Contaminated Media Management Plan

Seasons on Meeker Site – Former Cornforth-Campbell Motors
115 2nd Street SE
Puyallup, WA 98371

Prepared for:
City of Puyallup
333 South Meridian
Puyallup, Washington 98371

June 9, 2025
Apex Project No. 25007243

APEX
214 EAST GALER STREET
SUITE 300
SEATTLE, WA 98102
206.233.9639 MAIN
866.727.0140 FAX
APEXCOS.COM

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1. INTRODUCTION

This Contaminated Media Management Plan (CMMP) outlines procedures for managing volatile organic compounds (VOCs) and petroleum-contaminated soil (PCS) and water that may be encountered during construction and redevelopment activities at the property. This CMMP was prepared by Apex Companies LLC (Apex) on behalf of the City of Puyallup.

It is noted that there are currently no actionable items related to contaminated media management at the property. The CMMP shall be in place prior to subsurface work that disturbs soil and/or groundwater and implemented should potential contamination be encountered.

1.1 Property Information

The property, Seasons on Meeker – Former Cornforth-Campbell Motors, is comprised of three Pierce County tax parcels (706000002, 7060000030, and 7060000070). The property is currently owned by the City of Puyallup, and the City intends to redevelop the property.

The three parcels cover a total area of approximately 64,900 square feet (about 1.5 acres). According to Pierce County Assessor data, Parcels 7060000030 and 7060000070 are currently occupied by vacant commercial buildings constructed around 1975 and 1941, respectively. Parcel 7060000020 is currently occupied by a public parking lot.

1.2 Objective

The objective of the CMMP is to provide information regarding the location, type, and source of contaminated media (soils and groundwater) present at the property, and to assist future subsurface or earthworks workers in proper media handling, management, and disposal, as needed. The CMMP addresses how the known contamination, and any new discoveries of previously unidentified contamination, will be handled safely and to avoid effects to schedule. The CMMP also provides information to contractors to develop a Health and Safety Plan (HASP) that is appropriate to protect site workers from exposure to contaminants.

This CMMP contains:

- Information on current environmental conditions and contaminants of concern.
- Roles and responsibilities of project team members for the CMMP.
- Procedures for the storage of contaminated soil or debris in stockpiles or staging piles awaiting sampling, classification, load-out, and disposal (should temporary storage occur).
- Procedures for the management and sampling of new discoveries of contaminated materials.
- Procedures for the storage of contaminated water in temporary holding tanks or lined ponds awaiting sampling, classification, and disposal.
- Required documentation for contaminated material handling, storage, loading, and disposal.

1.3 Background

The Cornforth Campbell Motors Inc. Main Facility (a.k.a. Car Lot Site) consists of two Pierce County tax parcels (Nos. 7060000030 and 7060000020) totaling approximately 1.2 acres. From 1971 to 2002, Cornforth-Campbell Motors, Inc. operated the Site as an auto dealership and service center, which included three underground storage tanks (USTs) used for waste oil, heating oil, and gasoline. The USTs were removed in the early 1980s before environmental regulations required subsurface investigation. The

City of Puyallup acquired the Site in 2002, and it is currently leased by Sound Transit for commuter parking. The original showroom and garage buildings remain but are vacant.

Subsequent investigations by Farallon Consulting (Farallon) and others identified gasoline-range organic petroleum hydrocarbons (GRO) and benzene, toluene, ethylbenzene and xylene (BTEX) compounds in soil and groundwater above Model Toxics Control Act (MTCA) Method A cleanup levels (CULs). In 2003, approximately 1,100 tons of contaminated soil were excavated, and a combined air/ozone sparging and soil vapor extraction system was installed to treat groundwater. The system was also designed to address solvent releases from the adjacent Cornforth Campbell Motors Inc. Dry Cleaner Site through the former sanitary sewer system.

Post-cleanup groundwater monitoring at the Car Lot Site included sampling from wells near the former gasoline USTs (MW-3, MW-4, and SVE-6). Since 2005, GRO and BTEX compounds have not been detected, with all results remaining below MTCA Method A cleanup levels. In 2006, the Washington State Department of Ecology (Ecology) issued a concurrence letter confirming that sufficient compliant groundwater data had been collected. Based on the completed cleanup activities and monitoring results, Farallon concluded that MTCA cleanup standards have been met for petroleum-related compounds in soil and groundwater, supporting a No Further Action (NFA) determination for the former UST area.

Reportedly, groundwater beneath the Site/Property is also impacted with chlorinated volatile organic compounds (cVOCs) due to dry cleaning operations at the east adjacent Cornforth Dry Cleaner Site located across 3rd Street SE. Groundwater monitoring of on-property wells by Farallon Consulting (Farallon) in February 2023 indicates that concentrations of trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE) and vinyl chloride (VC) in groundwater exceed MTCA Method A CULs. Cleanup of residual dry-cleaning solvents in the northeastern portion of the Site remains ongoing under the adjacent Dry Cleaner Site case.

In January 2024, confirmatory soil sampling was conducted to verify that residual petroleum impacts had been addressed. The results support that the Car Lot Site meets MTCA cleanup standards and form the basis for an NFA request submitted to Ecology and Tacoma-Pierce County Health Department (TPCHD) by Farallon.

