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STATE OF WASHINGTON

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July 08, 2020

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

Re: Groundwater Monitoring Well Replacement

- 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 your email summary of historical information for wells CTMW-23 and PZ-4 and your request for additional clarification on why the reinstallation of these wells is necessary for groundwater monitoring at the Site.¹ Your email was in response to the Department of Ecology's (Ecology) June 19, 2020, comment letter on the Data Gaps Work Plan.² Below are our comments:

- 1. Ecology agrees that the reinstallation of PZ-4 will not be necessary at this time since it was only used for water-level monitoring in the past.
- 2. Reinstallation of CTWM-23 is particularly necessary to monitor concentrations of chlorinated volatile organic compounds (for example vinyl chloride) that exceeded screening levels (MTCA Method A) during the last monitoring event in

¹ Re: *Data Gaps Work Plan Comment Letter*. Email from Tasya Gray, Dalton Olmsted Fuglevand (DOF), to Steve Teel, Washington State Department of Ecology (Ecology), dated July 1, 2020.

² Comments on the Final Data Gaps Work Plan, dated June 2020, prepared by Dalton Olmsted Fuglevand (DOF). Letter from Steve Teel, Ecology, to Tasya Gray, DOF, dated June 19, 2020.

2015. The specific location of this well is also important for the Resource Conservation and Recovery Act (RCRA) groundwater monitoring program for the Stericycle facility.

The above comments were also previously submitted via email on July 1, 2020.³ In order to meet the Agreed Order signature and/or confirmation deadline it is required that the revised work plan be submitted to Ecology by **July 20, 2020**.⁴ If you have any questions, please contact me at (360) 407-6247 or <u>steve.teel@ecy.wa.gov</u>.

Sincerely,

SSTER

Steve Teel, LHG Cleanup Project Manager/Hydrogeologist Toxics Cleanup Program Southwest Regional Office

Clint Babcock, Glenn Springs Holdings Clint_Babcock@oxy.com cc by email: Robert F. Bakemeier, Bakemeier, P.C. rfb@rfblaw.com Greg Fink, Stericycle Greg.Fink@STERICYCLE.com Robert Healy, Port of Tacoma rhealy@portoftacoma.com Scott Hooton, Port of Tacoma shooton@portoftacoma.com Brenda Meehan, Schnitzer Steel bmeehan@schn.com Mark M. Myers, Williams Kastner MMyers@williamskastner.com Marlys S. Palumbo, VanNess Feldman LLP msp@vnf.com Kim Seely, Coastline Law Group PLLC kseely@coastlinelaw.com Gabrielle Gurian, Office of the Attorney General, gabrielle.gurian@atg.wa.gov Rebecca S. Lawson, Ecology, rebecca.lawson@ecy.wa.gov Marian Abbett, Ecology, marina.abbett@ecy.wa.gov Nick Acklam, Ecology, Nicholas.acklam@ecy.wa.gov Sheila Coughlan, Ecology, Sheila.coughlan@ecy.wa.gov Kaia Petersen, Ecology, kaia.peterson@ecy.wa.gov **Ecology Site File**

³ Re: Data Gaps Work Plan Comment Letter. Email from Steve Teel, Ecology, to Tasya Gray, DOF, dated July 1, 2020.

⁴ *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.