



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Southwest Region Office PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

February 6, 2023

Tasya Gray, LG DOF Dalton, Olmsted & Fuglevand 1001 SW Klickitat Way, Ste 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 Port Parcel 110 and Former Potter Property Work Plan

- Site Name: Taylor Way and Alexander Avenue Fill Area (TWAAFA)
- 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 work plan (plan) for additional investigation at Port Parcel 110 and the former Potter Property¹ for review by the Department of Ecology (Ecology) in response to our previous comments.² Please revise the plan to incorporate the following comments:

- 1. <u>Page 6, Parcel 110 soil vapor sampling</u>: Ecology has the following recommendations for soil vapor sampling using the post-run tubing (PRT) methodology:
 - a. The driller shall ensure that the Post-Run Tubing (PRT) tip threads and seat shall be cleaned on a daily basis (or more frequently if needed) and the O-ring shall be changed daily.
 - **b.** Only rigid wall tubing shall be used. The tubing above the PRT connector shall be thick wall so that sufficient torque is available to screw the tip tightly into the seat.
 - c. The rods shall be pulled back no more than 6 inches above the sampling point.

¹ Maul Foster & Alongi, Inc. (MFA), *Supplemental Investigation Work Plan, Port Parcel 110 and Potter Property, Taylor Way and Alexander Avenue Fill Area*, January 5, 2023.

² Ecology, *Comments on Indoor Air Sampling and Analysis Plan, Former Potter Property*, December 19, 2022; and *Comments on TWAAFA reports and request for work plan*, email from Steve Teel, Ecology, to Scott Hooton, Port of Tacoma, November 9, 2022.

- **d.** An equilibration period of 60 minutes shall be observed after soil gas probe installation and prior to shut-in testing, leak testing, purging, and sampling. The time period for equilibration shall begin after the rods have been pulled back.
- 2. As recommended by Ecology's vapor intrusion guidance, soil vapor sampling shall not be performed immediately following a significant rain event.³
- 3. <u>Page 7, Potter Property</u>: The text refers to three temporary borings designated TWA-SB10 through -SB12. However, Figures 2 and 3 designate the proposed soil borings as TWA-SB06 through -SB08. Please revise the plan so that the text and figures are consistent with respect to the boring designations.
- 4. Figure 2:
 - a. Please move Potter Property sampling location TWA-SB06 so it is as close as possible to TWA-SV-35 rather than the location shown on the figure. This is needed to help determine if the source of the elevated sub-slab total petroleum hydrocarbon (TPH) vapors at TWA-SV-35 is from a vadose zone source, or from the water table, or from both.
 - b. Please move Potter Property sampling location TWA-SB08 so it is as close as possible to TWA-SV-41 rather than the location shown on the figure. This is needed to help determine if the source of the elevated sub-slab total petroleum hydrocarbon (TPH), tetrachloroethene (PCE), and trichloroethene (TCE) vapors at TWA-SV-41 is from a vadose zone source, or from the water table, or from both.
- 5. <u>Parcel 110, page 6</u>: Please state the approximate step-out distance from TWSV-1 to TW-14.
- 6. <u>Schedule</u>: The plan states that MFA will conduct the proposed work "within 30 days following the ongoing discussion and resolution in cooperation with Ecology regarding other potential data gaps..." that were identified in Ecology's October 13, 2022, email.⁴ The data gaps that were identified by Ecology included the installation of additional monitoring wells to fully delineate the extent of groundwater contamination. The plan also states that MFA proposes to conduct the above-described soil vapor sampling at Parcel 110 when the groundwater table is low, anticipated for between July and September. Ecology acknowledges that it makes sense to consolidate field activities and reduce the number of drill rig mobilizations when possible. However, there needs to be a firm deadline for

³ Ecology, *Guidance for Evaluating Vapor Intrusion in Washington State, Investigation and Remedial Action*, Toxics Cleanup Program, Publication No. 09-09-047, March 2022.

⁴ Ecology, *Comments on TWAAFA reports and request for work plan*, email from Steve Teel, Ecology, to Scott Hooton, Port of Tacoma, October 13, 2022. These comments were also included in this formal letter: Ecology, *Comments on First and Second Quarter Groundwater Reports, Request for Work Plan, and Resolution of Informal Dispute*, December 6, 2022.

implementation of the plan. Therefore, Ecology agrees that the work described in the plan may be delayed until the data gap discussions have concluded, provided that the implementation of the plan and associated sample collection work is begun by July 10, 2023, and/or when the groundwater depth is sufficiently low to expose the vadose zone (depth to water ≥ 5 feet below ground surface). Also, plan data collection activities must be completed before September 30, 2023.

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 <u>steve.teel@ecy.wa.gov</u>.

Sincerely,

SSTeel

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

Robert F. Bakemeier, Bakemeier, P.C., rfb@rfblaw.com cc by email: Melinda Borgens, Schnitzer Steel, mborgens@schn.com Greg Fink, CleanEarth, gfink@harsco.com Mark M. Myers, Williams Kastner, mmyers@williamskastner.com Marlys S. Palumbo, VanNess Feldman LLP, msp@vnf.com Kim Seely, Coastline Law Group PLLC, kseely@coastlinelaw.com Rick Tackett, Pierce County, rick.tackett@piercecountywa.gov Lisa Waskom, Glenn Springs Holdings, lisa waskom@oxy.com Victoria Banks, Office of the Attorney General, victoria.banks@atg.wa.gov Rebecca S. Lawson, Ecology, rebecca.lawson@ecy.wa.gov Jerome Lambiotte, Ecology, jerome.lambiotte@ecy.wa.gov Kerry Graber, Ecology, kerry.graber@ecy.wa.gov Jason Landskron, Ecology, jason.landskron@ecy.wa.gov Mark Furnish, Ecology, mark.furnish@ecy.wa.gov Rob Reed, Ecology, rob.reed@ecy.wa.gov Ron Kaufmann, Ecology, ronkaufmann@ecy.wa.gov **Ecology Site File**