In July 2024, the cleanup Site 5682 was granted an NFA determination by Ecology concerning the former owner, Cornforth Campbell Motors Inc. Main Facility (a.k.a. Car Lot Site), its activities, and the reported petroleum release to soil and groundwater. Since 2000, significant environmental site characterization activities, remedial soil excavation and monitoring had occurred to clean up the petroleum release to the subsurface soils.

The location of the property and the former location of the UST(s) and impacted soil and groundwater plumes are shown in Figure 1.

1.4 Contaminants of Concern

Based on the investigations conducted on site and described above, the following are the contaminants of concern (COCs):

- Total petroleum hydrocarbons (TPH) as gasoline/gasoline-range organic petroleum hydrocarbons (GRO).
- Volatile Organic Compounds (VOCs) include benzene, ethylbenzene, toluene, and xylenes (BTEX).

- Chlorinated volatile organic compounds (cVOCs) include trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE) and vinyl chloride (VC).

Soil impacted by the identified COCs will be profiled for disposal as summarized in Section 2.5.

2. ADVANCE COORDINATION PRIOR TO SUBSURFACE DISTURBANCE

This section describes the activities that shall be conducted under the guidance of this CMMP, and considerations to be in place prior to earthwork. Any contractor should be aware of this document prior to planning for work that disturbs soil and/or groundwater on site. Controls and processes described in the CMMP may have an impact on the Work.

2.1 Responsible Charge

The property owner shall make the information in this plan available to any site workers who may contact potentially contaminated media.

2.2 Activities with the Potential to Generate Contaminated Soil and/or Groundwater

Construction activities that may generate soil or groundwater requiring appropriate management include the following:

- Excavation for utilities
- Building demolition
- General grading
- Excavation for footings and other foundation structures
- Dewatering

2.3 Project Team

Prior to earthworks activities, management roles shall be identified and are detailed per the following table:

Title	Name	Affiliation	E-mail	Phone Numbers
Owner/Site Manager	Anthony Hulse	City of Puyallup	AHulse@PuyallupWA.gov	253.208.0247
Project Consultant	Nasrin Bastami	Apex	Nasrin.Bastami@Apexcos.com	206.817.1371
Contractor	TBD	TBD	TBD	TBD
Contractor	TBD	TBD	TBD	TBD

2.4 Health and Safety Plan

Any Contractor doing significant subsurface work (disturbing and handling soil and/or groundwater) should maintain a site-specific Health and Safety Plan (HASP) in accordance with applicable Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA) regulations. The HASP will provide information for site workers that address the health risks and hazards

for each site task, employee training assignments to assure compliance with WISHA, personal protective equipment, site control measures, and decontamination procedures. The HASP will include procedures and controls that are site specific to the identified project.

The Contractor is responsible for conducting on-site activities in accordance with the HASP. The Contractor will review the contents of the HASP with on-site workers and will ensure adequate training for on-site workers in accordance with the HASP. Outside contractors or consultants participating in soil management activities have responsibility for their employee's health and safety while on site.

2.5 Waste Profiling

Petroleum contaminated soil and water encountered during project work, which is to be removed from the site, will be characterized for disposal. Soil containing petroleum hydrocarbons *(*gasoline, diesel, heavy oil) must be managed as petroleum contaminated soil consistent with the Solid Waste Handling Standards (WAC 173-350).

The Contractor may elect to begin the waste profiling process at any time by selecting a receiving facility/landfill. Having contaminated media profiled and accepted by a facility in advance is recommended as it may prevent delays. Each facility may have differing cost structures and permitting processes. Proximity is also a factor the Contractor should consider. Receiving landfills are likely to require that the Contractor submit waste material sample analytical results so that they can profile the waste. This should be arranged prior to transport of the material.

Discharge of water to the sanitary sewer or storm sewer will require an appropriate permit from the City of Puyallup or Ecology, respectively. Absent the appropriate permit, wastewater will require containerization during profiling for offsite disposal at an appropriately permitted treatment facility.

It is noted that waste profiling can also be completed following ground disturbance, but that waste will need to be stored on site during profiling prior to disposal.

3. MATERIAL DEFINITIONS

Contaminated soil and water encountered during project work will be characterized for reuse or disposal. This section describes the classification and management of the contaminated material as follows:

3.1 Clean Soil

Clean soil is defined as soil exhibiting no odors, containing no detectable contaminants at concentrations exceeding either MTCA Method A cleanup levels (CULs) and meeting all definitions of Category 1 soil as defined by the Guidance for Remediation of Petroleum Contaminated Sites:

1. Reusable Soil 1: Soil that contains no detectable levels of contamination. Reusable Soil 1 can be reused on site or transported offsite for reuse at a location chosen by the contractor. Alternatively, Reusable Soil 1 may be disposed of at any facility willing to accept.

It is noted that threshold concentrations for Reusable Soil 1 for certain constituents are lower than CULs. Concentrations of constituents in waste soil for which threshold concentrations have been established in Table 12.1 of the Guidance for Remediation of Petroleum Contaminated Sites must be below the threshold concentrations for the waste soil to meet the definition of Reusable Soil 1. CULs are only used for constituents for which threshold concentrations have not been established in Table 12.1 when

considering reuse. If concentrations of other constituents are detected in waste material above CULs, the material may not be reused on site and should be profiled for offsite disposal.

