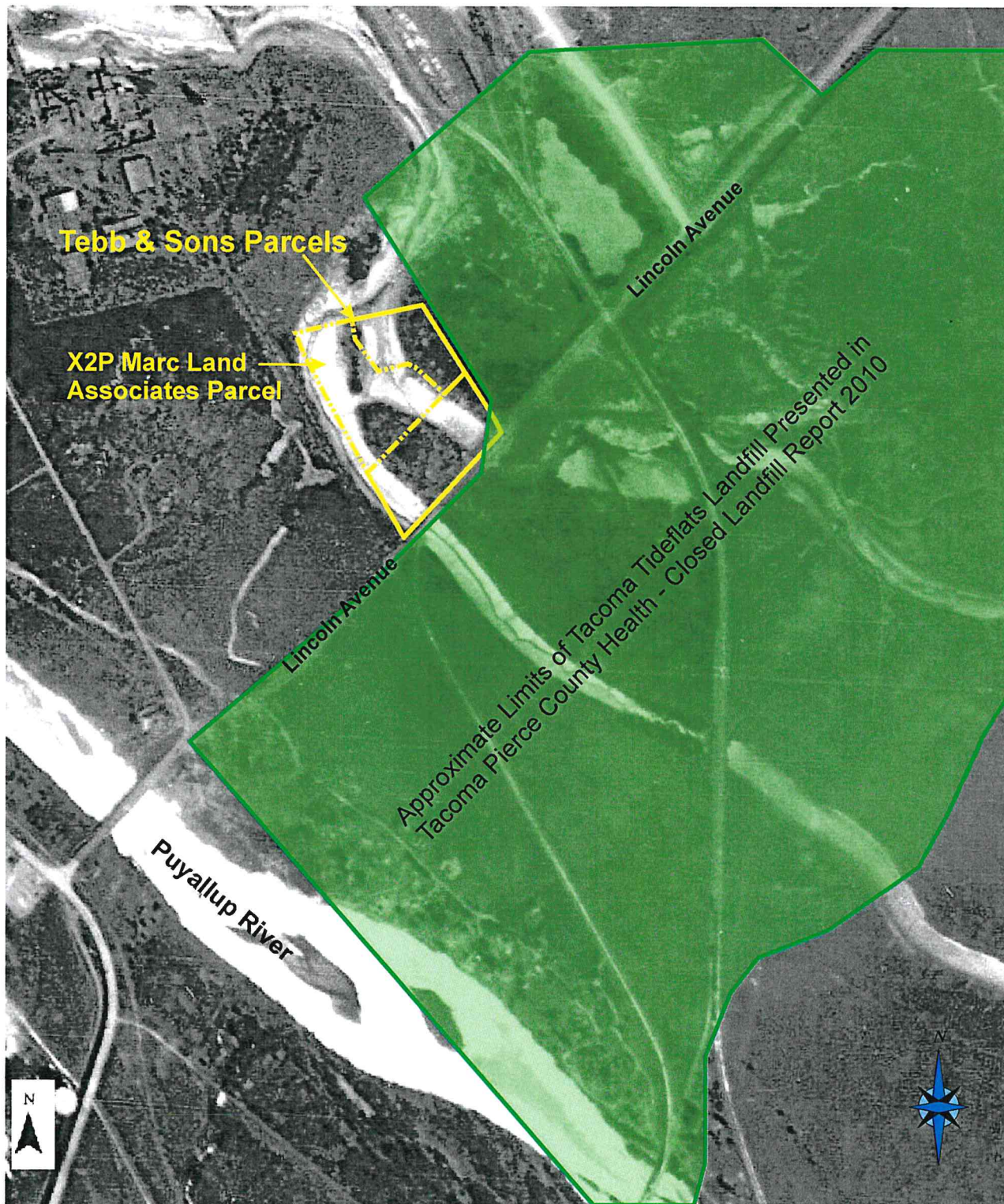
The map features are approximate and are intended only to provide an indication of said feature. Additional areas that have not been mapped may be present. This is not a survey. Orthophotos and other data may not align. The County assumes no liability for variations ascertained by actual survey. ALL DATA IS EXPRESSLY PROVIDED 'AS IS' AND 'WITH ALL FAULTS'. The County makes no warranty of fitness for a particular purpose.

