

**From:** [Song, Jing \(ECY\)](#)  
**To:** ["Miguel Ortega"](#)  
**Cc:** [Bruce Clarkson](#)  
**Subject:** NW3447 - Ecology's recommendation for additional site characterization for Sutton Trucking  
**Date:** Monday, March 9, 2026 12:12:19 PM

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Miguel,

Ecology reviewed the submitted reports for [Sutton Trucking](#) facility (NW3447), and has the following recommendations for additional site characterization:

**1. Further delineation of chlorinated volatile organic compounds (CVOC) contamination.**

The [Phase II Environmental Site Assessment](#), dated February 17, 2025, recommends *“Additional site characterization be completed to define the horizontal and vertical extent of PCE impacts in soil and PCE and TCE impacts in groundwater at the Subject Property.”* Ecology concurs with this recommendation.

- Additional soil borings and monitoring wells are needed to define the horizontal and vertical extent of CVOC contamination in soil and groundwater.
- Please note, at least three permanent monitoring wells are needed to determine groundwater flow directions. More monitoring wells are likely needed to delineate the groundwater plume.

**2. Shallow soil investigation across the Property.**

- The Site is located within the boundary of the [Tacoma Smelter Plume King County](#) facility (facility site ID 66948686, Cleanup site ID 2123). Ecology's [Dirt Alert](#) map predicts the arsenic concentration at surface soil in this area to be 40 to 100 milligrams per kilogram (mg/kg).
- Ecology recommends soil characterization at the entire Property for arsenic and lead in accordance with sampling requirements as outlined in Ecology's 2019 [Tacoma Smelter Plume Model Remedies Guidance](#).
- Ecology recommends analyzing for cPAHs in select soil samples because cPAHs were previously detected in shallow soil at the property (in 2018 Sound Transit investigation discussed below).

### 3. Investigation on the east portion of the Property

- Sound Transit completed a focused phase II environmental site assessment in 2018 at the easternmost portion of the Property. Concentrations of arsenic and cPAHs exceeded the MTCA Method A cleanup levels in one shallow soil sample (B1) at 0-1.5 feet below ground surface (bgs). Concentrations of total petroleum hydrocarbons in diesel and oil range (TPH-D and TPH-O) exceeded the MTCA Method A cleanup level in one soil sample (B4) at 5 to 6 feet bgs.
- Please confirm the status of the contaminated soil discovered by Sound Transit in 2018. Has the contaminated soil been removed during Sound Transit's construction? Ecology understands that Sound Transit holds an easement on the easternmost portion of the Property. Do you have access to that portion of the Property?
- Three former lagoons (setting ponds), two of which were unlined, were located east of the maintenance garage on the eastern portion of the Property. A semi-volatile organic compound (SVOC) contaminant, bis(2-ethylhexyl) phthalate, was reportedly present in soil beneath the lagoons. More than 900 tons of contaminated soil and sludge that were classified as Dangerous Waste were reportedly removed from the lagoon area in 1988. The excavated lagoons were reportedly filled with clean fill. However, post-excavation groundwater sampling was not performed in this area.
- Additional investigation for soil condition on the eastern portion of the Property is needed. Groundwater monitoring wells and groundwater sampling are also needed in this area. The soil and groundwater sampling should include TPH, metals, VOCs, and/or SVOCs.

### 4. Surface water protection.

Two drainage ditches are present along the northern and southern property boundaries. Ecology recommends installing monitoring wells along the drainage ditches and collecting soil and groundwater samples to investigate the potential impact to surface water in the ditch.

### 5. Next Step.

Please submit a work plan for additional site characterization for Ecology's review. Please let me know if you have any questions.

**Jing Song, LG, LHG**

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