3.2 Non-Dangerous Waste:

Soil not meeting the definition of clean soil as established in Section 3.1 will require special handling and reuse and/or disposal to comply with local, state and federal regulations. All project soil must be handled in accordance with Chapter 173-350 WAC. Generally, soil with contamination relating to petroleum contamination is handled in in Washington State in accordance with Ecology's Guidance for Remediation of Petroleum Contaminated Sites. The Guidance establishes 4 categories of petroleum contaminated soil for reuse and/or disposal. Category 1 soil is already defined in Section 3.1 and may be reused on site if deemed suitable for reuse by the geotechnical engineer on the project or disposed of/reused at any receiving facility. Category 2 through 4 soils can be reused or disposed of as specified below.

2. Reusable Soil 2: Soil that contains detectable levels of contaminants within the range of concentrations established for Soil Category 2 in Table 12.1, Guidelines for Reuse of Petroleum-Contaminated Soil (Appendix A). Reusable Soil 2 can be reused onsite if it is not laterally or vertically within 10 feet of water or disposed of at any facility licensed/permitted to accept it. Reuse of Reusable Soil 2 is subject to the limitations included in Table 12.1 (Appendix A).
3. Reusable Soil 3: Soil that contains detectable levels of contaminants within the range of concentrations established for Soil Category 3 in Table 12.1, Guidelines for Reuse of Petroleum-Contaminated Soil (Attachment I). Reusable Soil 3 can be reused as a pavement base material under public and private paved streets and roads or under commercial and industrial parking lots or disposed of at any facility licensed/permitted to accept it. Reuse of Reusable Soil 3 is subject to the limitations included in Table 12.1 (Appendix A).
4. Reusable Soil 4: Soil that contains detectable levels of contaminants within the range of concentrations established for Soil Category 4 in Table 12.1, Guidelines for Reuse of Petroleum-Contaminated Soil (Attachment I). Reusable Soil 4 can be reused as a landfill daily cover, for asphalt manufacturing or disposed of at any facility licensed/permitted to accept it. Reuse of Reusable Soil 4 is subject to the limitations included in Table 12.1 (Appendix A).
5. Contaminated Soil: Soil that contains one or more contaminant(s) at concentrations that exceed either the CUL(s) or concentrations established for Reusable Soil 4 in Table 12.1 (Appendix A). Ecology requires that Contaminated Soil be disposed of at a Resource Recovery and Conservation Act (RCRA) Subtitle D facility unless it meets the definition of a Dangerous Waste. Dangerous Waste must be disposed of at a RCRA Subtitle C facility.

In addition to the requirements established above, soil containing petroleum hydrocarbons *(*gasoline, diesel, heavy oil) must be managed as petroleum contaminated soil consistent with the Solid Waste Handling Standards (WAC 173-350). Soil/material/debris/liquid of any kind that is defined as Dangerous Waste per WAC 173-303 may not be reused in any capacity on or offsite and must be handled in accordance with Section 3.3 below.

3.3 Dangerous Waste

Soil/material/debris/liquid that has contaminant levels that potentially exceed the Washington State Dangerous Waste criteria in accordance with WAC 173-303 would be considered Dangerous Waste. Ecology requires that Dangerous Waste be disposed of at an RCRA Subtitle C facility.

Based on preliminary review of potential contaminant sources in the project area, dangerous waste is not expected to be encountered. If sampling and analysis determines material to be dangerous waste, it will be handled in accordance with Washington State and RCRA Regulations.

4. CONTAMINATED MEDIA HANDLING

This section summarizes work that potentially generates contaminated media requiring proper management and disposal.

4.1 Contaminated Soil and Groundwater Management Procedures

If applicable (Contractor to determine), a Contractor will manage contaminated soil in accordance with an established Spill Prevention, Control, and Countermeasure (SPCC) Plan, Construction Stormwater General Permit (Ecology, 2020), SWPPP/TESC Plan and Solid Waste Handling Standards in WAC 173-350 (Ecology, 2018).

Soil disturbance will be limited to the minimum area required to execute project work and any potentially contaminated soils will be protected from contact with stormwater via the use of berms, plastic sheeting, and other best management practices (BMPs).

An environmental consultant will collect soil samples (see section 4.4) when soils suspected to be contaminated are encountered or prior to removal.

Soil containing observed or detectable levels of petroleum contaminants but not meeting the definition of Contaminated Soil per Section 3.1 will be managed and disposed of in accordance with Table 12.1 of the Guidance for Remediation of Petroleum Contaminated Sites (Appendix A) as summarized in Section 3.2.

Soil that contains other contaminant(s) (other VOCs, cPAHs, etc.) at concentrations that exceed the CULs (but does not meet Dangerous Waste criteria) shall be disposed of at a RCRA Subtitle D facility.

If applicable (Contractor to determine), the Contractor will manage contaminated groundwater in accordance with the established SPCC Plan, Construction Stormwater General Permit (Ecology, 2020), SWPPP, TESC Plan and WAC Chapter 173-201A Water Quality Standards for Surface Waters of the State of Washington (Ecology, 2016b). Groundwater that contains contaminant(s) at concentrations that exceed CULs (but does not meet Dangerous Waste criteria) will be disposed of at an appropriately licensed facility.

4.2 Field Screening and Identification

A Contractor foreman, subcontractor foreman, or other designated HAZWOPER certified monitor will be present during excavation activities to provide visual screening of soils.