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Enclosure C

Old Tacoma Landfill Approximate Boundaries – 1941, 1957, & 1968

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1941 AERIAL PHOTOGRAPH

X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354

Job Number:

JN 33035-1

Date:

June 2020

Scale:

Plate:

4

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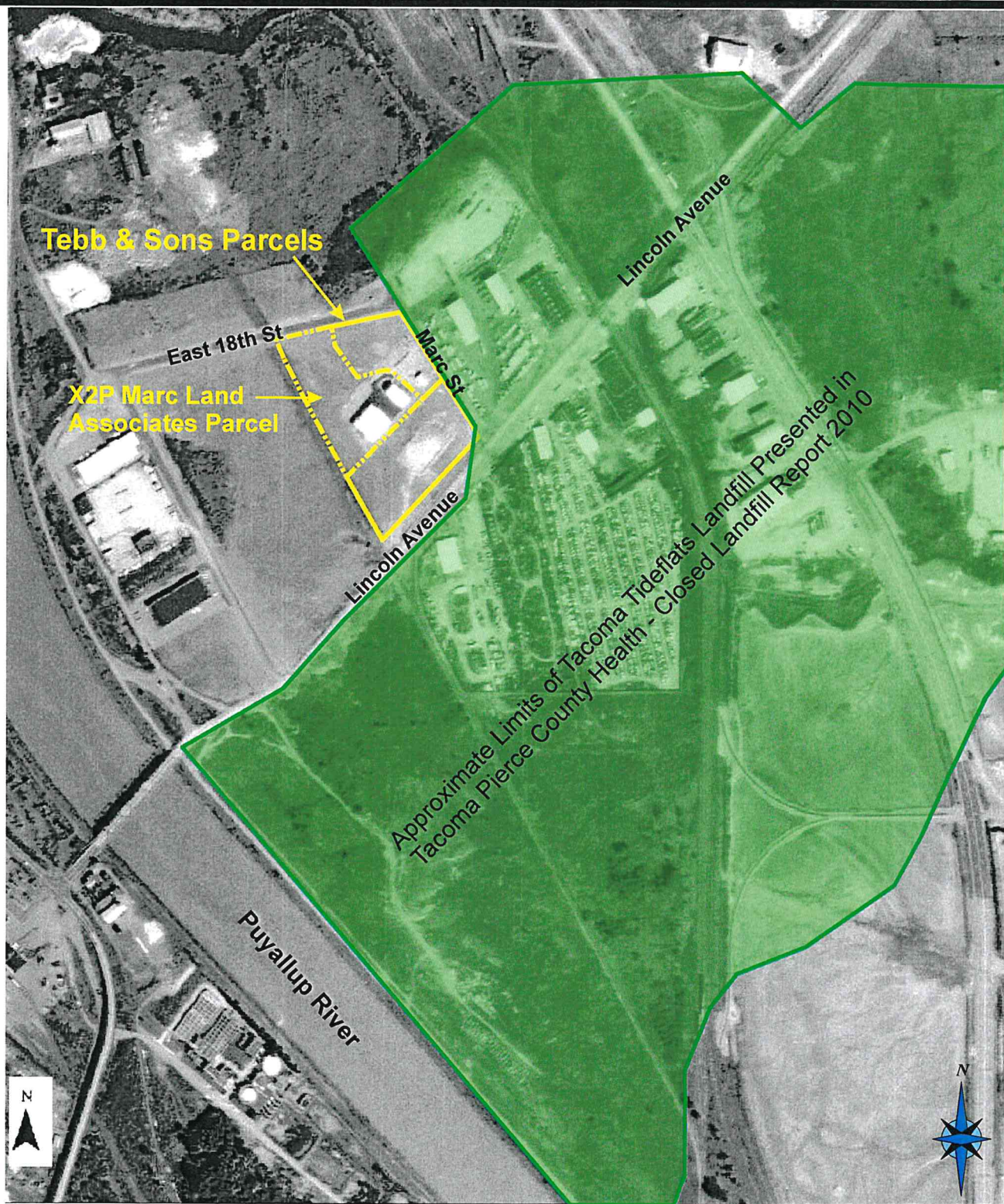
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1957 AERIAL PHOTOGRAPH

**X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354**

Job Number:	Date:	Scale:	Plate:
JN 33035-1	June 2020		5

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1968 AERIAL PHOTOGRAPH

X2P Marc Land Associates Site
1650 East 18th Street
Tacoma, Washington 98354

Job Number:

JN 33035-1

Date:

June 2020

Scale:

Plate:

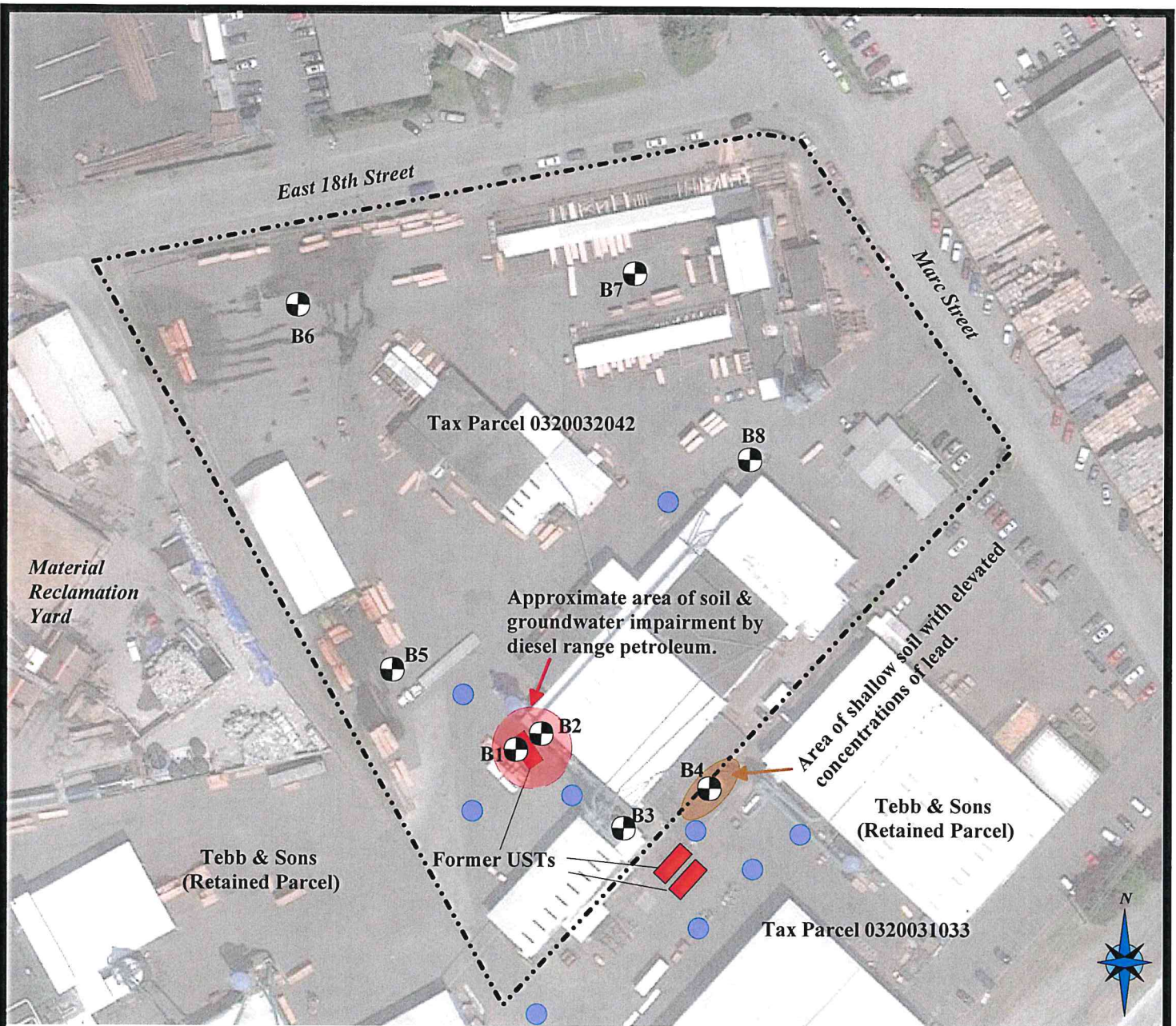
6

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Enclosure D

Prior Site Exploration Maps and Boring Logs – March 2013

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-----Approximate locations of site boundary.

⊗ Approximate locations of borings observed by EAI in March 2013.

● Former monitoring well locations utilized to assess completeness of independent cleanup action activities following removal of underground storage tanks in 1989 and later in the early 1990's. A "no further action" (NFA) was granted in 2003 by the Washington State Department of Ecology (WDOE / Tacoma Pierce County Health Department (TPCHD)).



