

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** [Peter Leon](#)  
**Cc:** [Williams, Chase \(ECY\)](#); [Todd Nicholson](#); ["Michael Cecil"](#); [Grant Hainsworth](#)  
**Subject:** FW: PoFH: Preliminary Sediment Data Presentation  
**Date:** Monday, October 14, 2024 11:43:50 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

Hi Peter,

FYI – Chase and I will be out of office with limited availability from Tuesday afternoon until Friday morning.

Your email requested to Chase: *"Are you available next week for us to summarize the in-water dataset and discuss next steps based on the approved RI Work Plan?"*

We believe that Ecology is clear on our expectations of next steps for the Site. The over-arching next step is the preparation and submittal of the RI/FS report(s) required in the Agreed Order. The Agreed Order has a due date of 180 days after receipt of laboratory data. Task 2 of the Agreed Order Scope of Work states:

*PFH shall provide interim data reports and updates to Ecology as new site data and information become available. Laboratory analysis data shall also be provided in electronic format when it has been validated (emphasis added). Raw laboratory data will be provided to Ecology upon request.*

Ecology understands that the data have not yet been validated and request that this be done as soon as possible (see further discussion below). We also request submittal of Excel tables once the below requested corrections have been made. Also, for future submittals, Ecology requests that PDFs be compiled tables and figures so that less separate documents are provided. This will facilitate Ecology's review as well as provide for a more clear project record.

Task 2 of the Agree Order Scope of Work also states:

*Prior to submittal of the Agency Review Draft RI/FS Report (see task 4), a Key Project Meeting will be held. During this Pre-Report Check-In, Ecology and PFH will review available data and an updated conceptual site model and discuss the content and organization of the Draft RI/FS Report. Ecology and PFH will review ARARs and potential remedial alternatives and establish points of compliance for the FS.*

*If the data collected during this investigation is insufficient to define the nature and extent of contamination, and/or to select a cleanup action plan an additional phase of investigation shall be conducted to define the extent of contamination.*

Ecology understands that there have been several iterations of what is defined in the Agreed Order as the "Pre-Report Check-in". As discussed, Ecology will be providing some feedback regarding expectations for the RI report in the relatively near future. Note that a critical component of the second part of the above quote, that data are sufficient to define the nature and extent of contamination, will be Ecology making a determination regarding a potential second site to the west. The submittal of data on that subject so that Ecology can make this determination in a timely manner is critical.

## Ecology Requested Next Steps

We understand that the PoFH team is seeking concurrence that sufficient data have been collected to move on to preparing the RI/FS report(s). Prior to Ecology providing our concurrence the following are requested:

1. A response from the PoFH providing concurrence on the splitting of the RI/FS report required in the Agreed Order to separate RI and FS reports, and further splitting the RI reports between uplands and marine area. This splitting of reports is anticipated to expedite project completion.
2. Correction and update of the submitted tables and figures with the appropriate sum values for total PCBs and total DFs. Currently, the sums include non-detect values. Chase can work the PoFH team for the calculation of these sums consistent with SCUM chapter 6 & Appendix F 1.2 requirements, as needed.
3. A statement from the PoFH team that the Site data have been reviewed and validated and the data are considered usable for the purposes of the RI. Note that the complete data quality review, including laboratory validation reports should be included within the draft RI Report. Required validation is discussed in Section 2 of the Agreed Order Scope of Work, which states:

*Laboratory analysis data shall also be provided in electronic format when it has been validated. Raw laboratory data will be provided to Ecology upon request.*

In addition, validation is discussed within Section 7.3 of the Ecology-approved RI/FS Work Plan.

*All chemistry and conventionals data will undergo a quality assurance review and data validation by EcoChem, Inc. (EcoChem). EcoChem validation shall include a minimum Stage 2b validation for all chemical data. Ten percent of the dioxin/furan congener data will undergo Stage 4 validation, in addition to the Stage 2b validation. Validation will be conducted using the most recent EPA (EPA 2005, 2008, 2009, 2010) guidelines. EcoAnalysts will perform a QA1 review of bioassay data.*

Please proceed with completion of data quality review and validation discussed within the Agreed Order and Ecology-approved work plan as quickly as possible. If there are specific questions regarding, or you would like Ecology input on, the selection of the ten percent of the dioxin/furan congener data will undergo Stage 4 validation, please work with Chase on that. Note that Ecology does not need to approve the selection of the ten percent for complete validation.

4. A submittal presenting the data and the case for the splitting of the separate site to the west. This submittal should include tabulated data, laboratory analytical reports, site plan map(s) showing sampling locations, and boring logs (for any subsurface soil data). This submittal should be provided as soon as possible.

5. Any other collected data that have not been submitted to Ecology (e.g. test pit data to the east).

We look forward to receipt of the above requested items.

