

Ecopsy



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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December 19, 2024

Katie Randall
Mercy Housing NW
6930 Martin Luther King Jr Way S
Seattle, WA 98118
katie.randall@mercyhousing.org

Re: 35th Street Landfill Additional Comments on the RI Work Plan

- **Site Name:** 35th Street Landfill
- **Site Address:** S 35th St & Pacific Ave Tacoma
- **Facility/Site ID:** 5774537
- **Cleanup Site ID:** 341

Dear Katie Randall:

Thank you for meeting on the Site to review the proposed well sites and for providing the Draft Proposed Exploration Plan map (see Enclosure A). This was very helpful to show the progress based on our previous comments to the RI Work Plan. The following are additional comments from the December 6, 2024, site visit.

As we mentioned in our email sent on December 5, 2024, if Mercy plans to conduct field work in December 2024, it will be done independently under an unapproved draft RI Work Plan. Approval of the RI Work Plan is contingent after public comment period ends, giving Ecology a chance to address public comments and revise the work plan and PPCD. Reminder: any work under an unapproved work plan may not be eligible for reimbursement under the grant if the final work plan includes revisions. Investigation conducted for geotechnical purposes only, that is not required under the final RI Work Plan for the Subject Property area, would not be eligible. Retroactive costs are contingent on a signed grant agreement and sufficient documentation of eligible costs. See pages 39 & 40 Section 7.3 Eligible Costs and Retroactive Costs of the [Affordable Housing Cleanup Grants Guidance for the 2023–25 Biennium](#).

Here are a few items from our site visit that requires further revisions to the draft RI Work Plan:

- RI Work Plan for the Interim Action covering the Southern Property, and the Redevelopment Area needs to be completed before the Interim Action Plan can be submitted. See all the additional components required in an Interim Action Plan in [WAC 173-340-430 Interim Actions](#).
- Mercy will also be required to submit a draft RI Work Plan for the remaining portion of the Site and complete a RI/FS/CAP for the entire site. Based on Phase 1 sampling, additional sampling may be needed in Phase 2 to fully characterize the Site.
- Figure 5 map and Exhibit A in the PPCD (See Enclosure A & B) describe in the legend with a hatchet area “35th St Landfill Site CSID No. 341” This needs to be deleted. The hatched area is not the Site boundary. The Site boundary has not yet been defined. Figure 4 Previous Investigation map of the RI Work Plan should be revised similarly.
- The orange Phase 2 boundary in the Figure 5 map (See Enclosure A) should also be deleted, as Phase 2 sampling locations may be further refined following Phase 1 sampling. Instead, use a different color circle around each sampling location to indicate Phase 2 samples.
- Utility locates must include all utilities including the surface water drainage pipe that drains into the ravine. If sampling shows methane is a concern, additional monitoring may be required along utility corridors.
- Drill rig access at AMW-04 should not be limited due to fencing. Fences should be able to be temporarily removed to allow the drill rig to access the well site. If Mercy/TCRA choose not to remove the fence, this well site can still be accessed from the south by obtaining an access agreement with the Tacoma Power.
- Stockpiles of unknown material with trees growing out of them along northern side of the Southern Property will also need to be sampled for chemical analysis. To adequately characterize the stockpiles, Ecology recommends 3 discrete samples for stockpiles up to 100 cubic yards and 5 discrete samples for stockpiles up to 500 cubic yards.
- Ecology requests the City of Tacoma examine aerial photos and documents to determine the full area of the street sweeping mass. This information may help determine the full extent of the Site and may be needed in developing the phase 2 RI Work Plan.
- It was brought to Ecology’s attention that a private property owner at 3510 A St is pursuing to purchase the small sliver property at 106 E 35th St (parcel 2085140050). Mercy and TCRA should let the owner know that they would be purchasing a part of an area where street sweepings were placed in 1985-1998 that requires ongoing investigation with sampling of soils and soil gas monitoring at proposed gas probe AGP10 and may need future cleanup. Prospective purchasers should consult an attorney to understand their potential liabilities under RCW 70A.305.

