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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Re: Groundwater Plume Commingling

- **Site Name:** Tacoma Coal Gasification, Tacoma, Washington
- **Facility/Site No:** 1249
- **Cleanup Site ID No:** 3675

Dear Jackie Wetzsteon, Suzanne Dolberg, Dana deLeon, and Victoria Book:

Ecology received the draft Memorandum Identification of Contaminants of Concern, Former Tacoma Coal Gasification Site, 22nd and A Streets, Tacoma, Washington (COC Memo), dated February 10, 2024, prepared by Dalton Olmsted Fuglevand (DOF). Analytical data presented in the COC Memo from monitoring well groups “A” and “B” suggest that groundwater contamination at the Tacoma Coal Gasification (TCG) and adjacent Standard Chemical Company (SCC) sites is commingled.

Background

The TCG site was discovered in the mid-1980s during construction of Interstate 705. At that time, the area of exploration was comprised of several city blocks generally bounded by Puyallup Avenue, A Street, 21st Street and the Thea Foss (former City) Waterway, which encompasses both the TCG and SCC sites. The same area was included in original Agreed Order (AO) DE-93TC-S166. Around 2000, information was shared with Ecology that revealed Standard Chemical Company, likely was a substantial contributor to contamination on waterfront property and in the Thea Foss Waterway. Based on this information, the Tacoma Coal Gasification site was administratively divided in 2001 to separate former Standard Chemical Company parcels from the remainder of the Tacoma Coal Gasification site.¹

Groundwater Commingling

At Ecology's request, the PLPs installed monitoring wells as part of supplemental remedial investigation field activities performed in 2023. Monitoring well groups "A" and "B" were installed during these field activities, near the upgradient boundary of SSC and the downgradient boundary of TCG, respectively, based on past groundwater elevation measurements. The purpose of monitoring wells MW-AS, MW-AI, MW-AD, MW-BS, and MW-BI was to provide data to differentiate between the Tacoma Coal Gasification and Standard Chemical Company sites, and to understand the TCG site extent in that area, which is a necessary step in a remedial investigation. Recent groundwater analytical data from these wells do not provide clear evidence of differentiation between the TCG and SSC sites. Groundwater samples from monitoring wells groups A and B are contaminated, particularly with benzene, suggesting a commingled groundwater contamination plume. For example, benzene concentrations are elevated groundwater samples from monitoring wells MW-BS (71.8µg/L) and MW-BI (347µg/L) installed to identify the downgradient extent of the TCG groundwater plume in the area. Groundwater samples collected from monitoring wells MW-AS and MW-AI installed generally downgradient of MW-BS and MW-BI also contained benzene at 28.6µg/L and 2.5µg/L, respectively.

¹ Letter from Ken Lederman, Washington State Assistant Attorney General, to Doug Mosich, Kim Foster, Ken Stone, Steve Secrist, Charles Allen, dated April 9, 2001

Next Steps

As we touched on in our project conference call on December 12, 2024, going forward, Ecology's expectation is that PLP's work will proceed without delay to include former the Standard Chemical Company property and the right-of-way between SCC and 3-tank area in the scope of work addressed by the Tacoma Coal Gasification site AO, as well as other areas necessary to cover the extent of site contamination. We appreciate your continuing efforts to work toward cleanup of the Tacoma Coal Gasification site. If you have questions regarding this letter, please contact Sandy Smith at 360.999.9588 or sandy.smith@ecy.wa.gov.

Sincerely,



Marian L. Abbett, P.E.
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Ecology Site File