

Saltbush Environmental Services, Inc.

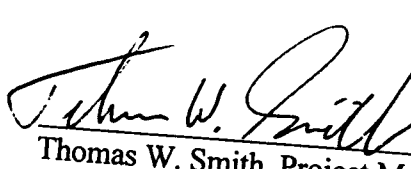
UST Decommissioning Report The 1940 East 11th Street Project Tacoma, Pierce County, Washington Project No. 98122974 February 3, 1999

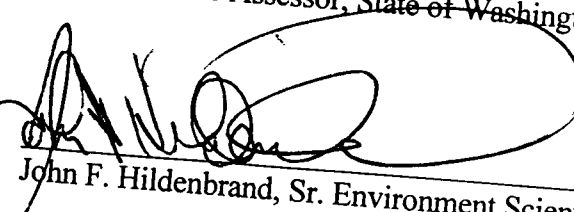
Prepared for:

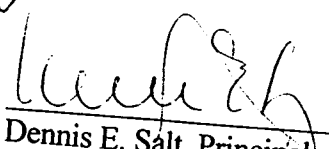
Mr. Bob Shea
P.O. Box 1655
Tacoma, Washington 98401

The on-site date for this project was January 21, 1999.

Questions regarding this report, the presentation of the information, and the interpretation of the data are welcome and should be referred to the Project Manager.


Thomas W. Smith, Project Manager
Registered Site Assessor, State of Washington


John F. Hildenbrand, Sr. Environment Scientist


Dennis E. Salt, Principal

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REPORT DISTRIBUTION

2 Copies	Mr. Bob Shea
1 Copy	Tacoma-Pierce County Health Department
1 Copy	Washington Department of Ecology
1 Copy	Saltbush Environmental Services, Inc. (Project Reference # 98122974)

1.0 INTRODUCTION

1.1 Purpose and Objectives

This report presents the results of a field visit, removal of an underground storage tank (UST) and sampling and testing of soils from the UST excavation. The site is located at 1940 East 11th Street, Tacoma, Washington. Services provided for this project were authorized by Mr. Bob Shea on December 15, 1998.

The purpose of this project was to properly decommission a 6,000-gallon UST. Field activities were conducted on January 21, 1998.

1.2 Project Personnel

Project Manger/Registered Site Assessor:

Thomas W. Smith

Senior Environmental Scientist:

John F. Hildenbrand

Principal:

Dennis E. Salt

Excavation Contractor/Decommissioning Supervisor:

CEcon Corporation

Laboratory:

Spectra Laboratories, Inc.

2.0 BACKGROUND INFORMATION

2.1 Site Identification

The subject site is located in the Port of Tacoma area. The site address is 1940 East 11th Street, Tacoma, Washington 98421. This site is utilized as a distribution center for Brown & Haley, a candy manufacturer.

2.2 Regional Geology/Hydrogeology

The subject is located in an area that is relatively flat with an elevation of approximately 5 to 20 feet above sea level. The depth to ground water was found at approximately 6 feet below the ground surface during removal of the UST. Soils in this area are described as Xerorthents (Fill Areas) which consist of smoothed areas filled artificially with earth, trash or both. This unit is most commonly found in and around urban areas. A large area is located in Tacoma where wet lands have been filled with material from the construction and dredging of the waterways and Commencement Bay.

2.3 Previous Investigations

None were provided or noted for the site.

3.0 UNDERGROUND STORAGE TANK INFORMATION

3.1 Dimension and Size of UST

The tank measured 109 inches in diameter and 156 inches in length. The calculated storage capacity is approximately 6,000 gallons.

3.2 Type of UST

The type of construction of the tank was single-walled steel and was used for the storage of heating oil.

3.3 Observed Condition of UST

The tank appeared to be in poor condition with observable holes found in the bottom of the tank.

3.4 Age of UST

The tank was taken out of service c. 1997 and is approximately 50 years old.

3.5 Type of Piping and Pumps

The piping was constructed of steel and encased in concrete. The lines were flushed clean and then capped at each end.