- The 1995, 1996 and 1998 aerial photos from the [City of Tacoma TMaps website](#) (or Enclosure C & D) indicate there may have been additional grading and dumping on 3510 A St and the southern portion of the small sliver property at 106 S 35th St. The City of Tacoma should research if this grading and dumping was associated with the 35th St landfill.
- Adjacent properties at 3421 and 3423 Pacific Ave are not in the RI Work Plan maps. The 1990 aerial photo from the [City of Tacoma TMaps website](#) (see Enclosure E) indicates there was dumping or grading operations of street sweeping or other material, just north of the northwest corner of redevelopment property. These properties may need to be sampled as a part of Phase 2.

If you have any questions regarding this letter, please contact me at 360-819-0460 or john.pearch@ecy.wa.gov.

Sincerely,



John Pearch, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Region Office

Enclosures (5): A - Draft Proposed Exploration Plan
 B – Draft PPCD Exhibit A Project Overview Site Plan
 C – City of Tacoma TMaps Parcels: 2085140050
 D - City of Tacoma TMaps Parcels: 2085140060
 E - City of Tacoma TMaps Parcels: 2085130040 and 2085130030

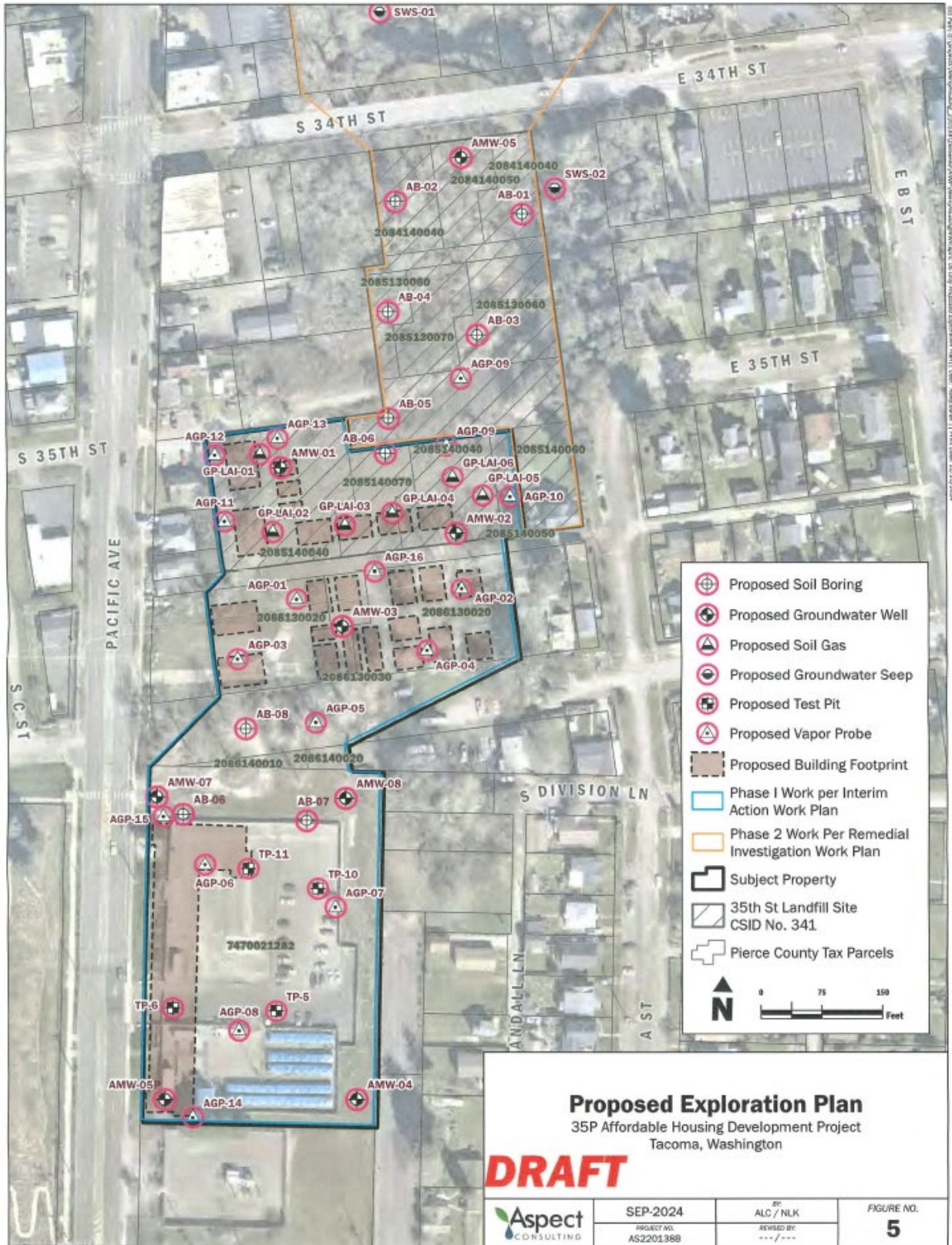
cc by email:

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Ecology Site File

Enclosure A

Draft Proposed Exploration Plan

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Proposed Exploration Plan
 35P Affordable Housing Development Project
 Tacoma, Washington

DRAFT

	SEP-2024	BY: ALC / NLK	FIGURE NO. 5
	PROJECT NO. AS2201368	REVIEWED BY: ---/---	

Date source created: None | Base map Service Layer Credit: NA

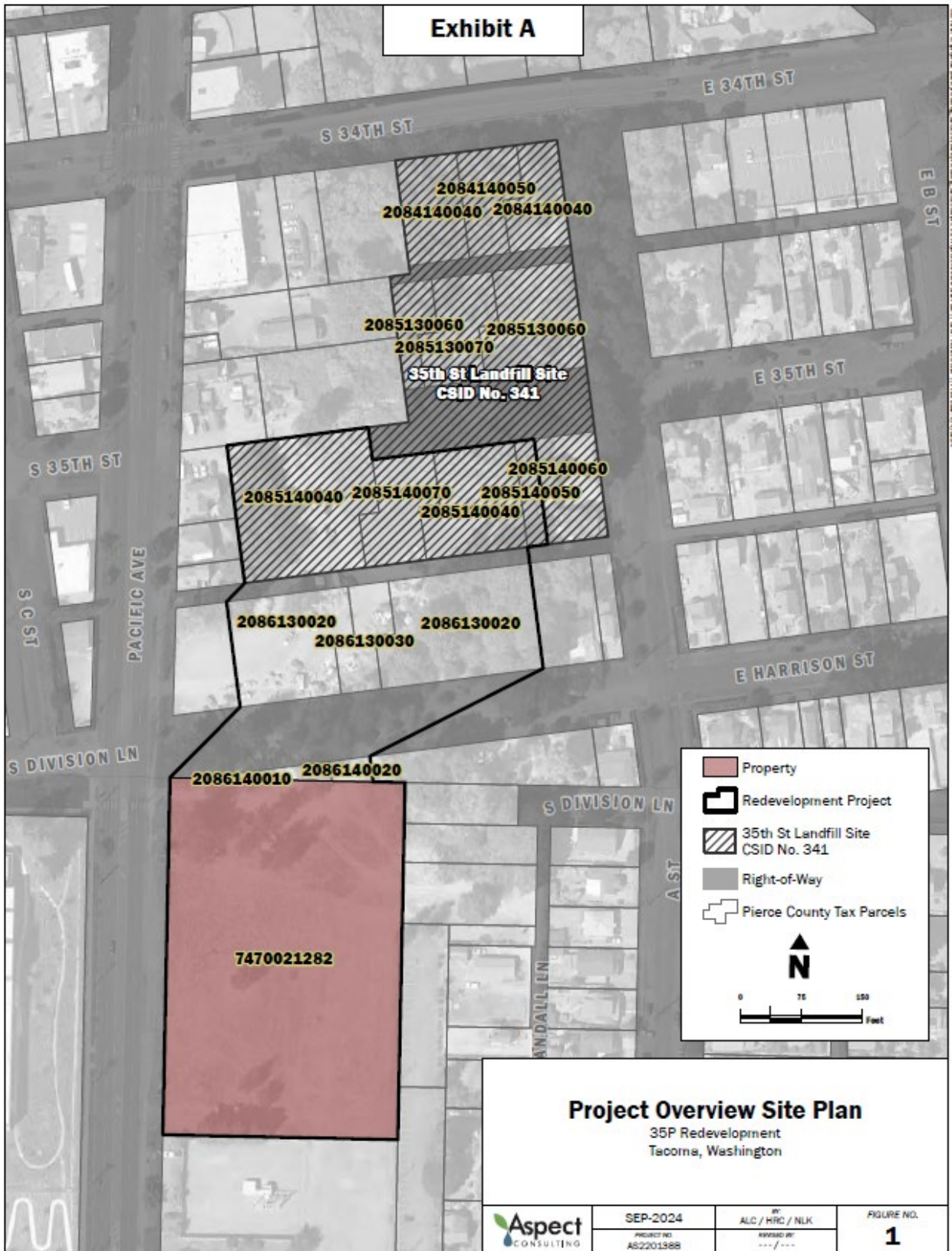
2024-09-10 10:00:00 AM

Enclosure B

Draft PPCD Exhibit A Project Overview Site Plan

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Exhibit A



Project Overview Site Plan

35P Redevelopment
Tacoma, Washington

	SEP-2024	BY: ALC / HRC / NLK	FIGURE NO. 1
	PROJECT NO. AS2201388	REVISION BY: ---/---	

GIS Source: UNITS: NAD 83; Base Map: Aerial; Layer: CAD; © 2024 Aspect Consulting. All rights reserved.

Enclosure C

City of Tacoma TMaps Parcels: 2085140050

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tacomaMAP Feedback TacomaFinc311 Results253 GetMap Quick Start Guide

Address, PIN or Place

Basemap Gallery

- Eng Hybrid
- Eng Road
- 2018 Imagery
- 2017 Imagery
- 2016 Imagery
- 2015 Imagery
- 2014 Imagery
- 2013 Imagery
- 2012 Imagery
- 2011 Imagery
- 2010 Imagery
- 2009 Imagery
- 2008 Imagery
- 2007 Imagery
- 2006 Imagery
- 2005 Imagery
- 2004 Imagery
- 2003 Imagery
- 2002 Imagery
- 2001 Imagery
- 2000 Imagery

(1 of 2)

Parcel: 2005140050

Site Address: 106 S 307th ST

Zipcode: 98402

Land Acres: 0.07

Land Value: \$70,500

Improvement Value: \$0

Taxable Value: \$0

Land Use Code: 1100

Tax Area Code: 005

[View Parcel Information Page](#)

[View Parcel Information Page](#)