Soils will be monitored for visual and olfactory evidence of contamination based on location of work, observed discoloration, texture, and odor, or the presence of metal or plastic remnants of tanks or drums. Physical characteristics that may be observed in excavated soils that indicate the need for separate stockpiling and laboratory testing include:

- Soil containing petroleum discoloration or odor;
- Soil or debris containing other unusual or unnatural discoloration or odor;
- Wood or wood fragments containing other unusual or unnatural discoloration or odor;

- Drums, tanks, or metallic debris encountered in the excavation; and
- Garbage or other debris.

A field instrument that can help to qualitatively assess the presence of contamination is a photoionization detector (PID). A PID can detect the presence of a volatile compound (such as benzene or gasoline) in the air but does not identify the chemical. It is not expected that a PID will be utilized during routine construction activities. If suspected contamination is encountered or could be expected to be encountered (i.e., for work in or near areas with petroleum contamination documented in the subsurface investigation reports), a PID would be useful to help identify and segregate contaminated media and can be used for worker protection.

Should suspected contaminated media be identified, the Contractor will notify the owner immediately.

4.3 Stockpiling

The Contractor shall provide proper storage of contaminated soil or debris in stockpiles/staging piles pending sampling, analysis, waste profiling, and disposal. Sufficient storage will be required so that the Contractor's operations are not disrupted due to insufficient storage.

General requirements for the temporary stockpile include: (a) prevent intermixing of stockpiled materials with underlying soils or materials from other sources/or with other contaminants; (b) prevent contact with storm water; (c) prevent erosion of stockpiled materials; (d) apply stormwater BMPs as appropriate for stockpile construction and maintenance; (e) maintain daily inventory of stockpile areas and provide information to the Project Engineer, as requested, and (f) appropriate site security such as fence areas to alleviate hazards to the public.

Incidental stockpiling of contaminated soil within the boundaries of a known contaminated soil area can be conducted without any liners or controls if soil is located in an area where run-off from the stockpile cannot run-on to a clean area or an area with a different type of contamination.

In circumstances where stockpiling will be required, such as during the temporary storage of contaminated soil in a clean area or area with a different type of contamination, or the discovery of undocumented contamination, stockpiles will adhere to the following:

- Stockpiles will be underlain by plastic sheeting with a minimum thickness of 6 mil, with adjacent sheeting sections overlapping a minimum of 3-feet.
- The perimeter of the stockpiles shall be surrounded by a berm to prevent run-on and/or run-off of precipitation.
- Stockpiles shall be covered with plastic sheeting when not in use and the cover should be anchored (such as with sandbags or otherwise) to prevent it from being disturbed by wind.

4.4 Soil Sampling and Testing

Trained environmental personnel will perform sampling of excavated materials for characterization of suspected contaminated soils. The following sections describe the procedures for soil sampling.

4.4.1 Sample Collection

Soil samples will be collected by filling laboratory provided containers. Soil will be collected in a single 4-oz jar for the analysis of TPH as diesel, of metals, and dry weight for that sample. Soil samples for analysis

of VOCs or TPH as gasoline will be collected into Volatile Organic Analysis (VOA) vials in accordance with EPA Method 5035A.

4.4.2 Decontamination

All non-disposable components of the sampling equipment (e.g., hand augers, shovels, spoons, or other equipment) used to collect samples that contact the soil will be decontaminated prior to, and in between, collection of individual samples as follows:

- Scrub with potable water containing Alconox/Liquinox detergent.
- Potable water rinse.

The sampler will don new disposable gloves for the collection of each sample. Samples will be placed in coolers on ice under chain-of-custody documentation for transport to the analytical laboratory.

In the case of stockpile sampling, the number of samples collected to characterize a given volume of soil will be based on Table 6.9 of the Guidance for Remediation of Petroleum Contaminated Sites. Soils will be collected from at least 1-ft below the surface of stockpiles.

4.4.3 Sampling Analysis Procedures

Samples may be analyzed for the following:

- TPH as Diesel Range by Method NWTPH-Dx
- TPH as Gasoline Range by Method NWTPH-Gx
- BTEX by EPA Method 8021B
- PAHs by EPA Method 8270/625
- Total Metals (RCRA-8: arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver) by EPA Method 200.8/6020A/7471
- VOCs by EPA Method 8260C
- PCBs by Method 8082

4.4.4 Evaluation of Analytical Results

The analytical results from samples collected will be reviewed by the Environmental Consultant and used to support regulatory reporting and waste profiling for disposal. The analytical results will be compared to the criteria defined for the types of wastes this plan addresses: "Clean Soil', "Non-Dangerous Waste" and "Dangerous Waste."

Petroleum and Volatile Organics

For the case of petroleum contamination, results will be compared with Tables 12.1 and 12.2 from the Guidance for Remediation of Petroleum Contaminated Sites, which indicate threshold concentrations for disposal and reuse categories for petroleum contaminated soil. Petroleum contaminated soil that is not otherwise classified as a dangerous waste is regulated under the Solid Waste Handling Standards, Chapter 173-350 WAC (Ecology, 2018) as well as Table 12.1.

4.5 Contaminated Water Management Procedures

Water accumulation related to stormwater management, limited perched groundwater, or incidental rainwater that accumulates in excavations will be handled and disposed of in accordance with the construction Stormwater Pollution Prevention Plan (SWPPP) for the project. If possible, water should not be discharged from the site in areas with known contamination.

