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**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office

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January 30, 2023

Randy Barnett
Ichijo USA Co., LTD
1406 140th Pl NE, Ste 104
Bellevue, WA 98007
randy@ichijousa.com

Re: Opinion on the Proposed Cleanup at a Site:

- **Site Name:** Brookdale Golf Club
- **Site Address:** 1802 Brookdale Rd E, Tacoma, Pierce County, WA 98445
- **Facility/Site ID:** 7758
- **Cleanup Site ID:** 14894
- **VCP Project ID:** SW1672

Dear Randy Barnett:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Former Brookdale Golf Club facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the [Model Toxics Control Act \(MTCA\)](#),¹ [chapter 70A.305 Revised Code of Washington \(RCW\)](#).²

Issue Presented and Opinion

Ecology is responding to your request for a no further action (NFA) determination for your Site. Upon the completion of your proposed cleanup, it has been determined that further action is necessary.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, chapter 70A.305 RCW, and its implementing regulations, [Washington Administrative Code \(WAC\) chapter 173-340](#)³ (collectively "substantive requirements of MTCA"). The analysis is provided below.

¹ <https://apps.ecology.wa.gov/publications/SummaryPages/9406.html>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Dieldrin in soil and groundwater.
- Arsenic in soil and groundwater.

The parcel(s) of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume facility (FSID #89267963). At this time, we have no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume facility.

Basis for the Opinion

This opinion is based on the information contained in the documents listed under **Enclosure A**:

You can request these documents by filing a [records request](#).⁴ For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on [Ecology's Cleanup Site Search web page](#).⁵

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

Analysis of the Cleanup

1. Characterization of the Site.

Ecology's current opinion is primarily based on the submittal of additional investigatory reports since Ecology's prior August 24, 2020, Opinion.⁶ These reports include the Supplemental Remedial Investigation Report (SRIR) and Cleanup Action Report (CAR), both dated August 31, 2022.

⁴ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁵ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=14894>

⁶ Ecology Opinion, Further Action at Site: Former Brookdale Golf Club, August 24, 2020.

In addition to presenting a summary of the Supplemental RI (North of Clover Creek) Report (dated May 29, 2020) which was incorporated in Ecology's prior August 24, 2020, opinion, the August 31, 2022, SRIR/CAR also included the Supplemental RI (South of Clover Creek).

Based on review of the activities conducted in those reports, Ecology has determined your characterization of the Site is not sufficient to establish cleanup standards and select a cleanup action. The soil and groundwater sampling performed at the Site has not sufficiently characterized and remediated the extent of dieldrin releases in soil and groundwater at the Site to the requested cleanup levels (CULs).

Ecology Comments

Ecology appreciates the significant remedial investigation (RI) and cleanup that you have conducted within the Site boundaries both north and now south of Clover Creek. We generally concur with the investigative and remedial excavation approach you have taken, based on our December 10, 2019, and August 24, 2020, Opinions. We also concur with your assessment that if additional areas of contamination are detected, additional remediation would need to be conducted.⁷

Nicolina Meadows. Post EPI's September 19, 2019, Technical Memorandum on the Nicolina Meadows PPD Project, and as previously requested in Ecology's prior August 24, 2020, Opinion, please present additional RI results from the areas west of the former golf course in the wetlands of the proposed Nicolina Meadows housing development. Analytical data along this boundary will provide an indication that hazardous substances released from the Site have not migrated to the Nicolina Meadows location.^{8,9} Please see Section 2: Establishment of Cleanup Standards (Section 2) below to further refine sampling and analytical requirements within this area.

On-Site Dieldrin Soil and Groundwater Data. Please refer to Section 2 below for further discussion on the soil and groundwater data generated to date.

Delineated Isopleth Maps. Ecology accepts the depiction of the lateral and vertical soil confirmation sample data in the plan view diagrams of the tee and green excavations in the August 31, 2022, CAR.

⁷ Report pages 2-3.

⁸ Letter from Department of Ecology Southwest Regional Office, To Robert Jenkins, Pierce County Planning and Public Works, September 12, 2019, available at: <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=91905>.