4.0 SAMPLE COLLECTION

4.1 Sampling Objectives

The objective of soil sampling from the UST excavation is to determine if a release of product from the UST system has occurred. A total of four (4) samples were taken for testing.

4.2 Sample Collection Methodology/Equipment

A backhoe was used to obtain a total of four soil samples from the excavation. Soil samples were collected from the backhoe bucket using pre-cleaned dedicated stainless steel spoons and transferred into laboratory-supplied, manufacturer-cleaned 4 oz. glass jars with Teflon®-lined plastic lids. Samples were selected for field and laboratory analysis based on field screening for visual contaminant characteristics and portable photoionization detector (PID) response.

4.3 Soil Sampling Observations

The excavation measured approximately sixteen feet by twelve feet and had a depth of twelve feet below the ground surface (bgs). A concrete pad and asphalt cover was removed to provide access to the UST. Ground water was encountered at approximately six feet bgs. Because of the shallow depth of the ground water, soil samples were not obtained from the base of the excavation. Samples were obtained from the ground water interface which occurs at approximately 5.5 feet bgs. Soils observed during the excavation were sandy silts that are common fill material in this area. The soils were noted as having a petroleum hydrocarbon odor and the ground water found in the excavation had a sheen, which indicates that a release of product has occurred from this underground storage tank system.

4.4 Field Screening

Soils were field characterized utilizing a properly calibrated photoionization detector (PID) response and visual characterization. There was indication of contamination from field screening of soils during this investigation.

5.0 SAMPLE ANALYSIS RESULTS

5.1 Laboratory Analytical Methods

Method NWTPH-Dx is the qualitative and quantitative method (extended) for semi-volatile ("diesel") petroleum products in soil and water. Petroleum products applicable for this analysis include jet fuels, kerosene, diesel oils, hydraulic fluids, mineral oils, lubricating oils and fuel oils.

The NWTPH-Dx method is intended to replace Oregon's Department of Environmental Quality TPH-D and Washington's Department of Ecology WTPH-D methods and to present a more comprehensive approach to semi-volatile petroleum product analyses. NWTPH-Dx adapts Oregon's TPH, Washington's WTPH and EPA SW-846 Methods 3510, 3540/3550 and 8000 and covers the quantitative and qualitative analysis of semi-volatile petroleum products, i.e. jet fuels through heavy fuel oils, in soil and water.

The method involves extracting the samples with methylene chloride and injecting a portion of the extract into a gas chromatograph (GC) equipped with a flame ionization detector (FID). This method specifies criteria for the identification and quantitation of semi-volatile petroleum products. A clean-up procedure, which may be used to aid in the removal of non-petroleum based organic interferences, i.e. biogenic interferences, has been included. When the type of petroleum product is unknown, #2 diesel will initially be used as the default petroleum standard.

The reporting limits are 25 mg/kg (soil) and 0.25 mg/L (water) for the petroleum products in the elution range of jet fuels through #2 diesel. For petroleum products eluting after #2 diesel oil, e.g. motor oils, hydraulic fluids, and heavy fuel oils, the reporting limits are 100 mg/kg (soil) and 0.50 mg/L (water). All soil results are reported on a dry weight basis. Since this value assumes 100 percent solids and therefore will be higher depending on the actual moisture content, the analyst is permitted to concentrate the extract to obtain these reporting limits. When doubt exists as to which reporting limit is applicable for the petroleum product present, the analyst should use the lower value.

The method is applicable for the identification, by pattern matching ("fingerprinting"), and quantitation of semi-volatile petroleum products. These include kerosenes, jet fuels, diesel oils, fuel oils, lubricating oils, hydraulic fluids, mineral oils and insulating oils, e.g. transformer oils. In general, those petroleum products that do not contain a substantial volatile fraction, i.e. the majority of the components eluting outside of the gasoline range, should be analyzed by this method.

