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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

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December 19, 2022

Tasya Gray, LG
DOF Dalton, Olmsted & Fuglevand
1001 SW Klickitat Way, Suite 200B
Seattle, WA 98134
ngray@dofnw.com

Scott Hooton
Port of Tacoma
PO Box 1837
Tacoma, WA 98401-1837
shooton@portoftacoma.com

Re: Comments on Indoor Air Sampling and Analysis Plan, Former Potter Property

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAIFA)
- **Site Address:** 1500 Block Taylor Way E, Tacoma, Pierce County, WA 98409
- **Agreed Order:** DE 14260
- **Enforcement Order:** DE 19410
- **Facility/Site ID:** 1403183
- **Cleanup Site ID:** 4692

Dear Tasya Gray and Scott Hooton:

Thank you for submitting the former Potter Property indoor air sampling plan (SAP) for review by the Department of Ecology (Ecology).¹ Please revise the SAP to incorporate the following comments:

1. As recommended by the New Jersey Vapor Intrusion Technical Guidance, please place sub-slab sampling locations no closer than 5 feet to an outer wall.²
2. Please move sampling location TWA-SV-45, 15-20 feet southwest, so it is closer to the portion of the Emerald Services Building that contains the Break Room. See attached Figure for a facility map that shows the layout of this building.³
3. Ecology recommends that the data-logging manometers be installed at vapor pins TWA-SV-36 and -42 instead of TWA-SV-37 and -43 because these locations are near the center of the building slab and will likely provide more representative differential pressure data.

¹ Maul Foster & Alongi, Inc. (MFA), *Indoor Air Sampling and Analysis Plan, Former Potter Property*, November 30, 2022.

² New Jersey Department of Environmental Protection, Site Remediation and Waste Management Program, *Vapor Intrusion Technical Guidance*, Version 5.0, May 2021 (See Section 3.3.1.4).

³ Figure from: *Facility Layout Diagram, Emerald Services Inc.*, February 9, 2015.

4. Please provide a detailed floor plan that shows proposed sample locations relative to interior walls, and any potential preferential pathways for vapor intrusion (such as floor drains, cracks, and utility penetrations). It is Ecology's understanding that a restroom is present in the Shop Building. Please label this area on the floor plan and also indicate the uses and locations of any other interior rooms that are present besides the restroom.
5. Ecology previously recommended that soil samples for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and metals be collected to investigate the source of the elevated sub-slab concentrations and any residual contamination.⁴ Via email,⁵ the Port of Tacoma (Port) requested that Ecology waive the requirement to test soils for SVOCs and PCBs because the data in the Data Gaps Data Report⁶ showed no soil results above TWAAFA screening levels. **Ecology does not approve this request for the following reasons:**
 - a. As shown in Data Gap Work Plan (DOF, 2020), Table 6, total PCBs were previously detected in samples of auto fluff from the Site at concentrations up to 14.3 milligrams per kilogram (mg/kg).⁷ PSC (2005) mapped auto fluff on portions of the former Potter Property and the extent of auto fluff at the Site has not been fully determined.⁸
 - b. As shown in DOF (2020), Table 13, cPAHs were previously detected from the Site at concentrations that exceed the screening level. For example, this table shows that a soil sample from MW-1 had a benzo(a)pyrene concentration of 9.6 mg/kg.
6. Please also analyze methane, oxygen, and carbon dioxide in sub-slab samples as was specified in the previous vapor sampling and analysis plan (MFA, 2021).⁹
7. Section 3.1, Laboratory Test Methods: This section indicates that samples will be analyzed only for chloroform, heptane, n-hexane, PCE, and TCE by the TO-15 Method. **Please revise this section to indicate that all samples will be analyzed for the full TO-15 list.** This is necessary because the laboratory reporting limits for some constituents exceeded screening levels. These constituents included naphthalene, 1,1,2,2-tetrachloroethane, 1,2-dibromoethane, 1,2-dichloroethane, 1,4-dichlorobenzene, benzene, methyl tert-butyl ether, vinyl chloride, and others.

⁴ Ecology, *Comments on TWAAFA reports and request for work plan*. Email from Steve Teel to Scott Hooton, Port of Tacoma and Tasya Gray, DOF, November 9, 2022; and, Ecology, *Comments on First and Second Quarter Groundwater Reports, Request for Work Plan, and Resolution of Informal Dispute*, December 7, 2022.

⁵ Port of Tacoma, *Re: Resolution of Informal Dispute*. Email from Scott Hooton to Steve Teel, Ecology, November 17, 2022.

⁶ Dalton, Olmsted, & Fuglevand (DOF), *Data Gaps Data Report*, November 2022.

⁷ DOF, *Final Data Gaps Work Plan*, July 2020.

⁸ Philip Services Corporation (PSC), *Final Comprehensive RI Report*, Philip Services Corporation Tacoma Facility, January 21, 2005.

⁹ MFA, *Final Vapor Sampling and Analysis Plan, Taylor Way and Alexander Avenue Fill Area, Former Potter Property*, November 10, 2021.

Please submit a revised SAP for Ecology review and approval within 30 days of the date of this letter.

If you have any questions, please contact me at 360-890-0059 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Region Office

Enclosure: Figure – Emerald Services Facility Layout Diagram

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Ecology Site File

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Enclosure

Figure – Emerald Services Facility Layout Diagram

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