⁹ Letter from Stephen R. Shelton, Office of the Pierce County Hearing Examiner, Re: Major Amendment to Approved Preliminary Plat, available at: <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=93053>

Arsenic, Ethylene Dibromide (EDB), Dieldrin, Diazinon, Nitrate (as N), and ortho-Phosphate (as P). Ecology appreciates the additional assessment of surface/subsurface soil, sediment, groundwater, and surface water for these additional compounds. Ecology requests that these data be summarized in one table for both of the investigations conducted on the north and south sections of the course. Based on the data, Ecology concludes the following:

- **Soil:** EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site soil at the soil sample locations. However, while arsenic was present at various concentrations in all the collected samples, it occurred above the MTCA Method A CUL of 20 milligrams per kilogram (mg/kg) in soil samples obtained from locations B-7 and AOI-20. Arsenic within the AOI-20 area was reportedly excavated in September/October 2020¹⁰ according to TRC's Response to Ecology Comments dated February 3, 2021. However, the soil confirmation sample data in Table 22 of the August 31, 2022, CAR does not exhibit arsenic data to assess adequacy of impacted soil removal. Please provide these data.
- **Sediment:** EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site sediment at the respective sample locations – although no freshwater sediment cleanup values exist for those compounds. In addition, while arsenic was present at various concentrations in all the collected samples, it occurred below the Ecology Freshwater Sediment Cleanup Objective of 14 mg/kg. Dieldrin was also not detected in any of the sediment samples at the laboratory method detection limits (MDL) of 0.006 mg/kg, and at a level above the Ecology freshwater sediment cleanup objective of 0.0049 mg/kg. Please refer to the discussion under Section 2 below regarding this issue.
- **Groundwater:** EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site groundwater at the temporary well groundwater sample locations. While total arsenic was present at various concentrations above the MTCA Method A CUL of 5 micrograms per Liter (µg/L), the dissolved sample results did not occur at or above the laboratory MDL of 1 µg/L. Dieldrin was detected in sample B4 at 0.032 µg/L above the MTCA CUL of 0.0055 µg/L but not detected in most of the samples at an MDL of 0.02 µg/L. Please refer to the discussion under Section 2.

¹⁰ TRC Cleanup Action Report – Former Brookdale Golf Course, pg. 10, August 31, 2022.

- **Surface Water.** Arsenic, EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site surface water from either the Clover Creek, NFCC, or the main irrigation pond samples. While dieldrin was not detected at or above the laboratory MDL of 0.02 µg/L, that MDL occurred at four orders of magnitude above the CLARC surface water CUL for human health of 0.0000061 µg/L. Please refer to the discussion under Section 2 below.

Indicator Hazardous Substances. As stated above in the selection of cleanup standards, use of the MDLs to assess whether other indicator hazardous substances as analyzed by the full list of organochlorine pesticides are present at the remedial excavation limits is not sufficient. A comparison between the MDLs and the respective CULs should be provided to further assess whether other indicator substances are present. Please refer to the discussion under Section 2 below regarding this issue.

Environmental Information Management System (EIM) Results. Ecology acknowledges TRC's uploading of the environmental data from the August 31, 2022, SRIR/CAR documents. In addition, Ecology also confirms receipt of the January 25, 26, and 27, 2017, results for 4,4-DDE and 4,4-DDT.

Terrestrial Ecological Evaluation. Ecology will reevaluate the TEE upon application of the lower cleanup levels for soil dieldrin discussed in Section 2 below.

2. Establishment of Cleanup Standards.

Ecology has determined that not all the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA. Under MTCA, cleanup standards consist of three primary components; points of compliance,¹¹ cleanup levels,¹² and applicable state and federal laws.¹³

Points of Compliance: Points of compliance are the specific locations at the Site where cleanup levels must be attained. For this Site, the standard points of compliance for soil and protection of groundwater are appropriate. However, points of compliance for sediment in the Clover Creek are also applicable and need to be included for the Site. Ecology provides the following table of standard points of compliance for the Site:

¹¹ WAC 173-340-200 "Point of Compliance."