The detection limits of all analytical procedures coincided with the detection limits necessary to determine cleanup levels as established by the Model Toxics Control Act (MTCA). Analytical methods used to evaluate the effectiveness of a cleanup action were compliant with the requirements in WAC 173-340-707 and WAC 173-340-830.

5.2 Analytical Results

A total of four samples were submitted to Spectra Laboratories, Inc. for NWTPH-Dx analysis. Two of the soil samples submitted for analysis reflected levels of diesel-range hydrocarbons to be present at concentrations above The Model Toxics Control Act (MTCA) Method A table for soils. One of the samples reflected levels of diesel-range hydrocarbons to be present at concentrations above the method practical quantitation levels (PQL) but below the MTCA Method A table for soils. The fourth sample reflected levels of diesel-range hydrocarbons to be present at concentrations below the PQL (non detect). All four of the samples had non-detectable concentrations for heavy oil-range hydrocarbons. The following is a summary of laboratory analytical results:

**Table #1 NWTPH-Dx
Results in parts per million (ppm)**

Sample ID	Description	Diesel	Heavy Oil
BH-1	Taken from east end of tank @ 5 ft bgs	< 25.0	< 100.0
BH-2	Taken from northeastern portion of excavation @ 5 ft bgs	280.00	< 100.0
BH-3	Taken from the northern portion of the excavation @ 5 ft bgs	64.0	< 100.0
BH-4	Taken from the northwestern portion of the excavation @ 5 ft bgs	19,000.0	< 100.0
MTCA Method A Levels for Soil		200.0 ppm	200.0 ppm

< indicates less than

Bold reflects concentration above MTCA Method A table for soils

6.0 Quality Assurance/Quality Control (QA/QC)

6.1 Sample Collection

Samples were placed directly into pre-cleaned laboratory prepared 4-ounce sample jars, after texture characterization, visual observation and PID field screening. The determination of particle size and PID screening was conducted with soils still resident in the backhoe bucket.

Samples were transferred using a single dedicated stainless steel sampling spoon. Samples were immediately transferred to a cooler with frozen blue ice after completion of labeling. Samples were maintained at approximately 4 °C.

6.2 Chain-of-Custody

Each sample was appropriately logged on a correctly completed chain-of-custody form. The form was reviewed by the project manager for completeness prior to submittal of the samples to the laboratory.

6.3 QA/QC

There were no problems or deviations reported by the analytical laboratory, Spectra Laboratories, Inc., Tacoma, Washington.

7.0 CONCLUSIONS AND RECOMMENDATIONS

7.1 Conclusions

Based on site observation and analytical results developed from soil samples tested from this location there is contamination present at this location. The contamination present is in the form of diesel-range petroleum hydrocarbons released from the underground storage tank system located at the site. Effected media at the site includes soil and ground water.

7.2 Recommendations

A remedial investigation to include soil borings, ground water wells and analytical testing of soil and ground water is recommended for this site. Before remedial activities can begin, a workplan outlining details of the remedial investigation must be submitted to the Tacoma-Pierce County Health Department for their review and approval.

