

March 20, 2020

Mr. Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Washington State Department of Ecology
Southwest Regional Office
PO Box 47775
Olympia, Washington 98504-7775

steve.teel@ecy.wa.gov

Subject: Data Gaps Work Plan, Response to Comments

Taylor Way and Alexander Avenue Fill Area (TWAIFA) Site
Draft Agreed Order 14260
Tacoma, Washington

Dear Mr. Teel,

Dalton, Olmsted, and Fuglevand (DOF) has prepared this response to comments on behalf of Glenn Springs Holdings, Inc. (Occidental Chemical), the Port of Tacoma, General Metals of Tacoma (GMT), and Stericycle Environmental Solutions, Inc. (Stericycle). These parties are among those potentially liable parties (each a “PLP”, collectively, the “PLPs”) identified in the draft Agreed Order Number 14260 proposed by the Washington State Department of Ecology (Ecology). This letter addresses comments on the January 2019 Revised Data Gaps Work Plan (Work Plan), received by the PLPs on January 8, 2020 from Ecology.

The parties met with Ecology on January 9, 2020 and discussed Ecology’s comments. The parties later met for a site walk of the CleanCare property on February 21, 2020. This letter describes the proposed approach to addressing Ecology’s comments and seeks concurrence from Ecology prior to preparing the fully revised Work Plan.

Comments 1, 2, and 6c are accepted.

Regarding Comment 3 – The group understands that Ecology expects all samples analyzed for NWTPH-Dx to be analyzed *without* silica gel cleanup procedures and that the group may additionally analyze samples *with* silica gel cleanup procedures and/or total and dissolved organic carbon to support potential future use of silica gel cleanup as part of diesel/oil range analyses during future groundwater monitoring events.

Regarding Comments 4, 5, and 6b – The group understands that Ecology wants the RI for the TWAIFA site to be mindful of the different uses, contaminant levels, and potential remedial options for the different parcels within the site. Considering Ecology’s recent comments and discussion with the group, we propose to revise the Work Plan proposed tasks in Section 5.2 to clarify the vapor intrusion evaluation process to be followed for the CleanCare property. Ecology has requested a Tier 2 Vapor Intrusion Assessment Work Plan for the CleanCare property portion of the TWAIFA site as an initial task to be conducted upon signing of the Agreed Order.

Under Ecology’s Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action five steps are outlined to address the potential for vapor intrusion, acknowledging that not all steps are warranted at all sites.

- Preliminary Assessment

- Tier I Assessment
- Tier II Assessment
- Mitigation
- Cleanup

As stated in the guidance *“the goal of the preliminary assessment is to quickly identify whether the potential for vapor intrusion exists at a specific site, and if it does, which buildings may be affected.”* Based on the information gathered in preparation of the Data Gaps Investigation Work Plan, the preliminary assessment at the CleanCare property indicates that concentrations, at least historically, were at levels that indicate the potential exists for vapor intrusion at the CleanCare property. Following the guidance *“If the preliminary assessment concludes that there are toxic, volatile hazardous substances at the site and the contamination is either a) close to one or more currently occupied buildings, or b) close to an area where a building could be constructed in the future, investigators will need to continue to assess the pathway.”* The next step is typically a Tier I Assessment.

The February CleanCare property site walk allowed the technical team to begin evaluating the second part of this preliminary assessment with regards to existing buildings. While the future use of the existing buildings is uncertain, the potential for future buildings to be constructed certainly exists. The group acknowledges that the RI must therefore consider the vapor intrusion pathway.

The Tier I assessment generally involves measuring contaminant concentrations in groundwater and/or soil gas areas where buildings exist (or could exist in the future) and considers the nature and extent of contaminants that pose or may pose a risk for localized vapor intrusion. This objective is consistent with shallow groundwater data collection to be performed under the Data Gaps Work Plan. This data will be screened against levels protective of indoor air. Historical results for shallow groundwater include detections above screening levels protective of indoor air; however, no recent data have been collected on the CleanCare property.

