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Southwest Region Office

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October 19, 2023

Jake Lund, P.E.
Senior Engineer, Parks, Arts, and Recreation Department
City of Olympia
P.O. Box 1967
Olympia, WA 98507
jlund@ci.olympia.wa.us

Re: Comments on data gaps investigation memo

- **Site Name:** Solid Wood Inc.
- **Site Address:** 700 W Bay Dr NW, Olympia, Thurston County, WA 98502-4838
- **Facility/Site No.:** 94656838
- **Cleanup Site ID:** 4228
- **Agreed Order No.:** DE-08-TCPSR-5415

Dear Jake Lund:

Thank you for submitting the data gaps investigation technical memorandum (memo) for review by the Department of Ecology (Ecology).¹Please revise the memo to incorporate the following comments:

1. **Page 4**, Biological Testing and Page 5, Conclusions, 2nd paragraph: Change “(SCL)” to “(CSL).”
2. **Conclusions:**
 - a. Ecology suggests that this section includes a summary of the wood waste sieve results and how these results were used to choose samples for bioassay analysis.
 - b. The conclusions compare maximum detected carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and total dioxins/furans toxicity equivalence (TEQ) to South Puget Sound Natural Background and Regional Background

¹ Pioneer Technologies Corporation (Pioneer), 2023, City of Olympia Solid Wood, Inc. Site, Results of Soil and Sediment Samples Collected as Part of the Data Gaps Investigation, July 25.

Concentrations. Please note that when you prepare the Remedial Investigation (RI Report), you will need to include calculated surface weighted average concentrations (SWACs) for bio accumulative chemicals to compare to natural or regional background criteria in the text and as figures using inverse distance weighting (IDW). Please also follow Ecology's Sediment Cleanup User's Manual (SCUM) Chapter 6 guidance with respect to censored data and IDW.² The practical quantitation levels should be clearly stated for each sample, particularly for data that are estimated (J flag) and/or below reporting limits (U flag).

- c. **3rd** paragraph, footnote 7: This footnote references a soil value, which is not helpful in the context of sediment media. Ecology suggests either removing the footnote or referencing the regional sediment background criteria rather than a soil screening level.

3. Table 2:

- a. The table does not show detected values for mercury and indeno(1,2,3-cd) pyrene but concludes that the detected maximum detected value does not exceed criteria. Please revise the table columns to include a column that shows the maximum laboratory reporting limit for all chemicals. Also, list any occurrences of laboratory reporting limits that exceeded criteria as "exceedances" in the "yes" or "no" column in the table.
 - b. **Total Dioxins/Furans:** The statement that the maximum detected concentration exceeds natural background may not be accurate because this comparison needs to be done using a calculated SWAC value. If the SWAC is equal to or less than natural background the site passes for dioxins/furans. Please revise the table to indicate this.
- 4. Attachment 1, Field Notes:** Thank you answering our questions about the field notes during our August 23, 2023, meeting and for the follow-up email that you sent on August 31.³ Ecology concurs with the additional information that you provided in the email and with your proposed revisions. Please include this information in the revised memo.

² Ecology, 2021, Sediment Cleanup User's Manual (SCUM), Publication No. 12-09-057, Third Revision, December.

³ Pioneer, Re: Solid Wood – Data Gaps Investigation Questions. Email from Hannah Morse, Pioneer, to Steve Teel, Ecology, August 31, 2023.

If you have any questions about this letter, please contact me at 360-890-0059 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Toxics Cleanup Program
Southwest Region Office

ST/at

cc: Jonathon Turlove, City of Olympia, jturlove@ci.olympia.wa.us
Chris Waldron, Pioneer Technologies Corporation, waldronc@uspioneer.com
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Ecology Site File