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EXPLORATION PLAN

Tebb & Sons Lumber
(Pierce County Tax Parcel 0320032042)
1906 Marc Street
Tacoma, Washington

Job Number:

JN-33035

Date:

April 2013

Scale:

Plate:

2

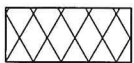
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2014 Google Earth Image

● Borings made by EAI in September 2017.

○ Borings made by EAI in 2013.



Approximate former excavation limits based deduced by ground-penetrating radar.



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STUDY AREA / EXPLORATION PLAN

**Former Tebb & Sons
(UST / NFA Area)**

**1906 East Marc Street
Tacoma, Washington**

Job Number:

JN 33035-1

Date:

September 2017

Scale:

1"=30'

Plate:

3

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WDOE Well Tag:

Lat:

Long:

BORING B1 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill (old UST removal / remediation excavation).		
5		damp				X	
		▼ Wet Wet					
10				SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments. Hydrocarbon odor at 8 ft.	X	
					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.		
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B1

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

3/1/2013

Logged by:

RBR

Plate:

A-1

WDOE Well Tag:

Lat:

Long:

BORING B2 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.		
5		damp		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	
		▼			Hydrocarbon odor between 7 & 8 ft.	X	
		Wet					
10					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.		
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B2

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

03/01/2013

Logged by:

RBR

Plate:

A-2

WDOE Well Tag:

Lat:

Long:

BORING B3 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.	X	
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B3

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

WDOE Well Tag:

Lat:

Long:

BORING B4 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.	X	
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B4

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

WDOE Well Tag:

Lat:

Long:

BORING B5 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.	X	
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

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BORING B5

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

WDOE Well Tag:

Lat:

Long:

BORING B6 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					Silt, organic, at 10 feet.	X	
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B6

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

WDOE Well Tag:

Lat:

Long:

BORING B7 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					Silt, organic, at 10 feet.	X	
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B7

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

WDOE Well Tag:

Lat:

Long:

BORING B8 (2013 Study)

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	<u>Fill</u> . Sand, gravel fill underlying asphalt pavement.	X	
5		damp moist ▼ Wet		SP	<u>Sand</u> , fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	
10					<u>Silt</u> , organic, at 10 feet.	X	
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 7 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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BORING B8

Tebb & Sons Lumber
1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035

Date:

03/01/2013

Logged by:

RBR

Plate:

Enclosure E

Study Area/Exploration Plan and Boring Logs – September 2017

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● Borings made by EAI in September 2017.

○ Borings made by EAI in 2013.



Approximate former excavation limits based deduced by ground-penetrating radar.



**ENVIRONMENTAL
ASSOCIATES, INC.**

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STUDY AREA / EXPLORATION PLAN

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington

Job Number:

JN 33035-1

Date:

September 2017

Scale:

1"=30'

Plate:

3

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WDOE Well Tag:

Lat:

Long:

BORING B3

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.		
5		damp ▼ Wet		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
10		Wet		ML	Silt, silt, sandy, some natural woody material, brown/black.	X	0.0
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



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Bellevue, Washington 98004

BORING B3

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-3

WDOE Well Tag:

Lat:

Long:

BORING B4

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.		
5		damp		SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
		Wet			<i>Slight petroleum odor between 6' & 7' BGS.</i>	X	7.2
10		Wet		SM	Silt-Sand, very-fine to fine sand, with silt, black.	X	0.0
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B4

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-4

WDOE Well Tag:

Lat:

Long:

BORING B5

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.		
5		damp		SP	Sand, fine to course (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
		Wet				X	0.0
10		Wet		SM/ ML	Silt-Sand / Sandy-Silt, very-fine to fine sand, with silt, black/brown.	X	0.0
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B5

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-5

WDOE Well Tag:

Lat:

Long:

BORING B6

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Sand, gravel fill underlying asphalt pavement. <i>Concrete encountered at 1 ft.</i>		
		damp			<i>Concrete encountered at 4 ft (foundation??)</i>		
5		Wet		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
10		Wet		SM/ ML	Silt-Sand / Sandy-Silt, very-fine to fine sand, with silt, black/brown.	X	0.0
					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B6

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-6

WDOE Well Tag:

Lat:

Long:

