



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 19, 2018

Allison Geiselbrecht, Principal  
Floyd Snider  
601 Union Street, Suite 600  
Seattle, WA 98101

**RE: Ecology comments on Floyd Snider memorandum titled: “Initial Vapor Intrusion Assessment”**

- **Site Name:** Smith-Kem Ellensburg Inc.
- **Site Address:** 200 South Railroad Avenue, Ellensburg
- **FSID No.:** 12832256
- **CSID No.:** 4257
- **Agreed Order:** DE 12908

Dear Allison Geiselbrecht:

The Department of Ecology (Ecology) approves of the proposal that petroleum vapor intrusion (PVI) does not have to be evaluated immediately. However, the vapor intrusion assessment must occur within the next four months rather than the indefinite period as stated in the memorandum. The PVI assessment can be as simple as the collection of an air sample using a Summa canister within the crawl space area of the office building. To reduce the number of mobilizations, this sampling can be performed concurrent with other fieldwork that may have to be conducted. Petroleum compounds such as naphthalene, which could drive the PVI risk, must also be evaluated.

However, Ecology objects to the proposal to use an alternative PVI screening level that is based on a Method A soil cleanup level of 2,000 mg/Kg. The EPA screening value of 250 mg/kg is based on a large number of samples from different sites whereas the rationale Floyd Snider presented is largely based on the chromatograms and does not yield sufficient quantitative information. For instance, no data using fractionation methods to support the Total Petroleum Hydrocarbon chromatogram data was provided, which would allow Ecology to evaluate whether the alternative screening level is sufficiently protective of human health.



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Note that our concurrence regarding PVI assessment does not apply to other potential vapor intrusion concerns posed by non-petroleum hydrocarbons contaminants. Floyd Snider must still evaluate other contaminants of concern, either individually or additively, depending on such factors as their chemical properties, their concentration within a particular medium, and proximity to a current or future receptor.

Sincerely,



John Mefford  
Cleanup Project Manager  
Central Region Office  
Toxics Cleanup Program

JM:rl

cc: Koalani Kaulukukui, Assistant Attorney General  
Andrew King, Foster Pepper PLLC  
Andrea Wing, Shell Oil Products US