8.0 LIMITATIONS

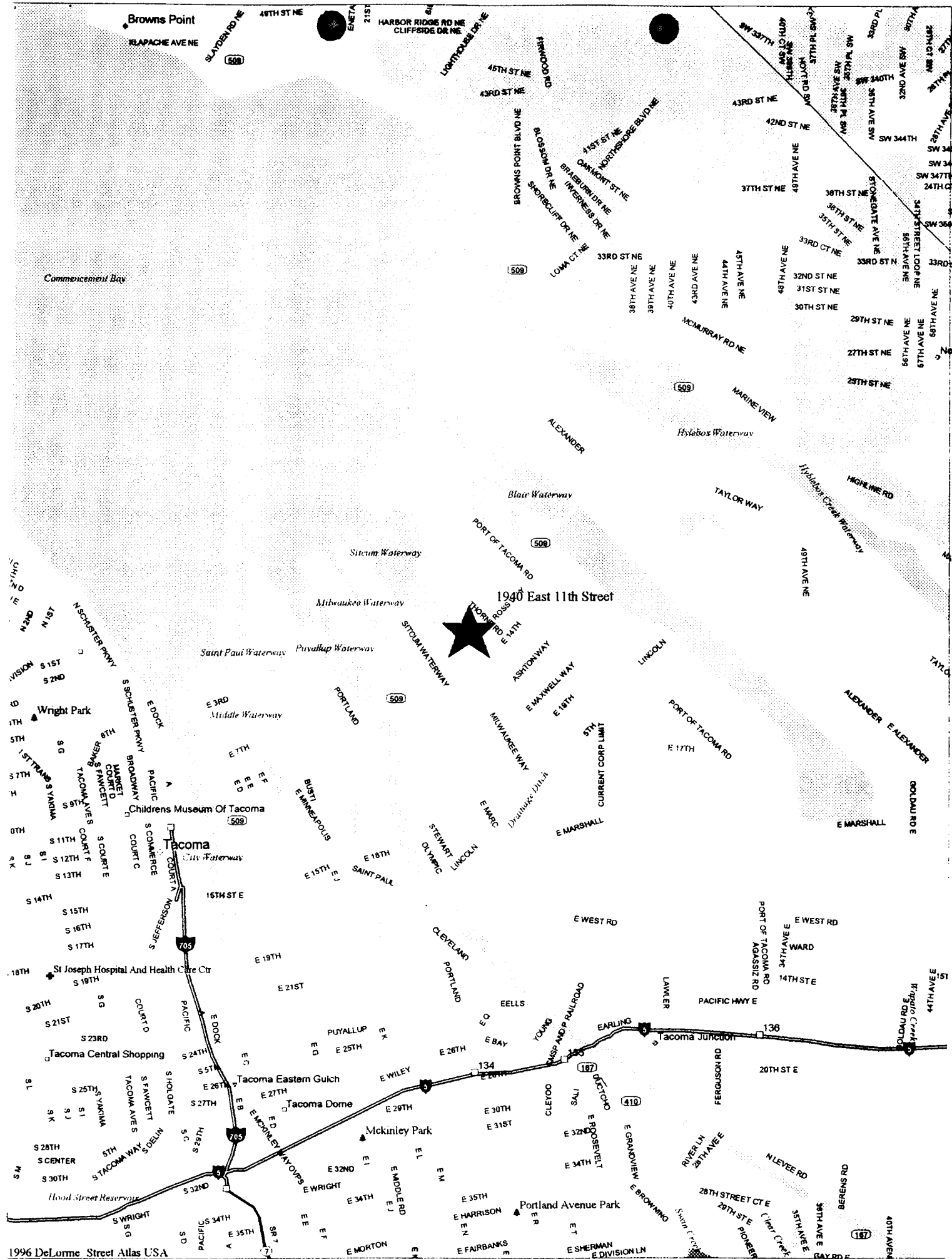
The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. Since site conditions and regulations beyond our control could change at any time after the completion of our site visit, we are not responsible for the impacts of any changes in environmental conditions, standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

9.0 CLOSURE

This concludes the investigation and presentation of material gathered on the herein-described site for the tasks described for this study. Saltbush Environmental Services, Inc. will be pleased to assist with any further requirements that may be necessary for this property.