¹² WAC 173-340-200 "Cleanup level."

¹³ WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c).

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. WAC 173-340-740(6)(d) <i>Ecology concurs that the standard point of compliance for soil direct contact is appropriate for the Site.</i>
Soil-Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. WAC 173-340-747 <i>Ecology concurs that the standard point of compliance for soil protection of groundwater is appropriate for the Site.</i>
Soil-Protection of Plants, Animals, and Soil Biota	Based on ecological protection, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. WAC 173-340-7490(4)(b) <i>Ecology concurs with the standard soil point of compliance for ecological protection, but a Terrestrial Ecological Evaluation (TEE) is needed to evaluate potential cleanup standards based on ecological protection.</i>
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. WAC 173-340-720(8)(b) <i>Ecology concurs that the standard point of compliance for groundwater is appropriate for the Site.</i>
Sediment	Based on the protection of sediment quality, compliance with the requirements of 173-204 WAC. ¹⁴

Cleanup Levels. Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment. At this Site, with the exception of the calculated TPH soil CULs and the groundwater CUL for pentachlorophenol (PCP), as the EPA MCL, Ecology concurs with the selection of the other CULs as follows:

Applicable Laws and Regulations. In addition to establishing minimum requirements for cleanup standards, applicable local, state, and federal laws may also impose certain technical and procedural requirements for performing cleanup actions. Ecology's suggestions for including applicable laws and regulations for this cleanup were provided in our December 10, 2019, opinion for the Site. Ensure to adequately address this requirement in the completed RI.

¹⁴ WAC 173-340-760

3. Selection of Cleanup Action.

Ecology has determined the cleanup action you selected for the Site as a whole does not meet the substantive requirements of MTCA. Based on Ecology's review of the August 31, 2022, CAR,¹⁵ the remedial excavation process at the Site was independently conducted by Ichijo in conjunction with completion of the initial Environmental Partner's, Inc. (EPI) RI/FFS¹⁶ on March 18, 2019.

Based on review of the RI portion of the EPI RI/FFS as stated in Ecology's December 10, 2019, Opinion,¹⁷ Ecology's review comments focused on completion of the RI sufficient for Ecology to determine that the requirements of WAC 173-340-350 were met. This included consideration of additional chemicals being assessed in soil, groundwater, surface water, and sediment as well as potential adjustments to cleanup levels and use of indicator hazardous substances for the project.

Ecology further stated that it would review the FFS and concurrently submitted EPI CAR¹⁸ when sufficient information was available for Ecology to determine that the RI for the Site had been completed. As a result, Ecology determined at that time that characterization of the Site was not sufficient to establish cleanup standards and select a cleanup action. However, at that time, Ecology also understood that remedial excavation actions proposed in the March 2019 EPI CAR were already underway at the Site.

Interim remedial measures (IRM)¹⁹ are a necessary component for Site cleanup and closure and as such, Ecology concurs with execution of the remedial excavations completed thus far across the Site as IRM's based on dieldrin and arsenic (at AOI-20) in soil. Ecology appreciates your efforts to reduce contaminant concentrations in the environment. As was the case with these excavations, IRM's are remedial actions conducted without Ecology oversight or approval and are not executed under an administrative order, agreed order, or consent decree.

Per WAC 173-340-515(3)(a), Ecology shall determine whether IRM's meet the substantive requirements of MTCA and/or whether further remedial action may be necessary at the Site. Those entities conducting IRM's do so at their own risk, and may be required to take additional remedial actions if Ecology determines such actions are necessary. In such circumstances, Ecology reserves all of its rights to take actions authorized by law.

¹⁵ TCR Environmental Consultants, Cleanup Action Report – Brookdale Golf Course, August 31, 2022.

¹⁶ Environmental Partners, Inc., Remedial Investigation and Focused Feasibility Study Report – Brookdale Golf Course, March 18, 2019.

¹⁷ Ecology, Opinion – Further Action – Former Brookdale Gold Course, December 10, 2019.