Groundwater pumped from excavations or footings will be managed as follows:

- *Contain and Analyze*: Water suspected to be contaminated with petroleum hydrocarbons due to contact with contaminated soil or from pumped groundwater will be pumped into an appropriate container (temporary tanks or DOT approved drums) and sampled. The samples will be analyzed to assess the correct method of treatment and/or disposal. Laboratory analytical results will be compared to both the Water Quality Standards established in WAC 173-201A and the MTCA Method A Cleanup Levels established in WAC 173-340, along with standards promulgated by the EPA for Human Health Criteria for Consumption.
- *Halt Work*: If significant indications of contamination are observed in groundwater, then construction work will be halted while analytical testing is conducted to determine options for treatment, disposal, and health and safety requirements. In the event that work is halted, the owner will be notified. Such indicators could include presence of free phase liquids, odor, sheen, or extreme discoloration of the groundwater. If unanticipated contamination is revealed as a result of the analyses, the owner shall notify Ecology.
- *Disposal*: Based on the volume of water generated and the concentrations of the constituents of concern, the groundwater will be disposed of by one of the two following methods:
    1. Infiltration back into the area from where it was pumped or discharge to storm/sanitary sewer. Any discharge to storm sewer or surface waters or infiltration into the work area must be authorized by Ecology under the National Pollutant Discharge Elimination System (NPDES) permit.
    2. Off-site disposal by contacting a vendor to collect the water and transport it to a proper disposal or recycling facility. Groundwater that contains contaminants at concentrations that preclude discharge to storm sewer or infiltration in the work area (per the criteria noted above) shall be hauled offsite to an approved facility coordinated by the Contractor. Disposal shall be at a facility permitted to treat and indirectly discharge wastewater to the public sewer under 40 CFR 437 (centralized waste treatment facility).

4.6 Contaminated Demolition Debris Management Procedures

Demolition debris will be characterized for disposal pursuant to WAC 173-303 and WAC 173-350. Demolition debris contaminated with PCBs or heavy metals at concentrations exceeding the adopted cleanup standard should be segregated with appropriate secondary containment (i.e., plastic sheeting with berms, metal container, etc.) for off-site disposal.

4.7 Procedures for Specific Construction Activities

This section describes activities that may result in the generation of waste for off-site disposal.

4.7.1 Utility Work

Subsurface utility work may be undertaken to support routine maintenance or upgrades. Contaminated soil identified during utility work will be managed in accordance with this CMMP.

4.7.2 Grading

Mass grading may take place during significant redevelopment work. In general, grading will reuse soil cut and transported within the site. Contaminated soil identified during trenching or grading operations should be contained, characterized, and disposed of off-site at a permitted facility.

4.8 Dust and Odor Control

There is the potential for nuisance dust or odors to be emitted during soil excavation activities. The goal is to eliminate visible airborne Fugitive Dust. Therefore, state and local regulatory agencies expect that as many of these control techniques be employed as necessary to achieve this goal. Should excessive dust or nuisance odors develop during excavation as determined by visual and olfactory observation by the Contractor, or complaints, the Contractor shall be prepared to implement one or more of the following odor control measures:

- Minimize the open area where high concentrations of contaminants may be present.
- Apply a mist of water over the area as needed to minimize odor and dust. The use of water for dust control will be sufficient to suppress dust but should not be excessive such that surface runoff of water used for dust control is permitted.
- Cover exposed areas with elevated concentrations of contaminants with plastic sheeting at the end of each day and when excavation activities are not being performed.
- Keep stockpiles covered when not in use.

4.9 Decontamination Procedures

If contaminated soils are identified within work areas, procedures should be implemented to avoid spreading such material. In such areas, oil residue on equipment and excavator tracks/tires and truck tires will be removed using a combination of wet and dry methods. During dry conditions, soil residues will be removed by dry brushing. Soil that cannot be removed by this procedure will be removed from equipment by washing with high-pressure water.

During wet season conditions, high-pressure water washing will be used to remove material residues and mud from equipment and tires. If a contaminated area can be delineated that will experience extensive vehicle traffic, a decontamination station will be constructed at an appropriate location on the site. The station will consist of a bermed bed of crushed aggregate rock equipped with a water collection sump. Water generated during decontamination activities will be handled as process water and disposed of to the sanitary sewer or disposed of off-site at an approved facility. The work areas will be kept clean and free of excessive soil or debris.

4.10 Contingency Plan for Unknown Contamination

Contaminated soils may be encountered during the Work that have not previously been identified or characterized. The equipment operator shall stop work and notify the Project Team if any of the following are encountered:

- Obvious staining, sheen, or colored hues in soil or standing water in locations not previously designated.
- Presence of gasoline- or oil-like vapor, odor, or unexpected petroleum products or other chemicals.
- Utility pipelines with sludge or trapped liquid indicating petroleum or chemical discharge sludge.
- Unexpected buried pipes, conduits, tanks, or unexplained metallic objects or debris.
- Vapors causing eye irritation or nose tingling or burning.

In the event that suspected contaminated soil or groundwater are observed, the contractor will notify the Project Team. Soil samples will be field screened, and samples will be collected and analyzed to ensure that the contaminated soil and/or groundwater is removed and properly characterized prior to disposal.

