

Ecology Responses to Public Comments on the Draft Second Periodic Review Report, Freighthouse Square Site

Comments submitted by Tom McDonald, Washington State Department of Transportation.
Comment period: June 8 – July 10, 2017

Comment: Section 1.0

- This is almost word-for-word the same as the previous review. No comment.

Response: No response.

Comment: Section 2.1. Site History

- 2nd paragraph notes the site is bordered by East 26th Street to the South. Could be revised to be bordered by the ST and Tacoma Rail lines.

Response: Comment accepted and the text was revised accordingly.

Comment: Section 2.3

- This appears to be word-for-word the same as the previous review. No comment.

Response: No response.

Comment: Section 2.4. 1st paragraph. Please revise to clarify analytical testing:

- During November 2014 ... 11 groundwater samples were also collected for laboratory analysis. **Select** samples were selected for ~~diesel-and-oil-range~~ total petroleum hydrocarbons (TPH-G, TPH-D and TPH-O), total **and** dissolved priority pollutant metals, ... **polychlorinated biphenyls, and lead by Toxicity Characteristic Leachate Procedure.** ... **Dissolved** arsenic (7.5 mg/L ...).
 - o Eighty-eight samples were collected, but not all 88 samples were analyzed.
 - o Testing included gasoline-range petroleum hydrocarbons.
 - o Both total and dissolved metals analysis were completed on groundwater samples.
 - o Select samples were also analyzed for PCBs and TCLP lead.
 - o The arsenic concentration range is from dissolved analysis.

Response: The text was revised to include the above suggested changes. The new language include separate paragraphs for soil and groundwater samples laboratory analytical parameters and a brief discussion of results.

Comment, Section 2.4, 1st paragraph

- This paragraph references **current** MTCA Method A criteria. However, Phase II ESA and Paragraph 2.2 of Draft Periodic Review indicate that “MTCA Method A cleanup levels prior to 2001 will be used ...” Should paragraph include concentrations exceeding 1996 criteria, or current criteria?
 - o Diesel-range hydrocarbons in soil exceed 1996 criteria.

- Diesel-range hydrocarbons in groundwater do not exceed 1996 criteria.

Response: When the cleanup was conducted in 1993, cleanup levels existed at that time were used for the cleanup. The no further action letter was issued based on these cleanup levels. Hence, the cleanup levels that were existed prior to 2001 will be used at this Site. However, since the cleanup levels were updated, the contaminant concentrations are compared to both the updated and the previous cleanup levels for comparison purposes. No additional cleanup will be required based on the current/updated cleanup levels, unless there is a threat to the human health or the environment which is not the case at this Site. An additional table is included to present both current and prior cleanup levels for comparison.

Comment, Section 2.4. 2nd paragraph

- This paragraph discusses construction activities that are separate from the Phase II ESA study. Suggest creating a new paragraph for construction/changes to ownership discussion.
- 2nd sentence of paragraph is incorrect. The existing footing was removed, new excavation was completed and a new foundation was installed.

Response: Separate paragraphs are included briefly discussing about new construction activities and changes to the Property ownership.

Comment, Section 2.5

- This section has been “beefed” up from the previous review. The language is directly from the restrictive covenant. No comment.

Response: no response.

Comment, Section 3.1

- Relates to my question in 2.4. I believe the restrictive covenant includes a portion of the railroad corridor ... which is not paved. Seems a bit disconnected from what I remember are planned construction activities.
Last sentence of 2nd paragraph notes that all asphalt and concrete surfaces in excellent condition. The FHS alleyway pavers are not in “Excellent” condition. They could be noted in good or satisfactory condition.

Response: The text is revised to reflect the above changes.

Comment, Section 4.0.

- Bullet 1. TPH-D in soil also exceeds 1996 criteria.
- Bullet 2. Mercury also exceeds MTCA in groundwater.

Response: Text is revised to reflect the above changes.

Comment, Appendix 6.4.

- Figure and some tables are difficult to read.

Response: *This is the maximum size that was achievable with scanning of the original figures and tables. If somebody is interested in these figures and tables, Ecology will provide them with copies of the originals.*

Comment, Appendix 6.6.

- Photo 4. Is this photo from the SW or the SE?
- Photo 5. Is this photo from the NE or the NW?
- Photo 6. Direction is confusing.

Response: *Photos titles have been revised to include the correct directions.*