



## E X T E R N A L     M E M O R A N D U M

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TO: Department of Ecology (Ecology)  
FROM: Scott Shock, P.E., Exponent  
DATE: June 18, 2018  
PROJECT: 1504026.001  
SUBJECT: Response to August 10, 2017 Ecology Review Comments Provided by Jeremy Hughes, VCP Site Manager, Toxics Cleanup Program, Southwest Regional Office, regarding the Draft Remedial Investigation Work Plan for Former WSDOT Potlatch Maintenance Facility, Skokomish, Washington, Ecology Cleanup Site #12397

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The “Draft Remedial Investigation Work Plan for Former WSDOT Potlatch Maintenance Facility, Skokomish, Washington, Ecology Cleanup Site #12397” (RI Work Plan) has been revised in response to review comments provided by the Washington State Department of Ecology (Ecology) in a letter dated August 10, 2017. In addition, significant changes were made to the RI Work Plan to expand the investigation area from one area of the Site (Area 1) to the entire Site (Areas 1-4). This memorandum provides responses to each of Ecology’s comments included in the August 10, 2017 letter.

### **Ecology Comment #1:**

*The Department of Ecology (Ecology) has reviewed the April 2016 Client Review Draft, Remedial Investigation Work Plan for Former WSDOT Potlatch Maintenance Facility, Skokomish, Washington (Draft RI Work Plan), submitted by Exponent on behalf of the Skokomish Tribe.*

### **Response:**

Exponent submitted an April 2016 Client Review Draft of the RI Work Plan to the Skokomish tribe for review. At some point thereafter, the Skokomish Tribe shared that draft with Ecology for initial input.

### **Ecology Call with Exponent August 7, 2017**

*Ecology spoke with Exponent personnel by phone on August 7, 2017 and discussed a number of items related to the Draft RI Work Plan, including:*

### **Ecology Comment #2:**

- *Clarification regarding the mis-numbered table titled "Proposed sampling depths and analytical methods" (listed in the Draft RI Work Plan as "Table 7 (cont.)");*

**Response:**

Table titles and numbering have been reviewed and updated as needed.

**Ecology Comment #3:**

- *Use of the term "Skoob fill" in reference to uncontrolled fill imported following the purchase of the property in 2003 from the Washington State Department of Transportation (WSDOT), as presented in the "Proposed Sampling Depths and Analytical Table" from the Draft RI Work Plan;*

**Response:**

This term refers to a reported source of fill material that was brought onto the Site from a 2005 "Skabob Creek" bridge construction project. The RI Work Plan has been updated to include this information.

**Ecology Comment #4:**

- *Whether "upgradient" groundwater samples within Area I will be proposed in a subsequent Draft RI Work Plan specific to Area 4 of the Site;*

**Response:**

The RI Work Plan has been updated to include the entire Site, Areas 1-4, and presents a comprehensive sampling plan for soil and groundwater.

**Ecology Comment #5:**

- *Numerous herbicide analyses for Site soil within Area I; and*

**Response:**

The RI Work Plan has been updated to include a list of herbicides that may have been stored at the Site and used by WSDOT crews, and the sampling plan includes analyses where appropriate to investigate the possible presence of herbicides.

**Ecology Comment #6:**

- *Ecology's request for non-conditional analysis of volatile organic compounds (VOCs) for groundwater samples associated with former USTs and maintenance shop drain lines (i.e. borings EX-B4, EX-B13, EX-B17, and EX-B20). Conditional analysis of groundwater samples from the remaining, proposed boring locations are acceptable to Ecology.*

**Response:**

Please note that boring identification numbers have been changed during the RI Work Plan revision process. Therefore, the boring numbers specified in the Ecology comment are not the same locations identified in the April 2016 draft. Groundwater samples will be collected and

analyzed for VOCs in these same areas, at the new sampling location numbers Skok-5, EX-B-2, EX-B-3, EX-B-4, and EX-B-5.