5. CONTAMINATED MEDIA TRANSPORT AND OFF-SITE DISPOSAL

Transport of contaminated media to the appropriate disposal facilities will be performed by haulers licensed to transport that media. The Contractor shall submit a copy of its transporter's permit/qualifications for shipping contaminated soil prior to any waste transfer.

5.1 Waste Profile and Manifest

Prior to transport of contaminated material, the waste material must be properly manifested and approved for acceptance by the selected disposal facility. The Contractor shall provide the owner with copies of the waste profile, manifest, and approval notification from the selected disposal facility 3 days prior to removal of contaminated material from the project site.

5.2 Contaminated Soil Transport

Transport of contaminated soil to the appropriate disposal facilities will be performed by haulers licensed to transport the type of contaminated soil. Contaminated soil will be loaded from stockpile or containers directly to the designated vehicle for transport to the approved disposal site. The Contractor shall provide the owner with copies of shipping records (manifest or bill of lading) and quantity tickets for all shipped wastes, indicating each waste shipment has been received at a disposal facility.

5.3 Off-Site Disposal

Soil with detectable concentrations of petroleum hydrocarbons must be managed as petroleum contaminated soil and disposed of at a permitted solid waste facility in accordance with WAC 173-340. Soil with detectable concentrations of other contamination such as VOCs (including TCE) must be managed according to its waste category and disposed of at a permitted solid waste facility in accordance with WAC 173-350. The Contractor is responsible for determining waste facility requirements and facilitating additional preliminary waste profiling if required. Sampling for waste profile analysis may be required by the receiving facility prior to approval.

Once a permitted facility is selected, the Contractor will submit copies of the facility permits and environmental approvals to the owner for review and approval prior to transport and disposal of material. Example facilities that may be used for disposal of contaminated waste include:

- Republic Services'
- Waste Management's
- Ecology permitted solid waste facilities

- Other public health department approved facility

6. POST CONSTRUCTION MANAGEMENT

This CMMP was created as guidance related to contamination encountered during the utility maintenance and/or a construction period. It is understood that additional management related to contamination may be appropriate once construction is complete. Ongoing management may include inspection, notification, maintenance, and monitoring.

7. REPORTING AND DOCUMENTATION

Contractors and any subcontractors managing contaminated media will maintain all necessary permits and approvals related to the removal, excavation, management, storage, transportation, and/or treatment/disposal of the contaminated soil or water that might be generated during the project. Permits may include, but are not limited to, excavation permits, transportation permits and manifests, discharge permits and approvals, and permits for treatment or disposal of contaminated waste. Copies of permits and disposal receipts should be retained for future reporting by the property owner.

In summary, documentation may include:

- Quantity by weight as determined by number of truckloads and disposal facility weight tickets.
- Quantity of water by gallons retained by dewatering activity for discharge or disposal. The destination (discharge or disposal) of the water will be documented. If off-site disposal, facility delivery receipts (gallons) shall be retained.
- Physical characteristics including analytical results when applicable.
- Disposal facility for each material disposed.
- Disposal facility receipts.
- Weight / truck tickets.
- Manifests / Bills of Lading.
- Fee receipts.
- Certification from each receiving facility owner that the facility's operating permit conditions were met for materials disposed.
- Copies of all analytical data will be provided to the landfill operator upon request.

The documentation shall be presented to the property owner in a report that includes the attachment of all laboratory data. An accompanying narrative will describe the soil removal and any deviations to the procedures that occurred. Corrective actions will be identified as needed, and the resolution of any discrepancies will be reported.

8. SIGNATURE

Apex Companies LLC

Nasrin Bastami
Apex Sr. Environmental Practice Lead

Melanie Young, PE
Apex Sr. Environmental Engineer

9. REFERENCES

(Ecology, 2024) *Model Toxics Control Act Regulation and Statute,* Washington State Department of Ecology, Publication No. 94-06, revised 2024.

(Ecology, 2014) *Dangerous Waste Regulations WAC 173-303,* Washington State Department of Ecology, December 2014.