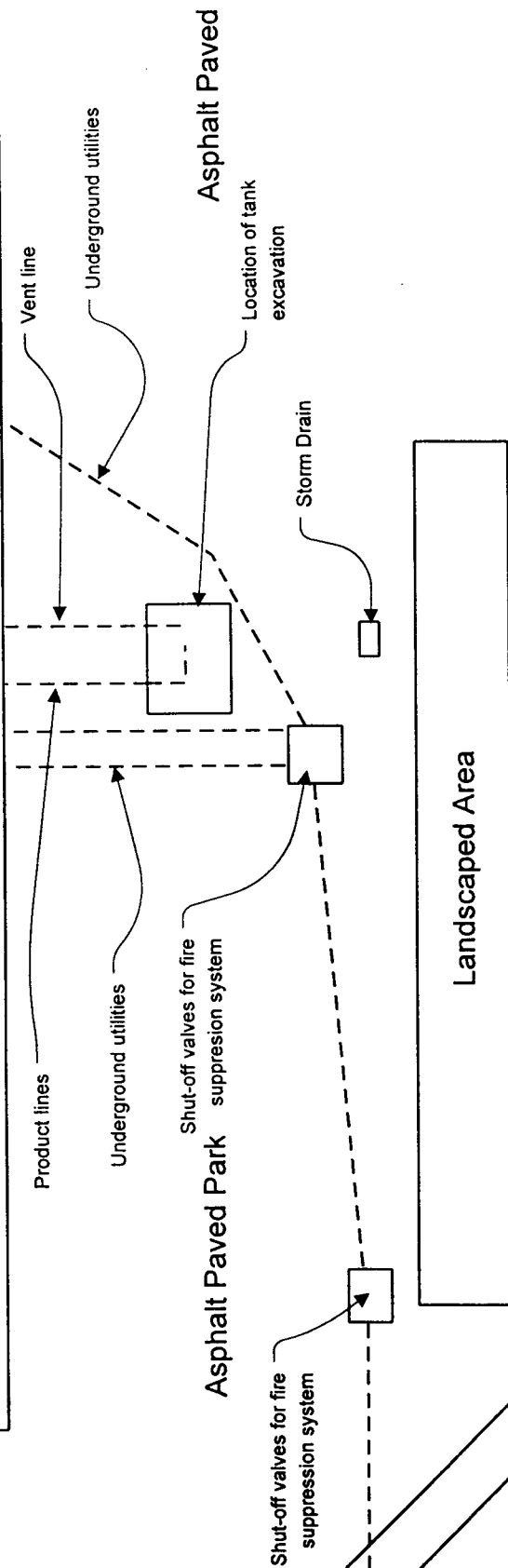
Thank you for allowing us the opportunity to be of service to you. If you have questions regarding this report or require further discussion of any portion of this project we will be pleased to offer our assistance.





Brown & Haley Distribution Center Building

Brown & Haley Distribution Center Building

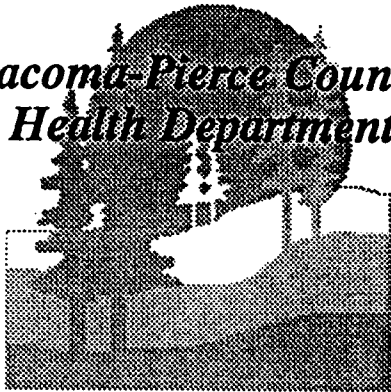


Site Diagram: February 3, 1999
Saltbush Environmental Services, Inc.
Tacoma, Washington
Drawn By: TWS



1 in = 25 ft

**Tacoma-Pierce County
Health Department**



Permit #

9904

UNDERGROUND STORAGE TANK REMOVAL PERMIT

Tacoma-Pierce County Health Department (TPCHD)

Site Location

1940 East 11th St

Facility Name

Brown & Haley Dist. Center

Removal Firm

CECON Corp

Number of Tanks to be Removed

1

All work must be performed in accordance with current laws, ordinances, resolutions and rules and regulations.

A handwritten signature in black ink, appearing to read "M. E. Taylor", written over a horizontal line.

Approval Signature

VALIDATION:

Permit must be accessible at site - DO NOT ALTER OR DEFACE
Expires 180 days from validation date.

Forty-eight (48) hour notice must be provided to the TPCHD prior to removal/abandonment.
Site assessment report for TPCHD due 90 days after removal.



UNDERGROUND STORAGE TANK 30 DAY NOTICE

See back of form for instructions

Please ✓ the appropriate box: ☐ Intent to Install ☒ Intent to Close ☐ Both

FOR OFFICE USE ONLY	
Site ID #:	
Owner ID #:	
Once validated by Ecology, this form serves as your temporary permit for the tanks listed below.	

