STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
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May 16, 2024

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Re: Comments on Former Potter Property Vapor Intrusion Data Gaps Work Plan

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAAFA)
- **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 the Former Potter Property vapor intrusion (VI) data gaps work plan (plan) for review to the Department of Ecology (Ecology).[1] Please revise the plan to incorporate the following comments. These comments were also transmitted via email on May 14, 2024.

1. **Figure 3, Proposed Sample Locations**:

    a. Please move soil vapor sampling point TWA-SV-46 approximately 16 feet southwest so that it is more directly adjacent to TWA-SV-45.

    b. Ecology guidance recommends that soil gas samples seldom be collected from depths shallower than 5 feet below ground surface (fbg) due to the possibility of diluting the collected soil gas with atmospheric air from either short circuiting or from barometric pumping effects.[2] Ecology is concerned that the proposed sample depth of 2 fbg for permanent soil gas monitoring points may reduce the

[1] Maul Foster Alongi (MFA), 2024, Vapor Intrusion Data Gaps Work Plan, Taylor Way and Alexander Avenue Fill Area – Former Potter Property, April 12.

[2] Ecology, 2022, Guidance for Evaluating Vapor Intrusion in Washington State, Investigation and Remedial Action, Toxics Cleanup Program Publication No. 09-09-047, March.

representativeness of the samples. Ecology acknowledges that this depth was selected due to historic depth to groundwater measurements ranging from approximately 1 to 3.5 fbg and that the plan includes the use of a helium shroud for leak-checks. However, because of the importance of investigation results for decision-making regarding the VI risk to the adjacent Emerald Services property, additional verification sampling will be necessary. **This additional verification shall consist of the placement of passive samplers adjacent to the TWA-46, -47, and -48 locations plus two additional locations at intervals of approximately 20 feet between the TWA-SV-47 and -48 sample locations, for a total of five passive samplers.** According to the Wisconsin Department of Natural Resources (WI DNR), passive samplers that have been successfully used to measure soil gas include the Beacon Passive Sampler and the Waterloo Membrane Sampler (WMS)-Low Uptake.[3]

2. **Passive Samplers:** Add the type of passive sampler that will be used, installation method with schematic diagram, sample depth, sample duration, quality assurance/quality control (QA/QC), analytical constituents, and limits of quantitation.

3. The plan states that the permanent soil sampling points will be constructed using 6-inch stainless-steel screen connected to Teflon tubing equipped with a shut-off valve and a stickup monument. However, the plan does not describe the installation methods such as sand pack and annular seal types and intervals. **Please add this information to the plan.** Please also note that ITRC (2018) states that nylon tubing is recommended over Teflon tubing, because nylon tubing is less expensive, and the compression fittings are easier to seal.[4]

4. **Equilibration Time**: ITRC (2018) references a study that recommended an 8-hour equilibration time following the installation of tubing in a sand pack. Therefore, please add to the plan that an equilibration time of at least 8 hours will be used following permanent soil gas tubing installation and prior to sampling.

5. Please add that Ecology will be provided 48 hours' notice prior to beginning of field work.

[3] James Walden, WI DNR, personal communication, January 11 and April 30, 2024.

[4] Interstate Technology Regulatory Council (ITRC), 2018, Petroleum Vapor Intrusion, Fundamentals of Screening, Investigation, and Management, PVI-1, March, https://itrcweb.org/teams/training/petroleum-vapor-intrusion.

If you have any questions, 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