¹⁸ Environmental Partners, Inc., Cleanup Action Report – Brookdale Golf Course, March 18, 2019.

¹⁹ WAC 173-340-430

Further and of general note relative to TRC's February 3, 2021, response to Ecology comments, specifically Comment 2, all levels cited by the Manchester Laboratory consist of analytical method reporting limits (MRL) which are analogous to the practical quantitation limit (PQL). The PQL is the lowest amount of a compound that can be accurately calibrated and quantified according to the quality control objectives of the instrument.

Conversely, TRC incorrectly references Manchester levels as MDLs relative to the selection of matrix (i.e., soil, sediment, groundwater, and surface water) CULs. Although statistically derived, the MDL is less accurate in terms of analytical quantity determination than the PQL. As such, for the purposes of proposing alternative CULs exceeding established MTCA cleanup levels, the PQL should always be cited in the laboratory analytical report and utilized accordingly.

In addition, and as referenced under WAC 173-340-707(4), when the PQL occurs above cited Ecology CULs, Ecology can require the use of improved analytical techniques to achieve lower PQLs and other appropriate actions. This may involve utilizing Washington-approved analytical laboratories that incorporate the most up-to-date instrumentation and quality control methods to achieve the necessary analytical method limits.

Soil. As originally stated in Section 2.3 of the March 2019 EPI CAR, remedial excavation conducted at the Site was primarily based on dieldrin at the proposed MTCA Method B cleanup level of 0.0625 mg/kg, a CUL that is based on direct contact with soil. Based on Ecology's review of data from TRC's May 29, 2020, Supplemental Remedial Investigation²⁰ and on Ecology's subsequent August 24, 2020, Opinion,²¹ Ecology specifically mentioned on page 6 of our opinion, that TRC's proposed dieldrin soil CUL of 0.0625 mg/kg did not account for groundwater protection. Rather, Ecology suggested using the dieldrin soil CUL of no greater than 0.0028 mg/kg as protective of groundwater and as stated in Ecology's Cleanup Levels and Risk Calculation Master Table (CLARC).²² Alternatively, Ecology also stated that an empirical demonstration could be completed showing that soil concentrations would not cause an exceedance of the applicable groundwater CUL.

To that end, the groundwater dieldrin CUL of 0.0055 µg/L was specified in both the TRC May 29, 2020, Supplemental Remedial Investigation Report (SRIR) and TRC August 31, 2022, SRIR. However, both the initial groundwater grab samples obtained from the 2020 SRIR soil borings and the 2022 SRIR monitoring well groundwater samples were reported at stated MDLs of 0.02 µg/L and 0.1 µg/L above the respective CUL.

²⁰ TRC Environmental Consultants, Supplemental Remedial Investigation – Brookdale Golf Club, May 29, 2020.

²¹ Ecology, Further Action Opinion – Former Brookdale Golf Club, August 24, 2020.

²² Ecology, Cleanup Levels and Risk Calculation Master Table, July 2022.

As a result, Ecology does not consider that dieldrin in groundwater has been adequately evaluated across the Site nor does an analytical (nor empirical) basis currently exist to adequately assess whether the direct contact-based soil CUL for dieldrin of 0.0625 mg/kg proposed by TRC would be applicable (i.e., protective of groundwater). The groundwater CUL may also be applied to surface water as it is a realistic upward adjustment to the regulatory surface water PQL.

Although Ecology is in agreement that dieldrin has both a low aqueous solubility and an elevated log octanol water-partitioning coefficient, and which generally indicates limited vertical migration via adsorption to vadose zone soil, its long-term application and widespread operational use as a pesticide on the Brookdale Golf Course tees and greens is of concern. This includes its presence in soil that has been subjected to many decades of surface recharge from regional precipitation as well as its persistence in the environment, and which subsequently indicates the potential for the presence of dieldrin in groundwater at the Site.

