



May 31, 2017

Jeremy Hughes
Department of Ecology Southwest Region
Toxics Cleanup
300 Desmond Drive
Olympia, WA 98503

**RE: Draft for Ecology Review Feasibility Study Report (Dated March 1, 2017)
Sound Mattress and Felt Site – 1940 E. 11th Street (VCP SW0857)**

Dear Mr. Hughes,

The Port of Tacoma (Port) is hereby requesting that Ecology reject the *Draft for Ecology Review Feasibility Study Report*(FS) dated March 1, 2017 that was prepared by Pacific Crest Environmental for Sound Mattress and Felt Company (Sound Mattress). The Port is the current owner of the 1940 E. 11th Street property and is also the owner of a downgradient property within the Site impacted by the historical releases of interest in the FS. Under the 2006 purchase and sale agreement for the property, Sound Mattress is responsible to perform cleanup of the Site. In the past, the Port was provided the opportunity to review and comment on Sound Mattress work products. This FS was prepared and submitted without Port input. This FS does not comply with MTCA content requirements (WAC 173-340-350(8)(c)) and none of the remedial alternatives considered comply with the minimum requirements for cleanup actions (WAC 173-340-360(2)). The Port has many concerns with the FS. For your consideration, we present a few examples to demonstrate how the FS does not comply with MTCA.

The FS Does Not Include Cleanup Alternatives that Protect Human Health and the Environment (WAC 173-340-350(c)(i)(A) and 173-340-360(2)(a)(i))

There are two current potential exposure pathways that are not adequately addressed in the FS. First, the risk of vapor intrusion on downgradient properties has not been fully evaluated. These properties include the East 11th Street right-of-way and the Port of Tacoma Administration Building. It states in Section 2.5 of the FS that this pathway is considered a “potential future exposure pathway...since soil, soil vapor, and groundwater in the Upper Sand do not appear to be impacted in the northwestern portion of the Site”. No vapor samples have been collected from either of these properties and only 2 direct push shallow groundwater samples have been collected from the vicinity of the Port Administration Building.

Second, it states in Section 2.5 of the FS that “Human ingestion of aquatic biota exposed to contaminants in surface water or in groundwater discharging to surface water is considered only a potential future exposure pathway”. This incorrect assertion is based on Puget Sound-wide fish and shellfish consumption advisories (for PCBs and mercury). Human consumption of seafood is a current potential exposure pathway since fishing for salmon and flatfish is allowed in the Sitcum Waterway, as is harvesting of Dungeness crab and spot prawns.

The FS Does Not Include Cleanup Alternatives that Comply with Cleanup Standards (WAC 173-340-360(2)(a)(ii))

The Port has two examples of how the cleanup alternatives in the FS do not comply with cleanup standards. First, it states in Section 2.5 of the FS that “PCE, TCE, and metals in groundwater do not “reach” the Sitcum Waterway”, a misapplication of the language in MTCA (WAC 173-340-720(6)(c)(i)(F)) that has a threshold of “not likely to reach”. The data are not definitive that PCE and TCE do not currently “reach” surface water, let alone being able to demonstrate that PCE and TCE are “not likely to reach” surface water. Furthermore, PCE and TCE are the parent compounds of vinyl chloride, a more toxic byproduct that is acknowledged to “reach” surface water.

Second, the FS proposes the use of Method C cleanup levels for soil, air, and groundwater protective of indoor air. The use of Method C requires institutional controls to be placed on properties within the Site. The Site includes the East 11th Street right-of-way and associated manholes and utility vaults. Current, and potential future, site use includes commercial office space, which is not consistent with the use of Method C cleanup levels. Further, the FS states that the Port is willing to limit future land use to industrial purposes, which is not the case. Any future landuse restrictions on the property would need to be fully vetted and would require final approval by Port Commission.

The FS does Not Include Cleanup Alternatives that Achieve Reasonable Restoration Time Frames.

The FS identifies restoration time frames for the remedial alternatives that are either unreasonable or overly optimistic. The restoration time frame identified for Alternative 1 is 50 to over 100 years, which is not reasonable and should result in Alternative 1 being eliminated from consideration. The restoration time frames for the remaining alternatives are not supported by technical analysis and appear unreasonably optimistic. In our opinion, none of the cleanup alternatives will achieve cleanup standards in a reasonable restoration time frame.

Beyond the above stated concerns that none of the remedial alternatives presented in the FS are capable of achieving the threshold criteria under MTCA, the Port has numerous concerns with other aspects of the FS, including:

- Remaining data gaps and data quality concerns, such as the representativeness of groundwater samples
- Mischaracterization of site hydrogeology
- Misrepresentation of previous site demolition and cleanup actions
- Incomplete COC list for which cleanup standards were developed
- Questionable cleanup technology screening and selection
- Lack of a permanent cleanup alternative, including omission of source area removal (Former Plating Area) from all cleanup alternatives
- Inadequate cleanup alternatives evaluation, such as poorly documented cost estimates and improperly developed and applied remediation levels

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The Port would be happy to discuss any questions you have regarding this letter or provide any further detail regarding our comments. Please feel free to contact me at 253-428-8643.

Sincerely,

PORT OF TACOMA

A handwritten signature in cursive script that reads "Robert Healy". The signature is written in black ink and is positioned below the typed name and title.

Robert Healy
Senior Environmental Manager

cc: Nicolas Aklam – Ecology
Jason Jordan – Port of Tacoma