

COPY



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DEPARTMENT OF ECOLOGY

Southwest Region Office
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April 3, 2024

Tasya Gray, LG
DOF Dalton, Olmsted & Fuglevand
1001 SW Klickitat Way, Ste 200B
Seattle, WA 98134
ngray@dofnw.com

Scott Hooton
Port of Tacoma
PO Box 1837
Tacoma, WA 98401-1837
shooton@portoftacoma.com

Re: Response to February 16, 2024 letter

Site Name: Taylor Way and Alexander Avenue Fill Area (TWAIFA)
Site Address: 1500 Block Taylor Way E, Tacoma, Pierce County, WA 98409
Agreed Order: DE 14260
Enforcement Order: DE 19410
Facility/Site ID: 1403183
Cleanup Site ID: 4692

Dear Tasya Gray and Scott Hooton:

Thank you for submitting your February 16, 2024 letter (response)¹ in response to the Department of Ecology's (Ecology) January 4, 2024, comment letter.² Ecology appreciates the intent of your letter: to confirm understanding and facilitate collaboration on the Remedial Investigation/Feasibility Study (RI/FS) efforts and the remaining data needs that were presented in Ecology's January 2024 letter.

Ecology's comments on your response are listed below, by response subject.

¹ Dalton, Olmsted, & Fuglevand (DOF), *Ecology January 4, 2024 letter regarding "Comments on Investigation Reports and requirement for work plan" – Response to Comments*, February 16, 2024.

² Ecology, *Comments on Investigation Reports and requirement for work plan*, January 4, 2024.

Comments on Response

Former Potter Property Tier II vapor intrusion assessment report

1. Thank you for noting our comments for use in preparation of the RI/FS and future reports.
2. Thank you for agreeing to prepare a work plan to collect sufficient soil vapor and/or sub-slab samples to assess the potential for vapor intrusion from Site sources to the adjacent Emerald Services building complex. Ecology concurs with the proposal in the response that this investigation first consist of collecting soil vapor samples on the Former Potter Property, on the east side of the Shop Building (in between the Shop Building and the Emerald Services building complex). However, if the results of this investigation are inconclusive or if vapor intrusion screening levels are exceeded, then sub-slab sampling beneath the Emerald Services building complex may be required.

Former Potter Property supplemental subsurface investigation report

1. The response included the statement that 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.” While Ecology cannot yet concur with this conclusion, we are willing to begin discussion of remedial alternatives in more detail to see if there is sufficient data to complete the remedial alternatives analysis before collecting the additional data requested in our letter (soil sampling and non-aqueous phase liquid [NAPL] source type and distribution). Ecology shares the hope in the response that reviewing FS alternatives at this stage will lead to more efficient design for cleanup by allowing remedy planning to guide data collection needs. However, it is Ecology’s view that there will likely still be some data gaps that need to be filled to finalize the FS and/or for engineering design.

Port Parcel 110 supplemental investigation report

1. Thank you for noting and considering our comments.

Burlington Environmental Stabilization Building vapor sampling memorandum

1. Thank you for noting and considering our comments.

DOF letter regarding Ecology’s comments on the Data Gaps Data Report

1. No additional comments.

Work Plan Requirement

1. See above comments.

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

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Region Office

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Ecology Site File