

## MEMORANDUM

DATE: March 3, 2022  
TO: Rachael Brown, City of Puyallup  
Associate Planner  
FROM: Darren Sandeno, Parametrix  
SUBJECT: # P-210033 SEPA/DRT Mitigation Measures Responses  
CC:  
PROJECT NUMBER: 217-7312-004  
PROJECT NAME: SHB-TC Parking Expansion

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Hello Rachael – Please see the formal responses to the SEPA/DRT Mitigation Measures.

### Department of Ecology:

- **Background:** As was noted, the subject property is a contaminated site on Ecology's Confirmed and Suspected Contaminated Sites List. Texas Instruments Inc. is currently conducting an independent cleanup under the Voluntary Cleanup Program (VCP; FSID 56763887 and VCP ID SW1273). Contaminants of concern include diesel-range petroleum hydrocarbons (TPH-D) in soil and groundwater from a historical release in the late 1980s associated with two former diesel underground storage tanks (USTs). Chlorinated volatile organic compounds (cVOCs) including tetrachloroethene (PCE) and its related degradation products (trichloroethene [TCE], dichloroethenes [DCEs] and vinyl chloride [VC]) were detected in 2016 groundwater samples in a portion of the site. Voluntary cleanup actions at the subject property have included, but are not limited to, remedial excavation of accessible TPH-D contaminated soils, bioremediation injections and the installation of a monitoring well network. A monitored natural attenuation program with semi-annual groundwater sampling is on-going.
- Known contamination is unlikely to be encountered during the proposed parking expansion project and the project is unlikely to affect contamination at the site. This conclusion is based on several factors.
  1. Known contamination at the subject property (TPH-D contamination in soil and groundwater and cVOC contamination in groundwater) is limited to the northeast portion of the property in the general vicinity of the former USTs, which does not underlie the extent of the proposed parking improvements. The area of known contamination is located more than 400 feet from the proposed area of parking improvements.
    - a) TPH-D: TPH-D contamination in soil is limited to the immediate vicinity surrounding the former USTs (source); the USTs were located approximately 500 feet northwest of the proposed parking improvements area. The residual TPH-D groundwater plume is well defined and is being actively monitored. Concentrations of TPH-D were below the MTCA Method A cleanup level in the easternmost existing monitoring well (MW-30) from 2012 through 2015 (MW-30 was removed from the sampling program following the 2015 sampling event based on MTCA compliance at this well).

- b) **cVOCs:** The area where cVOCs were detected in 2016/2017 groundwater samples is generally west of the former USTs (more than 500 feet northwest of the proposed parking improvements area). cVOCs were not detected in the monitoring well nearest to the proposed parking improvements (MW-30): this well is situated approximately 400 feet northwest of the northernmost portion of the proposed parking improvements area.
2. The proposed improvements are situated **upgradient** of the known areas of contamination. Groundwater at the site is generally shallow with measured groundwater depths between approximately 8 and 15 feet below ground surface (bgs) beneath the proposed parking improvements area and between approximately 10 and 30 feet bgs beneath the northwest portion of the property in the vicinity of the former USTs. The interpreted groundwater flow direction is generally to the northwest, although the former USTs influence groundwater flow in that vicinity resulting in some localized variability.
    - a) Planned construction depths are limited in extent, with shallow excavations occurring with installation of stormwater management chambers on the order of four feet below existing ground surface, or shallower. Groundwater is not expected to be encountered in the excavations.
    - b) Planned construction elements include a parking lot and associated near-surface improvements (lighting, landscaping) (no structures).
- **Planned contingency measures to be used during construction of the parking lot improvements:** The Contractor will have a contingency plan in place to ensure there is a protocol for appropriate notification, evaluation, characterization and proper handling/disposal of any suspected contaminated media that may be encountered.

**DRT #45: Traffic impacts will be assessed at time of building permit application**

- Clarified via 2.25.22 email that assessment of traffic impacts will not be required for this project.

**DRT #46: The existing eastern most driveway on 39th Avenue SE will be required to limit turning movements to right-in, right-out only.**

- Proposed right in/right out improvements at eastern access off of 39<sup>th</sup> Ave SE were installed with the Group Health project. Lane markings and tubular markers will be replaced as needed.