Site Information

Site ID Number _____
(Available from Ecology if the tanks are registered)

Site/Business Name Brown & Haley Distribution Ctr. Mailing Address 1940 East 11th Street
Street Street

Site Address 1940 East 11th Street P.O. Box _____

City/State Tacoma, WA City/State Tacoma, WA

Zip Code 98421 Telephone (____) _____ Zip Code 98421 Telephone (____) _____

Owner Information

(This form will be returned to this address)

UST Owner/Operator Brown & Haley

Tank Installation Company (If known). Fill out this section ONLY if tanks are being installed.

Service Company _____ Contact Name _____

Address _____
Street P.O. Box _____
City State Telephone (____) _____
Zip Code _____

Tank Permanent Closure Company (If known). Fill out this section ONLY if tanks are being closed.

Service Company CEcon Corporation Contact Name Andrew J. Riddell

Address 1703 Portland Avenue P.O. Box _____
City Tacoma State WA Zip Code 98421 Telephone (253) 272-8851

Tank Closure Information

Fill out this section ONLY if tanks are being closed.

Tank ID	Projected Closure Date	Tank Capacity	Substance Stored	Date Tank Last Used	Is There Product in the Tank (Yes/No)	If No, Date Tank Was Pumped
NA	1/99	6,000 K	Heating Oil	NA	Yes	

Tank Installation Information

Fill out this section ONLY if tanks are being installed.

Tank ID	Approx. Install Date



1703 Portland Avenue

Tacoma, WA 98421

(206) 272-8851

98-104

Environmental and Industrial Contractors

No 0414

SHIPPER Brown & HaleyADDRESS TACOMA WASH

PHONE _____

ORIGIN TANK cleanings

U.S. D.O.T. DESCRIPTION Including Proper Shipping Name, Hazard Class & I.D. Number	CONTAINER		QUANTITY	
	No.	Type	Wt.	Vol.
THIS MATERIAL IS NOT REGULATED UNDER WAC 173-303, 40 CFR PART 261 OR PART 261 OIL/WATER	TANK	TRUCK	461 gal	

PHYSICAL STATE (CIRCLE):

SOLID

LIQUID

SLUDGE

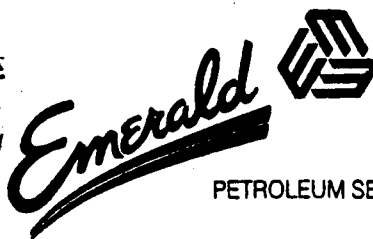
OTHER _____

SPECIAL INSTRUCTIONS AND ADDITIONAL INFORMATION _____

IN THE EVENT OF A SPILL, CONTACT EITHER THE DEPARTMENT OF ECOLOGY 800-258-5990 AND/OR
THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 800-424-8802 FOR EMERGENCY ASSISTANCE.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulation of the U.S. Department of Transportation.

SHIPPER SIGNATURE Johannes Brown & HaleyDATE 1-27-99TRANSPORTER ECON CORPPHONE 253-272-8851ADDRESS 1703 PORTLAND AVESIGNATURE Don RuffDESTINATION Emerald PetroleumPHONE 206-622-1108ADDRESS 1700 AIRPORT WAY, SEATTLESIGNATURE Bob BluffDATE 2/10/99



42485-104
**BILL OF LADING AND
GALLONAGE REPORT**

CUSTOMER CECON DATE 2/10/99
JOB LOCATION BROWN & HALEY
DRIVER LAKE EQUIP WAD TRK
JOB NO _____ DOCUMENT NO 02114
PRODUCT OIL / H₂O EST. GALS 461
PRODUCT _____ EST. GALS _____
DRUMS _____ NO _____
OTHER _____ EST SOLIDS _____
WASH OUT: YES ☐ NO ☐ TIME IN _____ TIME OUT _____
WATER 100 GAL LOCATION S-6 CODE TRANSIT
SOLIDS _____ GAL LOCATION _____ CODE _____
_____ % SUSPENDED SOLIDS BY CENTRIFUGE + _____ GALS. SEDIMENT
OIL/DIESEL 401 GAL LOCATION S-6 CODE TRANSIT
HOC'S _____ PCB'S _____ B.S.&W. _____ API. _____ LAB: YES ☐ NO ☐
GAS _____ GAL LOCATION _____
BUNKER FUEL _____ GAL LOCATION _____
OTHER _____

