



**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 16, 2024

**Subject: Ecology January 4, 2024 letter regarding “Comments on Investigation Reports and requirement for work plan” – Response to Comments**

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This letter has been prepared on behalf of Glenn Springs Holdings, Inc. (Occidental Chemical), General Metals of Tacoma (GMT), and Burlington Environmental LLC (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 4, 2024 the AO Parties received Ecology comments regarding several investigation reports submitted in 2023 in relation to the TWAFA Remedial Investigation/Feasibility Study data gaps investigation. Ecology, DOF, and the Port of Tacoma (Port) met on February 2, 2024 and discussed the approach to addressing Ecology’s comments.

This letter was prepared as a response to the comments to confirm our understanding and facilitate collaboration with Ecology on Remedial Investigation/Feasibility Study (RI/FS) efforts and remaining data collection requests presented by Ecology in the January letter.

**Comments regarding Former Potter Property Tier II vapor intrusion assessment report:**

Comments noted for use in preparation of the RI/FS and future reports:

With regards to tetrachloroethene and trichloroethene concentrations detected in sub-slab vapor, Ecology, DOF, and the Port agreed to conduct additional soil gas sampling and analysis. This sampling would be located on the east side of the Former Potter property in between the building on the Former Potter property and the building on the west side of the Emerald Services property. This investigation can be conducted more efficiently as it is within the current TWAFA property footprint under investigation as part of the TWAFA Data Gaps Work Plan. DOF and the Port will prepare a map of proposed sampling locations and a sampling plan for Ecology consideration at an upcoming coordination meeting in March 2024.

**Comments regarding Former Potter Property supplemental subsurface investigation report:**

Ecology, DOF, and the Port discussed scheduling a meeting in March to review potentially applicable remedial technologies for consideration in the RI/FS for the TWAFA site instead of preparing a work plan to further investigate the data gaps identified by Ecology in the January letter. A remedial alternatives analysis in the RI/FS can be completed with existing data, while the data gaps identified may be more specifically addressed as part of pre-remedial design studies. Reviewing potential remedial alternatives at this stage may lead to more efficient design for cleanup of the site by allowing for remedy planning to guide additional data collection

needs. Rather than prolonging data gap investigation, narrowing the focus to applicable remedial technologies can be used to identify more specific engineering design data needs to add to the substantial investigation conducted to date.

With regards to vapor intrusion risk for the Emerald Services Building, the parties instead agreed to perform additional investigation on the east side of the Former Potter property in between the building on the Former Potter property and the building on the west side of the Emerald Services property, in lieu of sampling at the Emerald Services Building. .

**Comments regarding Port Parcel 110 supplemental investigation report:**

Comment noted; well TWA-11 will be considered for groundwater monitoring plans negotiated with Ecology for future stages of TWAAFA cleanup. At our February meeting the Port expressed that they have no plans to abandon that monitoring well.

**Comments regarding Burlington Stabilization Building vapor sampling memorandum:**

Comments noted for use in preparation of the RI/FS and future reports.

**Comments regarding Ecology's comments on the Data Gaps Data Report:**

None; thank you for the concurrence.

**Comments regarding Work Plan Requirement:**

As noted above, Ecology, DOF, and the Port discussed scheduling a meeting in March to review potentially applicable remedial technologies for consideration in the RI/FS for the TWAAFA site instead of preparing a work plan to further investigate the data gaps identified by Ecology in the January letter.

The parties do not dispute that data gaps exist; however, they may not prevent completion of the RI/FS and Ecology, DOF, and the Port agreed at the February meeting it is prudent to explore this possibility before delaying the RI/FS milestone for the cleanup process and expending further investigative costs. Future data collection may still be necessary as part of remedial action pre-design work that would benefit the overall design of a remedy.