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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
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February 4, 2026

Greg Peters
Farallon Consulting, LLC
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Re: Technical Assistance to Complete the Remedial Investigation at the following contaminated Site:

- **Site Name:** Woodworth & Co Inc. Lakeview Plant
- **Site Address:** 2800 104th St Ct S, Tacoma, Pierce County, WA 98499
- **Facility/Site ID:** 1372
- **Cleanup Site ID:** 165
- **VCP Project ID:** SW1012

Dear Greg Peters:

The Washington State Department of Ecology (Ecology) hereby provides this technical assistance letter (TAL) that is responding to Farallon Consulting, L.L.C.'s (Farallon) December 30, 2025 Interim Action Report (IAR) and Response to Opinion for the Woodworth & Co, Inc. (Woodworth) Lakeview Plant in Lakewood, Washington. Accordingly, Ecology's recommendations in this technical assistance letter (TAL) are provided to both further complete the remedial investigation (RI) at the Site and collect the necessary data to inform the feasibility study (FS)/disproportionate cost analysis (DCA) process. However, to facilitate realization of these goals, it is incumbent upon the VCP customer team to continue to execute Ecology's recommendations.

We are providing this letter under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70A.305 Revised Code of Washington (RCW).[2]

[1] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

Issue Presented and Opinion

Farallon has submitted the IAR Response to document supplemental remedial investigation (RI) work and additional interim remedial actions that were completed in 2025 at the Woodworth Site. Ecology further understands that Farallon plans to submit a final RI Report in Spring 2026 after completion of an anticipated March 2026 groundwater sampling event.

Ecology understands that Farallon's stated objective of the supplemental RI work and additional IRM activities was to meet the requirements of MTCA for completing the RI in accordance with WAC 173-340-350; complete soil remediation work required at the Site to protect human health and the environment, with a focus on removal of the sources in soil affecting groundwater quality; eliminate a need to complete another Feasibility Study (FS); and focus on a path forward for Site closure that incorporates groundwater monitoring to evaluate the continued natural attenuation of residual compounds of potential concern (COPC) present in groundwater.

Of note, the term "Site" used in the following sections, as defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), refers to the portions of the Lakeview Facility where hazardous substances have come to be located. In support of the aforementioned objective, Ecology continues to support pursuing a no further action (NFA) determination, but we need additional data to demonstrate the following:

- Releases of hazardous substances are appropriately delineated and remediated at the Site and providing assurances that future releases of hazardous substances will be prevented;
- Contamination within the shallow, deep, and regional aquifers will not impact the Lakewood Water District drinking water system;
- Provision of sufficient data for Ecology to adequately evaluate groundwater contaminant trends and the reasonableness of proposed restoration timeframes; and
- Adequate definition of the lateral and vertical extents of contamination in all water-bearing zones and other select areas of the Site identified by Ecology.

As a result, this TAL is based on an analysis of whether the activities conducted at the Site to date meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Washington Administrative Code (WAC) Chapter 173-340 (collectively "substantive requirements of MTCA").

Description of the Site

This TAL applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Diesel and Heavy oil petroleum hydrocarbons, polycyclic aromatic hydrocarbons, chlorinated volatile organic compounds (CVOC), polar metabolites (PM), and heavy metals into the soil and groundwater.

The parcel(s) of real property associated with this Site are located within the projected boundaries of the Tacoma Smelter Plume (TSP) facility (FSID #89267963). At this time, we have no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the TSP facility.

Basis for the Opinion

This TAL is based on comments contained in the documents listed as follows:

1. Farallon Consulting, LLC (Farallon)*, Interim Action Report; Woodworth & Co, Inc. Lakeview Facility, 2800 104th Street Court South, Lakewood, Washington*, December 30, 2025.

2. Farallon, *Ecology Comments Summary (2022-2024); Lakeview Facility, Lakewood, Washington*, Farallon PNL 188-004, December 12, 2025.

3. Farallon Consulting, LLC*, Technical Memorandum – Site Status and Summary of May 2023 through August 2024 Data Collection; Woodworth & Co, Inc. Lakeview Plant, 2800 104th Street Court South, Lakewood, Washington*, September 4, 2024.

4. Ecology, *Letter Regarding Technical Assistance on Further Investigation for the Woodworth & Co. Lakeview Plant*, June 20, 2023.

5. Farallon Consulting, LLC*, Response to October 21, 2022 Letter Regarding Further Action At Woodworth & Co, Inc. Lakeview Plant, 2800 104th Street Court South, Lakewood, Washington*, April 18, 2023.

