



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

July 7, 2010

Dr. Taku Fuji, Toxicologist
Kennedy/Jenks Consultants
200 S.W. Market Street, Suite 500
Portland, OR 97201

Re: Transmittal of Ecology Comments on the *Site-Specific Terrestrial Ecological Evaluation*, dated April 30, 2010, Former Tacoma Metals Site, 1919 Portland Avenue, Tacoma, Washington, Agreed Order DE 97-5435.

Dear Dr. Fuji:

Based on our review of the above-referenced site-specific Terrestrial Ecological Evaluation (TEE) report, we find that it meets the intent of the TEE process set forth in the Model Toxics Control Act (MTCA), WAC 173-340-7490. The report assesses the risks to wildlife receptors from the site contaminants using the site-specific ecological indicator soil concentrations. The proposed soil cap in conjunction with the institutional controls has been adequately demonstrated to be protective of ecological receptors.

Therefore, the overall conclusions regarding ecological risks found at the site are valid and a paved cap will prevent exposure to soils exceeding the Table 749-3 values. The presumptive remedy will be protective of terrestrial ecological receptors from exposure to soil contaminants. **The pavement will need to be maintained and proper institutional controls and environmental covenants will need to be used.** Effectively, paving the property is considered a long-term interim action since contaminants exceeding the screening values will be left in place.

An evaluation of risks from sediment contamination from other exposure pathways was not addressed in the TEE report. Ecology is currently reviewing a proposed groundwater investigation work plan to define the extent of groundwater contamination that could potentially affect sediments.

If you have questions about this letter, please contact me at (360) 407-6247 or via e-mail at steve.teel@ecy.wa.gov.

Sincerely,

Steve Teel

Steve Teel, LHG
Site Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

By certified mail: (7009 2820 0001 7160 8968)

cc: Ty Schreiner, Kennedy/Jenks Consultants
Mr. and Mrs. Leslie Sussman, c/o Mr. Guy Sternal, Eisenhower & Carlson
Portland Avenue Associates, LLC, c/o Mr. Guy Sternal, Eisenhower & Carlson
Mr. Robert Pollack, Tacoma Metals, Inc
Mr. Jim Jakubiak, Schnitzer Steel Products Company
Mr. Philip J. Slowiak, Senior Project Manager, EHS, International Paper Co
Mr. Bill Hengemihle, Managing Director, LECG, LLC
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