



Electronic Copy

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300  
Call 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 3, 2018

Estate of Sophie Sussman  
Portland Avenue Associates, LLC  
Attn: Mr. Loren R. Dunn  
Beverage & Diamond PC  
600 University Street, Suite 1601  
Seattle, WA 98101-3109

**Re: Department of Ecology comments on Revised *Draft Remedial Investigation and Feasibility Study*, prepared for the Estate of Sophie Sussman by Aspect Consulting, dated June 22, 2018**

- **Site Name:** Former Tacoma Metals
- **Site Address:** 1919 Portland Avenue, Tacoma, Pierce County, WA 98421-2804
- **Agreed Order:** DE 97-5435
- **Facility/Site No.** 1257
- **Cleanup Site ID No.** 3910

Dear Mr. Dunn:

As you are aware, I am the new site manager for this project. I have reviewed the draft remedial investigation/feasibility study (RI/FS) and other documents for this site and have the following additional comments related to the completion of the RI/FS. These items will need to be addressed prior to finalization of the RI/FS and the ability to move forward with the final cleanup for this site.

1. There are soils that are impacted with total petroleum hydrocarbons (TPH) as diesel- and oil-range organics (DRO/ORO), total carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and/or total Naphthalenes at depths between 20 ft and 32 ft that exceed the respective cleanup levels for these contaminants within the on- and off-property areas of the site. It appears these soils are impacting the groundwater beneath the site. Develop and evaluate alternatives in the FS to address these contaminants at depth and incorporate into the selected remedy.
2. The groundwater beneath the site in the area of the E 18<sup>th</sup> ST right-of-way and the International Paper Property is impacted by DRO/ORO, total cPAHs and total Naphthalenes. Develop and evaluate alternatives in the FS to address these contaminants and incorporate into the selected remedy.
3. The RI/FS is proposing wells along the northeastern boundary of the site as conditional point of compliance (CPOC) to demonstrate that the impacted groundwater is not

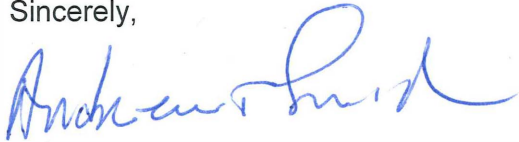
Mr. Loren R. Dunn  
December 3, 2018  
Page 2

migrating off site and impacting the river. It will be difficult to determine if impacted groundwater is not migrating off site and impacting the river because the groundwater in these wells is already impacted with contaminants above the cleanup levels. Please evaluate and propose alternative CPOCs for this site.

4. The soil beneath the former 450,000 gallon above ground storage tank (AST) and northeast of that area (riverward) does not appear to be characterized. Characterize the soils in this area to a depth of at least 32 feet to determine if this area needs to be addressed in the FS.

If you have any questions, please contact me at (360) 407-6316

Sincerely,



Andrew Smith, PE, LHG  
Unit Supervisor  
UST/Technical Support Unit  
Toxics Cleanup Program  
Southwest Regional Office

By certified mail: 9489 0090 0027 6066 6793 09

cc : (Via Electronic Mail)  
Peter S. Bannister, Aspect Consulting  
Mary Henley, City of Tacoma Environmental Services Department  
Bill Hengemihle, Managing Director, LECG, LLC  
Brenda Anderson, CHMM, Schnitzer Steel Industries  
Paul E. Kalina, P.E., AECOM  
Mark Meyers, Attorney for General Metals  
John Cermiak, Jr., Baker Hostetler  
Clark Davis, Attorney for Tacoma Metals  
Rod Rennie, Dept. of Natural Resources  
Rich Scrivner, Dept. of Natural Resources  
Matt Dalton, LG/LHG, Dalton, Olmsted & Fuglevand, Inc.  
Phil Slowiak, Senior Project Manager, EHS, International Paper Company  
John Level, Attorney General's Office  
Rebecca Lawson, Ecology  
Ecology Site File