

SEPA¹ Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

A. Background

[Find help answering background questions²](#)

1. Name of proposed project, if applicable:

Former Fleischmann's Vinegar Plant

2. Name of applicant:

J.S. Held

3. Address and phone number of applicant and contact person:

Adam R. Morine, P.E. (425) 563-9527

4. Date checklist prepared:

October 6, 2025

5. Agency requesting checklist:

City of Sumner

6. Proposed timing of schedule (including phasing, if applicable):

Proposing to do the work this Fall, 2025, prior to heavy rains. If not, spring of 2026.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No. Property owner intends to clean up contaminated soils prior to listing for sale in 2026. Once permitted and cleaned up, the owner will solicit the Washington State Department of Ecology for a No Further Action Determination prior to sale.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The Site is currently enrolled in the Washington State Department of Ecology's Voluntary Cleanup Program (VCP) and has the Site ID numbers:

- Facility/Site No.: 85671776
- Cleanup Site ID.: 12577
- VCP Project No.: SW1562

Attached are the known documentation of environmental characterization and remediation efforts conducted at the property to date. These reports include:

1. Underground Storage Tank Closure Report - Floyd Snider, September 8, 2016
2. VCP Project Status Request – Department of Ecology, August 16, 2023
3. Washington State Department of Ecology SHARP report, March 8, 2025

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

10. List any government approvals or permits that will be needed for your proposal, if known.

SEPA and Fill and Grade Permit.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Bunker C (diesel) contamination is present as a result of former vinegar manufacturing processes.

The soils remain in a limited area around private utilities from 3 to 8 feet below ground. Former remediation work in this area terminated due to the presence of the utilities. Plan includes the removal of ~490 yds³ of remaining contaminated soils to restore the property to state cleanup requirements.

Prior remedial efforts were documented in an Underground Storage tank Closure Report, listed above.

An estimated 490 cubic yards of contaminated soils are located within the area depicted on Figure 1 and are subject to removal.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The location of this proposal is 1700 Steele Ave, Sumner WA, tax parcel 040241154.

The site lies in section 24, Township 20, Range 4, and Quarter 13.

B.Environmental Elements

1. Earth

[Find help answering earth questions³](#)

³ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

a. General description of the site:

This is the site of a former food manufacturing facility.

The site is generally flat and is located within an area estimated to be approximately 2,150 Sq. Ft., and up to 8 feet in depth.

Circle or highlight one: **Flat**, rolling, hilly, steep slopes, mountainous, other:

b. What is the steepest slope on the site (approximate percent slope)?

The approximate steepest slope on site is 1.7%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The soils generally present on site are a predominant mixture of sand and gravel with some silt.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Excavation will be performed in a limited area of the site to remove diesel-contaminated soil. Excavation work will be initially performed to 2 feet below grade to remove and temporarily stockpile clean soils within the area identified on the plans.

Then, contaminated soils will be removed from 2 feet to 8 feet below grade and sent off site for disposal. The approximate area is 2,150 square feet.

Clean backfill will be supplied by Miles Sand and Gravel and sourced from the Fennel Pit located at 11621 McCutcheon Rd. E., in Bonney Lake. Soils will be tested prior to import and will be structurally suitable and free draining.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Minimal erosion could occur due to the flat Site topography, limited excavation size and excavation work occurring above the water table.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

None.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

A Temporary Erosion and Sediment Control Plan has been prepared to address the potential for erosion or sediment migration.

Plans include minimizing the footprint of excavation area, covering all exposed soils with plastic as appropriate, erecting and maintaining sediment traps and ensuring no soils are tracked onto city streets.

2. Air

Find help answering air questions⁴

- a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

None.

- b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

None.

- c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**

Contractors to minimize vehicle traffic and shut off combustion engine equipment when not in use.

Contractors to spray any visible emissions during excavation work to minimize windblown dust as necessary.

3. Water

Find help answering water questions⁵

- a. **Surface:**

Find help answering surface water questions⁶

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

The White River is approximately 1,000 feet west of the site.

- 2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

No.

- 3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

N/A.

- 4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

No.

- 5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No, per FEMA.gov.

- 6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No.

b. Ground:

[Find help answering ground water questions⁷](#)

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

No.

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

None.

c. Water Runoff (including stormwater):

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Runoff will be collected in localized storm water features. All features will be protected and free of sediment.

Minor stormwater that accumulates within the excavation will drain to groundwater.

- 2. Could waste materials enter ground or surface waters? If so, generally describe.**

No.

- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

No. Following excavation, soils will immediately be backfilled to site grade.

- d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:**

None.

4. Plants

Find help answering plants questions

- a. Check the types of vegetation found on the site:**

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other

shrubs

grass

pasture

crop or grain

orchards, vineyards, or other permanent crops.

wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

water plants: water lily, eelgrass, milfoil, other

other types of vegetation

- b. What kind and amount of vegetation will be removed or altered?**

None.

- c. List threatened and endangered species known to be on or near the site.**

None.

- d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

None.

- e. **List all noxious weeds and invasive species known to be on or near the site.**

Dandelion. Mongolian Blackberry.

5. Animals

Find help answering animal questions⁸

- a. **List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

Rats, mice, squirrels, pigeons, crows.

Examples include:

- **Birds: hawk, heron, eagle, songbirds, other:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

- b. **List any threatened and endangered species known to be on or near the site.**

None.

- c. **Is the site part of a migration route? If so, explain.**

No.

- d. **Proposed measures to preserve or enhance wildlife, if any.**

None.

- e. **List any invasive animal species known to be on or near the site.**

None.

6. Energy and natural resources

Find help answering energy and natural resource questions⁹

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

None.

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

None.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

None.

7. Environmental health

Health Find help with answering environmental health questions¹⁰

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

There is no risk of fire, spills, or explosions, or exposure to toxic chemicals. The removal is targeting parts-per million level contamination in soil.

The proposal involves excavating soils with known contaminants, directly loading into trucks and transferring them off-site at a disposal facility.

- 1. Describe any known or possible contamination at the site from present or past uses.**

Known impacts include minor diesel (aka bunker C) petroleum products in soil.

- 2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

None. Natural gas service to the Site to be shut off by PSE and bled free of contents prior to any subsurface work.

- 3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

None.

- 4. Describe special emergency services that might be required.**

None.

- 5. Proposed measures to reduce or control environmental health hazards, if any.**

Trucks will have covered beds when transporting contaminated soils to reduce sediment mobilization. Trucks will be swept free of sediment prior to leaving the site.

Soils will be covered with plastic to reduce the potential for sediment mobilization.

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

b. Noise

- 1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

North of the site is a railroad that may have negligible noise impacts.

- 2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

Short term, low-level traffic and excavation activities would generate moderate noise during work hours.

- 3. Proposed measures to reduce or control noise impacts, if any:**

None.

8. Land and shoreline use

[Find help answering land and shoreline use questions¹¹](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

The site is currently vacant. The usage of the adjacent properties is industrial. The proposal will negligibly affect nearby properties due to increased vehicle traffic when excavation is taking place.

This project will have no effect on current land uses on adjacent properties.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

No changes in use. The area is zoned as industrial.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

No.

- c. Describe any structures on the site.**

There are no buildings located within the defined project area. Nearby structures are remnants from a former vinegar and yeast manufacturing facility.

- d. Will any structures be demolished? If so, what?**

No.

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

- e. **What is the current zoning classification of the site?**
Industrial.
- f. **What is the current comprehensive plan designation of the site?**
Industrial.
- g. **If applicable, what is the current shoreline master program designation of the site?**
Not applicable.
- h. **Has any part of the site been classified as a critical area by the city or county? If so, specify.**
No.
- i. **Approximately how many people would reside or work in the completed project?**
None.
- j. **Approximately how many people would the completed project displace?**
None.
- k. **Proposed measures to avoid or reduce displacement impacts, if any.**
N/A.
- l. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**
None.
- m. **Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**
None.