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager  
Department of Ecology – Toxics Cleanup Program  
1250 W. Alder Street, Union Gap, WA 98903  
(509) 424-0543 (cell)

[Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov)

---

**From:** Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>

**Sent:** Friday, October 11, 2024 1:17 PM

**To:** Williams, Chase (ECY) <[wcha461@ECY.WA.GOV](mailto:wcha461@ECY.WA.GOV)>

**Cc:** Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Subject:** PoFH: Preliminary Sediment Data Presentation

External Email

Hi Chase,

We would like your input to help us finalize and submit the draft sediment data tables per Frank's 10/7 email. **Are you available next week for us to summarize the in-water dataset and discuss next steps based on the approved RI Work Plan?** If it would be helpful, I would be happy to give you a brief RI Work Plan summary/roadmap.

The best days for me next week are Wednesday (10/16) and Friday (10/18). If neither of those work for you, I can also carve out time on Tuesday (10/15) afternoon.

In the meantime, below and attached please find our initial submittal of the preliminary draft sediment data to Ecology.

Thanks,

**Peter Leon**

Principal Scientist  
206.948.5366



[www.leon-environmental.com](http://www.leon-environmental.com)

---

**From:** Peter Leon

**Sent:** Thursday, May 23, 2024 10:31 AM

**To:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>; Voss, Britta (ECY) <[bvos461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>; Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>

**Cc:** Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>

**Subject:** PoFH: Preliminary Data Presentation

Good morning Bonnie, Pete, and Britta,

Attached please find our preliminary data presentation, which includes:

- Preliminary Draft Data Tables:
  - Dry weight data
  - OC-normalized data
  - D/F summations
  - PCB Aroclors summations
- Preliminary Draft COPC Figures:
  - D/F
  - Hg
  - PCBs
  - TBT
  - Bioassays

Based on these preliminary results, we believe that no further sampling or analyses are needed to proceed to the next phase of the RI/FS. We look forward to discussing this preliminary presentation with you after you've had time to review.

To help inform your review of our preliminary presentation, I've prepared some notes:

- **General Data Considerations:**
  - **Data validation** has not been completed (see Britta's 12/8/2023 email below). We anticipate initiating this work after we've had a chance to discuss our preliminary results.
  - **Summations** (D/F and PCB Aroclors) include FULL RL values for non-detects. We intend to update our data tables to address non-detects in chemical sums (SCUM 6.3.3) after our initial consultation with Ecology. Please see below for some examples of the magnitude of these non-detect contributions.
  - **Non-detects and Qualifiers:** Data qualifiers affect a substantial amount of our preliminary results.
- **Draft Figures:**
  - **RI Work Plan Figures:** We've used figures from the RIWP as basemaps for our

preliminary data presentation. We anticipate preparing new figures for the RI report.  
Notes regarding the RIWP basemaps:

- 2018 Data: The RIWP figures include polygons defining footprints of preliminary SQS/DMMP exceedances (Fluoranthene, Hg, PCBs, TBT) based on the 2018 surface sampling data. These polygons DO NOT represent the current dataset summarized in the attached draft data tables.

- **Specific Data Notes:**

- **D/F Non-Detects:** Non-detects contributions to D/F TEQ summations are substantial. For example:
  - SED-27 = 5.1 ng/kg TEQ
    - 2,3,7,8-TCDD: non-detect; 0.99 ng/kg; 0.99 ng/kg TEQ; reporting at ½ RL reduces TEQ summation by 0.5
    - 1,2,3,4,6,7,8-HpCDD: B-qualified; 130 ng/kg; 1.3 ng/kg TEQ
    - 1,2,3,4,6,7,8,9-OCDD: B-qualified; 925 ng/kg; .28 ng/kg TEQ
    - Passed bioassays
- **TOC:** TOC is outside Ecology criteria for OC-normalization in a few sampling locations (SED-7, SED-25, SED-26). Except for PCBs at SED-26C:0-1, all samples pass AET criteria (for OC-normalized analytes) at these locations.

I look forward to scheduling a time to discuss these preliminary data and next steps with you.

Thanks,

**Peter Leon**

Principal Scientist  
206.948.5366



[www.leon-environmental.com](http://www.leon-environmental.com)

---

**From:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>

**Sent:** Friday, December 8, 2023 11:08 AM

**To:** Voss, Britta (ECY) <[bvoss461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>; Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>;  
Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>;  
Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Eric Young  
<[eyoung@friedmanandbruya.com](mailto:eyoung@friedmanandbruya.com)>; Michael Erdahl <[merdahl@friedmanandbruya.com](mailto:merdahl@friedmanandbruya.com)>

**Cc:** Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>

**Subject:** RE: Cleanup Level Exceedance

Thanks so much Britta!

Bonnie

---

**From:** Voss, Britta (ECY) <[bvos461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>  
**Sent:** Friday, December 8, 2023 9:47 AM  
**To:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>; Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>; Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Eric Young <[eyoung@friedmanandbruya.com](mailto:eyoung@friedmanandbruya.com)>; Michael Erdahl <[merdahl@friedmanandbruya.com](mailto:merdahl@friedmanandbruya.com)>  
**Cc:** Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>  
**Subject:** RE: Cleanup Level Exceedance

Hi Bonnie,

Yes, I'm okay with all of that. Just to clarify one thing that we only discussed briefly at the meeting, based on what Peter said these results haven't yet gone through formal data validation, which could result in some changes to the data qualifiers. The EIM submission needs to reflect the final post-validation qualifiers.

