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**STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY**

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

December 20, 2023

Matthew G. Dalton  
Dalton Olmsted Fuglevand, Inc.  
1236 NW Finn Hill Road  
Poulsbo, WA 98370

**Re: Ecology Comments –Revised Remedial Investigation/Feasibility Study Report, dated October 9, 2023**

- **Site Name:** Tacoma Metals Site-General Metals Remedy Performance Area
- **FSID#** 1257

Dear Matthew G Dalton:

Ecology received the Revised Remedial Investigation/Feasibility Study (RI/FS) Report, prepared by Dalton, Olmsted, & Fuglevand on October 9, 2023. Following our review, Ecology has the following major comments. Attached is the RI/FS with these and other minor comments for your review.

PDF PG 24, 5<sup>th</sup> Paragraph, **Section 4.0 Storm Drain Modeling Information**

Will need to confirm with the city that there are no unreasonable requirements for future development.

PDF PG 38, **Section 10.2 Proposed Soil CULs in Unpaved Area, Human soil Contact**

Please provide cumulative cancer risk calculations or indicate where these calculations are located in the report.

PDF PG 38, **Section 10.2 Protection of Groundwater (and Surface Water)**

Check WAC 173-340-747(7)(b) to see if TCLP is more appropriate for metals.

PDF PG 43, Section 11.3, **TPHs in Soils**

Based on your analysis, you are stating that GW will not likely be impacted at these concentrations. There will need to be empirical GW data that demonstrates that GW does not exceed 500 ug/L.

Use updated MTCATPH12.0 spreadsheet to calculate VPH/EPH analysis for direct contact CUL for TPH.

PDF PG 44, **Section 11.4.2 MW8(R)**

Reference Agreed Order Amendment from 3/30/21:  
<http://ecyaptcp/DSARS/docViewer.ashx?did=107456>

PDF PG 44, **Section 11.4.4 P55-S40**

This location is east of the " International Paper Remedy Performance Area Blue Dashed Line (creosote contamination)" that is defined in the Agreed Order Amendment (From 3/30/2021). AO Amendment defines the area of creosote, and this is outside of that area. Be aware that you will need to meet the groundwater CUL in this area.

PDF PG 46, **Section 12.0, Paragraph 3**

Once battery casings are removed, you will need to evaluate whether there is the potential for impacts to soil beneath the vault.

PDF PG 50, **Section 13.6 Groundwater Quality Parameters**

Please include other groundwater quality parameters such as Oxidation Reduction Potential (Eh), specific conductivity/salinity, dissolved oxygen, etc., in a table? ORP and specific conductivity were also measured by Aspect in 2017.

PDF PG 50, **Section 14.0 Conceptual Site Model**

Please provide a figure for the CSM to help potential pathways for the contaminants on the Site, which will be helpful for public outreach.

PDF PG 62, **Section 18.2, In-Situ Containment Technologies**

Are you planning on removing the former building foundations? If not, please state the foundations will be left in place.

PDF PG 67, **Section 19.2.1 Alternative 1 Description**

Please describe how the asphalt cap will interface with the existing concrete foundations on site in each of the alternatives.

PDF PG 68, **Section 19.2.2 Alternative 2 Description**

Do all the alternatives remove all the metal junk?

PDF PG 72, **Section 20.1.3 MTCA Selection Criteria**

New MTCA rules are in effect Jan. 1.

PDF PG 86, **Table 2b**

Map shows TP-C8. Please resolve.

PDF PG 86, **Table 3**

Shouldn't all the metals to protect surface water to be measured as total unfiltered results.

If you have any questions regarding Ecology's comments, please contact me at 360 485-3987 or [andrew.smith@ecy.wa.gov](mailto:andrew.smith@ecy.wa.gov).

Sincerely,



Andrew Smith, P.E., LHG  
Unit Supervisor, UST/Technical Support Unit  
Toxics Cleanup Program  
Southwest Regional Office

cc email: John Pearch, Ecology; [jope461@ecy.wa.gov](mailto:jope461@ecy.wa.gov)

Attached: Tacoma Metals Revised RI/FS Report, dated October 9, 2023