9. Housing

[Find help answering housing questions](#)¹²

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**
None.
- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**
None.
- c. **Proposed measures to reduce or control housing impacts, if any:**

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

None.

10. Aesthetics

Find help answering aesthetics questions¹³

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Not applicable. No construction is to take place.

- b. **What views in the immediate vicinity would be altered or obstructed?**

None.

- c. **Proposed measures to reduce or control aesthetic impacts, if any:**

None.

11. Light and glare

Find help answering light and glare questions¹⁴

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

This proposal will not generate any glare as no further constructions are planned.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

N/A.

- c. **What existing off-site sources of light or glare may affect your proposal?**

None.

- d. **Proposed measures to reduce or control light and glare impacts, if any:**

None.

12. Recreation

Find help answering recreation questions

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**

None.

- b. **Would the proposed project displace any existing recreational uses? If so, describe.**

None.

- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

None.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions¹⁵

- a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

No.

- b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

No.

- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

None.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

N/A. Permit plans have been submitted to the City of Sumner.

14. Transportation

Find help with answering transportation questions¹⁶

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

The site has access from Steele Ave. Access plans can be seen on the attached site plan.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

No. The nearest transit stop is approximately 1 mile from the site.

¹⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

No.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

No.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

None. This is a temporary excavation with no permanent construction activities proposed.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

None.

15. Public services

[Find help answering public service questions¹⁷](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

No.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

None.

16. Utilities

[Find help answering utilities questions¹⁸](#)

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

Natural Gas, water, sanitary sewer.

¹⁷ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

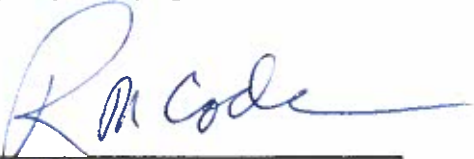
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

C. Signature

[Find help about who should sign](#)¹⁹

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X 
FLEISHMAN'S INDUSTRIES pk. LLC

Type name of signee:

Position and agency/organization:

Date submitted:

D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet](#)²⁰

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

- Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

¹⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

²⁰ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

- Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

- Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

- Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

- Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

- Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

Memorandum

To: Rob Olsen, Tacoma Pierce County Health Department
Copies: Bob Code, Fleischmann's Industrial Park LLC
From: Tom Colligan
Date: September 8, 2016
Project No: CC-Fleischmann's
Re: **Underground Storage Tank Closure Report
Fleischmann's Industrial Park
Sumner, Washington**

This memorandum presents historical and recently collected soil and groundwater data to support the closure of former underground storage tanks (USTs) at the Fleischmann's Industrial Park-owned property located at 1700 Steele Avenue in Sumner, Washington (Figure 1). A permit for UST closure, #RO0000605, was issued on September 30, 2015, for this property by the Tacoma-Pierce County Health Department (TPCHD) and remains pending.

PROPERTY BACKGROUND

The Fleischmann's Industrial Park property (the property) is the site of a former commercial yeast manufacturing facility and current commercial vinegar manufacturing operation. It is located in an area zoned for heavy industrial use by the City of Sumner. The property was divided into several sub-parcels for further industrial and commercial usage in 2008 after the cessation of yeast manufacturing operations. The parcel that is the focus of this memorandum (the subject property) remains in use for vinegar production on its north side and contains associated temporary office and out-buildings on its south side. The structures associated with former yeast manufacturing have been removed. The parcel to the west is currently vacant, the parcel to the southwest has been redeveloped with the Fleischmann's Industrial Park commercial/light industrial facility, and the parcel to the south is owned by the City of Sumner and is the site of a City-owned water supply well that is not currently in use. The subject property and surrounding property uses are shown on Figure 2.

As previously reported to TPCHD, the subject property formerly contained two 15,000-gallon USTs within a concrete vault and one 500-gallon aboveground storage tank (AST). The tanks held heavy fuel oil for use in boilers and backup generators. Several soil investigations performed on the property between 1998 and 1999 identified areas of soil contaminated with diesel-range organics (DRO) and oil-range organics (ORO) originating from these fuel oil tanks, as well as minor

amounts of gasoline-range organics (GRO). The USTs and ASTs, associated concrete pads, vaults, plumbing, and over 1,200 tons of contaminated soil were removed from the property in 2000, with oversight of the tank removal by TPCHD. The presence of buried utilities and other structures prevented full excavation of soils with DRO and ORO exceeding the Model Toxics Control Act (MTCA) Method A cleanup levels. Post-excavation groundwater sampling by URS in 2000 confirmed that the release of heavy fuel oil had not impacted groundwater quality. The previous property investigations, tank closure, and soil excavation are described in detail in the UST and AST Removal and Voluntary Cleanup Action Report prepared by the URS Corporation (URS 2002) and submitted to TPCHD and Ecology in 2002. One well downgradient of the excavation (MW-3-00) was also reportedly sampled by Environmental Resolutions, Inc., in 2003 and did not have detectable DRO or ORO; these results were summarized in a letter to TPCHD (G-logics 2010).

2016 SOIL AND GROUNDWATER INVESTIGATION

In July 2016, Floyd|Snider performed additional direct push borings to assess current soil (Figure 3) and groundwater conditions (Figure 4) in the vicinity of the remaining residually-contaminated soils as recent development activities resulted in more areas of the site being accessible. To assess if additional excavation was feasible, soil borings were advanced near the northern limits of the previous excavation, where previous confirmation samples had indicated residual DRO and/or ORO concentrations exceeding MTCA Method A cleanup levels, and near the southeastern limits of the previous excavation where confirmation samples had detectable DRO and/or ORO at concentrations less than the MTCA Method A cleanup levels. Borings were also advanced within the footprint of the former power plant and transformers located to the west of the former UST vault, where a chemical odor in soil was noted by construction workers during demolition of those two structures in 2016.

Strong field indications of petroleum contamination were observed in soil samples obtained from two soil borings (FS-05 and FS-06) advanced near the northern limit of prior excavation. These borings were located as close as practicable to the southern limit of multiple active utilities that run east-west in that area. It was likely that this utility corridor limited the extent of the prior excavation. These utilities include a City of Sumner water supply line, multiple storm sewer water lines, and a fire water supply line as well as new concrete footings for an outbuilding that was under construction adjacent to the vinegar manufacturing facility at the time of the investigation. Borings were also advanced as close as possible on the northern side of the utility corridor. However, the samples from these borings did not have any field evidence of contamination, indicating that the heavy fuel release terminates within the utility nest.

Mild to moderate field indications of contamination, including slight staining and petroleum odor, were observed in one other boring (FS-02) located near the southwestern corner of the former excavation but not at boring locations farther to the south. Soil samples were collected for DRO and ORO analysis from intervals in FS-02, FS-05, and FS-06 with field indications of contamination, which was generally encountered between 3.5 and 5.5 feet below ground surface

(bgs), in the moist to wet soils overlying and at the water table. At the other locations where contamination was not apparent, samples were also collected between approximately 3.5 and 5.5 feet bgs, or at depths where prior samples had indicated residual contamination was present. The two most highly contaminated samples were also sampled for analysis of volatile petroleum constituents, petroleum additives, and volatile petroleum hydrocarbons/extractable petroleum hydrocarbons (VPH/EPH). Based on the southerly groundwater flow direction established by URS during post-excavation groundwater sampling, one location (FS-09) to the south of the borings with the greatest field indications of contamination was selected for collection of a groundwater screening sample using a temporary well screen set inside the Geoprobe boring and purged and sampled using a peristaltic pump.