The Tier 2 assessment stage is intended to answer the question *“is volatile contamination in the subsurface unacceptably contaminating this particular building’s indoor air”*. Ecology’s guidance for this work states: *“When Tier I screening fails to lead to a VI assessment off-ramp, the next steps are dictated by whether the building of concern currently exists. If no buildings currently exist, the assessment phase ends with completion of Tier I. A Tier II assessment cannot be performed unless (or until) there is a building present.”*

The group understands Ecology’s wish to answer this question as part of the RI; however, none of the buildings that currently exist at the CleanCare property are in use, and are unlikely to be used in their current condition. The February site walk confirmed that several of the buildings appear structurally sound and we understand that therefore the current conditions do not necessitate the County immediately demolish the structures. However, utilities have been severed and stripped, windows and doors are broken or missing, interior walls and finished surfaces are in poor and/or damaged condition, and abundant debris is present inside some areas. Thus, future use of the existing structures is anticipated to require at least some level of building modification. During the February site walk the county engineer explained that the cost of improvements drives requirements to comply with the current building code. The costs to

re-wire and provide electrical service alone are likely to exceed that threshold. Among other things, current code requirements would require insulation, fire protection systems and more. Ultimately a future property user is likely to deem it most economical to demolish existing structures and rebuild.

Given that the most likely future uses will require building demolition or heavy modification and preliminary data review indicate a Tier I assessment would confirm a need for a Tier 2 evaluation of building use, we agree that future structure use will require consideration of the vapor intrusion pathway. Based on the Data Gaps work completed to date, the current conceptual model of the site assumes that the vapor intrusion pathway is complete at the CleanCare property for any buildings that may be used or constructed. Therefore vapor intrusion should be considered in the Feasibility Study as part of cleanup planning, or sooner, if development is imminent by the County or another party. Risk could be assessed in cooperation with the entity planning development to more appropriately design assessment of exposure for the planned use. We hope this conservative assumption expedites the RI process and will only be better informed by the groundwater data collection already planned for under the Data Gaps Plan.

We recognize that conducting a Tier 2 evaluation of existing structures could allow for more immediate use of the property, assuming the scenario where particular buildings will be used without modification. However, prior to preparing and implementing a Tier 2 Work Plan the group requests that the first step would be to identify a potential user of the building(s) and determine the proposed use of the building(s), along with evaluating current conditions via groundwater sampling. Mitigation and Cleanup steps would be considered as part of post-RI work, as described in Ecology's guidance.

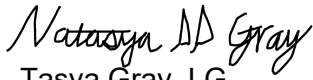
To reiterate, the group recognizes the importance of the RI task of performing an assessment of the risk of vapor intrusion at the site and understands that Ecology views the presence of waste materials buried at the site as posing a potential risk to vapor intrusion in structures at the site for future use. The group agrees and will include this information in the Revised Data Gaps Work Plan and statements regarding the current conceptual site model assumptions that vapor intrusion is a potential risk and should be considered during cleanup planning and in any interim proposed property use. This way a Tier 2 assessment can be done in cooperation with the owner or potential users of the parcels within the site so that Tier 2 sampling can be implemented with use or intended use of the existing and new buildings considered.

Regarding Comment 6a – The work plan section regarding schedule will be revised; however, the group requests that instead of requiring initial tasks to be conducted within 30 days of the effective date of the Agreed Order, we request the timing to be 90 days to allow for the necessary coordination of budget authorizations for each of the PLPs. The Port of Tacoma must have the appropriate time to schedule review of the final work plans by the Port Commission in order to obtain approval of funding to perform required work for the TWAFA site.

We hope this letter clarifies remaining questions on the Work Plan and we may proceed with submission of the Revised Data Gaps Work Plan upon hearing from you.

Page 4

Thank you,



Tasya Gray, LG
Principal Geologist
DOF

cc: Brenda Meehan, Schnitzer Steel Industries, Inc.
Clint Babcock, Glenn Springs Holdings, Inc.
Greg Fink, Stericycle Environmental Solutions
Scott Hooton, Port of Tacoma
Rob Healy, Port of Tacoma