

- Total PCB aroclors; antimony; arsenic; copper; lead; mercury; selenium; silver; zinc; cadmium, total carcinogenic Polycyclic Aromatic Hydrocarbons (cPAHs); bis(2-ethylhexyl) phthalate; butyl benzyl phthalate; diethyl phthalate; dimethyl phthalate; and pentachlorophenol into the soil.
- Suspected Contaminants of Concern (COCs) noted above in groundwater.
- Suspected COCs noted above in surface water.
- Arsenic and lead in sediment, and suspected COCs noted above in sediment.

Enclosure A includes diagrams of the Site, as currently known to Ecology.

Please note the parcels of real property associated with this Site are also located within the projected boundaries of the Asarco Tacoma Smelter Plume facility (#89267963; [Dirt Alert](#)). At this time, we have no information that those parcels are actually affected. This opinion does not apply to any contamination associated with the Asarco Tacoma Smelter Plume facility.

Basis for the Opinion

This opinion is based on the information contained in the documents listed in **Enclosure B**. In addition, communications during meetings and via email contributed to Ecology's understanding of site conditions. A number of these documents are accessible in electronic form from the [Site web page](#)^[1]. The complete records are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our [Public Records Request page](#)^[2] to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or 360-407-6040.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis and Opinion of Interim Actions

The independent interim cleanup actions at this property present unique challenges for a VCP site. Ecology has a number of concerns as described in this opinion letter about potential impacts to human health and the environment related to use of property within this Site as a public park. While access to a green space is important for communities, especially communities of color and low-income communities like this one, great care must be taken when remediating a space open to the all-ages of the public to ensure that there will not be

^[1] [Duwamish Waterway Park Ecology Site Page](#)

^[2] <https://ecology.wa.gov/publicrecords>

sampling results for lead and arsenic, there is additional sediment sampling data in the Ecology Environmental Information Management database ([EIM](#)) for additional chemicals of concern within the Site boundaries.

Additionally, Ecology does not recognize the use of composite sampling (Incremental Sampling Methodology) for sediment characterization during the RI stage, and recommends following guidance provided in the [SCUM](#) (see section 4.4.2) for use of discrete sampling methodology. Ecology requests that you resolve these data gaps to adequately characterize sediment conditions and the areal and vertical extent of hazardous substances in sediments.

2. Establishment of cleanup standards

Typically, cleanup standards are initially established during a RI and further refined during a Feasibility Study (FS). The purpose of the FS is then to develop and evaluate cleanup action alternatives to enable a cleanup action to be selected for the site ([WAC 173-340-350](#)). For an RI, establishment of cleanup standards requires specification of cleanup levels, points of compliance, and any additional regulatory requirements. For this Site, points of compliance need to be addressed for all relevant media. Cleanup levels should be determined using Method B; since the Site overlaps the Lower Duwamish Waterway (LDW) Superfund sediment cleanup area, and the Site is not considered industrial in use, neither Method A or Method C are applicable. Ecology recommends using the LDW Preliminary Cleanup Levels (PCULs) workbook, found on [Ecology's Document Repository for the LDW](#), as the basis for the selection of preliminary cleanup levels for all chemicals of concern and all media discussed for point of compliance of the Site. Considering the number of COCs known and suspected at the Site, cleanup levels will likely require adjustment in order to establish the cleanup standards. Ecology requests that future work pertaining to the selection of cleanup standards follow prior Ecology feedback and utilize the LDW PCULs workbook, which incorporates criteria from all pertinent regulations, including MTCA and the Sediment Management Standards.

Site cleanup standards must meet the following criteria:

Soil

The point of compliance for soil is soil throughout the Site. While the RI discussed points of compliance for soil, Ecology identified spatial and analytical data gaps in characterization of the Site that affect the applicability of the points of compliance selected in the RI.

