

e-Copy



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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

August 23, 2023

Mindy Graddon  
SoundEarth Strategies, Inc.  
2811 Fairview Avenue East, Suite 2000  
Seattle, WA 98102  
[mgraddon@soundearthinc.com](mailto:mgraddon@soundearthinc.com)

**Re: Comments on Engineering Design Report**

- **Site Name:** Buckley Library
- **Site Address:** 123 S River Ave, Buckley, Pierce County, WA 98321
- **Facility/Site ID:** 39884259
- **Cleanup Site ID:** 9017
- **VCP Project ID:** SW1673

Dear Mindy Graddon:

Thank you for submitting your June 8, 2023, Engineering Design Report (EDR) for the planned cleanup action at the Buckley Library facility, VCP SW1673. We understand that you are not requesting a formal VCP review of the EDR, and that the cleanup work is anticipated to start in mid-August. We received your EDR on July 12, 2023, and have added it to our records for the Site.

We understand that your intent is to submit a request for a no-further-action (NFA) opinion once the cleanup work is completed. Please keep in mind that our evaluation of your cleanup action for any future VCP opinion requests will include an assessment of your responses to our requests in the December 21, 2022, NFA Likely opinion. To provide feedback prior to the start of work and identify potential issues related to the recent opinion, Ecology has performed a limited informal review of the EDR and offers the comments summarized below.

It is important to understand that this is not a formal review and does not constitute acceptance of, or concurrence with, your EDR. These comments are provided for informational purposes to highlight issues that are relevant to meeting the standards for independent remedial actions under MTCA.<sup>1</sup> If not addressed, these issues would more likely than not preclude an NFA determination for the site.

**Informal EDR review comments:**

- Ecology requested two additional monitoring wells to be installed in River Avenue to the east of the granular activated carbon (GAC) barrier (i.e., down-gradient). These new wells are needed for confirmational monitoring and possibly for long-term monitoring, if any is required. Without these new wells, Ecology would consider the confirmational monitoring well network to be insufficient. Please add the new wells requested in the December 21, 2022 opinion.
- Ecology is not requiring a public comment period for your independent remedial action. This does not preclude you from soliciting public comment on the EDR if desired, or if you have reason to do so, such as previous inquiries from the public. A reasonable step may be to post the project details near the work area and establish a site document repository inside the library.
- Please note that although your confirmational groundwater monitoring may require only 4 quarters, it is important to understand that any reduction from the 8 quarters of monitoring, as described in the December 21, 2022 opinion, requires Ecology concurrence. That determination will not be made until the first 4 quarters of monitoring are completed and reported to Ecology.
- The EDR suggests that the vapor pathway is incomplete at the Site. Per the December 21, 2022 opinion, Ecology does not concur with this assessment based on historical TPH concentrations above the current sub-slab screening levels for vapor intrusion, and because of the potential for contaminated soil to remain beneath the building. Please include the requested limited vapor sampling as part of the confirmation sampling for your remedial action.
- Regarding the use of silica gel cleanup (SGC) for groundwater samples, Ecology understands that the presence of polar metabolites is suspected based on the underlying lithology but cautions that groundwater analyses using SGC are currently only for evaluative purposes and may not be suitable for direct comparison with groundwater cleanup levels under current MTCA guidelines. Ecology recognizes that the

---

<sup>1</sup> WAC 173-340-515(3)

contribution of polar metabolites can be significant, and that their exclusion from the reported TPH concentrations used to evaluate compliance is appropriate for some sites. To address this issue, Ecology recently released a draft guidance on the use of SGC in groundwater, including applicability to cleanup levels, for public comment. [The draft SGC guidance can be viewed at this link](#) for informational purposes (the public comment period has ended), but Ecology cautions that the final version may differ from the draft. Pending release of the final version of the SGC guidance, Ecology recommends continuing to analyze your groundwater samples both with and without SGC.

- Thank you for providing a TEE with your EDR. Ecology does not concur with the proposed TEE exclusion based on contiguous undeveloped land (the total land area appears to be between 1.5 and 2 acres), and considers it more likely than not that the Site would meet the criteria to end the TEE process under a Simplified TEE scenario.<sup>2</sup> As such, Ecology would accept a proposal to end the TEE process based on a simplified TEE, including completing MTCA Table 749-1, but you will need to submit a revised TEE including your completed Table 749-1 and a map showing the area within 500 feet of the margins of your Site. You will need to complete this task before Ecology will accept any future opinion requests. You will also need to provide an updated TEE Form with your next submittal to Ecology.
- Ecology reminds you that all Site data collected since August 2005 must be submitted to EIM. If you have not done so already, please submit your historical data to EIM prior to starting your cleanup work. All data collected during the cleanup and subsequent monitoring must be submitted to EIM before we will accept any future VCP opinion requests.

Please note that this is not intended to be a comprehensive list, but rather a summary of significant considerations pertaining to your goal of an NFA determination for the Site. It is the responsibility of the VCP customer and their consultant to ensure that the independent remedial action is performed, documented, and confirmed in a manner consistent with MTCA, the December 21, 2022 opinion, and any other applicable guidance documents. Ecology recommends the June 2016 [Guidance for Remediation of Petroleum Contaminated Sites](#) as a resource to evaluate the adequacy of your confirmational sampling and monitoring.

---

<sup>2</sup> WAC 173-340-7492

If you have any questions about this letter, please contact me by phone at 360-999-9584 or email at [dean.malte@ecy.wa.gov](mailto:dean.malte@ecy.wa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dean Malte". The signature is fluid and cursive, with the first name "Dean" and last name "Malte" clearly distinguishable.

Dean Malte, LG  
Southwest Region Office,  
Toxics Cleanup Program

DM:jc

cc by email: Clifford Jo, Pierce County Library System, [cjo@piercecountylibrary.org](mailto:cjo@piercecountylibrary.org)  
Tom Cammarata, SoundEarth, [tcammarata@soundearthinc.com](mailto:tcammarata@soundearthinc.com)  
Levi Fernandes, SoundEarth, [lfernandes@soundearthinc.com](mailto:lfernandes@soundearthinc.com)  
Jerome Lambiotte, Ecology, [jerome.lambiotte@ecy.wa.gov](mailto:jerome.lambiotte@ecy.wa.gov)  
Ecology Site File