BORING B7

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0				(F)	Fill. Sand, gravel fill underlying asphalt pavement. <u>Concrete at 2 ft.</u>		
		damp					
		damp		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
5		Wet				X	0.0
10		Wet		SM/ ML	Silt-Sand / Sandy-Silt, very-fine to fine sand, with silt, some woody material, black/brown.	X	0.0
					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B7

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-7

WDOE Well Tag:

Lat:

Long:

BORING B8

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill underlying asphalt pavement.		
5		damp		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	0.0
		Wet				X	0.0
10		Wet		SM/ ML	Silt-Sand / Sandy-Silt, very-fine to fine sand, with silt, black/brown.	X	0.1
15					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B8

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-8

WDOE Well Tag:

Lat:

Long:

BORING B9

Ground Surface Elevation: ~12 ft

Depth/ Sample	Well Design	Moisture/ Water Table	Blows / Foot	USCS	DESCRIPTION	Soil Sample	PID
0		damp		(F)	Fill. Sand, gravel fill (old UST removal / remediation excavation).		
		damp				X	0.0
5		▼ Wet				X	0.2
		Wet		SP	Sand, fine to coarse (mostly fine) sand, minor gravel, black, some shell fragments.	X	1.4
10		Wet		SM/ ML	Silt-Sand / Sandy-Silt, very-fine to fine sand, with silt, black/brown.		
					Soil boring terminated at 10 feet. Groundwater encountered at approximately 6 feet below ground surface.		
15							
20							
25							
30							
35							
40							

Sampler: Continuous Macro-Core (5ft).

Driller: ESN - Geoprobe Rig



ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

BORING B9

Former Tebb & Sons
(UST / NFA Area)

1906 East Marc Street
Tacoma, Washington 98354

Job Number:

JN-33035-1

Date:

9/29/2017

Logged by:

RBR

Plate:

A-9

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Enclosure F

CHB's Comments on Proposed Removal of Restrictive Covenant

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Citizens for a Healthy Bay

535 Dock Street

Suite 213

Tacoma, WA 98402

Phone (253) 383-2429

chb@healthybay.org

www.healthybay.org

April 10, 2020

Panjini Balaraju
Washington Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775
Submitted electronically

Re: X2P Marc Land Associates Site Proposed Removal from a Restrictive Covenant

Thank you for providing the opportunity to review and comment on proposed removal of the X2P Marc Land Associates site from its Restrictive Covenant.

Executive Director

Melissa Malott

Citizens for a Healthy Bay (CHB) is a 30-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

Board of Directors

Desiree Wilkins Finch

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Alan Varsik

Staff and expert members of CHB's Policy and Technical Advisory Committee have reviewed the proposal and supporting documents. Our comments are outlined below.

The Department of Ecology (Ecology) has proposed the removal of an environmental Restrictive Covenant at the X2P Marc Land Associates property at 1650 East 18th Street, a site in the Tacoma Tideflats north of the Puyallup River. In the past, a 500-gallon gasoline/diesel underground storage tank, contaminated soil, and existing structures were removed from the site, and groundwater monitoring indicates that petroleum contamination is below state standards. Consequently, surface contamination appears to be remediated. No subsurface investigation or cleanup is documented in the current information.

**A tax-exempt
501(c)(3) Washington
nonprofit corporation**

CHB is concerned about the likelihood that this site is within the boundaries of the historic Tacoma Tideflats Landfill. This historic landfill was described in the 2010 Tacoma Pierce County Health Department report¹, and appeared to extend from the Puyallup River to the western portion of the US. Oil site. Figure 33 in the report shows the approximate boundaries for the landfill. Solid waste was reported as being relatively shallow, extending down 8-10 feet. In addition to household waste, the report indicates that waste from Hooker Chemical may have been disposed in this area. When the second phase of the nearby Gog-le-hi-te wetland was constructed, over 180,000 tons of debris including contaminated soils and solid waste was excavated. Consequently, any work done on this site may well uncover additional landfill materials.

Because of the strong possibility of subsurface contamination, CHB requests that a modified restrictive covenant for any subsurface work be placed on the property, and that Ecology be notified immediately if contamination is found. The owner should notify and obtain approval from Ecology before subsurface excavation is undertaken, and Ecology should be allowed access to the property. The previous restrictive covenant should be removed.

Thank you for considering these comments. Please contact Erin Dilworth at edilworth@healthybay.org for any questions or clarifications.

Sincerely,



Erin Dilworth
Policy & Technical Program Manager



Melissa Malott
Executive Director