1180 NW Maple St., Suite 310
Issaquah, WA 98027
T 425.395.0010
TRCcompanies.com

August 12, 2020

Mr. Grant Yang
NWRO/Toxics Cleanup Program
Washington State Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008

Re: Revised Cleanup Action Report and Response to Ecology Letter Dated February 19, 2020
Mutual Materials Newcastle Lot 4 Cr Site
6620 Coal Creek Parkway SE
Newcastle, Washington 98056
Cleanup Site ID No.: 15081
VCP Project No.: NW3248

TRC Project Number: 015325

Dear Mr. Yang:

On behalf of Newcastle Joint Ventures, LLC (NJV), TRC Companies, Inc. (TRC)[1] has prepared this response letter and revised Cleanup Action Report (CAR) to the Further Action Letter from the Washington State Department of Ecology (Ecology) Volunteer Cleanup Program (VCP) dated February 19, 2020 regarding the cleanup of the Mutual Materials Newcastle Lot 4 Cr Site located 6620 Coal Creek Parkway SE, Newcastle, Washington (Site). The Site is designated VCP Project Number NW3248.

This letter is in response to the section of Ecology's letter that describes "Missing Information" and "Revisions." Where appropriate, the CAR has been revised to reflect the information requested by Ecology. For ease of reference each of Ecology's comments is provided verbatim in italics below followed by TRC's response.

MISSING INFORMATION

- *Geologic log for test pit TP 32, including date of test pit excavation a method/date of test pit backfilling.*

[1] Prior work on this Site has been performed by Environmental Partners, Inc. (EPI). EPI was acquired by TRC on December 27, 2019. For the purposes of this letter and attached report, EPI and TRC may be used interchangeably.

TRC response: The requested information has been added to pages 6 and 7 of the revised CAR.

- *Locations, depths, and lithology of soil samples collected from TP-32 and composited to create the single sample with the total Chromium results of 98 mg/kg*.

  TRC response: The requested information has been added to page 6 of the revised CAR.

- *Description of lithology encountered in the 19 feet by 19 feet by 6 feet deep remedial excavation, and of the five confirmation soil samples collected at depths of 3 to 6 feet bgs in the excavation*.

  TRC Response: The requested information has been added to page 10 of the revised CAR.

- *Presentation of sufficient lines of evidence to demonstrate that groundwater has not been affected by chromium for this Site. In the absence of such demonstration, groundwater sampling well be necessary to assess potential impacts from contaminated soil.*

  TRC Response: The highest concentration of chromium in soil at the Site was 98 milligrams per kilogram (mg/kg). The Site-Specific TEE Cleanup Level determined for this Site is 42 mg/kg. The CAR documents the attainment of that cleanup level throughout the Site. The Method A Cleanup Level for total chromium or chromium III is 2,000 mg/kg and is based on protection of groundwater. The prior assessments of the property demonstrated that chromium VI was not present on the property. The cleanup level used for the remedial action of 42 mg/kg is substantially lower than the 2,000 mg/kg cleanup level considered protective of groundwater. Therefore, with groundwater at least 20 feet below ground surface (bgs), no further groundwater assessment is warranted. This information has also been added to bullet 4 of Section 11, Conclusions, page 12 of the revised CAR.

REVISIONS

Ground surface elevation at TP-32

- *Stated in the CAR report text and Figure 3 (Cross Section A-A') as 390 feet above mean sea level (amsl).*

  TRC Response: The 390-foot amsl elevation is correct. This is the general elevation of Lot 4 prior to mass excavation for redevelopment. This is confirmed by the surveyed elevation of the groundwater monitoring well BLK-4 MW-5 in the Lot 4 Dry Well CAR, 180 feet south-southeast of the Site. Well BLK-4 MW-5 is outside of the area of excavation for construction. You will note that the groundwater elevation in the Dry Well CAR is at 360 feet amsl, or about 30 feet below the elevation at the Site.

- *King County IMAP and the Lot 4 Dry Well report (VCP project NW3247) both show ground surface elevation as 375 feet amsl.*

- TRC Response: This statement is correct for the Lot 4 Drywell Cleanup Action Report. The elevation used in that report is the elevation after the mass excavation of soil for the new buildings. The elevation used for the chromium excavation was the site elevation when the chromium pit was excavated in 2015 prior to substantial redevelopment on Lot 4.

- *Revise text to identify ground surface elevation as 375 feet amsl.*

  TRC response: As stated above, the 390 amsl elevation is the correct elevation, and reflects the elevation of the chromium excavation at the time, which was prior to the dry well excavation after mass excavation for the building.

- *Revise Figure 3, including expanding the vertical scale, to show the following:*
  - *Ground surface elevation of 375 feet msl*

    TRC response: As mentioned above, the approximate elevation of 390 amsl is the correct elevation at the time the work was performed.

  - *Depth, lithology, soil sample locations, and the associated chromium concentrations for test pit TP-32.*

    TRC response: Requested revisions completed in Figure 3 of the revised CAR.

