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DEPARTMENT OF ECOLOGY  
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May 11, 2020

Scott Hooton  
Port of Tacoma  
PO Box 1837  
Tacoma, WA 98401-1837  
[shooton@portoftacoma.com](mailto:shooton@portoftacoma.com)

**Re: Response to Port of Tacoma, Informal Dispute Notice**

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAIFA)
- **Site Address:** 1514 Taylor Way E, Tacoma, Pierce County, WA 98409
- **Facility/Site ID:** 1403183
- **Cleanup Site ID:** 4692
- **Agreed Order No.:** DE13921

Dear Scott Hooton:

The Washington State Department of Ecology (Ecology) has reviewed the April 29, 2020, response and Informal Dispute Notice (Notice)<sup>1</sup> by the Port of Tacoma (Port) to Ecology's April 16, 2020, comment letter<sup>2</sup>. The Informal Dispute Notice process is described in Section VIII.H of the Agreed Order.

As per Section VIII.H.b, the parties (Ecology and the Port) "shall informally confer for up to fourteen (14) calendar days from receipt of the receipt of the Informal Dispute Notice." The Notice was received by Ecology on April 29, 2020. **Ecology has the following comments on the Notice and it is Ecology's belief that the response below will resolve the dispute:**

1. **Notice Response to Ecology Comment 1A:** The Port disagreed with Ecology's comment that further assessment and/or mitigation of methane concentrations is needed beneath the buildings. Based on the explanation provided in the Notice, the Port believes that the requirement to assess methane hazard has been satisfied and no further actions are needed.

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<sup>1</sup> Agreed Order No. DE 13921, 1514 Taylor Way E, Tacoma, Pierce County WA, April 16<sup>th</sup>, 2020 Comments on Post-Construction Vapor Intrusion Assessment. Letter from Scott Hooton, Port of Tacoma, to Steve Teel, Ecology, dated April 29, 2020.

<sup>2</sup> Comments on Post-Construction Vapor Intrusion Assessment. Letter from Steve Teel, Ecology to Scott Hooton, Port of Tacoma, dated April 16, 2020.

The key points in the Ports explanation are:

- a. There is only a relatively small volume of methane gas present because few measured probes showed methane concentrations above 5% and the maximum is less than 30%. A single, isolated hot spot of 5 to 30% methane is unlikely to result in an indoor air concern. Also, “no detectable methane was noted by the gas meter in the building air at the time the sub-slab survey field measurements were conducted.”
- b. Differential pressure measurements are “about three orders-of-magnitude” lower than the 500 Pascals (Pa) differential pressure criteria (ASTM 2016),<sup>3</sup> so there is no pressure gradient to drive gas from below the floor slab into the building.
- c. Additional data were presented from a resampling of the vapor probes on April 22, 2020, to further assess methane concentrations. Measurements were collected from 11 locations (three locations were not accessible).

Ecology has reviewed the April 2020 data and has the following conclusions:

- A total of 10 out of 11 locations showed either zero, equal, or lower concentrations compared to the previous sampling event (January 13, 2020).
- The location that previously showed the highest methane concentration in January 2020 (VP-8, 27.2%) decreased to a concentration of 19.4% on April 22, 2020.
- Only one location showed an increase in concentration (VP-14, increased from 0.1% to 1.5%).

**Ecology agrees that, based on the explanation and additional data provided by the Port, no further assessment or mitigation of methane is required.** Ecology’s primary concern regarding methane concentrations was the caution from ASTM (2016) that any capping of the ground surface can impede the natural venting of soil gas and result in an increase in methane concentrations.

Observed methane concentrations had increased from the pre-construction initial measurements in 2016 and 2018 (1.4% maximum)<sup>4</sup> to a maximum of 27.2% in January 2020. However, the additional methane measurements collected in April 2020 and the additional mitigation work performed by Avenue 55 (discussed below) is sufficient to alleviate this concern.

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<sup>3</sup> *Standard Guide for Evaluating Potential Hazard as a Result of Methane in the Vadose Zone*. E2993-16, ASTM International, 2016.

<sup>4</sup> *Summary of Soil Vapor Survey Data and Vapor Mitigation Plan for the 1514 Taylor Way Site*. Prepared by Floyd|Snider, dated June 8, 2018.

- 2. Notice Response to Ecology Comment 1B:** To reduce the potential for chloroform vapor intrusion, Ecology required the following actions to be performed:
- a. The open penetrations shall be sealed around each of the fire supply lines in Buildings A and B.
  - b. Sealant shall be placed within the wide expansion joint in Building A.

The Notice stated that although the Port disagreed with Ecology's suggestion that there could be a potential for chloroform vapor intrusion, Avenue 55 has proceeded to seal the open penetrations around the fire supply lines in both buildings and the wide expansion joint in Building A. A description of the methods and materials used for this work was also provided by the Port in the Notice. **Ecology appreciates the Port's and Avenue 55's cooperation in performing this mitigation work.**

- 3. Notice Responses to Comments 2, 3, 4, and 5:** The Port agreed to incorporate Ecology's comments. Thank you for your cooperation.

Please provide the revised Interim Action Completion report **within 30 days** of the date of this letter as required by Exhibit C of the Agreed Order.

If you have any questions about this letter, please contact me at (360) 407-6247 or [steve.teel@ecy.wa.gov](mailto:steve.teel@ecy.wa.gov).

Sincerely,



Steve Teel, LHG  
Toxics Cleanup Program  
Southwest Regional Office

SST/tam

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