From: Unruh, David (ECY)
To: "Michael Pereira"; "Martini, Cory"
Subject: RE: NW3393 - 503 Bella St Additional Data Requests
Date: Monday, June 10, 2024 8:49:50 AM
Attachments: image001.png

Hi again Cory and Michael,

I was looking through the data we have for the site with respect to the Terrestrial Ecological Evaluation (TEE). Since the site is located in an area with "undeveloped land" as defined in WAC 173-340-7491(1)(c)(iii) and some samples contain oil-range petroleum hydrocarbons (TPH-O) above the natural background concentrations, it will be necessary to conduct a simplified TEE. Please see WAC 173-340-7492 for further discussion about the simplified TEE process. Two samples (TA1-S and TA1-4) contain TPH-D above the cleanup levels protective of ecological receptors (460 mg/kg; see Table 749-2).

The best route to end the simplified may be to use an exposure analysis for this site (WAC 173-340-7492(2)(a)(i)). Based on the findings from the rest of the site, it seems like the extent of soil containing TPH-D above the cleanup level referenced above in Table 749-2 will be relatively limited. To demonstrate this, Ecology recommends collecting two additional soil samples west and south of TA1-4 at approximately the same depth. We can use the data from TA1-BS and TA7-W to bound the north and east extent of contamination.

Please let me know if you have any questions about the TEE process. I'm happy to set up another meeting if that would be helpful as well.

Thank you,
David

David Unruh, LHG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
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From: Unruh, David (ECY)
Sent: Wednesday, June 5, 2024 1:48 PM
To: 'Michael Pereira' <MichaelPereira@UmpquaBank.com>; Martini, Cory <cmartini@partneresi.com>
Subject: RE: NW3393 - 503 Bella St Additional Data Requests

Hi Cory and Michael,

One more thing I forgot to mention this morning. We'll also need you to complete a Terrestrial Ecological Evaluation (TEE) form. The TEE is intended to determine whether more stringent cleanup levels protective of wildlife are necessary at the Site. This can be included with the revised report or memo discussed in my earlier email.

Thanks again,
David

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From: Michael Pereira <MichaelPereira@UmpquaBank.com>
Sent: Wednesday, June 5, 2024 11:21 AM
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>; Martini, Cory <cmartini@partneresi.com>
Subject: Re: NW3393 - 503 Bella St Additional Data Requests

External Email

Thank you!

MP

Michael Pereira
VP, Environmental Risk Officer
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From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Wednesday, June 5, 2024 10:58:22 AM
To: Martini, Cory <cmartini@partneresi.com>; Michael Pereira <MichaelPereira@UmpquaBank.com>
Subject: NW3393 - 503 Bella St Additional Data Requests

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Hi Cory and Michael,

Thank you for the productive discussion this morning, I appreciate your diligent work on the 503 Bella St site (Site). Ecology has a few recommendations for sampling and reporting for the Site before we can issue our opinion letter.

BP1 Confirmation Sampling

Characterization soil samples collected from location BP1 in October 2023 indicated that gasoline-range petroleum hydrocarbons (TPH-G), benzene, and arsenic exceeded their respective Method A cleanup levels in this area. Confirmation soil samples collected from the limits of the excavation completed in January 2024 included analysis of TPH-G, but not benzene and arsenic. Ecology recommends collecting an additional soil sample from the BP1 area at a depth of 0.5 to 1 foot below ground surface (bgs) to confirm benzene and arsenic are not present above their respective Method A cleanup levels in this area following the remedial excavation.

Soil to Groundwater Transport Pathway Evaluation

Ecology recommends additional discussion of hydrogeology at the Site to document the likelihood of a release to groundwater at the Site:

- Discussion of depth to groundwater and inferred flow direction.
- Discussion of nearby water systems and potential impacts from Site contamination if any.
- Discussion of likelihood of groundwater impacts based on hydrogeology and nature of releases at the Site.

The following resources may be helpful for discussion of Site hydrogeology:

- Source Water Assessment Program (SWAP) Maps
- Ecology's Well Report Viewer

You may include the data and narrative in a revised RI/Cleanup Action Report, or draft a separate technical memorandum.

Additionally, before Ecology can issue you an NFA opinion for this Site, you must submit all sampling data to Ecology's Environmental Information Management (EIM) Database. Further information on submitting Site data to EIM is available on EIM's Webpage. If you require further assistance submitting data to EIM, please contact Ecology's EIM data coordinator Nicole Masurat at nicole.masurat@ecy.wa.gov.

Please let me know if you have any questions regarding these recommendations or the VCP process.

Thanks again,
David

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