



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: October 23, 2023

Subject: Ecology September 6, 2023, letter regarding “Comments on fourth quarter groundwater report and requirement for additional groundwater sampling” – 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 September 6, 2023, the AO Parties received Ecology comments regarding the March 2023 Fourth Quarter 2022 Groundwater Data Analysis Report (Ecology, 2023a). 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 September 6 letter.

Comment 1 – Arsenic Groundwater Background:

Comment noted. The recent Ecology-published background threshold value for arsenic in groundwater in the Puget Sound Basin area will be considered in future data reporting.

Comment 2 – Sampling for Dissolved Metals:

DOF discussed Ecology’s request for sampling with the Port and will implement the sampling event during the 4th quarter 2023, delaying preparation of the draft Remedial Investigation/Feasibility Study to 2024 to accommodate inclusion of these results and those related to Comment 3 below. DOF and the Port plan to conduct sampling similar to the previous four quarters of sampling were conducted, with DOF leading sampling and reporting while the Port conducts the sampling concurrently at the wells located on Port-owned properties.

Sampling is scheduled to be conducted in December 2023, and will include the wells/analytes as requested as summarized in the attached Table 1. This list of wells includes all wells sampled during the broadest TWAFA sampling event to date (second quarter 2022) plus three additional piezometers (PZ-7, PZ-8, and PZ-9) located on the northern portion of the Site (on the Burlington parcel). This sampling event is intended to provide additional data in Site groundwater where concentrations for several metals exceeded Data Gaps Work Plan assigned levels in 2022.

Comment 3 – PFAS Sampling:

Per the Ecology request, DOF is preparing a Sampling and Analysis Plan (SAP) for the investigation of PFAS in groundwater at the Site in accordance with Ecology’s 2023 guidance (2023b). The PFAS sampling at the Site will be scheduled and conducted upon Ecology’s approval of the SAP. The PFAS data will be collected at a select set of groundwater wells at the Site and results obtained are expected to reflect the historically industrial nature of the Tacoma tideflats, where many potential sources of PFAS may exist. Full delineation of PFAS below screening levels may be impracticable as a result. The AO Parties recognize that collecting PFAS data at the Site will support Ecology’s objective of site characterization in light of PFAS recently classified as a hazardous substance in Washington. It is important to note however that PFAS characterization at the Site is outside the scope of the Data Gaps Work Plan attached to the AO and as such, the AO Parties expect these samples to sufficiently satisfy needs of the RI and do not intend to characterize PFAS beyond these select samples.

References

Ecology, 2023a. Comments on fourth quarter groundwater report and requirement for additional groundwater sampling. September 6.

Ecology, 2023b. Guidance for Investigating and Remediating PFAS Contamination in Washington State, Toxics Cleanup Program Publication No. 22-09-058. June.

Attachments

Table 1 – 4th Quarter 2023 Groundwater Monitoring Schedule

TABLE 1
4TH QUARTER 2023 GROUNDWATER MONITORING SCHEDULE
TWAafa Site
Tacoma, Washington

Analytical Method	Analyses- Dissolved Metals							
	Arsenic	Copper	Manganese	Lead	Mercury	Chromium	Nickel	Zinc
CCW-1A	4	4	4					
CCW-1B	4	4	4	--	--	--	--	--
CCW-1C	4	4	4	--	--	--	--	--
CCW-2A	4	4	4	--	--	--	--	--
CCW-2B	4	4	4	--	--	--	--	--
CCW-2C	4	4	4	--	--	--	--	--
CCW-3A	4	4	4	4	--	--	4	4
CCW-3B	4	4	4	--	--	--	--	--
CCW-3C	4	4	4	--	--	--	--	--
CCW-4C	4	4	4	--	--	--	--	--
CCW-5B	4	4	4	4	--	--	--	--
CCW-5C	4	4	4	--	--	--	--	--
CCW-6B	4	4	4	4	--	--	--	4
CCW-6C	4	4	4	--	--	4	--	--
CCW-7B	4	4	4	--	--	--	--	--
CCW-7C	4	4	4	--	--	--	--	--
CCW-8B	4	4	4	--	--	--	--	--
MW-1 (Potter) ¹	4	4	4	--	--	--	--	--
MW-4	4	4	4	--	--	--	--	--
SB-1A	4	4	4	--	--	--	--	--
SB-2A	4	4	4	--	--	--	--	--
SB-3A	4	4	4	--	--	--	--	--
CTMW-1	--	--	--	--	--	--	--	--
CTMW-5	4	4	4	--	--	--	4	4
CTMW-7	4	4	4	--	--	--	--	--
CTMW-8	4	4	4	--	--	--	--	--
CTMW-9	4	4	4	--	--	--	--	--
CTMW-10 ¹	--	--	--	--	--	--	--	--
CTMW-11R2	4	4	4	--	--	--	--	--
CTMW-12	4	4	4	--	--	--	--	--
CTMW-14	4	4	4	--	--	--	--	--
CTMW-15	4	4	4	--	--	--	--	--
CTMW-17	4	4	4	--	4	4	--	--
CTMW-17D	4	4	4	--	--	--	--	--
CTMW-18	4	4	4	--	--	--	--	--
CTMW-20	4	4	4	--	--	--	--	--
CTMW-23R2	4	4	4	--	--	--	--	--
CTMW-24	4	4	4	--	--	--	--	--
CTMW-24D	4	4	4	--	--	--	--	--
CTMW-25D	4	4	4	--	--	4	--	--
PZ-5	--	--	--	--	--	--	--	--
PZ-7	4	--	4	4	--	--	4	4
PZ-8	4	--	4	4	--	--	4	4
PZ-9	4	--	4	4	--	--	4	4
TWA-1	4	4	4	--	--	--	--	--
TWA-2	4	4	4	--	--	--	--	--
TWA-3	4	4	4	--	--	--	4	--
TWA-4D	4	4	4	--	--	--	--	--
TWA-5D	4	4	4	--	--	--	--	--
TWA-6D	4	4	4	--	--	4	--	--
TWA-7D	4	4	4	--	--	--	--	--
TWA-8D	4	4	4	--	--	--	--	--
TWA-9D	4	4	4	--	--	--	--	--
TWA-10D	4	4	4	--	--	--	--	--

Notes

1. Wells that historically had LNAPL.
2. Abbreviations: -- = not sampled.
4 = 4th quarter

Shading indicates wells on the Port of Tacoma property and monitored by the Port's consultant