



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

May 19, 2025

Natalie J Morrow
Tetra Tech, Inc.
2525 Palmer Street, Suite 2
Missoula, MT 59808
Natalie.Morrow@tetratech.com

Re: **Request to Discontinue Groundwater Monitoring**

Site name: Puget Sound By-Products
Site address: 2041 Marc Ave, Tacoma, Pierce County, WA 98401
Facility/Site ID: 25455514
Cleanup Site ID: 8475

Dear Natalie J Morrow:

The Washington State Department of Ecology (Ecology) received the 2025 Groundwater Monitoring and Asphalt Inspection report for the above referenced Site on March 21, 2025. In this report Tetra Tech, Inc. is requesting Ecology's approval to discontinue groundwater monitoring at the Site based on the following:

- The Mann-Kendall statistical analysis presented in the Cleanup Action Plan (CAP) and continued monitoring have shown that concentrations of hydrocarbons have continued to decline over the past 20 years of monitoring.
- Silica gel treatment results for #2 diesel and heavy oil range hydrocarbons have been non-detect or nearly non-detect (detected between the reporting limit and method detection limit) since at least 2003, including extractable petroleum hydrocarbon fraction ranges analyzed between 2002 and 2017.
- The elution pattern observed by the laboratory for multiple events coupled with the strong hydrogen sulfide odor in groundwater suggest that hydrocarbons present in

groundwater are likely due to degradation of landfill and/or tidal flat organic matter rather than petroleum hydrocarbons.

- Compliance is demonstrated by meeting the conditions specified and applying the polar metabolite cleanup level of 700 micrograms per liter ($\mu\text{g/L}$), as presented in Table 3 of Ecology's Guidance for Silica Gel Cleanup in Washington State (Ecology 2023).

Ecology **does not approve** of your request to discontinue groundwater monitoring at the Site based on the following:

- Applying the polar metabolite cleanup level of 700 $\mu\text{g/L}$ is only appropriate for cases where there is no detectable concentration of petroleum hydrocarbons with Silica Gel Cleanup [SGC] and concentrations of petroleum hydrocarbons without SGC do not exceed 700 $\mu\text{g/L}$. Total petroleum hydrocarbon (TPH) concentrations without SGC have exceeded 700 $\mu\text{g/L}$ in both monitoring wells MFG-1 and MFG-2 during every monitoring event conducted between 2002 and 2025.
- Groundwater monitoring is to occur at the Site every 3 years between January and March. Following each monitoring event, the need for continuing the monitoring program is to be re-evaluated based on 1) groundwater concentrations; 2) status of structures over the former underground storage tank (UST) basin in anticipation of petroleum-impacted soil removal; and 3) status of Darling Ingredients, Inc.'s property lease with the Port of Tacoma (Port).

Although concentrations of diesel range and oil range petroleum hydrocarbons in groundwater appear to be stable or decreasing, soil contamination remains at the Site. Therefore, ongoing long-term groundwater monitoring is needed to ensure that the cap and structure over contaminated soil remains effective and continues to protect groundwater.

Based on the 2025 Groundwater Monitoring and Asphalt Inspection report, it appears Darling Ingredients Inc. is still leasing the property from the Port. In addition, the figure presented in this report appears to show that the structure over the former UST basin is still in place.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle R. Gibson", with a long horizontal flourish extending to the right.

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

cc by email: Jon Elrod, Darling Ingredients, Inc., jelrod@darlingii.com
William Holmes, Darling Ingredients, Inc., bholmes@darlingii.com
Melisa Bod, Port of Tacoma, mbod@portoftacoma.com
Robert Healy, Port of Tacoma, rhealy@portoftacoma.com
Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File

References:

Tetra Tech, Inc. 2025. 2025 Groundwater Monitoring and Asphalt Inspection, Darling-Tacoma Facility (aka Darling Delaware Co., Inc. and Puget Sound By-Products), Facility No.: 25455514. Cleanup Site No.: 8475, VCP Project No.: SW1317. March 21.

Washington State Department of Ecology. 2023. Guidance for Silica Gel Cleanup in Washington State, Publication No. 22-09-059. November.