



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 2, 2017

**Electronic Copy**

Kimberly Seely  
Coastline Law Group PLLC  
4015 Ruston Way, Suite 200  
Tacoma, WA 98402

**Re: Draft Remedial Investigation and Feasibility Study Report for the following site:**

- **Site Name:** West Coast Door
- **Site Address:** 3133 S Cedar St Tacoma, 98409 Pierce
- **Facility/Site No.:** 6308485
- **Cleanup Site No.:** 2599
- **VCP Site No.:** SW0865

Dear Ms. Seely:

In accordance with Agreed Order No. DE 14016, the Washington State Department of Ecology (Ecology) is providing the following letter to comment on the sufficiency of the January 7, 2014 Draft Remedial Investigation and Feasibility Study (RIFS) Report for the West Coast Door Cleanup Site (Site) in meeting the requirements of WAC 173-340-350. The January 7, 2014, RIFS Report was developed while cleanup was being pursued at the Site through the Voluntary Cleanup Program (VCP). The Site was terminated from the VCP on October 15, 2015 due to inactivity and is now under an agreed order to complete a remedial investigation, feasibility study, and preliminary Draft Cleanup Action Plan (DCAP).

The comments below summarize the data gaps Ecology has identified in the January 7, 2014 Draft RIFS Report.

**1. Conceptual Site Model and Source Area Delineation**

- a) Please propose additional investigation which evaluates the presence of source material at a greater depth near monitoring well MW-7 and radially around this location. Page 3-1 states, "*The presence of a low permeability silt layer under the retort area at 45 feet bgs (below ground surface), however, appears to have limited further downward migration of the creosote product*". Ecology disagrees that this statement has been adequately determined.

More specifically, monitoring well MW-7 appears to have been advanced past the elevation of this silt layer and the silt layer was not identified. A heavy rainbow sheen and strong petroleum odor were noted at the bottom of this investigation location (as deep as 51.5 feet bgs) which indicates the bottom of the source area has not been delineated. In addition, investigation locations advanced radially around monitoring well MW-7 were not advanced to sufficient depth to delineate the potential source material. Proposed investigation locations should be advanced until the source material impacts are vertically delineated. If the vertical extent of the source area is identified prior to reaching the silt layer, the investigation should still be advanced to the approximate elevation of the deepest identified silt layer (approximately 175 feet above mean sea level).

- b) Please include a more in-depth evaluation of the contaminants of concern (COCs) in the next iteration of the Draft RIFS Report. The COCs currently proposed include carcinogenic polycyclic aromatic hydrocarbons, naphthalene, and select volatile organic compounds (benzene, toluene, ethylbenzene, and xylenes). Please describe why other hazardous substances associated with wood treating (pentachlorophenol, metals, and dioxins/furans) were not included as COCs. As discussed on June 29, 2017, additional soil sample collection for metals analysis should be collected from the source area.

## **2. Groundwater Characterization**

- a) Please provide a more in-depth evaluation on the impacts of changes in groundwater flow direction and the extent of the dissolved-phase impacts. As noted in the January 7, 2014 Draft RIFS Report, inconsistencies in the groundwater flow direction occur due to strong downward gradients as well as localized mounding observed at monitoring well MW-4. In addition, Ecology anticipates inconsistencies may occur from nearby groundwater extraction wells (see comment below). A more in-depth evaluation may include preparing groundwater contours for four consecutive quarters and comparing these to isoconcentration contours of the same time period.
- b) Please provide a more in-depth evaluation of the impacts of groundwater extraction wells on the extent of the contaminated groundwater. Page 2-8 states, "*West Coast Door Site lies within the theoretical capture zone of 12A its distance from well 12A and the limited pumping schedule of this well will result in no detectable movement of contaminants from West Coast Door to the South.*" Additional evaluation of this statement needs to be included in the next iteration of the Draft RIFS Report. Ecology recommends comparing the pump schedules of nearby extraction wells to the groundwater and isoconcentration contours mentioned above.
- c) Please install permanent monitoring wells in the locations where the contaminated groundwater has primarily been characterized by grab groundwater samples and any other locations needed to vertically and horizontally delineate the groundwater plume.

