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PMX No. 235-1577-024 (04/04)

Steve Teel, LHG
Department of Ecology
Toxics Cleanup Program
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Re: Ecology Comments to Parametrix memorandum titled "Draft Approaches to Address Outstanding RI/FS Issues, Solid Wood Inc. Site", dated September 29, 2010

Dear Steve:

Thank you for your comments regarding the Parametrix memorandum referenced above. The City's responses are provided below. The comments are also provided in italics for your reference.

General Comment

Please prepare a Data Gap Work Plan to incorporate the following comments and then resubmit it for our review within 30 days of the date of this letter.

Response

Additional project information has been developed since the "Approaches" memorandum was submitted in September 2010. This information, which sheds light on data gaps addressed in comments 4, 5, and 6 below, is reported in the 7th and 8th quarter groundwater monitoring technical memoranda. The City requests that development of a Data Gap Work Plan be postponed until Ecology reviews and comments on the 7th and 8th quarter technical memoranda.

Comment

1. *Data Gap/Issue – Retesting SD-29 and -30 for bioassay and Total Petroleum Hydrocarbons (TPH): Ecology agrees with the approach of sampling Area 2 if either SD-29 or -30 fail bioassay.*

Response

Acknowledged.

Comment

2. Data Gap/Issue – Exceedance of TPH Criteria, SD-23 and -24: Ecology disagrees with the use of threshold criteria as proposed in the memo. It is inappropriate to establish threshold criteria until the results of the retesting of SD-29 and -30 have been received.

Response

The City acknowledges that the results for SD-29 and SD-30 will provide additional data that will be used to refine the threshold criteria evaluation.

Comment

3. Data Gap/Issue – Exceedance of TPH Criteria, Reporting Limits for SD-19 and -20.

Response

Please see response to comment 2.

Comment

4. Data Gap/Issue – Copper and Nickel in Groundwater: Ecology agrees with the continuation of quarterly groundwater monitoring in wells MW-8 through -10. However, additional groundwater monitoring wells are needed to evaluate background metals concentrations. Sampling of Seeps 4 and 5 shall also continue on a quarterly basis.

Response

As reported in the 7th and 8th quarter technical memoranda, marine water in West Bay was sampled to assess for background metals. Copper and nickel were detected at significant concentrations in the marine water samples during both quarters. The data indicates that the source of the copper and nickel in groundwater is the adjacent marine surface water. This is due to tidal water mixing with groundwater in the near-shore aquifer. It is the City's opinion that continued monitoring for metals should no longer be required.

Comment

5. Data Gap/Issue – SB-4 Area Groundwater: Ecology agrees that groundwater monitoring for TPH, benzene, toluene, ethylbenzene, and total xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs), and lead may be discontinued at wells MW-2, -3, and -4 since these compounds have never exceeded screening levels. The groundwater sample results from direct push boring SB-4 do not appear to be representative of groundwater (probably due to suspended sediment). However, wells MW-2, -3 and -4 should not be decommissioned yet because they may be useful for sampling to determine background metals concentrations.

Response

The City acknowledges that groundwater monitoring may be discontinued for the listed constituents. Regarding background metals, please refer to the response to comment 4 above.

Comment

6. *Data Gap/Issue – Area A Groundwater: Ecology agrees that groundwater monitoring for TPH, BTEX, PAHs, and lead may be discontinued at wells MW-1, and -5 through -7 since these compounds have never exceeded screening levels. However, these wells should not be decommissioned yet because they may be useful for sampling to determine background metals concentrations.*

Response

The City acknowledges that groundwater monitoring may be discontinued for the listed constituents. Regarding background metals, please refer to the response to comment 4 above.

Comment

7. *Shallow Soils Along Entire Rail Spur Alignment: Ecology disagrees that no further soil samples for PAHs need to be collected to characterize contamination from the rail spur. The extent of carcinogenic PAH contamination needs to be determined from the results of soil samples and not just assumed. Therefore, additional soil samples are needed to define the extent of contamination at each location that exceeds the screening level. Please include in the work plan a map summarizing previous PAH soil sample locations in the portion of the Site that was not addressed as part of the Interim Action.*

Response

RI sampling to date has indicated that the source of the PAHs along the rail spur alignment is creosote leaching from the creosote-treated rails ties. The apparent contaminant transport mechanism is infiltrating stormwater. Since the ties are buried at grade in permeable gravelly soils, it is reasonable to assume that the stormwater infiltrates rapidly and that the horizontal extent of the creosote contamination is limited to within a few feet horizontally of the ties. In cleanup Area C during the Interim Action, the City capped the spur alignment using a combination of vegetated soil and asphalt. That cap extends five feet beyond the outside edge of the ties and is a minimum of 20-feet wide. In future development of the rail spur, it is anticipated that the City will take the same approach.

Comment

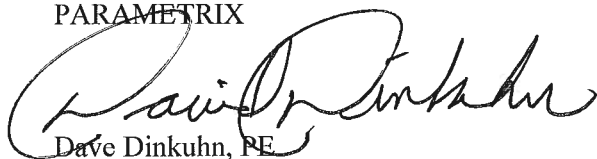
8. *Please include in the Data Gap Work Plan the locations of proposed samples previously identified in the Work Plan for Remedial Investigation/Feasibility Study and Interim Action.*

Response

All samples proposed in the work plan have been collected and analyzed.

Sincerely,

PARAMETRIX



Dave Dinkuhn, PE
Engineer IV

DD:cb