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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
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October 29, 2024

Stephen Spencer
ECI
P.O. Box 153
Fox Island, WA 98333
(stephen@alleci.com)

Re: Technical Assistance on the BLT Trucking Site Remedial Investigation Report

Site name:	BLT Trucking
Site address:	8010 S 259th Street, Kent, WA
Facility/Site ID:	60800
Cleanup Site ID:	16551
VCP No.:	NW3338

Dear Stephen Spencer:

Thank you for your continued efforts on the BLT Trucking Site (VCP NW3338). Per our email (October 10, 2024), I have prepared this Technical Assistance letter regarding my review of the following reports that were recently submitted to the Washington State Department of Ecology (Ecology) under the VCP:

- *Remedial Investigation Report*, October 16, 2023
- *First Quarter 2024 Groundwater Monitoring Report*, February 16, 2024
- *Second Quarter 2024 Groundwater Monitoring Report*, June 6, 2024
- *Third Quarter 2024 Groundwater Monitoring Report*, September 27, 2024

Ecology recommends that upon the completion of the quarterly groundwater sampling, you combine the remedial investigation, feasibility study, and the cleanup action into one final report (RIFS/CAR). The following comments regarding the above-mentioned reports are to be addressed in the forthcoming RIFS/CAR.

Soil

- Please provide a figure that shows all of the soil samples/locations (2016 through 2023). Samples should include borings/monitoring wells, excavation, and test pits. Delineate on the figure where soil samples exceed the cleanup levels (for TPH-D+TPH-O, PCBs, and metals). The areas where contaminated soil remains in place need to be clearly delineated on the figure. This will determine whether contamination has extended off the Property. An estimation of the amount of contaminated soil remaining in place and a figure showing the location(s) are required before an environmental covenant can be considered.

Groundwater

- Provide a discussion to explain the groundwater contours and how the stormwater detention system might be affecting flow.
- The groundwater cleanup level for arsenic should be adjusted up to the background level of 8 µg/L (Natural Background Groundwater Arsenic Concentrations in Washington State). Correct the data tables and the discussion regarding arsenic. Arsenic results at or below the background level are considered in compliance.
- Provide an explanation to the sudden detection of TPH-D and TPH-O in groundwater above the Method A cleanup levels.
- Provide a discussion on TPH-D+TPH-O results with and without silica gel cleanup. Refer to the Guidance for Silica Gel Cleanup in Washington State to evaluate compliance. Please add a column on the groundwater results table for "Polar Metabolites" concentration with the appropriate polar metabolite cleanup level. The cleanup level for polar metabolites is 500 µg/L or 700 µg/L depending on whether there are detections of TPH-D and TPH-O (with silica gel cleanup) across the Site.
- For future groundwater contour maps, add the month and year to the title block (not just the quarter), the storm drain lines (along the north Property boundary and those connected to the stormwater detention system as shown on as-built Drawing C-5 "Storm Drain Plan"), and concentrations (arsenic, TPH-D, and TPH-O).

Stormwater Detention System (RI Report)

- Add a discussion that describes the construction of the stormwater detention system and how stormwater is conveyed, as supported by the as-built drawings provided in Appendix D of the report. It's important to understand how the stormwater detention system is constructed so we can understand how groundwater may be affected.
    - As-built Drawing C-5 shows a storm drain line in the storm drainage easement (north Property boundary) that connects to a pond that doesn't seem to currently exist. Please confirm how that storm drain line is conveyed and whether it is also connected to the stormwater detention system.
    - The report (Section 6.2.4) states that the stormwater entering the stormwater detention system infiltrates to groundwater; however, Drawing C-5 shows an 18-inch outlet pipe (P13 on the "Storm Drainage Table") located at the southeast corner of the stormwater detention system that is connected to SDMH2. Stormwater appears to be conveyed from the stormwater detention system to SDMH2, to MWS Unit 2, to SDMH3, and ultimately off the Property (Drawing C-5). It is not clear whether the corrugated metal pipes (CMP) installed in the system are perforated (Drawing C-6 states the pipe walls are solid). Please confirm whether stormwater collected in the stormwater detention system infiltrates to groundwater or is tight-lined and conveyed off the Property as seems to be the case according to Drawing C-5.