SUMMARY OF SOIL AND GROUNDWATER CONDITIONS

The 2016 supplemental soil boring locations are shown on Figure 3 along with analytical results for DRO and ORO for prior samples in the vicinity with concentrations that exceeded the MTCA cleanup levels. Pre-existing and 2016 soil data and 2016 soil data are shown on Table 1. The 2016 borings served to adequately delineate the extent of residual contamination, which occurs mostly near and within a utility corridor. This area of residual contamination extends less than 20 feet beyond the northern extent of the 2000 excavation, as shown by the samples collected in 2016. The estimated extent of the remaining release is shown on Figure 3.

In other areas to the south and southwest of the 2000 excavation area, which were suspected to have potential residual contamination due to confirmation sample results or recent observations of odor during building demolition, were determined to have DRO and ORO concentrations less than the applicable cleanup levels by results from 2016 soil sampling.

Prior groundwater samples collected at the property have demonstrated that groundwater has not been impacted by releases from the USTs or AST. DRO, ORO, and benzene, toluene, ethylbenzene, and xylenes (BTEX) have not been detected in any groundwater samples analyzed for these compounds. This condition was expected, as heavy fuel oils are nearly insoluble in water. This earlier conclusion of no impact to groundwater was reinforced by the non-detect results from the 2016 groundwater grab sample collected from a boring located downgradient of the area of residual contamination. The extent of the groundwater investigation is shown on Figure 4 and groundwater analytical results for GRO, DRO, ORO, and BTEX are presented in Table 2.

CONCLUSIONS

The heavy fuel oil release from the former USTs at the property was cleaned up to the maximum extent possible during the UST removal completed in 2000. Although some residual contamination of DRO and ORO is present in the soil of the areas to the north and northwest of the former UST vault, removal of this soil remains constrained by active utilities; the removal of structures associated with the former yeast manufacturing operations has not significantly

increased the accessibility of the contaminated soils. The remaining residual DRO and ORO in soil to the west and southwest of the USTs and in the area surrounding the AST are present at concentrations less than MTCA Method A cleanup levels. Recent and historical sampling events, including a 2016 grab sample collected adjacent to and downgradient of the area with the most heavily impacted soil, have determined that groundwater has not been impacted by the heavy oil fuel release.

As demonstrated by the soil and groundwater data presented in this memorandum, the primary closure objectives have been met:

- The extent of accessible contaminated soil has been removed.
- The small amount of residual contamination has been defined
- Shallow groundwater quality has not been impacted.

Normally, under TPCHD regulation, full removal of all impacted soil from a UST is necessary to obtain closure. That is not possible in this case. Therefore, a variance to the TPCHD UST closure permit is an appropriate means to obtain regulatory closure through the UST Program. This UST closure is independent from regulatory closure of the property through the Voluntary Cleanup Program, which will be undertaken following certification of closure from TPCHD.

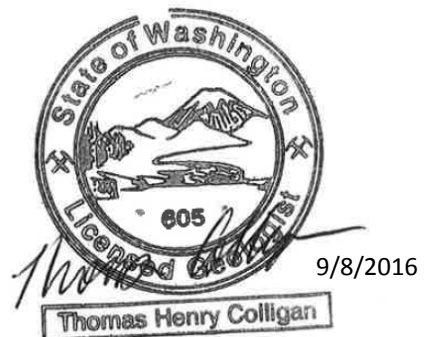
REFERENCES

G-Logics. 2010. Site Status, Underground Storage Tank Removal, Fleischmann's Property, Parcel 0420241150, Permit 2028, Sumner, WA. Letter from Rory Galloway, G-Logics, to Rob Olsen, Tacoma-Pierce County Health Department. 1 November.

URS. 2002. *UST and AST Removal and Voluntary Cleanup Action Report, 11156 Zehnder Street, Sumner, Washington*. Prepared for Mark Henson, Burns Philp Foods, Inc. 17 May.

LIST OF ATTACHMENTS

- Table 1 Analytical Results for Petroleum in Soil
- Table 2 Analytical Results for Petroleum in Groundwater
- Figure 1 Property Vicinity Map
- Figure 2 Current Property Usage
- Figure 3 Diesel- and Oil-Range Organics in Soil
- Figure 4 Diesel-, Gasoline-, and Oil-Range Organics in Groundwater



Tables

Table 1
Analytical Results for Petroleum in Soil¹

Location	Depth (feet bgs)	Date	Consultant	Total Petroleum Hydrocarbons by NWTPH-Gx	Total Petroleum Hydrocarbons by NWTPH-Dx		BTEX Compounds by USEPA Method 8021			
				Gasoline-Range Organics (mg/kg)	Diesel-Range Organics (mg/kg)	Oil-Range Organics (mg/kg)	Benzene (mg/kg)	Ethylbenzene (mg/kg)	Toluene (mg/kg)	Xylenes (mg/kg)
2016 Floyd Snider Investigation Data										
FS-01	6-7	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-02	3.5-4.5	7/7/2016	Floyd Snider	--	1,000	250 U	--	--	--	--
FS-03	3-4	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-04	8.5-9.5	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-05	10-11	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-05	3-5.5	7/7/2016	Floyd Snider	--	13,000	14,000	0.030 U	0.050 U	0.050 U	0.10 U
FS-06	3.5-5.5	7/7/2016	Floyd Snider	--	3,000	5,300	0.030 U	0.050 U	0.050 U	0.10 U
FS-06	7-8	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-07	5-6	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-08	5-6	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-10	3.5-4.5	7/7/2016	Floyd Snider	--	50 U	250 U	--	--	--	--
FS-11	4.5-5.5	7/7/2016	Floyd Snider	--	440	440	--	--	--	--
Historical Investigation Data										
P3	0-5	1/8/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P3	5-8	1/8/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P4	0-4	1/8/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P5	0-5	1/8/1998	Hart Crowser	10 U	20 U	95	--	--	--	--
P6	0-5	1/8/1998	Hart Crowser	10 U	20 U	230	--	--	--	--
P7	2-5	1/8/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P11	3-5	1/9/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P12	5-8.5	1/9/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
P13	1-4	1/9/1998	Hart Crowser	56	20 U	110	--	--	--	--
P13	4-8	1/9/1998	Hart Crowser	37	20 U	82	--	--	--	--
P14	0-4	1/9/1998	Hart Crowser	10 U	20 U	180	--	--	--	--
P15	0-4	1/9/1998	Hart Crowser	10 U	20 U	50 U	--	--	--	--
S-4	4-7	11/13/1998	Dames & Moore	--	40 U	850	--	--	--	--
S-5	1-4	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
S-6	1-4	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
S-7	1-4	11/13/1998	Dames & Moore	--	40 U	20 U	ND ²	ND ²	ND ²	ND ²
S-7	4-7	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
S-8	4-7	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
S-9	1-4	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
S-10	1-4	11/13/1998	Dames & Moore	--	40 U	20 U	ND ²	ND ²	ND ²	ND ²
S-11	7-10	11/13/1998	Dames & Moore	--	40 U	20 U	--	--	--	--
P-101	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-102	0-2	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-103	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--