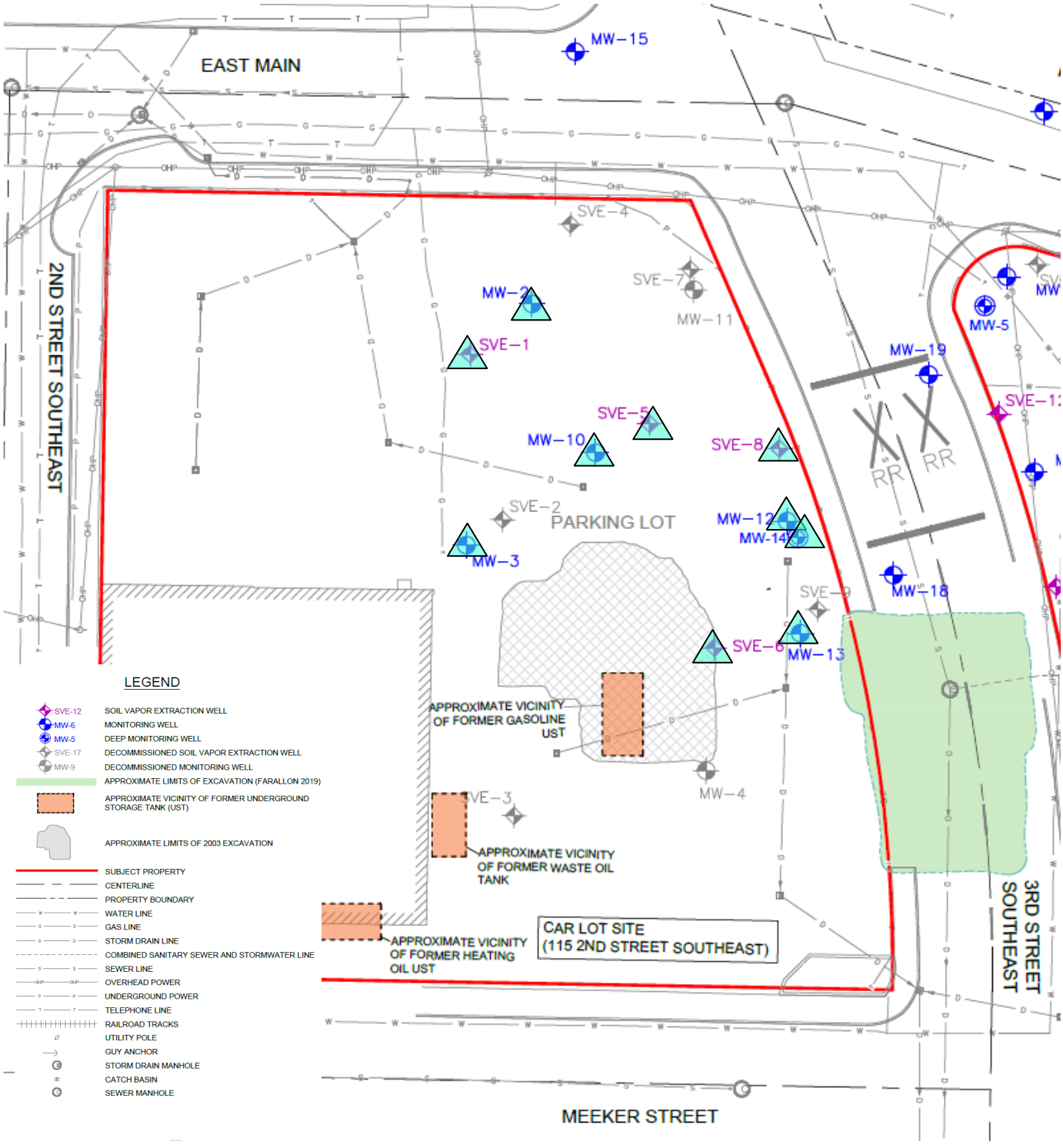
(Ecology, 2016a) *Guidance for Remediation of Petroleum Contaminated Sites,* Washington State Department of Ecology, June 2016.

(Ecology, 2016b) *Water Quality Standards for Surface Waters of the State of Washington,* Washington State Department of Ecology, August 2016.

(Ecology, 2018) *Solid Waste Handling Standards WAC 173-350,* Washington State Department of Ecology, September 2018.

Figures

Figure 1 - Site Plan



SOURCE: Farallon Consulting, Confirmatory Soil Sampling Report, Site Plan, Cornforth Cambell Motors-Car Lot Site (Figure 2 – March 2024)

LEGEND

Abandoned Monitoring and Soil Vapor Extraction Wells (May 2025)

PREPERED FOR: City of Puyallup

APEX

SITE PLAN

City of Puyallup – Seasons on Meeker
115 2nd Street SE, Puyallup, WA 98371

June 2025
25007243

FIGURE
1
Not To Scale

Appendix A

Ecology Guidance for Reuse of PCS
Tables 12.1 – 12.2

Table 12.1 Guidelines for Reuse of Petroleum-Contaminated Soil

Parameter	Analytical Method	Soil Category (8)(9)(10)			
		1 No detectable Petroleum Components (mg/kg)	2 Commercial Fill Above Water Table (mg/kg)	3 Paving Base Material & Road Construction (mg/kg)	4 Landfill Daily Cover or Asphalt Manufacturing (mg/kg)
Total Petroleum Hydrocarbons (1)(2) See Table 7.1 for petroleum products that fall within these categories.					
Gasoline Range Organics	NWTPH-Gx	<5	5 - 30	>30 - 100	>100
Diesel Range Organics	NWTPH-Dx	<25	25 - 200	>200 - 500	>500
Heavy Fuels and Oils*	NWTPH-Dx	<100	100 - 200	>200 – 500	>500
Mineral Oil	NWTPH-Dx	<100	100 - 200	>200 – 500	>500
Volatile Petroleum Components					
Benzene	SW8260B	<0.005	0.005 - 0.03	0.03 or less	See Table 12.2
Ethylbenzene	SW8260B	<0.005	0.005 - 6	6 or less	>6
Toluene	SW8260B	<0.005	0.005 - 7	7 or less	>7
Xylenes (3)	SW8260B	<0.015	0.015 - 9	9 or less	>9
Fuel Additives & Blending Components					
(MTBE) Methyl Tert-Butyl Ether	SW8260B	<0.005	0.005 - 0.1	0.1 or less	>0.1
Lead	SW6010A	<17	17 - 50	>50 - 220	See Table 12.2
Other Petroleum Components					
Polychlorinated (4) Biphenyls (PCBs)	SW8082	<0.04	<0.04	<0.04	See Table 12.2
Naphthalenes (5)	SW8260B	<0.05	0.05 - 5	5 or less	>5
cPAHs (6)	SW8270C	<0.05	0.05 - 0.1	>0.1 - 2	>2
Other Petroleum Characteristics (Applies to soils contaminated with any petroleum product.)					
Odors	Smell	No detectable odor			
Staining	Visual	No unusual color or staining			
Sheen Test	See Footnote # 7	No visible sheen			

IMPORTANT: See Table 12.2 and the footnotes to this Table on the following pages!

