



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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January 30, 2025

Charla Kinlow
City of Tacoma
Public Works, Engineering Division
747 Market Street, Room 522
Tacoma, WA 98402
ckinlow@cityoftacoma.org

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

Site name: American Plating
Site address: 2110 E D St, Tacoma, Pierce County, WA 98421
Facility/Site ID: 1202
Cleanup Site ID: 2539

Dear Charla Kinlow:

The Washington State Department of Ecology (Ecology) received your email on December 11, 2024, requesting to reduce the frequency of groundwater monitoring required at the above referenced Site from semi-annually to every 30-months. In addition, you requested to combine the report for this Site with that of the Tacoma Redevelopment Properties site (Cleanup Site ID 3677), which would be submitted to Ecology every 30 months following groundwater monitoring at both sites.

According to the 2003 Cleanup Action Plan (CAP) (GeoEngineers, Inc. 2003), following interim cleanup actions at the Site, groundwater compliance monitoring was to be performed semi-annually for a minimum of three years in accordance with an Ecology-approved Compliance Monitoring Plan (CMP). Ecology conducted semi-annual groundwater sampling of four wells (MW-2, -3, -4, and -5) at the Site between 2004 and 2011. During this time, concentrations of hexavalent chromium, copper, nickel, and weak acid dissociable (WAD) cyanide have occasionally exceeded their respective cleanup levels.

In 2012, additional cleanup actions were conducted at the Site including capping of contaminated soil remaining at concentrations above cleanup levels for unrestricted land use, decommissioning of existing monitoring wells, and installation of three new monitoring wells (MW-20, -21, and -22) at the point of compliance adjacent to the Thea Foss Waterway. Per the 2011 CMP (GeoEngineers, Inc. 2011), following completion of these additional cleanup actions, compliance groundwater monitoring was to be performed on a semi-annual basis of the three newly installed wells. However, Ecology does not have any documentation to support that these three wells (MW-20, -21, and -22) have been sampled since their installation in 2012.

Ecology does **not approve** of your request to reduce the frequency of groundwater monitoring, based on the following:

- It has not been demonstrated that monitoring wells MW-20, -21, and -22 have been sampled in accordance with the 2011 CMP.
- Groundwater monitoring completed at the Site between 2004 and 2011 shows some contaminants of concern are in groundwater at concentrations above cleanup levels.
- Contaminated soil remains at the Site under a cap at concentrations above cleanup levels for unrestricted land use. Groundwater monitoring is needed to confirm that the remedy remains protective of human health and the environment.

Ecology requests that monitoring wells MW-20, -21, and -22 be sampled semi-annually for at least two years, showing results for both wet and dry seasons. Following this, and at the City of Tacoma's request, Ecology will re-evaluate if a reduced sampling frequency may be appropriate. Until that time, reports submitted to Ecology for the American Plating and the Tacoma Redevelopment Properties sites should remain separate.

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

Sincerely,



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

cc by email: Regan Bogart, City of Tacoma, rbogart@cityoftacoma.org
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Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File

References:

GeoEngineers, Inc. 2003. Draft Final Cleanup Action Plan, Former American Plating Inc., 2110 East D Street, Tacoma, Washington. November 24.

GeoEngineers, Inc. 2011. Draft Compliance Monitoring Plan (CMP), American Plating Site Remediation Project, 2110 East D Street, Tacoma, Washington. October 4.