Table 1
Analytical Results for Petroleum in Soil¹

Location	Depth (feet bgs)	Date	Consultant	Total Petroleum Hydrocarbons by NWTPH-Gx	Total Petroleum Hydrocarbons by NWTPH-Dx		BTEX Compounds by USEPA Method 8021			
				Gasoline-Range Organics (mg/kg)	Diesel-Range Organics (mg/kg)	Oil-Range Organics (mg/kg)	Benzene (mg/kg)	Ethylbenzene (mg/kg)	Toluene (mg/kg)	Xylenes (mg/kg)
Historical Investigation Data (cont.)										
P-105	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-107	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-108	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-109	0-2	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-109	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
P-110	2-4	3/24/1999	Hart Crowser	--	220	50 U	--	--	--	--
P-114	2-4	3/24/1999	Hart Crowser	--	20 U	50 U	--	--	--	--
PEX-1	7.5	10/26/2000	URS	--	91	40 U	--	--	--	--
PEX-4	10	10/26/2000	URS	--	20 U	40 U	--	--	--	--
PEX-5	10	10/26/2000	URS	--	20 U	40 U	--	--	--	--
PEX-6	7	10/26/2000	URS	--	20 U	40 U	--	--	--	--
PEX-7	6	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-8	5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-11	9	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-14	5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-15	4.5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-16	4	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-17	3.5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-20	9.5	10/27/2000	URS	--	20 U	430	--	--	--	--
PEX-21	6	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-22	4	10/27/2000	URS	--	20 U	40 U	--	--	--	--
PEX-24	5	10/31/2000	URS	--	920	40 U	--	--	--	--
PEX-26	6	10/31/2000	URS	--	43	40 U	--	--	--	--
PEX-27	6	10/31/2000	URS	--	330	40 U	--	--	--	--
PEX-28	6	10/31/2000	URS	--	20 U	40 U	--	--	--	--
PEX-31	5	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-32	7	11/1/2000	URS	--	20 U	730	--	--	--	--
PEX-33	8	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-34	7	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-35	2	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-36	9	11/1/2000	URS	--	26	40 U	--	--	--	--
PEX-38	4	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-39	5	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-42	7	11/2/2000	URS	--	2,100	1,500	--	--	--	--
PEX-43	2.5	11/1/2000	URS	--	20 U	40 U	--	--	--	--
PEX-44	4	11/2/2000	URS	--	20 U	880	--	--	--	--
PEX-45	8	11/1/2000	URS	--	20 U	610	--	--	--	--
PEX-46	13	11/6/2000	URS	--	20 U	40 U	--	--	--	--

Table 1
Analytical Results for Petroleum in Soil¹

Location	Depth (feet bgs)	Date	Consultant	Total Petroleum Hydrocarbons by NWTPH-Gx	Total Petroleum Hydrocarbons by NWTPH-Dx		BTEX Compounds by USEPA Method 8021			
				Gasoline-Range Organics (mg/kg)	Diesel-Range Organics (mg/kg)	Oil-Range Organics (mg/kg)	Benzene (mg/kg)	Ethylbenzene (mg/kg)	Toluene (mg/kg)	Xylenes (mg/kg)
Historical Investigation Data (cont.)										
PEX-47	12	11/6/2000	URS	--	20 U	40 U	--	--	--	--
PEX-48	6	11/6/2000	URS	--	20 U	40 U	--	--	--	--
PEX-49	5	11/7/2000	URS	--	20 U	40 U	--	--	--	--
PEX-50	5	11/7/2000	URS	--	20 U	40 U	--	--	--	--
PEX-51	12	11/7/2000	URS	--	20 U	40 U	--	--	--	--
PEX-52	7	11/23/2000	URS	--	1,800	4,900	--	--	--	--
PEX-53	7	11/23/2000	URS	--	20 U	40 U	--	--	--	--
TP-5	3.5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
TP-6	5.5	10/27/2000	URS	--	20 U	40 U	--	--	--	--
TP-7	2.5	10/27/2000	URS	--	20 U	40 U	--	--	--	--

Notes:

-- Not analyzed.

bold Indicates a detected concentration that exceeds the MTCA Method A cleanup level.

1 Results were compared to MTCA Method A Soil Cleanup Levels for Industrial Properties (Table 745-1).

2 Reporting limits for BTEX compounds not provided in this report.

Abbreviations:

BTEX Benzene, toluene, ethylbenzene, and xylenes

DRO Diesel-range organics

GRO Gasoline-range organics

mg/kg Milligrams per kilogram

MTCA Model Toxics Control Act

ND Not detected

ORO Oil-range organics

Qualifier:

U The analyte was not detected at the given reporting limit.

Table 2
Analytical Results for Petroleum in Groundwater¹

Location	Date	Consultant	Total Petroleum Hydrocarbons by NWTPH-Gx	Total Petroleum Hydrocarbons by NWTPH-Dx			BTEX Compounds by USEPA Method 8021			
			Gasoline-Range Organics (µg/L)	Diesel-Range Organics (µg/L)	Oil-Range Organics (µg/L)	Benzene (µg/L)	Ethylbenzene (µg/L)	Toluene (µg/L)	Xylenes (µg/L)	
2016 Floyd Snider Investigation Data										
FS-09	7/16/2016	Floyd Snider	100 U	160 JM	250 U	1.0 U	1.0 U	1.0 U	1.0 U	
Historical Investigation Data										
MW-1-00	11/13/2000	URS	--	200 U	400 U	--	--	--	--	
MW-2-00	11/13/2000	URS	--	200 U	400 U	--	--	--	--	
MW-3-00	11/13/2000	URS	--	200 U	400 U	--	--	--	--	
MW-4-00	11/13/2000	URS	--	200 U	400 U	--	--	--	--	
MW-5-00	11/13/2000	URS	--	200 U	400 U	--	--	--	--	
MW-4	1/9/1998	Hart Crowser	200 U	800 U	2000 U	--	--	--	--	
MW-4	11/13/1998	Dames & Moore	--	200 U	500 U	--	--	--	--	
S-9	11/13/1998	Dames & Moore	--	200 U	400 U	--	--	--	--	
S-10	11/13/1998	Dames & Moore	--	200 U	400 U	ND ²	ND ²	ND ²	ND ²	
S-11	11/13/1998	Dames & Moore	--	200 U	400 U	--	--	--	--	
S-21	11/13/1998	Dames & Moore	--	200 U	400 U	ND ²	ND ²	ND ²	ND ²	
P3	1/8/1998	Hart Crowser	200 U	800 U	2000 U	--	--	--	--	
P7	1/8/1998	Hart Crowser	540	800 U	2000 U	--	--	--	--	
P9	1/9/1998	Hart Crowser	200 U	800 U	2000 U	--	--	--	--	
P13	1/9/1998	Hart Crowser	200 U	800 U	2000 U	--	--	--	--	

Notes:

- Bold** Indicates a concentration that exceeds the MTCA Method A cleanup level.
- 1 Results were compared to MTCA Method A Cleanup Levels for Groundwater (Table 720-1). There were no exceedances.
- 2 Reporting limits for BTEX compounds are not provided in this report.