In TRC's February 3, 2021, response to Ecology's August 24, 2020, comments on the TRC May 29, 2020, SRIR, TRC stated on page 14 that Ecology's December 10, 2019, Opinion²³ did not provide input on using alternative soil cleanup standards for dieldrin other than what was described in the TRC's March 2019 CAR. Hence, TRC stated that based upon that "feedback", the CAR was fully implemented at the Site. However, as stated above in Ecology's December 10, 2019, Opinion, Ecology's review of the RI portion of the EPI RI/FFS focused on providing comments for completing the RI sufficient for Ecology to determine that the requirements of WAC 173-340-350 were met.

Ecology further stated that it would review the FFS and the March 2019 EPI CAR when sufficient information was available for Ecology to determine that the RI for the Site had been completed. As a result, Ecology determined at that time, characterization of the Site was not sufficient to establish cleanup standards and select a cleanup action. Ecology also concluded in the December 10, 2019, opinion letter that additional remedial investigation is necessary at the Site before selecting a cleanup action.²⁴ However, Ecology also understood that remedial excavation actions proposed in the March 2019 EPI CAR were already underway at the Site.

TRC's February 3, 2021, response further discussed that the 0.0028 mg/kg soil dieldrin MDL specified by Ecology was not widely commercially available and was generally considered to be an estimate by the Washington-state accredited laboratories that they had consulted with.

²³ p. 6.

²⁴ p. 8.

These laboratories were not specified by name, however. TRC therefore concluded that the laboratory MDL of 0.01 mg/kg that was achieved by the Washington State-accredited project laboratory used for the Brookdale RI/FFS was considered to be reasonable and appropriate. Based on review of the laboratory analytical reports from the 2019 EPI RI/FS Report dated March 18, 2019, for dieldrin in soil, the analytical limit of 0.01 mg/kg was not specified as either an MDL or PQL. However, the laboratory quality control sample results did list it as a “reporting limit” in the footnotes, so Ecology assumes that it represents a PQL and not the MDL.

Groundwater/Surface Water. Similarly, regarding Ecology’s suggested groundwater and surface water CUL for dieldrin of 0.0055 µg/L, TRC stated in the SRIR/CAR that while that MDL was theoretically achievable, it was not commercially utilized nor available. TRC further stated that based on their discussions with unspecified laboratory directors, that the MDL could only be achieved under ideal conditions and would be widely considered as a potentially unreliable estimate based on a formal (and unspecified) MDL study. TRC proposed a groundwater and surface water CUL of 0.02 µg/L.

Sediment. Regarding sediment, Ecology specified a freshwater sediment cleanup objective (SCO) for dieldrin of not greater than 0.0049 mg/kg and a regulatory PQL of 0.003 mg/kg. As a result, no upward adjustment of the PQL should occur. Alternatively, TRC mentioned their laboratory MDL for dieldrin in sediment was 0.006 mg/kg and that a lower MDL was widely considered an estimate consistent with the explanations for soil and groundwater. TRC also mentioned that the findings of the RI demonstrated compliance with Table 4 Freshwater Sediment Cleanup Objectives and Cleanup Screening Levels Chemical Criteria of Ecology’s Sediment Management Standards (WAC 173-204-563). Sediment MDL for dieldrin in TRC sediment samples actually ranged from 0.006 to 0.01 mg/kg.

CULs. TRC CULs for dieldrin in soil, sediment, groundwater, and surface water for the Site were selected as the respective analytical MDL. This selection was based on the exposure pathways for human and ecological receptors at the site and specifications under WAC 173-340-707 that stated either the PQL or the MDL would serve as the CUL if the standard media CUL was less than the technically achievable MDL for a specific compound.

Ecology does not concur with TRC’s conclusion of 1) utilizing the analytical method MDLs as the CUL for soil and sediment and 2) concluding that the Ecology CULs were analytically unachievable nor commercially utilized or available.²⁵ As per WAC 173-340-707(2), though Ecology recognizes that there may be situations where a hazardous substance is not

²⁵ TRC Response to Ecology Comments dated August 24, 2020; page 7; February 3, 2021.

detected or is detected at a concentration below the PQL utilizing sampling and analytical procedures which comply with the requirements of WAC 173-340-830, Ecology does not believe that this is the case at this Site.