You can request this and any other documents in the project file by filing a records request.[3] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup Site Search web page.[4]

This opinion is void if any of the information contained in this document is materially false or misleading.

Technical Assistance

A. Ecology RI Recommendations: Thank you for the IAR and for conducting both the interim soil remedial actions as well as installation of both the shallow water-bearing zone (SWBZ) and regional aquifer (RA) monitoring wells. Other specific RI items that were included in Ecology's December 4, 2024 opinion[5] and that still need to be completed include the following:

1. Delineation of contamination/groundwater gradient in the deep water-bearing zone (DWBZ) within the western half of the Site and along the western Site boundary.

2. Delineation of the DRO/ORO/PM plumes in the shallow/deep WBZ's at MW4, MW9A/9D, MW9R, MW11/X, MW13, MW-18, MW36, MW16R, and SVE-2.

3. Regardless of other stratigraphic continuities that may exist between the SWBZ and DWBZ, decommissioning of SVE wells 3 and 6 (and 10) that were completed across both the SWBZ and DWBZ. Ecology understands that SVE-10 is currently covered with a gravel pile and will be decommissioned when exposed.

4. Resampling of DWBZ SVE/AS/M wells around the TCE plume to provide current data on plume extent.

5. Evaluation of the SWBZ/DWBZ near MW-13 (Equipment Parking Area), former boring B-19 (Hot Mix Area), former boring B-12 (Equipment Storage/ Carport Area), and former boring B-16 (Former Asphalt Testing Area).

[3] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[4] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=14894
[5] Ecology, Technical Assistance to Complete Remedial Investigation at the Woodworth & Co Inc. Lakeview Plant, December 4, 2024.

In addition, Ecology recommends installing both a DWBZ and another RA monitoring well along the southwestern margin of the Site and to the west of the TCE plume. Such an installation would refine the groundwater gradient within that area of the Site and the Site as a whole and will serve as a potential cross-gradient data point which is required under MTCA[6] in support of potential future MNA-type applications.

B. IAR Section 4.3 Groundwater Elevations (Farallon): Sufficient understanding of the groundwater flow direction(s) and hydrogeology of the shallow and deep-water bearing zones exists. Therefore, these monitoring wells were not evaluated for the purpose of the supplemental RI work.

RAWBZ. Groundwater elevations measured in regional aquifer water-bearing zone groundwater monitoring wells appear to show indications of seasonal variability in groundwater elevations. The general direction of shallow groundwater flow appears to be toward the center of the Site away from the property boundaries for the three quarterly sampling events performed through December 2025 (Table 4; Figure 4A). A more complete evaluation of seasonal groundwater elevation and flow direction variability will be completed following the fourth quarterly sampling event in March 2026. However, the preliminary evaluation of the groundwater flow direction suggests that groundwater at the Site would not represent a risk to the Lakewood Water District water supply wells west of the Site (Figure 3).

B.1 Ecology Response: Given the lack of DWBZ data within the western half of the Site, Ecology does not concur that sufficient understanding of the DWBZ exists (see recommendations provided in section A above). Further, given the depicted concentric groundwater flow direction and downward vertical gradient from the SWBZ, to the DWBZ, and to the RAWBZ, please better discuss and illustrate via stratigraphic cross-sections where the Site-wide volume of water that is impacting the RAWBZ is migrating to. Ecology suggests slug and pump test in selected wells to better assess both local (per well) and areal (between wells) hydraulic characteristics.

C. IAR Data Conclusions/MNA (Farallon): Farallon concludes the groundwater data indicates that DRO/ORO detected consists of polar organics and/or native biogenic carbon. Since there is no apparent actual DRO/ORO remaining, no further delineation of

[6] Ecology, Guidance on Remediation of Petroleum-Contaminated Ground Water by Natural Attenuation, Sections 1.4 and 1.5, July 2005.

TPH is necessary. Monitored natural attention of residual polar organics is appropriate under MTCA.

C.1. Ecology Response: Ecology concurs that the groundwater DRO/ORO concentrations at the Site appear to be mostly represented by PMs. However, PMs are not benign compounds and do exhibit toxicity, hence the combined petroleum + PM CUL of 500 micrograms per liter (ug/L)[7] each, or a total of 1,000 µg/L. Please follow Ecology's 2023 Silica Gel Cleanup guidance which discusses the toxicity of polar metabolites and the associated CUL's. For example, if you can show that there is no longer a dissolved hydrocarbon plume (meaning hydrocarbons are no longer present), then the CUL for TPH and polar metabolites becomes 500 ug/L and 200 ug/L.