Test soil for the parameters specified in Table 7.2.

****Does NOT include waste oil contaminated soils, which should be disposed of in a landfill.***

"<" means less than; ">" means greater than

Table 12.1 Guidelines for reuse of petroleum-contaminated soil.

Table 12.2 Description and Recommended Best Management Practices for Soil Categories in Table 12.1 (continued next page)

Category	Acceptable Uses	Limitations
Category 1 Soils: Soils with no detectable/ quantifiable levels of petroleum hydrocarbons or constituents using the analytical methods listed in Table 7.3 and are not suspected of being contaminated with any other hazardous substances.	• Can be used anywhere the use is allowed under other regulations. • Any use allowed for Category 2, 3 & 4 soils.	• These soils should be odor-free.
Category 2 Soils: Soils with residual levels of petroleum hydrocarbons that could have adverse impacts on the environment in some circumstances.	• Any use allowed for Category 3 & 4 soils. • Backfill at cleanup sites above the water table. • Fill in commercial or industrial areas above the water table. • Road and bridge embankment construction in areas above the water table.	• These soils may have a slight petroleum odor, depending on the sensitivity of the individual. This should be considered when reusing these soils. • Should be placed above the highest anticipated high water table. If seasonal groundwater elevation information is not available, place at least 10 feet above the current water table. • Should not be placed within 100 feet of any private drinking water well or within the 10 year wellhead protection area of a public water supply well. • Should not be placed in or directly adjacent to wetlands or surface water where contact with water is possible. • Should not be placed under a surface water infiltration facility or septic drain field. • Any other limitations in state or local regulations.
Category 3 Soils: Soils with moderate levels of residual petroleum contamination that could have adverse impacts on the environment unless re-used in carefully controlled situations.	• Any use allowed for Category 4 soils. • Use as pavement base material under public and private paved streets and roads. • Use as pavement base material under commercial and industrial parking lots.	• Should be placed above the highest anticipated high water table. If seasonal ground water elevation information is not available, place at least 10 feet above the water table. • Should be a maximum of 2 feet thick to minimize potential for leaching or vapor impacts. • Should not be placed within 100 feet of any private drinking water well or within the 10 year wellhead protection area of a public water supply well. • Should not be placed in or directly adjacent to wetlands or surface water. • Should not be placed under a surface water infiltration facility or septic drain field. • When exposed, runoff from area in use should be contained or treated to prevent entrance to storm drains, surface water or wetlands. • Any other limitations in state or local regulations.

Table 12.2 Description and recommended best management practices for soil categories in Table 12.1 (continued next page).

Table 12.2 (continued) Description and Recommended Best Management Practices for Soil Categories in Table 12.1

Category	Acceptable Uses	Limitations
Category 4 Soils: Soils with high levels of petroleum contamination that should not be re-used except in very limited circumstances.	• Use in the manufacture of asphalt. • Use as daily cover in a lined municipal solid waste or limited purpose landfill provided this is allowed under the landfill operating permit.	**Landfill Limitations:** The soil should be tested for and pass the following tests: ➢ Free liquids test. Soils that contain free liquids cannot be landfilled without treatment. ➢ TCLP for lead and benzene. Unless exempt under WAC 173-303-071(3)(t), soils that fail a TCLP for lead or benzene must be disposed of as hazardous waste. ➢ Flammability test. Soils that fail this test must be disposed of as hazardous waste. ➢ Bioassay test under WAC 173-303-100(5). Soils that fail this test must be disposed of as hazardous waste. ➢ PCBs. Soils with a total PCB content of 2 ppm or more must be disposed of as hazardous waste. Soil used for daily cover should be stockpiled within the landfill lined fill area. Soil containing more than 10,000 mg/kg TPH should be buried immediately with other wastes or daily covered to limit potential worker exposure. Any additional limitations specified in the landfill permit or in other state or local regulations. **Asphalt Manufacturing Limitations:** Soil storage areas should be contained in a bermed area to minimize contact with surface water runoff from adjacent areas. Runoff from storage areas should be considered contaminated until tested to prove otherwise. Soil storage areas should also be lined and covered with a roof or secured tarp to minimize contact with precipitation and potential groundwater contamination. Leachate from storage areas should be considered contaminated until tested to prove otherwise. The soil should be tested for and pass the following tests: ➢ TCLP for lead and benzene. Unless exempt under WAC 173-303-071(3)(t), soils that fail a TCLP for lead or benzene must be disposed of as hazardous waste. ➢ Flammability test. Soils that fail this test must be disposed of as hazardous waste. ➢ Bioassay test under WAC 173-303-100(5). Soils that fail this test must be disposed of as hazardous waste. ➢ No detectable levels of PCBs in soil (<0.04 mg/kg). Precautions should be taken to minimize worker exposure to soil storage piles and any dust or vapors from these piles prior to feeding into the asphalt batch plant.

IMPORTANT: See the following page for additional information!