



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 12, 2017

Mr. Branislav Jurista
Farallon Consulting, LLC
975 5th Avenue Northwest, Suite 100
Issaquah, WA 98027

Re: Review of September 25, 2017 "Sampling and Analysis Work Plan, Lakeview Facility, 2800 104th Street Court South, Lakewood, Washington, VCP Identification No. SW1012"

Site Address: 2800 104th Street Court South, Tacoma, WA 98499
Facility/Site No. 1372
Cleanup Site No. 165
VCP Project No. SW1012

Dear Mr. Jurista:

The Washington State Department of Ecology (Ecology) received your September 25, 2017, *Sampling and Analysis Work Plan* (2017 Work Plan) for the Woodworth Lakeview Facility, located at 2800 104th Street Court South in Tacoma, Washington (the Site). The 2017 Work Plan was prepared by Farallon Consulting, Inc. (Farallon) on behalf of Woodworth Capital, Inc. (Woodworth) and describes the proposed scope of work to further characterize the nature and extent of chemicals of concern (COCs) in soil and groundwater beneath the Site. The intent of this transmittal is to provide Ecology's comments on the 2017 Work Plan as provided for under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Ecology Comments

Item 1: PCBs and PAHs as Constituents of Concern

In Ecology's letter to Farallon, dated May 25, 2017, Ecology requested additional soil testing of polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) in the areas of the Washington State Department of Transportation (WSDOT) asphalt-testing laboratory area, and adjacent features indicated as "asphalt plant", "tar tank", and "hot mix plant areas."

Despite Ecology's requests to collect these data, the 2017 Work Plan provided a "technical rationale that confirms PCBs and PAHs are not constituents of concern for the Lakeview Facility" and cited Footnote 15 from Table 830-1 of MTCA (Required Testing for Petroleum

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Releases), which states that *"testing for PCBs is required unless it can be demonstrated that...oil containing PCBs was never used in the equipment suspected as the source of the release."* No such definitive demonstration has been made regarding the historical use of PCB-containing oil at the Site to date. Additionally, the documented presence of PCBs in some asphalt sealants also constitutes a potential source of these constituents in shallow soil in areas where recycled asphalt was processed at the Site. To demonstrate such PCB-containing materials have not been historically handled at the Site, please provide appropriate analytical data, testing documentation, or facility records regarding these historically-managed materials.

Farallon also asserts that *"based on the operational history and sources of contamination limited to vehicle maintenance and releases of used motor oil, PCBs are not considered a constituent of concern for the Lakeview Facility."* Footnote 15 of Table 830-1 provides *"examples of equipment where PCBs are likely to be found"*, including *"electric motors"* and *"hydraulic systems"*; both of which have been historically housed and maintained at the Site. Additionally, in accordance with Table 830-1 (Footnote 8), testing of PCBs for waste oils (i.e. used motor oil), "is required in a sufficient number of samples to determine whether this chemical is present at concentrations of concern." This sampling has not been performed for PCBs at the Site, to date.

It should be noted that Footnote 8 also requires sampling of PAHs at sites where waste and used motor oils have been released. As noted in an e-mail from Ecology to Farallon (March 10, 2016), *"Ecology does not consider two samples being analyzed for cPAHs as adequate, let alone representative, of the areas investigated"* (i.e. a sufficient number of samples was not obtained). Only 2 of the 127 samples previously collected from AOCs 2 and 3 were submitted for PAH analysis; a number which Ecology does not consider representative given the size of the Site and location of potential source areas of this contaminant. Additionally, the soil sample located closest to the suspected source areas (asphalt plant, tar tank, and hot mix plant areas) revealed detections of PAHs (sample A2-B1W), whereas the sample located distal to those areas (sample A3-B2, located along the western edge of the property) did not detect concentrations of PAHs above their respective PQLs.

Based on the above information, and due to the PCB- and PAH-containing nature of substances historically handled at the Site (as distinct from use or documented releases of these constituents), Ecology continues to request soil testing for PCBs and PAHs in the areas previously described as required in Table 830-1 (and associated footnotes) of MTCA.

Ecology is not requesting analysis of PCBs and PAHs in groundwater beneath the Site at this time.

Based on the requirements described in MTCA and multiple requests from Ecology personnel, the 2017 Work Plan should be revised to include these analyses. This work plan will not receive Ecology-approval until these sampling elements have been included.

Item 2: Proposed Soil Investigation Activities

Ecology generally concurs of the scope of work presented in the 2017 Work Plan regarding AOCs 1 through 3, with the following exception:

- The current proposed depth (“*approximately 7 feet bgs*”) for sample collection associated with former location A1-7040710-6 (AOC-1), should be increased to account for the approximate depth of excavation within this area (approximately 8 feet below ground surface [bgs]). Soil samples obtained at this location should be collected from at least 9 feet bgs.

Item 3: Proposed Groundwater Monitoring and Sampling

Ecology is requesting that Section 3.2 of the 2017 Work Plan be revised to address or include the following:

- Section 3.2 of the 2017 Work Plan discusses analysis of volatile organic compounds (VOCs) for site monitoring and remediation wells; however, Table 1 (*Groundwater Sampling Matrix*) provides for analysis of halogenated VOCs, only. The 2017 Work Plan should be revised to include analysis of VOCs for all locations currently proposed for HVOC analysis;
- Addition of monitoring location MW-21 for sampling and analysis of VOCs and TPH to evaluate the western extent of dissolved-phase trichloroethylene (TCE) and potential presence of petroleum hydrocarbons adjacent to the diesel fuel above-ground storage tanks (ASTs), respectively, in deeper-groundwater;
- Addition of well locations AS-9 and AS-10 for sampling and analysis of VOCs to evaluate the current dissolved-phase TCE plume geometry in deeper groundwater beneath the Site;
- Addition of monitoring location MW-10B for analysis of VOCs to evaluate for potential upgradient, off-property sources of TCE; and
- Analysis of VOCs in deeper groundwater monitoring wells MW-9B and MW-12B, contingent upon detection of TCE in the groundwater samples collected from MW-23.

Item 4: Data Compilation and Reporting

Ecology is requesting that Section 4.0 of the 2017 Work Plan (*Data Compilation and Reporting*) be revised to include the attachment of copies of all boring logs, field forms, and laboratory analytical reports generated during completion of the activities proposed therein.

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Closing

Please note that requests for site-closure determinations (i.e. No Further Action) through the Voluntary Cleanup Program (VCP) are contingent upon compliance with requirements and directives provided through that Program.

As noted under Ecology's Reservation of Rights in the VCP Agreement "Ecology reserves all right under MTCA, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environmental and to issue order requiring such remedial actions."

Contact Information

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this transmittal, please contact me by phone at (360) 407-0276 or e-mail at jeremy.hughes@ecy.wa.gov.

Sincerely,



Jeremy Hughes, LG
SWRO Toxics Cleanup Program

JJH: lk

By Certified Mail:

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