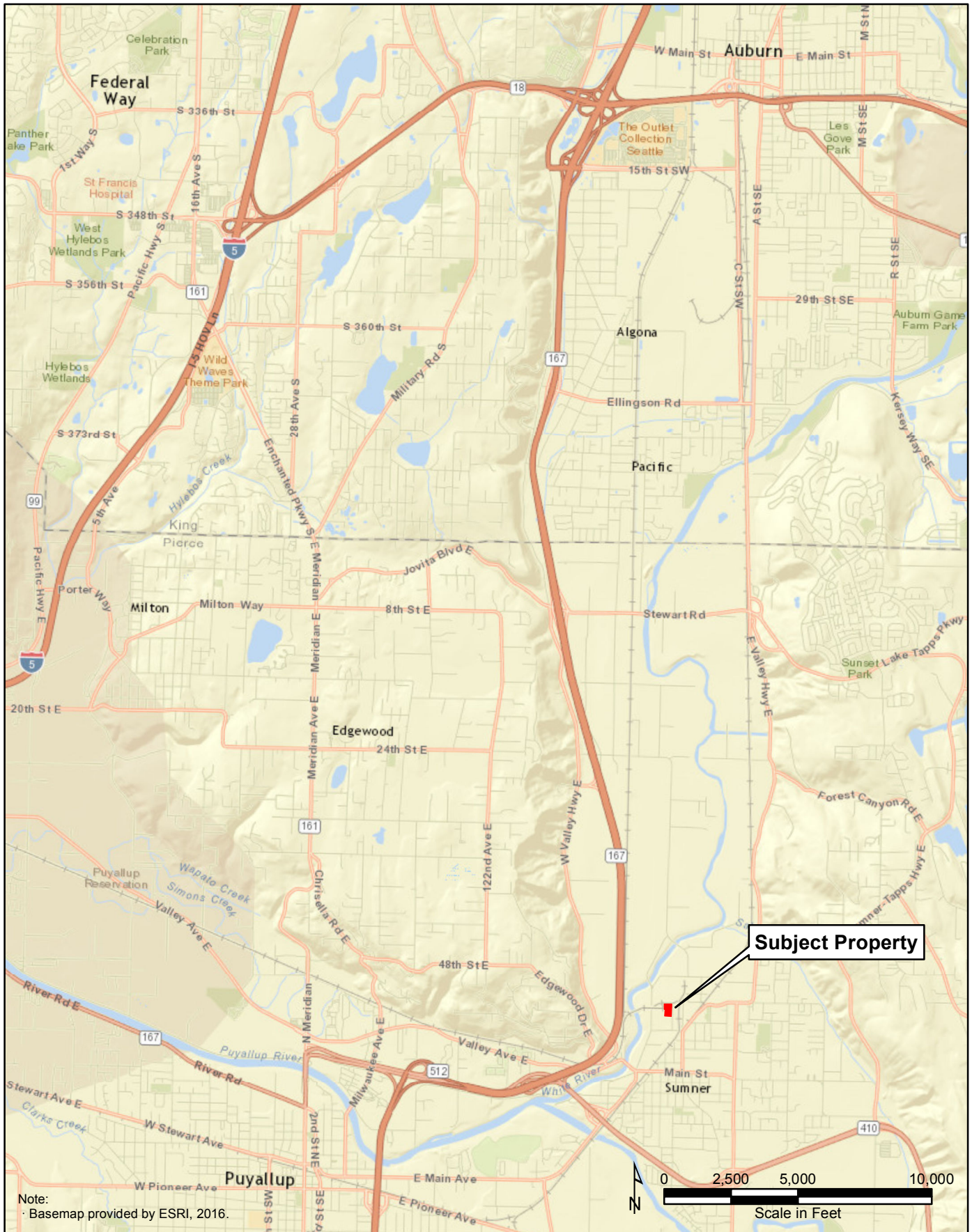
Abbreviations:

- BTEX Benzene, toluene, ethylbenzene, and xylenes
- µg/L Micrograms per liter
- MTCA Model Toxics Control Act
- ND Not detected

Qualifiers:

- JM Analyte was detected, chromatographic pattern is a poor match to standard used for quantitation, concentration is considered an estimate.
- U The analyte was not detected at the given reporting limit.

Figures



Note:
 • Basemap provided by ESRI, 2016.

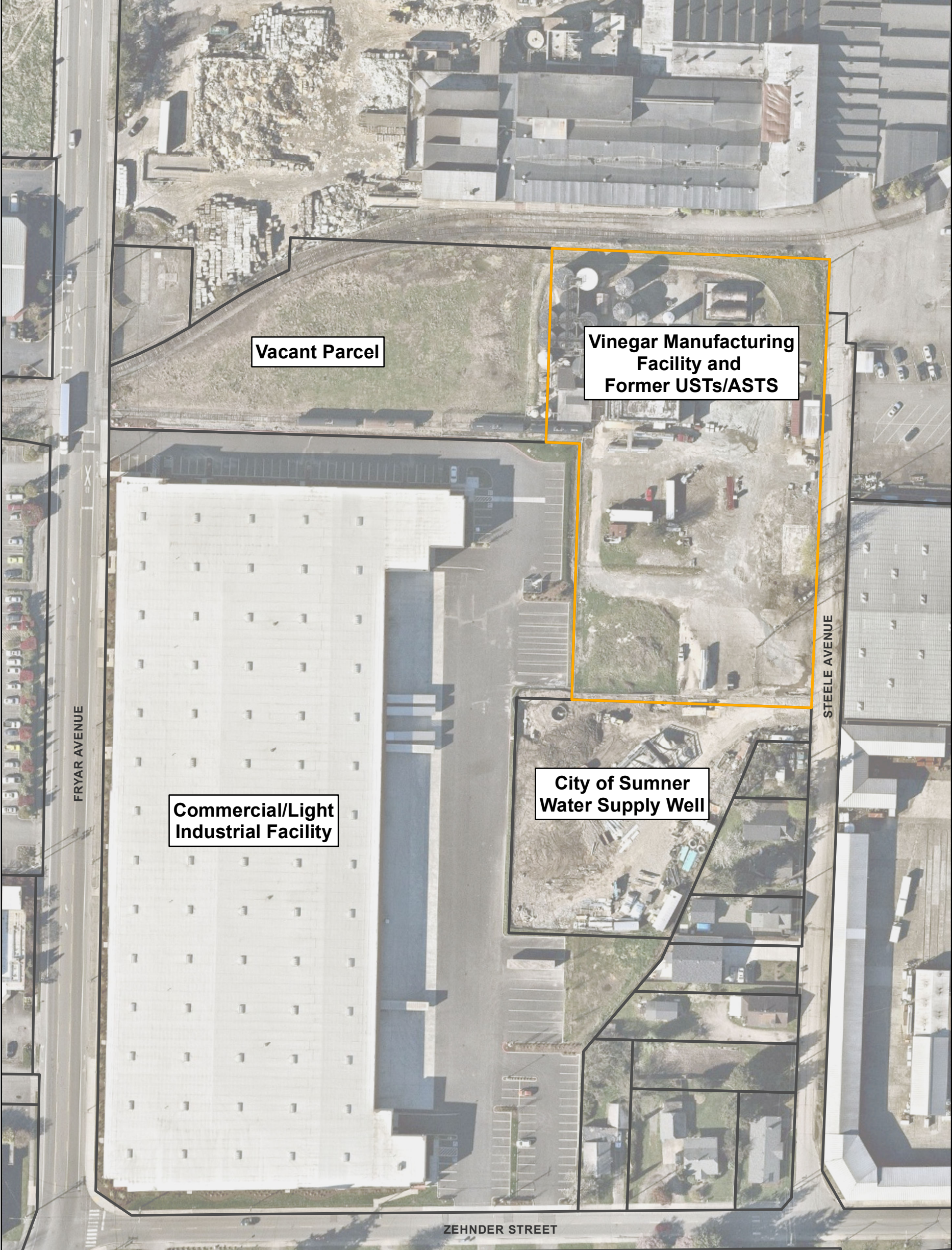
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**UST Closure Report
 Fleishmann's Industrial Park
 1700 Steele Avenue
 Sumner, Washington**

**Figure 1
 Property Vicinity Map**

Legend

- Subject Property
- Pierce County Tax Parcel



Notes:

- Orthoimage provided by NearMap, 2016.
- Tax parcels provided by Pierce County Spatial Services.