The soil CUL of 0.0028 mg/kg (2.8 micrograms per kilogram [$\mu\text{g/kg}$]) proposed by Ecology are achievable by several commercial laboratories in the Pacific Northwest utilizing the current standard analytical method for organochlorine pesticides, EPA Method 8081B. To that end, the achievable soil MDL and PQL for dieldrin by EPA Method 8081B should at least be 0.005 $\mu\text{g/kg}$ and 1.0 $\mu\text{g/kg}$.

The sediment CUL to be achieved should be correlative to the freshwater SCO of 0.0049 mg/kg, and a PQL of 0.003 mg/kg. As a result, there should be no upward adjustment to the PQL and the proposed CUL should not be greater than 0.0049 mg/kg.

Additionally, per WAC 173-340-830(2)(f), analytical laboratories shall achieve the lowest PQLs consistent with the selected analytical method and WAC 173-340-707. As a result, Ecology would concur with a Site CUL for dieldrin in groundwater and surface water that proposes using the MDL of 0.005 $\mu\text{g/L}$ and a PQL of 0.01 $\mu\text{g/L}$ versus the Method B CUL of 0.0055 $\mu\text{g/L}$. The proposed change in Site CULs does not exclude the use of an empirical demonstration for the Site, following WAC 173-340-747(3)(f).

Next Steps

Based on the CUL discussion above, the lateral and vertical extents of all RI and remedial soil, sediment, groundwater, and surface water data should be reevaluated relative to the suggested CUL's and MDL/PQL. Additional cleanup activities should be based on utilizing an analytical laboratory that can achieve and comply with those levels. Please also adequately summarize all environmental matrix data in tables for review and correlation with the laboratory analytical reports. Once these requested data are submitted, Ecology can better evaluate whether the RI is complete.

Limitations of the Opinion

1. Opinion Does Not Settle Liability with the State.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

2. Opinion Does Not Constitute a Determination of Substantial Equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action a party performs is substantially equivalent. Courts make that determination.
See RCW 70A.305.080 and WAC 173-340-545.

3. State is Immune from Liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.
See RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our [Voluntary Cleanup Program webpage](#).²⁶ If you have any questions about this opinion, please contact me at 360-489-5347 or joe.hunt@ecy.wa.gov.

Sincerely,



Joe Hunt, LHG
Toxics Cleanup Program
Southwest Region Office

JH/js/tam

Enclosure: A – List of Documents

cc by email: Thomas Morin, TRC, tmorin@trccompanies.com

Sharon Bell, Tacoma Pierce County Health District, sbell@tpchd.org

Robert Jenkins, Pierce County Planning and Land Services, rob.jenkins@piercecountywa.gov

Jerome Lambiotte, Ecology, jerome.lambiotte@ecy.wa.gov

Ecology Site File

²⁶ <https://www.ecy.wa.gov/vcp>

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Enclosure A

List of Documents

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List of Documents

1. TRC, *Cleanup Action Report – Brookdale Golf Course*, August 31, 2022.
2. TRC, *Supplemental Remedial Investigation Report – Brookdale Golf Course*, August 31, 2022.
3. TRC, *Response to Ecology Comments Dated August 24, 2020, Brookdale Golf Course*, February 3, 2021.
4. TRC Environmental Corporation (TRC), *Supplemental Remedial Investigation Report – Brookdale Golf Course*, May 29, 2020.
5. Environmental Partners, Inc., *Response to Ecology Comments; Nicolina Meadows PPD Project, Tacoma, WA*, September 19, 2019.
6. Environmental Partners, Inc., *Response to Ecology Comments (dated December 10, 2019)*, May 29, 2020.
7. Environmental Partners, Inc., *Cleanup Action Plan - Brookdale Golf Course*, March 18, 2019.
8. Environmental Partners, Inc., *Remedial Investigation and Focused Feasibility Study Report - Brookdale Golf Course*, March 18, 2019.