**Request for Additional Information and Modifications to the Draft RI Work Plan**

**Ecology Comment #7:**

*As a result of the above information, Ecology is requesting finalization of the Draft RI Work Plan to include:*

- 1. A correction of Table 4 to include all boring locations;*

**Response:**

Please note that table numbers have been changed during the RI Work Plan revision process. Table 4 is now Table 7, and includes a summary of all planned borings, stockpile, and well locations.

**Ecology Comment #8:**

- 2. Clarification of the use of the term "Skoob fill" within the body of text;*

**Response:**

Please see response to Ecology Comment #3.

**Ecology Comment #9:**

- 3. A discussion of subsequent remedial investigation work plans for up gradient areas ( ex. Area 4) of the Site;*

**Response:**

Please see response to Ecology Comment #4. The RI Work Plan now includes a discussion of investigation activities planned for Areas 2, 3, and 4, much of which is upgradient of Area 1.

**Ecology Comment #10:**

- 4. Revisions to Table 4, reflecting a more focused selection of soil samples for analysis of herbicides (i.e. areas in the immediate vicinity of the historical herbicide spill or previously uncharacterized regions within Area I); and*

**Response:**

Table 4 is now Table 7, and has been revised to include a more focused selection of soil samples targeted for herbicide analysis.

**Additional Comments:**

**Ecology Comment #11:**

- 5. Please ensure that all graphical representations of Site information are provided on appropriately-sized and intelligible figures in future hard-copy submittals. Draft RI Work*

*Plan figures, as presented, are difficult to interpret because of their small size and result in additional Ecology review time.*

**Response:**

This submittal includes two hard copies of the complete RI Work Plan, including figures that are appropriately-sized and intelligible. We will follow the same format for future hard-copy submittals.

**Ecology Comment #12:**

*6. For all future transmittals, please submit two **bound** hard copies and one electronic copy for future documents provided to Ecology for review per WAC 173-340-840 (General Submittal Requirements). To minimize the potential loss or misplacement of site documentation and information, large documents should not be submitted in loose-leaf format.*

**Response:**

This submittal adheres to Ecology's request, and future submittals will be made in the same format.

**Ecology Comment #13:**

*7. It does not appear that a Terrestrial Ecological Evaluation (TEE) has been performed for the Site.*

*Please prepare a TEE for Ecology review, including any supporting documentation, as appropriate. Additional information on completing this TEE can be found at <http://www.ecy.wa.gov/biblio/ecy090300.html>.*

**Response:**

A TEE has been completed for the Site and it is included as an appendix to the RI Work Plan.

**Ecology Comment #14:**

*8. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Remedial Actions shall be submitted simultaneously in both a written and electronic format. For additional information regarding electronic format requirements, see the website <http://www.ecy.wa.gov/eim>. Be advised that according to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered. Please ensure that data generated during on-site activities is submitted pursuant to this policy. **Data must be submitted to Ecology in this format for Ecology to issue a No Further Action determination; however, Ecology strongly recommends that data be submitted concurrently with submittal of each environmental report.** Please be sure to submit all soil and groundwater data collected to date, as well as any future data, in this format. Be advised that Ecology requires up to two weeks to process the data once they are received.*

**Response:**

Data will be submitted via EIM.

**Ecology Comment #15:**

*9. The Draft RI Work Plan was not sealed by a licensed professional. Please ensure that all documents submitted to Ecology for review containing geological and hydrogeological interpretations are done so under the seal of an appropriately licensed professional, as required by Chapters 18.43 and 18.220 RCW.*

**Response:**

The revised RI Work Plan is sealed by a licensed professional.

**Closing**

**Ecology Comment #16:**

*Please provide a revised, bound finalized version of the Draft RI Work Plan that addresses Ecology's comments as provided above. As previously indicated, these requests are not anticipated to significantly impact the performance or completion of the activities described in the Draft RI Work Plan.*

**Response:**

Two bound copies of the revised Draft RI Work plan addressing Ecology's comments as described above are submitted with this memorandum.