



January 27, 2021

Toxics Cleanup Program  
Southwest Regional Office  
300 Desmond Drive Southeast  
Lacey, Washington 98503

**Re: Edgewood Terrace Estates, LLC – Arsenic Cleanup Action Plan**

Ms. Barber:

EcoCon, Inc. (ECI) is pleased to provide you with the followed Letter Report to amend the Cleanup Action Plan for the Arsenic and Lead Mitigation Project dated January 14, 2021 for the King County Parcel 042104-9012. The property referenced within this document has been given the VCP number NW3302.

This Letter Report provides documentation to amend the Cleanup Action selected for the King County Parcel 042104-9012. During Department of Ecology's (Ecology) review of documents provided ECI, it was brought to ECI's attention that a composite duff sample (E1-Duff), which consisted of a composite sample that was collected from six subsamples within grid E1, exceeded the maximum mixable concentration of Arsenic in duff of 20 mg/kg. The concentration of arsenic in the respective duff sample from grid E1 had a laboratory concentration of 23.6 mg/kg. The grid sample that exceeded the "elevated" arsenic concentration of 20 mg/kg, is representative of approximately 3,750 sq feet. The attached Figure shows the subsample locations that made up the composite sample (E1-Duff). In addition to this, the attached Figure shows the estimated area to be hauled off and disposed of at an appropriate disposal facility. For this area ECI is proposing a permanent solution to the arsenic exceedance via excavation and removal. Upon removing the duff within the respective E1 grid, ECI will follow the Compliance Sampling Table provided within the Tacoma Smelter Plume Model Remedies Guidance Publication Number 19-09-101: Pg 44. Prior to restoration of the excavated area it is anticipated that the remedial area will require eight (8) performance samples from the excavated area from the excavation floor and sidewalls. The results of the remedial action will be documented in a property specific Cleanup Action Report (CAR) and submitted to the VCP Site Manager.

**Conclusion**

ECI appreciates the opportunity to provide environmental consulting services on this project. If you have any questions or comments, please feel free to contact Charles McFadden at (253) 318-3864 or Stephen Spencer at (253) 921-7059.

Enclosure:

Figure 1 – Grid E1 – Soil Sample Location Map

Cordially,



Charles H. McFadden

Project Geologist | ECI Environmental Services

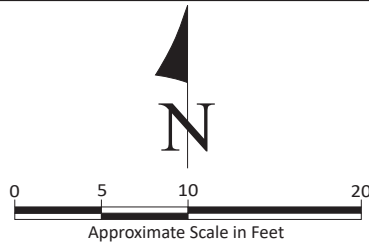
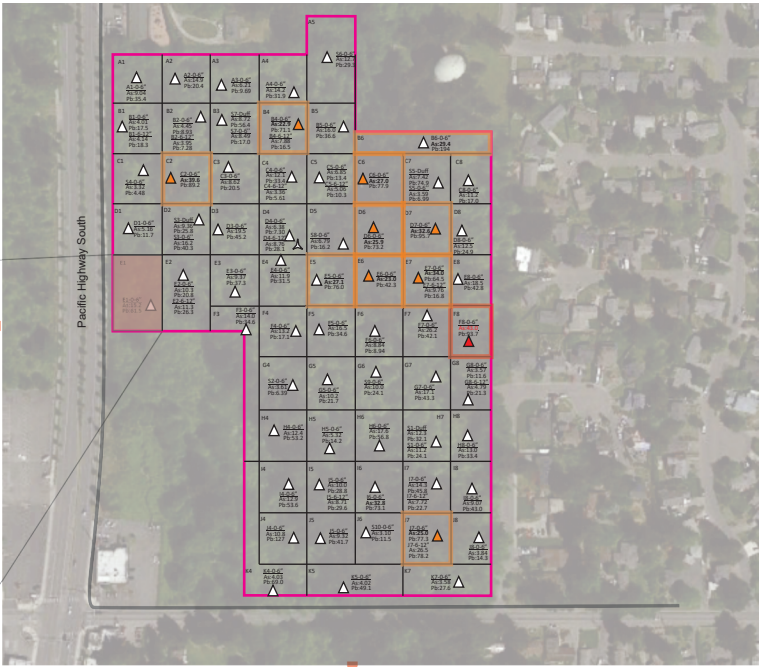
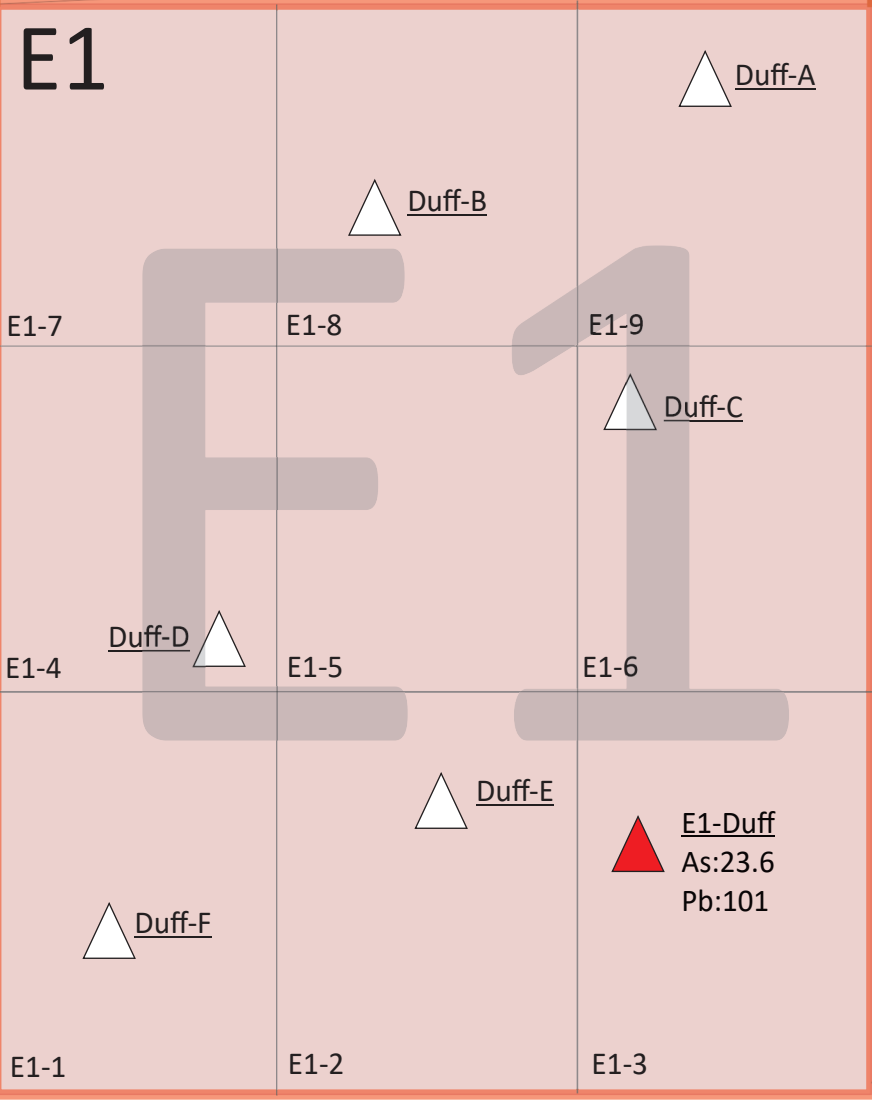
Direct: (253) 318-3864

D1

Estimated area to be excavated for appropriate disposal shaded in red.

E1


Pacific Highway South



- △ Duff Subsample Location
- ▲ Duff Sample Report >20 mg/kg Arsenic
- As Arsenic
- Pb Lead
- mg/kg milligram / Killogram

Grid E1 - Soil Sample Location Map  
Edgewood Terrace Estates, LLC - Arsenic Cleanup Action Plan  
1717-1999 S 304th St  
Federal Way, WA 98003

Date:	January 27, 2021	Figure No.:
Completed By:	K. Spencer	01
Reviewed By.:	S. Spencer	
Version:	R1-051019	
Project No.:	0766-01	
		Sheet 01 of 01



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