To assist Ecology with better assessing contaminant plume stability and further supporting MNA as a viable remedial option, please analyze representative groundwater samples for total/dissolved organic carbon and other standard analytes (including dissolved oxygen, nitrite, nitrate, sulfate, ferric iron, methane, ethane, ethene, pH, temperature, specific conductance, and oxidation-reduction potential) that would aid in the interpretation of whether MNA would occur to the maximum extent practicable and within a reasonable timeframe. Such data would augment the natural attenuation and water quality parameter data that was collected in December 2017.[8] Said 2017 data indicated low total organic carbon and a relative lack of biologically-mediated anaerobic chemical degradation (of TCE) as opposed to plume dispersion and dilution as the more dominant physical processes associated with a lowering of TCE groundwater concentrations. As you are aware, dilution and dispersion are not acceptable remedial options under MTCA.[9] Trend analysis of key wells would also provide additional data to assess the efficacy of MNA as a remedial option.

Further, as a way to empirically assess the PM source, and given groundwater coming on to the Site isn't elevated in total organic carbon, a characterization effort of the reclamation stockpile could be performed to assess it as a potential source of natural organic interference. Comparison of the reclamation data with groundwater that is upgradient and downgradient of it might provide additional credence to support MNA as a remedial option.

[7] Ecology, Guidance for Silica Gel Cleanup in Washington State, Section 3.2.2, November 2023.
[8] Farallon, Addendum to Focused Feasibility Study and Disproportionate Cost Analysis Report – Lakeview Facility, August 3, 2018.
[9] WAC 173-340-360(3)(a)(viii)

D. FS (Farallon): A Feasibility Study is not necessary. Soil excavation and removal was conducted in various stages as an interim action and has been successful at remediating soil to the extent practicable under MTCA. Groundwater quality has been improving in response to past interim actions, including application of air sparging/soil vapor extraction and source removal via excavation. Natural attenuation evaluation work has confirmed that TCE is biodegrading and is not a risk to any receptors, assuming soil and groundwater restrictions are applied to the Site cleanup to restrict access to areas and media where residual TCE that exceeds the MTCA Method A cleanup levels exists. Similarly, DRO/ORO sources have been successfully remediated and evaluation of natural attenuation has indicated that residual DRO/ORO present in groundwater is primarily a mixture of polar organics, which are less toxic than the parent petroleum products, and naturally occurring organic carbon. No further active cleanup of groundwater is necessary. Further, the groundwater impacts from DRO/ORO and CPAHs is restricted to the Site. Therefore, in light of the source area interim actions and natural attenuation evaluation, monitored natural attenuation with restrictions on use of groundwater at the Site is an acceptable cleanup alternative for groundwater under MTCA. A CAP will be provided following receipt of comments on the revised RI report with limited FS components focused on the selected cleanup action. Additional RI and Interim Action work has been conducted between 2023 and 2025 with one additional quarterly sampling event of the newly installed RA monitoring wells remaining in March 2026. A revised RI report will then be presented for Ecology's use. A preliminary assessment of the RI and Interim Action work indicates that monitored natural attenuation and Environmental Covenant restricting access/use of soil and groundwater where the MTCA cleanup levels have not yet been achieved will be a path that meets the MTCA cleanup requirements.

D.1. Ecology Response: Ecology concurs that several interim soil removal and SVE/AS groundwater remedial actions have been conducted to date. However, the RI remains to be completed (see A. above) and as such Ecology does not concur at this time that an FS/DCA would not ultimately be necessary. Pending implementation of the recommended groundwater delineation, Ecology recommends that the prior FS/DCA will need to be augmented with current data and actions to refine the remedial options to select the final cleanup remedy for the Site. To that end, Ecology would support inclusion of a focused FS Addendum based on off the 2018 FS Addendum in the upcoming RI Report as acceptable versus another standalone document.

Limitations of the Opinion

Technical Assistance Does Not Settle Liability with the State.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

Technical Assistance Does Not Constitute a Determination of Substantial Equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action a party performs is substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

State is Immune from Liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). Please do not hesitate to request additional services as your investigation and cleanup progresses. We look forward to working with you.

If you have any questions about this letter, please contact me at (360) 489-5347 or joe.hunt@ecy.wa.gov.

Sincerely,



Joseph B. Hunt, LHG
Toxics Cleanup Program
Southwest Region Office

JH:kw

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Ecology Site File