  - *Depth, lateral extent, lithology, soil sample locations, and chromium concentrations for the remedial excavation (3 feet deep at the margins and 6 feet deep at the center).*

    TRC response: Requested revisions completed in Figure 3 of the revised CAR.

  - *Ground water elevation, reported on the adjacent Lot 4 Former Drywell Site (NW3247) at 360 feet amsl.*

  - TRC response: Requested revision completed in Figure 3 of the revised CAR.

Ground water was not encountered during the assessment (TP-32 at a depth of 12 feet bgs) and soil excavation at the Site (the maximum depth of 6 feet bgs), and was expected to be present at approximately 15 feet below ground surface (bgs). The estimate was based on the groundwater table existing at the adjacent Lot 4 Dry Well Site VCP NW3247).

TRC Response: As mentioned above, based on the surveyed elevation of BLK-4-MW-5, the elevation of the top of the groundwater beneath the Site was expected to be approximately 360 feet amsl. With the correct Site elevation of the chromium excavation at 390 feet amsl, groundwater would not have been

expected to be encountered in the excavation. Groundwater would be expected to be present at more than 20 feet below the bottom of the excavation.

Entry of Site data into the Ecology Environmental Information Management (EIM) database must be completed and confirmed prior to issuance of a NFA opinion letter.

TRC response: The Site data has been entered into the EIM system (email confirmation attached).

CLOSING

It is our opinion that the responses above fully address Ecology's comments. If additional information is required please do not hesitate to contact us.

It remains TRC's opinion that the characterization of the Site is complete, that the cleanup action implemented at the Site meets the substantive requirements of MTCA, and that no further remedial actions are necessary.

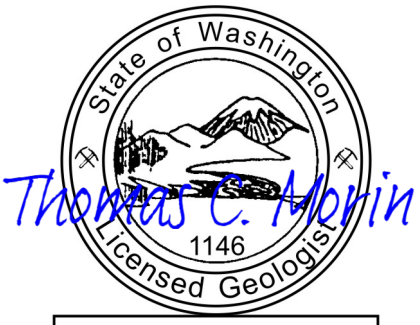
With the submission of the additional information contained here and confirmation of entry of all data into the EIM, TRC, on behalf of NJV, respectfully reiterates its request for an NFA determination for the Site.

If you have any questions or need additional information, please contact us at (425) 395-0010.

Sincerely,

ERIC L. CADDEY

Prepared by:
Eric Caddey, L.G.
Senior Geologist



THOMAS C. MORIN

Reviewed and approved by:
Thomas C. Morin, L.G.
Principal Geologist / PNW Area Leader

Enclosures: Ecology EIM Acceptance Notification Email
Revised Cleanup Action Report, dated August 12, 2020

Wyborny, Christy

From: Pool, Suzan (ECY) <spoo461@ECY.WA.GOV>
Sent: Wednesday, August 5, 2020 9:03 AM
To: EIM_TRC
Cc: Yang, Grant (ECY)
Subject: [EXTERNAL] EIM Data Submission - Study ID VCNW3248, Mutual Materials Newcastle Lot 4

Categories: EIM

TRC EIM Staff,

Thank you for submitting data for Mutual Materials Newcastle Lot 4. Submitted data for this study loaded into EIM successfully. The Ecology Project Manager will verify the data on study, locations, and results.

Below is further information on the loaded data.

Facility Site ID: 50608

Study ID: VCNW3248

Study Name: Mutual Materials Newcastle Lot 4

Date Range: Oct 2012, Apr 2015

New Locations: 6

New Results: 18

Information for data submitter:

- You can view the data by using the following link. https://apps.ecology.wa.gov/eim/search/Map/Map.aspx?MapType=EIM&StudySystemIds=99972190&StudyUserIdSearchType=Equals&StudyUserIds=VCNW3248&MapLocationExtent=-13598773.9184184%2c6031373.98788558%2c-13598768.3524422%2c6031378.93527353&CustomMap=y&BBox=-13599000,6031278,-13598541,6031473&Layers=0,1,2,3,4,5,6,7,8,9&Opacity=0.95&Basemap=bmHybrid&Options=v,h,h,h,h,h,h

Information for Ecology employees:

- You can view the data by using the following link. http://ecyeim/search/Map/Map.aspx?MapType=EIM&StudySystemIds=99972190&StudyUserIdSearchType=Equals&StudyUserIds=VCNW3248&MapLocationExtent=-13598773.9184184%2c6031373.98788558%2c-

13598768.3524422%2c6031378.93527353&CustomMap=y&BBox=-13599000,6031278,-13598541,6031473&Layers=0,1,2,3,4,5,6,7,8,9&Opacity=0.95&Basemap=bmHybrid&Options=v,h,h,h,h,h,h

- You should verify study, location, and result information.
- The EIM Data Entry Review Checklist, updated May 2018, can be found in the EIM Help Center.
- There is a video training on how to review the data.

Thanks,
Suzan

Suzan Pool
EIM Data Coordinator
Washington State Department of Ecology
300 Desmond Dr. SE, P.O. Box 47600
Olympia, WA 98504
Phone: 360-255-5773
Text: 360-791-8337
e-mail: suzan.pool@ecy.wa.gov