THIS MATERIAL IS NOT REGULATED UNDER WAC-173-303 OR 40CFR PART 261 AND 40CFR PART 761

[Signature] FACILITY REPRESENTATIVE
NW116 (REV. 8/96)
[Signature] DRIVER SIGNATURE
CUSTOMER

SCHNITZER STEEL INDUSTRIES, INC.

1902 MARINE VIEW DRIVE • TACOMA, WASHINGTON 98422

98-104

247648

SEQ. NO.		GROSS WT. (LB.)		DATE		
WD 125		14620		13:03 13:16 01 Feb 99		
W D CARLL						
CODE	MATERIAL	\$ / UNIT	TARE WT. (LB.)	NET WT. (LB.)	ADJUSTED NET WT. (LB.)	AMOUNT
16	# 1 SHEAR	\$21.00/NT	12340	2280	2280	23.94

Permit

(Non-Transferable)

- ☐ Annual
☐ Special

ABANDONMENT/REMOVAL OF UNDERGROUND TANK

TACOMA FIRE DEPARTMENT • Fire Prevention Bureau • Telephone: 591-5740 • Tacoma, Washington

Date 1-20-99 Expiration Date 2-20-99
Issued To CE con Corp. Phone No. 272-8851
Address PO B 1514 TAC. WA 98401
For (1) one 6000 gal. underground fuel tank
Removal.
Location 1940 E 11th st TAC.

Conditions:

1. Comply with Article 79 of the Uniform Fire Code (1994).
2. Comply with NFPA Standard #30.
3. Comply with TFD abandonment or removal of underground tank procedures.
4. Pay \$50 permit fee per tank; \$100 maximum per site.
5. Call for inspection AT LEAST 48 HOURS before tanks are removed from ground. Need to inspect tank and open hole. Contact Fire Dispatch 591-5733 & Water Dept.
6. Acquire permit from Pierce County Health Department, 3629 South D Street, 591-6469.

x Richard Redell
Responsible Party

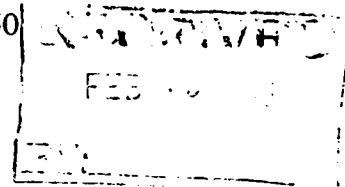
By Dan Ostlund
Fire Marshal

It is understood and agreed that this permit may be revoked for cause at any time.



SPECTRA Laboratories, Inc.

2221 Ross Way • Tacoma, WA 98421 • (253) 272-4850



February 1, 1999

Saltbush Environmental
P.O. Box 505
Tacoma, WA 98401-0505

Attn: Dennis Salt

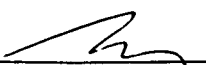
Project: 2974
Sample Matrix: Soil
Date Sampled: 1-21-99
Date Received: 1-21-99
Date Analyzed: 1-26-99
Spectra Project: S901-170

WTPH-D EXTENDED

<u>Spectra #</u>	<u>Sample ID:</u>	<u>WTPH-D mg/Kg dry wt.</u>	<u>Heavy Oils mg/Kg dry wt.</u>	<u>Surrogate Recovery p-Terphenyl</u>
0200	BH-1	<25	<100	136%
0201	BH-2	280	<100	133%
0202	BH-3	64	<100	132%
0203	BH-4	19,000	<100	169%*
Method Blank		<25	<100	118%

* Surrogate out of range due to the high level of diesel in the sample.

SPECTRA LABORATORIES, INC.



Steven G. Hibbs, Laboratory Manager

SPECTRA Laboratories, Inc.