The image is a screenshot of the TacomaMAP web application. The main view is an aerial satellite image of a residential area. A specific parcel is highlighted with a blue border. A white popup window is overlaid on this parcel, displaying the following information: Parcel: 2005140050, Site Address: 106 S 307th ST, Zipcode: 98402, Land Acres: 0.07, Land Value: \$70,500, Improvement Value: \$0, Taxable Value: \$0, Land Use Code: 1100, and Tax Area Code: 005. There are also two links: 'View Parcel Information Page' and 'View Parcel Information Page'. On the right side of the map, there is a 'Basemap Gallery' panel with a grid of 18 small thumbnail images representing different years of imagery from 2000 to 2018. The top of the interface includes a search bar with the placeholder text 'Address, PIN or Place' and a navigation menu with items like 'Feedback', 'TacomaFinc311', 'Results253', 'GetMap', and 'Quick Start Guide'. The bottom of the map shows a street grid with labels like '12th St' and '13th St'.

Enclosure D

City of Tacoma TMaps Parcels: 2085140060

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tacomaMAP Feedback TacomaFirst311 Results253 GeoHub Quick Start Guide

Address, PIN or Place

Basemap Gallery

- Bing Hybrid
- Bing Road
- 2018 Imagery
- 2015 Imagery
- 2012 Imagery
- 2009 Imagery
- 2008 Imagery
- 2000 Imagery
- 2005 Imagery
- 2002 Imagery
- 2002 Imagery
- 1998 Imagery
- 1998 Imagery
- 1996 Imagery
- 1990 Imagery
- 1973 Imagery

Parcel: 2085140060
Site Address: 2510 A ST
Zipcode: 28540
Land Acres: 0.22
Land Value: \$195,400
Improvement Value: \$325,100
Taxable Value: \$520,500
Land Use Code: 1101
Tax Area Code: 005

[Assessor Parcel Information Page](#)
[Parcel Analysis Information Page](#)

Zoom to

Enclosure E

City of Tacoma TMaps Parcels: 2085130040 and 2085130030

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tacomaMAP Feedback TacomaFirst311 Results/253 GeoHub Quick Start Guide

Address, PIN or Place

Basemap Gallery

- 2002 Imagery
- 1998 Imagery
- 1998 Imagery
- 1996 Imagery
- 1990 Imagery
- 1973 Imagery
- 1950 Imagery
- 1940 Imagery
- 1931 Imagery
- Light Gray Canvas

App State
Click to restore the map extent and layers visibility where you left off.