Cross-Sections (RI Report)

- Correct the Section line labels on Figure 10. The cross-section labels on Figures 8 and 9, do not match with the section lines on Figure 10. The A-A' Section shown on Figure 10 should be labeled B-B' and the B-B' Section line should be labeled A-A'.

- Add a vertical and horizonal scale in feet to the cross-sections (i.e. "Vertical Scale: 1 inch = 5 feet, Horizonal Scale: 1 inch = 10 feet").
- For both cross-sections, show depth in feet on the left and elevation in feet amsl on the right. The groundwater elevation is not the same in each well across the Site (as shown on the cross sections). The cross-sections (especially Section B-B', Figure 9) should be showing a gradient that matches the associated groundwater contour map(s). Please correct the upper and lower groundwater elevations, as appropriate.
- The stormwater detention system does not appear to be accurately shown on cross section A-A' (Figure 8). According to the report, the excavation for the stormwater detention system was only 6-8 feet deep; however, Figure 8 shows the excavation depth at 12 feet. Also, there are CMP installed in the stormwater detention system (Drawing C-6); Figure 8 only shows five. Please check Figure 8 for accuracy regarding the locations and sizes of the CMP and the placement of the excavation and fill and correct as necessary.
- The distances measured on Figure 10 do not seem to match the distances shown on the corresponding cross-sections on Figures 8 and 9. For example, the distance measured along the Section line between MW5 and B22 on Figure 10 is 82 feet, but the distance measured on the corresponding cross section A-A' (Figure 8) is 79 feet. Please check both cross sections for accuracy and correct as necessary.

NEXT STEPS

- Ecology recommends that groundwater sampling continue until four consecutive quarters with results below the MTCA Method A cleanup levels are obtained. Continue to analyze for dissolved and total arsenic using EPA 6020B and for TPH-D/TPH-O using NWTPH-Dx with and without silica gel cleanup. Based on the most recent groundwater report (3Q24):
    - Two additional quarters (4Q24 and 1Q25) of arsenic (EPA 6020B) below the cleanup level are needed in all wells to reach compliance, and
    - Continued quarterly sampling for TPH-D and TPH-O (using NWTPH-Dx with and without silica gel cleanup) is needed in all wells to further evaluate and monitor TPH in groundwater. Polar metabolite concentrations are currently above the cleanup level.
- Please incorporate the comments regarding the figures and tables associated with groundwater reporting in future submittals.
- Submit a RIFS/CAR when groundwater is in compliance (four consecutive quarters below the cleanup levels). The report should include revisions based on this Technical Assistance letter. Please review WAC 173-340-350 (Remedial Investigation), WAC 173-340-351 (Feasibility Study), WAC 173-340-370 (Cleanup Action Expectations), and WAC 173-340-840 (General Submittal Requirements) to make sure all required elements are included in the RIFS/CAR.
- Note that under the new MTCA rule (effective January 2024), remedial investigations must include the evaluation of **climate** (WAC 173-340-350[6][f]) and **vulnerable populations or overburdened communities** (WAC 173-340-350[6][g]). Please make sure these elements are included in the RIFS/CAR.

It is my understanding that this Technical Assistance letter is all that is needed at this time. An opinion letter will be issued after the final RIFS/CAR is submitted to and reviewed by Ecology. Please let me know if you have any questions or concerns regarding this letter, or if you need clarification on any of the comments. I am happy to discuss this letter or any other issues that may come up during the cleanup process.

Sincerely,

Kim Vik, LG
Site Manager
Toxics Cleanup Program, NWRO

cc: David Polivka, ECI, (david@alleci.com)