Abbreviations:

- AST = Aboveground Storage Tank
- UST = Underground Storage Tank

Scale in Feet

Legend

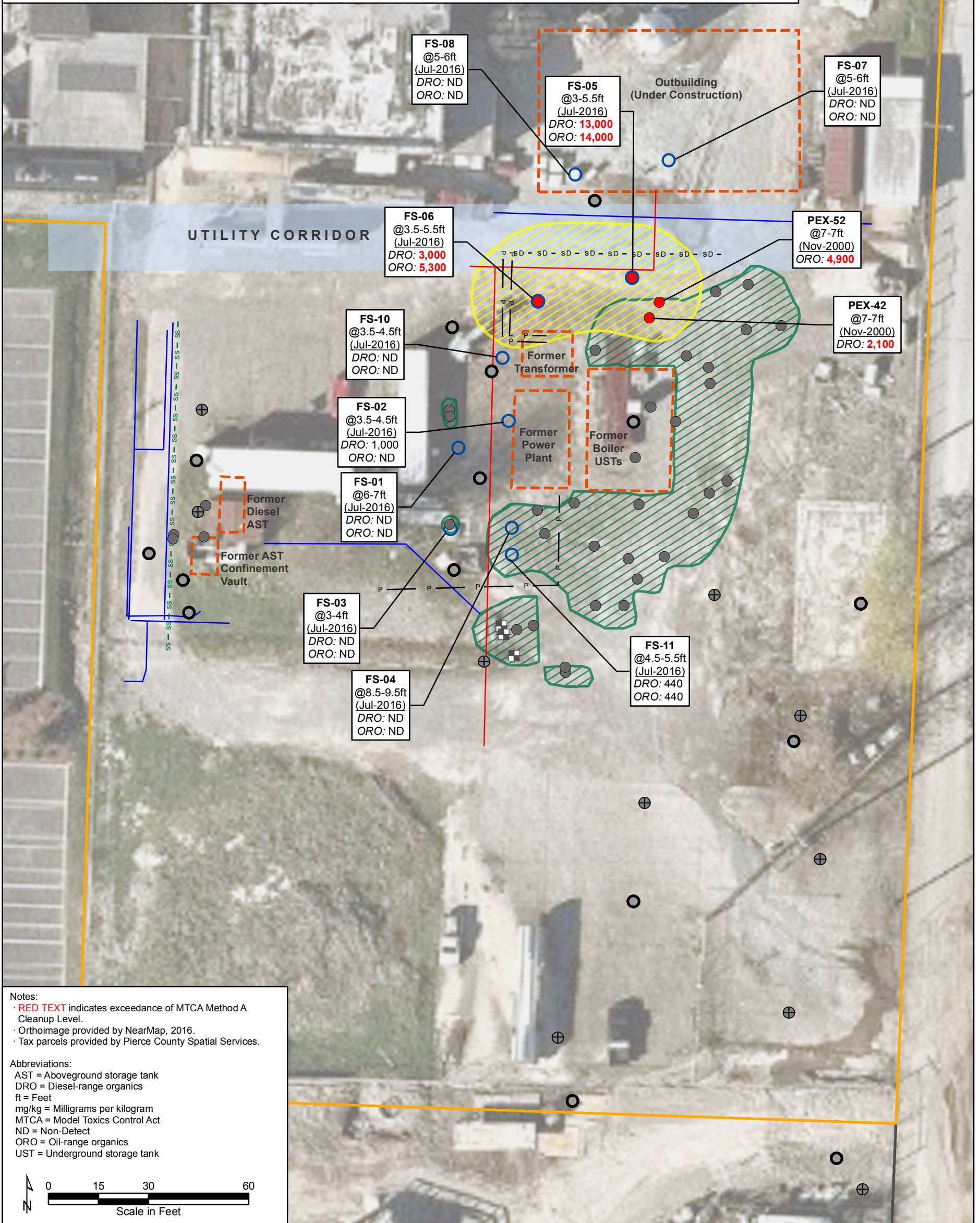
- Geoprobe Sample Below Cleanup Level (Floyd|Snider 2016)
- Geoprobe Sample Above Cleanup Level (Floyd|Snider 2016)
- Confirmation Sample Below Cleanup Level (URS 2000)
- Confirmation Sample Above Cleanup Level (URS 2000)
- ⊕ Test Pit (URS 2000)
- Geoprobe (Hart Crowser 1999)
- ⊕ StrataProbe (Dames & Moore 1998)
- ▨ Previous Excavation Extent
- ▨ Approximate Extent of Residual Contamination

- ▭ Structures of Interest
- ▭ Subject Property
- Utilities (Approximate Locations)**
- Underground fire hydrant supply line
- P — Underground power
- SS - SS - Underground sanitary or process waste water sewer
- SD - SD - Underground stormwater line
- Underground water line

Location Labels:

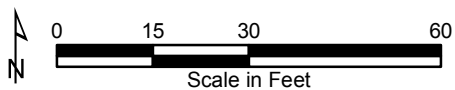
PEX-52
 @7-7ft
 (Nov-2000)
 DRO: 1,800
 ORO: 4,900

- ← Location ID
- ← Sample Depth Interval
- ← Sample Month/Year
- ← DRO Concentration in mg/kg
- ← ORO Concentration in mg/kg



Notes:
 · RED TEXT indicates exceedance of MTCA Method A Cleanup Level.
 · Orthoimage provided by NearMap, 2016.
 · Tax parcels provided by Pierce County Spatial Services.

Abbreviations:
 AST = Aboveground storage tank
 DRO = Diesel-range organics
 ft = Feet
 mg/kg = Milligrams per kilogram
 MTCA = Model Toxics Control Act
 ND = Non-Detect
 ORO = Oil-range organics
 UST = Underground storage tank



Legend

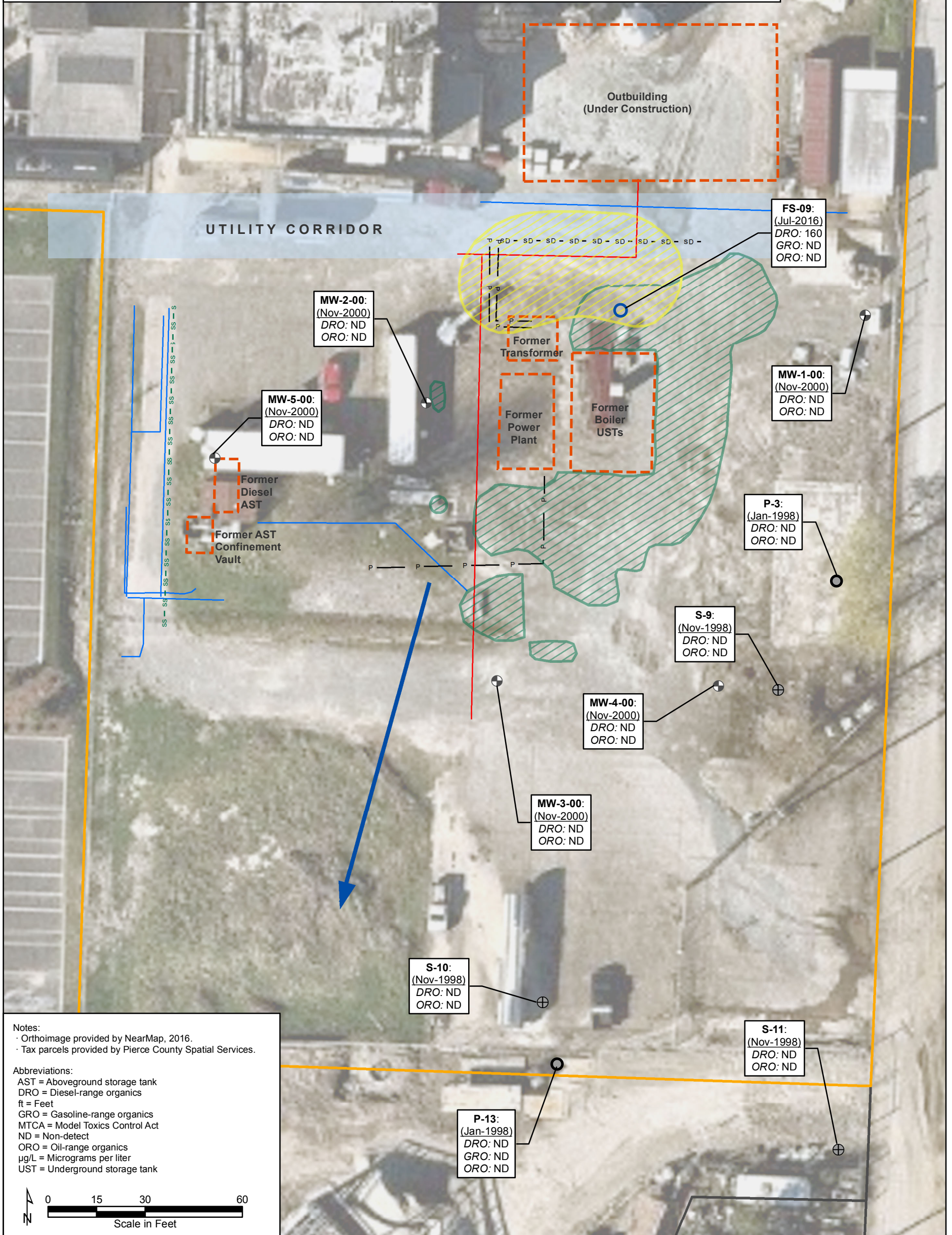
- Geoprobe Sample (Floyd|Snider 2016)
- ⊕ Monitoring Well Sample (URS 2000)
- Geoprobe Sample (Hart Crowser 1999)
- ⊕ StrataProbe Sample (Dames & Moore 1998)
- ➔ Approximate Groundwater Flow Direction
- Previous Excavation Extent
- Approximate Extent of Residual Contamination
- Structures of Interest
- Subject Property

