



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office

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April 4, 2024

Mr. Kevin Smith, P.E.  
Tacoma Public Utilities  
3628 South 35th Street  
Tacoma, WA, 98409-3192  
kesmith@cityoftacoma.org

**RE: Ecology Comments on the Draft Public Review Remedial Investigation Document**

- **Site Name:** Riffe Lake
- **Site Address:** Kosmos Flats Area, Morton, Washington
- **Facility/ Site ID:** 61559576
- **Cleanup Site ID:** 9890

Dear Mr. Kevin Smith (Project Coordinator),

This work is being done under Agreed Order No. DE 16955 between Washington State Department of Ecology (Ecology) and the City of Tacoma, Department of Public Utilities, Light Division (d.b.a. "Tacoma Power") and in compliance with the Model Toxics Control Act, Chapter 70A.305 RCW.

The following are Ecology's comments to the Draft Public Review Remedial Investigation submitted to Ecology on January 18, 2024. The purpose of the remedial investigation document is to collect data and information necessary to define the nature and extent of contamination, to characterize the Site, and to help inform eventual remedy selection. The following are Ecology's comments:

1. Please include a figure which includes the entire Area of Potential Effect (APE). Previously included in the Remedial Investigation Work Plan (RIWP) and Data Summary Report (DSR).
2. Briefly outline specific data gaps which were first identified in the DSR and how they were addressed during remedial investigation work.
3. Please elaborate on how cPAH TEQs were calculated. A brief footnote on the Tables would be adequate.
4. Add two tables outlining both the EPA and WA EHD data summarized in Section 2.4. Health data can be referenced instead of included as PDFs in an appendix.

5. Please add a section similar to Section 4.1 of the Remedial Investigation Work Plan discussing screening level selection. Add a brief explanation as to why Method A is applicable and applies to the site/screening levels. Include how or why Sediment Cleanup Objectives (SCO) and the Water Quality Protection Plan (WQPP) values are adequate screening levels for ruling out CPOCs in surface water or sediments.
6. The use of “laboratory reporting limits” instead of screening levels or proposed cleanup levels throughout the report causes confusion in some places. For example, in Section 2.2.1 the 500-gallon tank samples were not detected at or above laboratory reporting limits, but the 5,000-gallon tank samples were compared against the screening levels (MTCA Method A). If a sample was non-detect, but 1990s reporting limits were greater than current selected screening levels, then we cannot say that the sample did not contain concentrations less than selected screening levels. **Please adjust the language throughout the report to reflect the selected screening levels.**
7. Please elaborate on the stepwise process using field screening results to help guide which chemical analysis was run for each sample (Table 4). For example, how was it determined that a sample should be run for Cr6, but not BTEX? Or metals, but not hydrocarbons? Etc.
8. Update the Chemical Analytical Results section to include which labs ran which methods. This will enable the reader to clearly identify that a laboratory was accredited for a specific method.
9. We will want to retain surface water and sediment contaminants of potential concern. Although the emergency cap has demonstrated that it is effective, at this point we do not know what the selected remedy will be so retaining these pathways for now is needed.
10. Please add language to Section 5.2.3 exploring the potential for the site to be resubmerged under the reservoir. As I understand, this is a high priority for Tacoma Power in the future and will likely guide our future remedy selection in the Feasibility Study.
11. Various other small miscellaneous questions, comments, and requested changes found in the accompanying Word document.

Please make these requested changes and submit a revised copy of the Draft Public Review Remedial Investigation document. In accordance with the Agreed Order, a Public Review Ready Draft RI report is due 60 calendar days from receipt of these comments, that date is June 3, 2024. If you have any questions, please call me at 360-999-9590 or email me at [cpen461@ecy.wa.gov](mailto:cpen461@ecy.wa.gov).

Sincerely,



Cam Penner-Ash, LG  
Cleanup Project Manager  
Southwest Region Office  
Toxics Cleanup Program

cc: Kevin Smith, Tacoma Public Utilities, [kesmith@cityoftacoma.org](mailto:kesmith@cityoftacoma.org)  
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