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STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office

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February 7, 2023

Kristine Koch  
Remedial Project Manager  
USEPA, Region 10  
1200 6th Ave, Ste 155  
Seattle, WA 98101-3140  
[koch.kristine@epa.gov](mailto:koch.kristine@epa.gov)

**Re: Ecology Support of Proposed Remedy Change for Operable Unit 2, Asarco Smelter Site**

- **Site Name:** Asarco Smelter, Operable Unit 2
- **Site Address:** 52<sup>nd</sup> St & Baltimore, Tacoma, Pierce County, WA
- **Facility/Site No.:** 215
- **Cleanup Site ID:** 712

Dear Kristine Koch:

Thank you for sharing the description of the change to the remedy for Operable Unit 2, Asarco Smelter Superfund Site via email on December 20, 2022. Ecology reviewed the description and supports the proposed change.

The new design for the armor cap for the shoreline of the breakwater peninsula requires removal of slag material to install the armor toe and allow for a stable base. As there is no space available in the shoreline and the upland portion of Operable Unit 2 has been capped, the excess slag needs to be disposed of off-site.

In 1996, Ecology evaluated the disposal of this material and deemed it a dangerous waste that either needed to be disposed of in a monocell in a RCRA Subtitle D landfill or disposed of in a RCRA Subtitle C landfill. The monocell for the Asarco site was closed in the late 1990s; therefore, the only option is to dispose of the excess slag at a RCRA Subtitle C landfill. The closest facility is Chemical Waste Management in Arlington, OR.

Ecology concurs that the off-site disposal of slag in a RCRA Subtitle C landfill is necessary and consistent with the Washington State Dangerous Waste Regulations and supports this remedy change.

Kristine Koch  
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Re: Asarco Smelter, Operable Unit 2  
CSID: 712

If you have any questions, I may be reached at 360-489-4569.

Sincerely,

A handwritten signature in blue ink that reads "Marian L. Abbett". The signature is written in a cursive style.

Marian L. Abbett, P.E.  
Project Manager  
Toxics Cleanup Program  
Southwest Region Office

cc: Rebecca Lawson, Ecology, [rebecca.lawson@ecy.wa.gov](mailto:rebecca.lawson@ecy.wa.gov)  
Lyndsay Gordon, Ecology, [lyndsay.gordon@ecy.wa.gov](mailto:lyndsay.gordon@ecy.wa.gov)  
Ecology Site File