2221 Ross Way • Tacoma, WA 98421 • (253) 272-4850 • Fax (253) 572-9838

PAGE 1 of 1

[illegible]



View of start of tank
excavation.



View of removed tank.



View of base of excavation.

Saltbush Environmental Services, Inc.

August 20, 1998

Mr. Bob Shea
P.O. Box 1655
Tacoma, Washington 98401

Re: 6,000-Gallon Heating Oil Tank Decommissioning
Brown & Haley Distribution Center
1940 East 11th Street, Tacoma, WA 98421
2974

Dear Mr. Shea:

Thank you for allowing us the opportunity to assist you with the removal of the underground heating oil storage tank at the Brown & Haley Distribution Center near the Port of Tacoma. We sent requests for proposals to three contractors and have, as of today, received responses from two. Both contractors are properly licensed and have reputations for qualified work. Copies of their proposals are enclosed for your review.

Saltbush Environmental Services, Inc. will monitor the excavation and removal of the tank, document and photo-document site conditions, take appropriate confirmation samples, arrange for testing and prepare a written report for you, the Washington Department of Ecology and the Tacoma-Pierce County Health Department.

Should site conditions reflect a confirmed release we will notify you immediately and you will be required to notify the Department of Ecology within 24 hours. We are then required to notify Ecology within 72 hours.

Upon receipt of test results from the laboratory we will compare the level of analytes detected (if any) with the cleanup levels as indicated in the Model Toxics Control Act (MTCA) Cleanup Regulation, Chapter 173-340 WAC, Method A soil cleanup tables. You will be apprised of the test results by telephone and a written report will be provided as noted above.

Costs for conducting this work will be billed as noted below. Out-of-pocket expenses to include the excavation contractor and laboratory testing will be billed at cost plus 15%. The contractor quotations that have been received are as follows:

CEcon Corporation	\$4,125.00 plus tax
Langseth Environmental	\$6,451.00 plus tax
Lee Morse Construction	No quote received

Required testing will be conducted for the presence of heating oil by method WTPH-D. If there is no evidence of a release the minimum number of samples required by the Washington Department of Ecology will be taken; one from the excavation base and two, representing soil from each sidewall (composited). Additionally, a minimum of three samples is required to be taken from the excavated soils. The cost of testing is \$80.00 per sample. As noted, an administrative fee of 15% will be added to the costs of testing.

Eight hours are estimated for Saltbush Environmental Services, Inc. for pre work, sample preparation and laboratory coordination. An additional eight hours for consultation, research, report writing and follow-up. The sixteen hours Technician rate of \$65.00 per hour plus two hours of Principal oversight, \$ additional time for meetings, consultation or work directed by the client will be \$65.00 per hour rate for technician, \$95.00 per hour for Principal.

Please indicate acceptance
have any questions concerning
Environmental Service

IN WITNESS whereof,
executed this agreement on

Mr. Bob Shea,
Client/Owner

Bob Shea
Authorized Signature/Date

By: Vice President
Name/Title (please print)

Please let us know of your selection of a contractor for this work so we can implement this project. An authorization to proceed is included in this letter agreement, which we ask that you sign and return to our office. We will begin as soon as we hear from you. Please keep in mind that work cannot begin until a 30-day waiting period has expired (Ecology requirement).

A breakdown of estimated charges is noted to assist you with your calculations. We have noted the charge from CEcon for this example, as they are the lowest.

Description	Cost
CEcon Corporation	\$4,125.00
Tax at 8.4%	346.50
Testing: 6 tests at \$80.00 each	480.00
15% Administrative Fee	<u>742.73</u>
Saltbush Environmental Services, Inc.	
Total Estimated Project Costs	

Please let me know if you have any questions. We will be pleased to be of assistance that we can. Terms, conditions and the authorization to proceed continue.

Very truly yours,

Saltbush Environmental Services, Inc.

Dennis E. Salt

Dennis E. Salt
Principal

Authorization Received	by
Report Due to Client	by
Project Name	
Project Number	

