



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office  
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November 27, 2024

Charla Kinlow  
City of Tacoma  
Public Works, Engineering Division  
747 Market Street, Room 522  
Tacoma, WA 98402  
[ckinlow@cityoftacoma.org](mailto:ckinlow@cityoftacoma.org)

Re: **Request to Discontinue or Reduce Frequency of Groundwater Monitoring**

**Site name:** Tacoma Redevelopment Prop  
**Site address:** Thea Foss Waterway, Tacoma, Pierce County, WA 98402  
**Facility/Site ID:** 1263  
**Cleanup Site ID:** 3677

Dear Charla Kinlow:

The Washington State Department of Ecology (Ecology) received your email on July 3, 2024, requesting to discontinue or reduce the frequency of groundwater monitoring currently required at the above referenced Site.

Cleanup levels for groundwater at the Site are based on protection of marine surface water including protection of aquatic life and the protection of human health from consumption of aquatic organisms. Shallow groundwater is not considered a potable water source as shallow groundwater from the Site is not currently being used for potable water and it is not suitable as a future potable water source due to the high potential for saline water intrusion as a result of groundwater extraction. It is also unlikely that contaminants will be transported to an area where groundwater is a current or potential source of drinking water.

Groundwater monitoring is currently conducted at six wells on the Site (MW-2, MW-5, P3-MW-01R, P3-MW-02, P3-MW-03, and Landau Well) with samples analyzed for select dissolved metals only (arsenic, copper, lead, nickel, and zinc). Groundwater monitoring is currently conducted approximately every 15 months.

Arsenic concentrations detected in the six wells mentioned above have consistently exceeded the cleanup level of 0.14 micrograms per liter ( $\mu\text{g/L}$ ) established in the 1994 Cleanup Action Plan (CAP). In some instances, arsenic is not detected at or above the laboratory reporting limit; however, the laboratory reporting limit is above the cleanup level. Concentrations of copper over the last five sampling events have also occasionally exceeded the cleanup level of 2.5  $\mu\text{g/L}$ , established in the 1994 CAP, in monitoring well P3-MW-01R in 2019, 2021, 2022, and 2023 and in monitoring well P3-MW-03 in 2019. However, concentrations of lead, nickel, and zinc have been non-detect or below cleanup levels over the last five sampling events.

Ecology recommends groundwater monitoring continue, as residual contamination remains in soils on several properties that make up the Site. However, as concentrations of dissolved metals in groundwater do not appear to be trending upward, the monitoring frequency may be reduced to every 30 months, alternating between wet and dry seasons. This will allow for seasonal variations to be observed.

Ecology also recommends assessing if another laboratory or analytical method is available that may be able to detect concentrations of arsenic below the cleanup level of 0.14  $\mu\text{g/L}$ , so it can be determined if results for arsenic in groundwater are truly an exceedance of the cleanup level.

If you have any questions, please contact me at (360) 409-6164 or [danielle.gibson@ecy.wa.gov](mailto:danielle.gibson@ecy.wa.gov).

Sincerely,



Danielle Gibson  
Site Manager/UECA Coordinator  
Toxics Cleanup Program  
Southwest Region Office

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Ecology Site File

References:

HartCrowser. 2017. Groundwater Monitoring Results, October 2016, Thea Foss Waterway Esplanade, Thea Foss Uplands, Tacoma, Washington. January 13.

Washington State Department of Ecology (Ecology). 1994. Thea Foss Redevelopment Cleanup Action Plan. August 24.