



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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April 06, 2020

Tasya Gray, LG
DOF Dalton, Olmsted & Fuglevand
1001 SW Klickitat Way, Suite 200B
Seattle, WA 98134
ngray@dofnw.com

Re: Comments on Dalton Olmsted Fuglevand (DOF) Response Letter

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAFA)
- **Site Address:** 1500 Block Taylor Way E, Tacoma, Pierce County, WA
- **Draft Agreed Order:** DE 14260
- **Facility/Site ID:** 1403183
- **Cleanup Site ID:** 4692

Dear Tasya Gray:

Thank you for submitting your response letter¹ (response) regarding our previous comment letter² on the revised work plan³ for the Site. Below are our comments based on your response:

1. Thank you for incorporating Comments 1, 2, and 6c and your acknowledgement of Comment 3.
2. Response to Comments 4, 5, and 6b:
 - a. Thank you for acknowledging that the remedial investigation (RI) must consider the vapor intrusion (VI) pathway. However, Ecology does not agree with the statement that the task of collecting shallow groundwater data and comparing it to VI screening levels will fulfill an adequate Tier I VI assessment for Site.

¹ *Data Gaps Work Plan, Response to Comments.* Letter from Tasya Gray, Dalton Olmsted Fuglevand (DOF), to Steve Teel, Washington State Department of Ecology (Ecology), dated March 20, 2020.

² *Comments on the Revised Data Gaps Work Plan, dated January 29, 2019, prepared by Dalton Olmsted Fuglevand (DOF).* Letter from Steve Teel, Ecology, to Tasya Gray, DOF, dated January 8, 2020.

³ *Revised Data Gaps Work Plan.* Prepared by DOF, dated January 29, 2019.

The Tier I VI assessment in the RI work plan shall also include sub-slab samples beneath Buildings 1 through 5 and soil vapor samples in areas where buildings could exist in the future and where there is the potential presence of vadose zone contamination.

The potential for preferential pathways to affect VI also needs to be investigated (such as the sumps that were observed within the buildings and the oily water sewer system). A Tier I VI work plan shall be prepared as part of the initial tasks and submitted to Ecology within 30 days of the effective date of the Agreed Order.

The VI work plan shall be implemented within 30 days of Ecology's approval. The data from this assessment will be used in the Feasibility Study (FS) to evaluate cleanup options. Ecology appreciates your acknowledgement that "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."

- b. As stated in Chapter 6 of Ecology's VI guidance,⁴ VI mitigation is a supplemental or short-term solution. Ecology does not expect mitigation systems to attain any VI-based media cleanup levels. If subsurface media contamination presents a threat to human health from the VI pathway then cleanup levels will need to be established and remediation alternatives (beyond mitigation), capable of attaining the cleanup levels, must be evaluated in the FS.
 - c. Based on the current conditions of the buildings at the Site, as mentioned in your letter (windows and doors are broken or missing, interior walls and finished surfaces are in poor and/or damaged condition), Ecology agrees that it is not necessary to perform a Tier II VI assessment at this time.
3. Response to Comment 6a: Ecology does not agree with the request to change the schedule for initial tasks from "within 30 days of the effective date of the Agreed Order" to "90 days." The original schedule provides adequate time for budget authorizations since this type of administrative approval and coordination can begin well in advance of the effective date of the Agreed Order.
 4. Ecology Comments 7 through 12: The response does not mention these comments. Please indicate if these comments are accepted and will be incorporated.

⁴ *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action*. Publication No. 09-09-047, Washington State Department of Ecology, October 2009 Review Draft.

Contact Information

If you have any questions, please contact me at (360) 407-6247 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
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