Utilities (Approximate Locations)

- Underground fire hydrant supply line
- P — Underground power
- - - SS - SS - Underground sanitary or process waste water sewer
- - - SD - SD - Underground stormwater line
- Underground water line

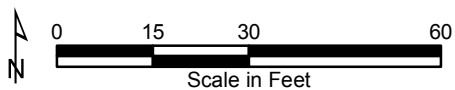
Location Labels:

- | | |
|----------------------------|-----------------------------|
| FS-08
(Jul-2016) | ← Location ID |
| DRO: 160 | ← Sample Month/Year |
| GRO: ND | ← DRO Concentration in µg/L |
| ORO: ND | ← GRO Concentration in µg/L |
| | ← ORO Concentration in µg/L |



Notes:
 · Orthoimage provided by NearMap, 2016.
 · Tax parcels provided by Pierce County Spatial Services.

Abbreviations:
 AST = Aboveground storage tank
 DRO = Diesel-range organics
 ft = Feet
 GRO = Gasoline-range organics
 MTCA = Model Toxics Control Act
 ND = Non-detect
 ORO = Oil-range organics
 µg/L = Micrograms per liter
 UST = Underground storage tank



e-Copy



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

August 16, 2023

Bob Code
6900 Fox Ave South
Seattle, WA 98108
bobc@cascadecolumbia.com

Re: VCP Project Status Request for the following contaminated Site:

- **Site Name:** Fleischmanns Vinegar
- **Site Address:** 1115 Zehnder St, Sumner, Pierce County, WA 98390
- **Facility/Site No.:** 85671776
- **Cleanup Site ID.:** 12577
- **VCP Project No.:** SW1562

Dear Bob Code:

The Department of Ecology (Ecology) requests additional information regarding the status of the Voluntary Cleanup Program (VCP) cleanup of the Fleischmanns Vinegar facility (Site).

To continue cleanup efforts under the VCP, please provide the following information.

Request for Information

1. Within 30 days of receipt of this letter, please provide a written update to Ecology. If a new Site cleanup report has been generated, submit one hard copy and one electronic copy. Mail any hard copy to:

Tim Mullin, LHG
Toxics Cleanup Program, Southwest Region Office
Washington State Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

Email the electronic copy of any report to tim.mullin@ecy.wa.gov.

2. If any contact information has changed for the VCP customer team, please fill out the enclosed [VCP change of contact form](#).¹

Email the updated form to tim.mullin@ecy.wa.gov.

3. **Required electronic data.** Please ensure that all environmental Site data collected since August 1, 2005, are accepted into Ecology's Environmental Information Management (EIM) system database. Ecology's current data submittal requirements are provided in Toxics Cleanup Program [Policy 840](#).

Next Steps

Based on your response, Ecology will decide whether to continue providing you services under the VCP. We will notify you of our decision in writing. Please note that we will terminate the Agreement governing the SW1562 project if you do not respond to this request within 30 days of receipt.

Contact Information

For more information about the VCP and the cleanup process, please visit our [VCP webpage](#).² If you have any questions about this transmittal, please contact me at (360) 999-9589 or tim.mullin@ecy.wa.gov.

Sincerely,



Tim Mullin, LHG
VCP Site Manager
Toxics Cleanup Program
Southwest Region Office

Enclosures: A – VCP Change of Contact Form
B – Toxics Cleanup Program Policy 840

TCM/jc

By certified mail: 9489 0090 0027 6339 2996 92

cc: Tom Colligan, Floyd Snider; tom.colligan@floydsnider.com
Jerome Lambiotte, CPG, Ecology, jerome.lambiotte@ecy.wa.gov
Rebecca Lawson, PE, LHG, Ecology, rebecca.lawson@ecy.wa.gov
Ecology Site File

¹ <https://apps.ecology.wa.gov/publications/documents/ecy070218.pdf>

² <https://www.ecy.wa.gov/vcp>

Enclosure A

VCP Change of Contact Form

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Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

CHANGE OF CONTACT FORM

Use this form to notify the Department of Ecology (Ecology) of any changes to the designated points of contact for a project under the Voluntary Cleanup Program (VCP). Include any changes to the contact information for those persons (for example: phone number or address). Please submit only one form for each point of contact.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are providing new contact information. This information may be found on the VCP Agreement.

Facility/Site Name:

Facility/Site Address:

Facility/Site No:

VCP Project No.:

Step 2: IDENTIFY CONTACT PERSON

Please identify the role of the person for whom you are providing new contact information. Check all that apply.

Project Manager

Project Attorney

Project Billing Contact

Property Owner

Project Consultant

Other – please specify:

Please provide below the new contact information for this person:

Name:

Title:

Organization:

Mailing address:

City:

State:

Zip code:

Phone:

Fax:

E-mail:

Effective date:

Step 3: IDENTIFY PRIOR CONTACT PERSON (IF APPLICABLE)

Is the new contact person replacing an existing point of contact?

Yes

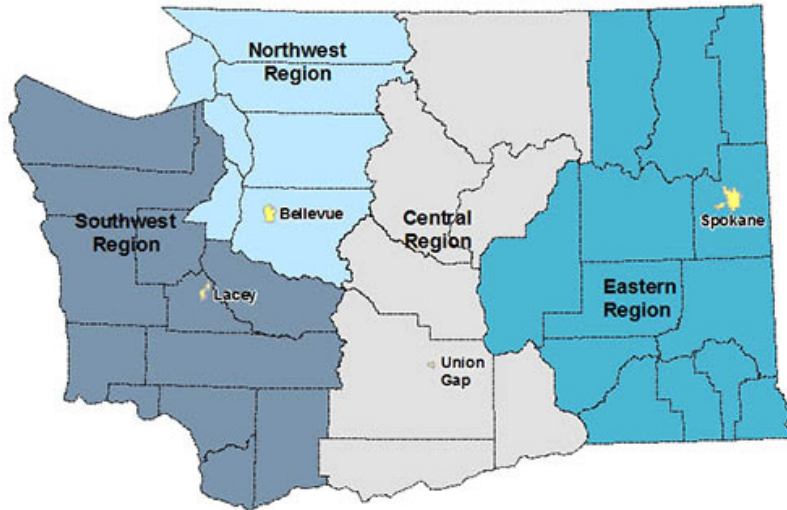
No

If you answered "YES" above, please identify below the person who is being replaced:

Name:		Title:	
Organization:			
Mailing address:			
City:		State:	Zip code:
Phone:	Fax:	E-mail:	

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<p>Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452</p>	<p>Central Region: Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009</p>
<p>Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p>	<p>Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p>

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call 877-833-6341.

