



To: Steve Teel, Department of Ecology

From: Tasya Gray, Taylor Way and Alexander Avenue Fill Area (TWAFA) Agreed Order Potentially Liable Parties Group Project Coordinator, ngray@dofnw.com

Date: February 27, 2023

Subject: Ecology January 26, 2023 letter regarding “Comments on Data Gaps Data Report” – Response to Comments

This letter has been prepared on behalf of Glenn Springs Holdings, Inc. (Occidental Chemical), General Metals of Tacoma (GMT), and Clean Earth Inc. (Clean Earth) formerly known as Stericycle Environmental Solutions, Inc. and Burlington Environmental (Burlington). These parties (collectively the “AO Parties”) are performing activities at the Taylor Way and Alexander Avenue Fill Area (TWAFA) Site under Agreed Order Number (AO) DE 14260 (effective December 4, 2020) with the Washington State Department of Ecology (Ecology).

On January 26, 2023 the AO Parties received Ecology comments regarding the November 2022 Data Gaps Data Report (Ecology, 2023). This letter was prepared as a response to the comments to confirm our understanding and facilitate collaboration with Ecology on Remedial Investigation/Feasibility Study efforts and remaining data collection requests presented by Ecology in the January 26 letter.

Comment 1 – Table 1, Data Gaps Status Summary regarding assessment of vapor intrusion in the Feasibility Study:

Comment noted; the Feasibility Study will review available remedial technologies to address sources of vapor which present a threat to indoor air quality.

Comment 2 – Section 3.0, 2nd Paragraph regarding validation flags on total petroleum hydrocarbon results:

We understand that Ecology is requiring that data flagged “x” by the laboratory shall not be qualified with “NJ” in future report tables or EIM data submittals. We agree that the analytical method does not discuss qualification of data and that “x” is a common laboratory flag. The data validator’s use of “NJ” was intended to draw the attention of the data user to more critically consider the use of these data (not reject it). We anticipate addressing these types of considerations as part of the Remedial Investigation/Feasibility Study in collaboration with Ecology and with consideration for Ecology guidance documents.

Comment 3 – Section 2.4.4, Burlington Stabilization Building data questions:

a. The fluctuations of 20.9 Pascals over approximately 3 minutes in the morning on March 1, 2022 is equivalent to 0.084 inches water column. The exact reason for this fluctuation is unknown, but this level of change in differential pressure may be due to the start of operations in the building, i.e., opening and closing bay doors and starting up the excavator prior to startup of the baghouse and active waste stabilization as shifts start at 7AM.

b. The difference in fluctuation in the data from the Transportation Building and the Stabilization Building is likely due to multiple instruments being used (separate rental units) during initial collection of differential pressures across the various buildings on the Burlington Property.

Per the Ecology request, collection of sub-slab vapor samples and additional pressure differential data will be collected in the Stabilization Building. DOF proposes collection of differential pressures in accordance with the December 3, 2021 *Revised TWAAFA Data Gap Investigation Progress Summary and Soil Vapor Intrusion Status and Recommendation Memo* (DOF, 2021) at location TWA-SV-30 (Figure 1) and will coordinate with the equipment supplier to attempt to obtain the same instrument that was previously used for the Transportation Building (and may lead to less fluctuation).

DOF proposes collection of two soil vapor samples from existing vapor pin locations TWA-SV-30 and TWA-SV-28 as shown on Figure 1 within the Stabilization Building. Sample collection and analysis will be performed in accordance with procedures specified in Appendix M of the Final Data Gaps Work Plan (DOF, 2020).

Comment 4 – Table 2, Soil Sample Results Summary:

Comment noted. In future reporting, DOF will include data table entries for the summation of diesel and oil fractions.

Comment 5 regarding additional data upload into EIM:

We understand that per Section 6.0 of the Final Data Gaps Work Plan (DGWP), the available sampling data collected after August 1, 2005 from the TWAAFA site should be uploaded into Ecology's EIM database. DOF will work with EIM staff to assess feasibility of uploading datasets identified in Ecology's comment. In some cases, the source data may not be available in a format acceptable to the EIM coordinator for upload.

DOF is coordinating with the Port of Tacoma regarding comment items a and g, as these data were generated by the Port's consultants. Other datasets are being evaluated by DOF to determine if the source data can be located but in some cases, data included in the Data Gaps Work Plan was only available in hard copy and/or summary form. We will contact Ecology regarding individual data set status to determine the appropriate data management approach prior to the Remedial Investigation/Feasibility Study.

References

Washington State Department of Ecology (Ecology), 2023. *Re: Comments on Data Gaps Data Report*. January 26.

Dalton, Olmsted, & Fuglevand, Inc. (DOF), 2020. *Final Data Gaps Work Plan*. July.

DOF, 2021. *Revised TWAAFA Data Gap Investigation Progress Summary and Soil Vapor Intrusion Status and Recommendation*. December 3.