



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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May 16, 2024

Tasya Gray, LG
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Re: Comments on Hylebos Marsh Subsurface Investigation Work Plan

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAAGA)
- **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 Hylebos Marsh subsurface investigation 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 to you via email on May 14, 2024.

1. Analytical Methods:

- a. Please add the full list of semi-volatile organic compounds (SVOCs) by EPA Method 8270 instead of only reporting naphthalene and phthalates.
 - b. Add the full list of volatile organic compounds (VOCs) analyses by EPA Method 8260 instead of only analyzing for benzene, toluene, ethylbenzene, and total xylenes (BTEX) by EPA Method 8021B.
- 2. Table 3, Preferred Analytical Methods, and Performance Criteria:** Some constituents in the table have higher method reporting limits (MRLs) than is recommended in Ecology (2016).² For example:

¹ Maul Foster Alongi (MFA), 2024, Hylebos Marsh: Subsurface Investigation Work Plan, May 3.

Soil Method Reporting Limit Comparison		
Constituent	Table 3 MRL (mg/kg)	Ecology Recommended PQL (mg/kg)
Diesel-range hydrocarbons	50	25
Oil-range hydrocarbons	250	100
Benzene	0.03	0.005
Toluene	0.05	0.005
Ethylbenzene	0.05	0.005
Total Xylenes	Not listed	0.005 for each isomer (m-, o-, p-)
Trichloroethene	0.02	0.005(a)
Lead	1	0.1
Nickel	1	0.1
Chromium	1	0.5
Cadmium	1	0.1
cPAHs	Not listed	0.05 for each cPAH
Footnotes and Abbreviations mg/kg = milligrams per kilogram MRL = Method Reporting Limit PQL = Practical Quantitation Limit cPAH = Carcinogenic Polycyclic Aromatic Hydrocarbons VOC = Volatile Organic Compound (a) Halogenated VOCs = 0.005 for each VOC		

Please revise Table 3 so that the MRLs are consistent with the recommended reporting limits from Ecology guidance and are below applicable preliminary cleanup levels and/or screening levels. Please also add the additional analytical constituents to the table listed in above comment 1.

- Approximately 30 feet south of the location of TWA-SB-09, there is an area where the sloped topography extends further west compared to the adjacent areas to the north and south. Please add an additional soil sampling location within this area.
- Please add that Ecology will be provided 48 hours' notice prior to beginning of field work.

² Ecology, 2016, Guidance for Remediation of Petroleum Contaminated Sites, Toxics Cleanup Program Publication No. 10-09-057. June.

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