Enclosure B

Ecology Toxics Cleanup Program Policy 840

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Toxics Cleanup Program

Policy 840: Data Submittal Requirements

Established: August 1, 2005

Revised: April 12, 2016

Contact: Policy & Technical Support Unit, Headquarters

Purpose: This Policy provides guidance on the submission of environmental monitoring data generated or collected during the investigation or cleanup of contaminated sites under the Model Toxics Control Act.

References: [WAC 173-340-840 \(5\)](#)
[Chapter 173-204 WAC](#)
[Environmental Information Management System Database](#)
[Sediment Cleanup Users Manual II](#)

Attachments: A - Model Grant and Permit Condition

Disclaimer: This Policy is intended solely for the guidance of Ecology staff. It is not intended, and cannot be relied on, to create rights, substantive or procedural, enforceable by any party in litigation with the state of Washington. Ecology may act at variance with this Policy depending on site-specific circumstances, or modify or withdraw this Policy at any time.

Approved by:

James J. Pendowski, Program Manager
Toxics Cleanup Program

Accommodation Requests: To request ADA accommodation, including materials in a format for the visually impaired, call Ecology's Toxics Cleanup Program at 360-407-7170. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

Purpose and Applicability

The investigation and cleanup of contaminated sites generate a large volume of environmental monitoring data that need to be properly managed to facilitate regulatory decisions. The data also need to be accessible by Ecology staff, site owners, consultants, and the general public.

This Policy describes the requirements for submitting environmental monitoring data generated or collected during the investigation and cleanup of contaminated sites under Chapter 70.105D RCW, Model Toxics Control Act (MTCA).

This Policy applies to Ecology staff and any person who investigates or cleans up contaminated sites and submits related environmental sampling data to Ecology, including potentially liable persons, Voluntary Cleanup Program (VCP) customers, prospective purchasers, government agencies, and Ecology contractors.

1. Unless otherwise specified by Ecology, all environmental monitoring data generated during contaminated site investigations and cleanups are required to be submitted to Ecology in both written format and electronically through EIM.

Environmental monitoring data include biological, chemical, physical, and radiological data generated during site investigations and cleanups under the Model Toxics Control Act Cleanup Regulation (Chapter 173-340 WAC) and the Sediment Management Standards (Chapter 173-204 WAC).

The Environmental Information Management System (EIM) is a searchable database that contains data collected by Ecology (or by environmental contractors on behalf of Ecology), and by Ecology grant recipients, local governments, the regulated community, and volunteers.

Under this Policy, data are considered to be “environmental monitoring data” if generated or collected during:

- a. Site investigations and cleanups conducted under an order, agreed order or consent decree, permit, grant, loan, contract, interagency agreement, memorandum of understanding; or
- b. An independent remedial action.

Under this Policy, data are not considered to be environmental monitoring data if generated or collected for the following studies. This means that entering data into EIM, while encouraged, is optional for:

- a. Non site-specific studies;
- b. Site hazard assessments that result in no further action; and
- c. All initial site investigations.

2. Orders, agreed orders, consent decrees, or permits must include a condition that site-specific environmental sampling data be submitted in compliance with this Policy.

For those reports prepared and submitted for review under an order, agreed order, consent decree, or permit, the environmental sampling data must be entered into EIM at the time of report submittal. If reports for such work do not include documentation that data was submitted in compliance with this Policy, the reports shall be deemed incomplete and a notice will be provided to the submitter.

Generally, Ecology should not review such reports until that documentation is provided. The assistant attorney general assigned to the site should be consulted for an appropriate response when Ecology's review is delayed due to failure of data entry into EIM.

3. Site-specific environmental sampling data must be entered into EIM before Ecology will review independent remedial action reports under the Voluntary Cleanup Program.

For independent remedial action reports prepared and submitted under Ecology's Voluntary Cleanup Program (VCP), environmental sampling data must be entered into EIM at the time any report is submitted requesting an opinion on the sufficiency of the action under the VCP.

However, Ecology may establish an alternate deadline for entering data into EIM if this Policy creates undue hardship on the VCP customer and Ecology does not need the data in EIM to begin the review.¹ But in no case will Ecology issue a No Further Action (NFA) opinion letter under the VCP—either for the whole site or a property located within the site—until the data has been entered into EIM.

If sampling data has not been entered into EIM, Ecology may still review the report for the limited purpose of determining whether it contains sufficient information to provide an opinion. If the report is incomplete, Ecology may also respond to the VCP customer's request for an opinion by issuing an administrative letter rejecting the report and requesting additional information.

¹ For example, when a site has multiple groundwater sampling events over time, it may be more efficient to enter the data into EIM at one time after monitoring is completed, rather than for each monitoring event. Another example would be where a VCP consultant is using EIM for the first time and needs additional time to learn how to use the system.

4. Grants, contracts, interagency agreements or memoranda of understanding issued after the effective date of this Policy must include a condition that site-specific data be submitted in compliance with this Policy.

Reports on such work will not be accepted as complete until the data have been submitted in compliance with this Policy. If a payment or transfer of funds is involved in the transaction, the relevant payment or transfer shall be withheld until this requirement has been met. Attachment A contains example language to include in these documents.

5. Data generated during upland investigations and cleanups must be submitted electronically using Ecology's EIM.

The Environmental Information Management System is Ecology's main database for environmental monitoring data. Proper submission of data through this system meets the requirement of submitting such data in an electronic format.

Additional information about EIM, including instructions for data submittal, can be found on Ecology's EIM website at <http://www.ecy.wa.gov/eim/>. The Toxic Cleanup Program's (TCP) EIM Coordinator can also provide technical assistance to site managers and consultants who use EIM.

6. Data generated during sediment investigations and cleanups must be submitted electronically using Ecology's EIM.

Effective March 1, 2008, EIM is Ecology's data management system for sediment-related data. Proper submission of data through EIM meets the requirement of submitting such data in an electronic format. Electronic data must be submitted to Ecology simultaneously with the accompanying report.

For additional information on sediment sampling and analysis plan requirements, see Ecology's *Sediment Cleanup Users Manual (SCUM II)* Publication No. 12-09-057, available at: <https://fortress.wa.gov/ecy/publications/summarypages/1209057.html>

The Sediment Data Coordinator in TCP's Aquatic Land Cleanup Unit (ALCU) can also provide technical assistance with EIM.

7. Data submitted electronically using EIM must be checked by the Toxics Cleanup Program's EIM Coordinator before the data will be officially loaded into EIM.

Normally, TCP's EIM Coordinator will receive a notice that data have been submitted through EIM. Upon receipt of the notice, the EIM Coordinator should notify the Cleanup Project Manager. The EIM Coordinator then reviews the submittal for quality control and officially loads the data into the system.

Attachment A

Model Grant and Permit Condition

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Model Grant and Permit Condition

The following condition is to be inserted in grants, loans, contracts, interagency agreements, and memoranda of understandings where site-specific environmental monitoring data is expected to be generated:

All sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840: Data Submittal Requirements. Electronic submittal of data is not required for site hazard assessments that result in no further action and initial site investigations. (FOR GRANTS, AND LOANS ADD: Failure to properly submit sampling data will result in Ecology withholding payment and could jeopardize future funding.)

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