Several grab groundwater samples indicate the western extent of the contaminated groundwater plume is approximately located beneath the Shea Property warehouse and the southern extent is located in the Sound Transit right-of-way. While this data is helpful for refining our understanding of the contamination, monitoring wells are necessary to observe how the contaminated groundwater responds to changes in groundwater flow conditions. In addition, some of the existing monitoring wells are not screened at an optimal depth interval based on our current understanding of the source area. Additional permanent monitoring wells appear to be needed in the following locations:

- I. West of monitoring well MW-10 on the Shea Property or immediately west of the Shea Property
- II. North of monitoring well MW-12
- III. Southeast of monitoring wells MW-6 and MW-7 on the Sound Transit and/or Parker Paint properties
- IV. Near monitoring well MW-7 (screened at an interval of most significant impacts based on field screening)
- V. North of monitoring well MW-7

### **3. Soil Characterization**

- a) Please elaborate in the next iteration of the Draft RIFS Report how the soil contamination fits into the conceptual site model and provide greater detail on the delineation of soil contamination. In addition, please include call out boxes (or another depiction) for all contaminants exceeding preliminary cleanup levels. The estimated extent of soil contamination should be described in the report and supported by field observation and analytical data.
- b) Please include all completed soil boring and monitoring well logs in the RIFS Report for all investigation locations used to characterize the Site. Soil borings SB-7, 8, 10, and 11 appear to be missing from the report.
- c) In accordance with WAC 173-340-7490, a Terrestrial Ecological Evaluation (TEE) needs to be completed for the Site. The evaluation must be included in the next iteration of the Draft RIFS Report even if the Site qualifies for an exclusion (WAC 173-340-7491) or simplified TEE (WAC 173-340-7492).

### **4. Indoor Air Characterization**

- a) Page 2-11 states, "*Naphthalene concentrations measured in indoor air range from 0.82 to 1.1 ug/m<sup>3</sup> and do not exceed MTCA Method B screening levels of 1.4 ug/m<sup>3</sup>.*" The screening level mentioned is the Method B non-cancer cleanup level for naphthalene in indoor air.

Effective April 6, 2015, the indoor air screening levels and cleanup levels have been updated. A Method B cancer cleanup level for naphthalene in indoor air has been developed (0.0735 ug/m<sup>3</sup>) and is considerably less than the non-cancer cleanup level (1.37 ug/m<sup>3</sup>). Ecology recommends resampling for naphthalene in indoor air using a laboratory method that can achieve reporting limits equal to or less than the Method B cancer cleanup level in indoor air.

- b) On September 1, 2016, Ecology was provided with a January 8, 2016 report entitled *Vapor Intrusion Investigation* by ECI Environmental Services. This document suggests the groundwater plume extending beneath the Shea and Nyssen properties is not producing concentrations of volatile contaminants of concern significant enough to cause indoor air quality concerns. The RIFS Report should be a stand-alone document which fully documents characterization of the Site. The evaluation of indoor air quality for the Shea and Nyssen property buildings needs to be incorporated into the RIFS Report.

#### **5. Miscellaneous and Administrative**

- a) All investigation data needs to be electronically submitted to Ecology (via EIM). Please ensure all previous site investigation data used for characterization purposes in the RIFS Report is submitted via EIM. Groundwater elevation measurements should be included in these electronic submittals.

#### **6. Feasibility Study**

- a) Page 4-8 states, “... *all alternatives retained for evaluation meet the threshold criteria outlined in MTCA.*” This statement is presumably referring to WAC 173-340-360(2)(a) “threshold requirements” for the selection of a cleanup action. In addition to threshold requirements, WAC 173-340-360(2)(b) includes “other requirements” that shall: 1) use permanent solutions to the maximum extent practicable, 2) provide for a reasonable restoration time frame, and 3) consider public concerns. In other words, monitored natural attenuation cannot be used exclusively as a cleanup action for groundwater unless it can be shown that a more permanent option is not practicable and the groundwater plume will degrade in a reasonable time frame.
- b) Ecology will provide additional comments on the feasibility study once the Site had been adequately characterized for the purpose of the remedial investigation. Please propose a meeting date or conference call with Ecology prior to submitting the next iteration of the Draft RIFS Report to discuss remedial alternatives to include in the feasibility study.

In accordance with Agreed Order No. DE 14016, Ecology’s comments shall be addressed in a Draft Remedial Investigation Work Plan (Work Plan). The Work Plan shall be submitted to Ecology for review within 90 calendar upon receipt of this letter.

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Please contact me at (360) 407-7529 or [matthew.morris@ecy.wa.gov](mailto:matthew.morris@ecy.wa.gov) if you have any questions regarding the comments provided.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew Morris".

Matthew Morris, P.E.  
Cleanup Project Manager  
Department of Ecology  
Southwest Regional Office Toxics Cleanup Program

By Certified Mail: [91 7199 9991 7037 1758 8778]

cc: Tom Colligan, LHG, Floyd Snider  
Rebecca S. Lawson, P.E., LHG, Ecology  
Marian Abbett, P.E., Ecology