Britta

**Britta Voss** (she/her) | TCP QA Coordinator | Dept of Ecology | [britta.voss@ecy.wa.gov](mailto:britta.voss@ecy.wa.gov) | 360-280-4305 (mobile)

---

**From:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>  
**Sent:** Friday, December 8, 2023 7:10 AM  
**To:** Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>; Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Eric Young <[eyoung@friedmanandbruya.com](mailto:eyoung@friedmanandbruya.com)>; Michael Erdahl <[merdahl@friedmanandbruya.com](mailto:merdahl@friedmanandbruya.com)>  
**Cc:** Voss, Britta (ECY) <[bvos461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>; Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>  
**Subject:** RE: Cleanup Level Exceedance

Hi Peter,

Just to clarity, if the MDL is the concentration of the cleanup level, this is not considered an exceedance. Whether your site concentration is non detect or a detect and whether it is equal to or less than the cleanup value, it does not make a difference as they are all considered not to exceed the cleanup level.

Britta and Pete stated they were ok with the way that the data has been reported after hearing the explanation. **Pete, Britta, can you please confirm that you are ok with the data and with what Peter is stating below?**

Thank you!

Bonnie

---

**From:** Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>

**Sent:** Friday, December 8, 2023 6:44 AM

**To:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>; Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Eric Young <[eyoung@friedmanandbruya.com](mailto:eyoung@friedmanandbruya.com)>; Michael Erdahl <[merdahl@friedmanandbruya.com](mailto:merdahl@friedmanandbruya.com)>

**Cc:** Voss, Britta (ECY) <[bvos461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>; Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>

**Subject:** RE: Cleanup Level Exceedance

Good morning Bonnie,

Thank you for checking in. Your email summarizing how to interpret **detected** concentrations is consistent with mine. But I want to make sure we are making an apples-to-apples comparison. The issue we are trying to address applies to reporting **undetected** concentrations.

In this case, MDL is below cleanup levels but the lab initially selected a conservative RL at the cleanup level with the expectation that this would not be interpreted as an exceedance. We have no reason to believe that these non-detect concentrations exceed cleanup levels. As Pete and Michael discussed, when we are trying to report such low trace concentrations, the lab has to estimate the reported non-detect concentration. It is my opinion that the lab manager requires the professional discretion to interpret the results of their equipment. In non-detect cases like this, it makes more sense to me that we report an estimated concentration at or above the MDL, but below cleanup level to avoid the misleading perception that the sample exceed cleanup levels.

Thanks,

**Peter Leon**

Principal Scientist

206.948.5366

**LEON**   
Environmental, LLC

[www.leon-environmental.com](http://www.leon-environmental.com)

---

**From:** Brooks, Bonnie (ECY) <[bobr461@ECY.WA.GOV](mailto:bobr461@ECY.WA.GOV)>

**Sent:** Friday, December 8, 2023 6:23 AM

**To:** Peter Leon <[peter@leon-environmental.com](mailto:peter@leon-environmental.com)>; Todd Nicholson <[toddn@portfridayharbor.org](mailto:toddn@portfridayharbor.org)>; Michael Cecil <[cecil@leon-environmental.com](mailto:cecil@leon-environmental.com)>; Robert Brenner <[brenner@leon-environmental.com](mailto:brenner@leon-environmental.com)>; Eric Young <[eyoung@friedmanandbruya.com](mailto:eyoung@friedmanandbruya.com)>; Michael Erdahl <[merdahl@friedmanandbruya.com](mailto:merdahl@friedmanandbruya.com)>

**Cc:** Voss, Britta (ECY) <[bvos461@ECY.WA.GOV](mailto:bvos461@ECY.WA.GOV)>; Adolphson, Peter (ECY) <[pado461@ECY.WA.GOV](mailto:pado461@ECY.WA.GOV)>

**Subject:** Cleanup Level Exceedance

Hi Everyone,

I confirmed with both Chance (sediments) and Andy (upland) that the following is how Ecology interprets an exceedance of cleanup level. This is consistent across media.

- If the site exposure concentration is **less than or equal to** the cleanup level, there is **no exceedance** of that cleanup level.
- If the site exposure concentration is **greater than** the cleanup level, there **is an exceedance** of that cleanup level.

### **Bonnie Brooks**

#### **Toxicologist**

she/her/hers

Toxics Cleanup Program

Policy & Technical Support Unit

Department of Ecology

Lacey, WA 98504

[bonnie.brooks@ecy.wa.gov](mailto:bonnie.brooks@ecy.wa.gov)

360-584-8856



*Protecting, preserving, and enhancing the environment for current and future generations.*