



PERSONAL AND CONFIDENTIAL

Main Office: PO BOX 14488, Portland, Oregon 97293
Main Tel: (503) 452-5561 / E-Mail: ENW@EVREN-NW.com
Offices in Portland, Oregon (Headquarters)
Satellite Offices in Bend Oregon and San Rafael, California

November 10, 2021

EcoLube Recovery
Attn. Eric Spencer
11535 N Force Avenue
Portland, OR 97217

RE: Critical Aquifer Recharge Area Report Review and Impact of Tank #3
EcoLube Puyallup, 213 10th Street SE, Puyallup, WA 98372-3404

Dear Mr. Spencer:

EVREN Northwest, Inc. has reviewed the Critical Aquifer Recharge Areas (CARA) Report prepared by another consulting firm¹ and the impact of bringing Tank #3 online for petroleum storage on the findings of that report. As required by PMC 21.06.1150, the previous CARA was required for the subject property because it is located within a City's Wellhead Protection Zone. This previous report outlined all required elements of the CARA and since this report was prepared, EcoLube has completed a Spill Prevention Control and Countermeasure (SPCC) plan. Therefore, this review focuses on the effects of the proposed project on the ground water quality and predictive evaluation of contaminant transport based on potential releases to ground water. No review of ground water quantity was conducted since there were not physical changes to the site layout and the site does not withdraw ground water; therefore, recharge to ground water at the subject site has not changed since this original report was prepared.

Based on the information reviewed in the previous CARA report, the principal ground water aquifer of the Puyallup River Valley is the alluvial aquifer, which is underlain by the Osceola Mudflow, and is a likely major aquitard in the Puyallup River Valley. Ground-water flow was interpreted to be to the west (down valley) and in the vicinity of the project site, ground water is estimated to be less than 10 feet below the ground surface. Only one commercial well was identified within 1300 feet of the subject property (located approximately 1100 feet east (up-gradient) from the subject site. Reportedly, this well is

¹ Associated Earth Sciences Inc., August 12, 2014. Critical Aquifer Recharge Areas Report, prepared for Thermo Fluids, Inc.

Environmental and Natural Resource Consulting

under artesian pressure, suggesting that it may be completed below the aforementioned aquitard since it may be confined.

Based on the following facts:

1. The majority of the site is impervious, and that storm water generated from the site is discharged to the City's storm water system,
2. Storm water discharge is monitored under a State-issued industrial storm water discharge permit,
3. The site has implemented a Storm Water Pollution Prevention Plan that outlines requirements for regular facility inspections and implementation of Best Management Practices to ensure storm water discharge is not impacted by onsite operations, and
4. A SPCC plan has been prepared for this facility to minimize the risk of a spill related to the current storage of petroleum product at the facility, and outlines procedures should a spill occur,

The risk of potential impacts to nearby wells (ground water) and surface water is low. The additional storage of petroleum product in Tank #3 does not change these findings.

Should you have any questions regarding this review, please do not hesitate to phone.

Kind regards,



Lynn Green, L.E.G.
Principal Engineering Geologist

[https://evrennw-my.sharepoint.com/personal/lynng_evren-nw_com/Documents/ENW Data/ENW/Projects/1217\(EcoLube Recovery\)/20001\(213 10th St-Puyallup-WA\)/05\(CARA Review\)/211110\(CARA review\)tr\(v01\).docx](https://evrennw-my.sharepoint.com/personal/lynng_evren-nw_com/Documents/ENW%20Data/ENW/Projects/1217(EcoLube%20Recovery)/20001(213%2010th%20St-Puyallup-WA)/05(CARA%20Review)/211110(CARA%20review)tr(v01).docx)



Lynn D. Green

EXP. 12/14/2021