



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Technical Memorandum

TO: Mark Roman – Envision Environmental, Inc.
11 Sleepy Hollow Court
Allentown, New Jersey 08501

FROM: Jason G. Cook, LG, Hydrogeologist 3, Washington State Department of Ecology (Ecology)

DATE: July 24, 2019

SUBJECT: Ecology comments regarding the below-referenced document.

Name of Document	Remedial Investigation Report – Indoor Air Sampling (June 2019)
Owner	Ball Corporation (Ball)
Prepared By	Envision Environmental, Inc. (Envision)
Reviewed By	Jason G. Cook, LG

The Department of Ecology (Ecology) has reviewed the *Remedial Investigation Report – Indoor Air Quality Sampling Ball Corporation* (Envision, June 2019). The contents and opinions within this memo are specifically focused on the above-referenced report.

Ecology has the following comments regarding the above-referenced document:

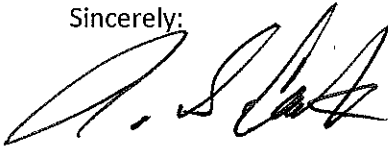
- Benzene was detected in soil gas and indoor air (IA) above the respective screening levels and MTCA IA Cleanup Levels (CULs). Please elaborate on the presumption that the contaminant concentration ratios of IA and in soil-gas deem the IA impacts from Benzene to be attributed to above-ground, non-point sources (pp. 15, Envision June 2018).
- Ecology does not concur with the development of CULs protective of indoor air, as the Site is not completely characterized. Establishing Cleanup Standards is premature at this time. Additionally, Envision indicated that IA is not impacted from the subsurface release, therefore the establishment of CULs protective of IA is not justified. Ecology requests the use of MTCA Method C CULs (cancer) for impacted soil and groundwater for all previously identified contaminants of concern (CoCs)¹. After the Site is completely characterized, Cleanup Standards (CULs and Points of Compliance [POCs]), can be established.

¹ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC/Data-tables>

- As mentioned previously, the Site is not completely characterized. Provide an additional updated time line as to when the Site will be characterized. Characterization and subsequent cleanup must be performed within a reasonable time frame. The Site has been in the Ecology State Voluntary Cleanup Program since 2002. If characterization activities continue to be unresolved, this Site is better-suited under the Ecology formal cleanup program.

Please contact me at 360.407.6834 or email at asco461@ECY.wa.gov if you have any questions or are in need of clarification.

Sincerely:

A handwritten signature in black ink, appearing to read 'J.G. Cook', written in a cursive style.

J.G. Cook, LG
Hydrogeologist 3
Washington Department of Ecology
Headquarters – Toxics Cleanup Program

cc: Adam Musulin – Ball Corporation