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June 19, 2020

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

Re: Comments on the *Final Data Gaps Work Plan*, dated June 2020, prepared by Dalton, Olmsted, & Fuglevand (DOF).

- **Site Name:** Taylor Way and Alexander Avenue Fill Area (TWAAFA)
- **Site Address:** 1500 Block Taylor Way E, Tacoma, Pierce County, WA
- **Draft Agreed Order:** DE 14260
- **Facility/Site No.** 1403183
- **Cleanup Site ID No.** 4692

Dear Tasya Gray:

Thank you for submitting the above-referenced work plan for the Department of Ecology's (Ecology) review. Below are our comments:

1. Please remove "Final" from the title of the work plan and from the titles of Appendices K and M. The document will not be "final" until the conclusion of the public comment period and a determination has been made that no comments were received that require changes to the work plan.
2. Appendix L, Revised Ground Water Monitoring Plan: As noted in our previous comment letters,¹ Stericycle wells CTMW-23 and PZ-4 need to be replaced since they were damaged during construction activities and had to be decommissioned. These wells are considered to be part of the monitoring network for the Site and their replacement shall be included in the work plan. We recognize that the 2019, Stericycle Groundwater Monitoring Plan² did not include these wells. However, the omission of these wells was not intended by Ecology.

¹ See comment EE of Ecology's August 3, 2018 comment letter on the Data Gaps Work Plan Response to Comments and comment 11b of Ecology's January 8, 2020 comment letter on the Revised Data Gaps Work Plan.

² *Groundwater Monitoring Plan, PSC Tacoma Facility, Tacoma Washington*. Prepared by DOF, dated November 2019.

It is, and has been Ecology's expectation since 2016, that these wells be replaced. Ecology's expectation for these wells to be replaced was also previously understood by Stericycle. Both of Stericycle's requests to abandon these wells in 2016, agreed that these wells would be replaced.³ Ecology's requirement that these wells be reinstalled was also communicated in a 2016, email.⁴ These wells shall be initially sampled for the same constituents of concern as the other Stericycle wells.

3. Appendix M, Soil Vapor Sampling and Analysis Plan:

- a. As per Ecology's petroleum vapor intrusion (VI) guidance (IM-18),⁵ please add the following constituents to the soil vapor sample constituent list:
 - Petroleum equivalent carbon (EC) fractions: EC5-8 (aliphatics), EC9-12 (aliphatics), and EC9-10 (aromatics). As noted in IM-18, these carbon fractions should be analyzed using the Massachusetts DEP Air Phase Hydrocarbon (APH) Test Methods WSC-CAM-IX⁶ rather than a bulk analysis of gasoline or diesel range total petroleum hydrocarbons.
 - Naphthalene
- b. Add the screening levels for the above constituents to Table 1.
- c. Add the trichloroethylene (TCE) subsurface screening levels for short-term exposure from Ecology's TCE short-term toxicity guidance (IM-22).⁷
- d. Add that differential pressure will be measured with the field methane monitoring instrument at all locations that show methane concentrations above 5% as per ASTM (2016).⁸

In order to meet the Agreed Order signature and/or confirmation deadline⁹ it is required that the revised work plan be submitted to Ecology by **July 20, 2020**.

³ Re: Revised Request to Abandon Monitoring Well CTMW-23, Tacoma Facility, Burlington Environmental LLC; a wholly-owned subsidiary of PSC Environmental Services, LLC, a wholly-owned subsidiary of Stericycle Environmental Solutions, Inc., Letter from William Beck, Stericycle, to Kaia Petersen, Ecology, dated April 7, 2016; and, Re: Request to Abandon Piezometer PZ-4, Tacoma Facility, Burlington Environmental LLC; a wholly-owned subsidiary of PSC Environmental Services, LLC, a wholly-owned subsidiary of Stericycle Environmental Solutions, Inc., Letter from William Beck, Stericycle, to Kaia Petersen, Ecology, dated May 25, 2016.

⁴ Re: Tacoma Facility, PZ-4 Abandonment Request. Email from Kaia Petersen, Ecology, to William Beck, Stericycle, dated May 25, 2016.

⁵ Petroleum Vapor Intrusion (PVI): Updated Screening Levels, Cleanup Levels, and Assessing PVI Threats to Future Buildings. Washington State Department of Ecology, Implementation Memorandum No. 18, January 10, 2018.

⁶ Available at: <https://www.mass.gov/guides/compendium-of-analytical-methods-cam#-air-sampling-methods->

⁷ See Table 2, in: Vapor Intrusion (VI) Investigations and Short-Term Trichloroethene (TCE) Toxicity. Washington State Department of Ecology, Implementation Memorandum No. 22, Publication No. 18-09-047, October 1, 2019.

⁸ Standard Guide for Evaluating Potential Hazard as a Result of Methane in the Vadose Zone. E2993-16, ASTM International, 2016.

⁹ Re: TWAAFA Site—PLP Group's Proposed Revisions to Draft Agreed Order. Email from Gabrielle Gurian, Assistant Attorney General, Ecology Division, to Kimberly Seely, Coastline Law Group PLLC, dated June 17, 2020.

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
Toxics Cleanup Program
Southwest Regional Office

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