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DEPARTMENT OF ECOLOGY

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September 15, 2020

Meg Strong
Vice President
Shannon & Wilson
400 N. 34th St., Suite 100
Seattle, WA 98103
(MJS@shanwil.com)

Re: Department of Ecology comments on the Remedial Investigation Work Plan, Jorgensen Forge Corporation Property, Tukwila, Washington, dated April 15, 2020 for:

- **Name:** Jorgensen Forge Corp Site
- **Address:** 8531 East Marginal Way South, Tukwila, WA 98106
- **Facility/Site No.:** 2382
- **Cleanup Site ID No.:** 3689
- **Agreed Order No.:** 14143

Dear Meg Strong:

The Washington State Department of Ecology (Ecology) has reviewed the Remedial Investigation Work Plan (RIWP) dated April 15, 2020 prepared by Shannon & Wilson (S&W) on behalf of Earle M. Jorgensen Company (EMJ) for the Jorgensen Forge Corp Site (Site) located at 8531 East Marginal Way South under Agreed Order (AO) 14143.

Thank you for proposing additional sampling to resolve outstanding data gaps identified in our previous comments. Ecology concurs with the proposed work presented in the RIWP. Please note that, if new data gaps are identified through the current scope of the RI, or by other means, additional sampling may be required. While we concur with the proposed scope of work, please note that this does not mean that we agree with all assertions, interpretations, or commentary in the document.

This letter provides Ecology's approval of the RIWP with the following comments and requests for additional information:

- Additional evaluation is needed at two areas of the Site. Please provide an addendum that resolves the following data gaps that arose from the Clean Closure Report prepared by DH Environmental on behalf of Star Forge, dated July 22, 2020:

- The area wide dust in the main building has been reevaluated by DH Environmental and designated as non-dangerous waste. It appears likely that this dust will be left in place prior to paving planned by the current property owner. Therefore, Ecology requests that EMJ add sampling in areas of exposed soil within the building to characterize these areas prior to paving.
- Please conduct an evaluation and sampling to show the extent of polychlorinated biphenyl (PCB)-containing asphalt identified at the Tote Storage Area (TSA). Ecology expects that this may include additional historical research regarding placement of asphalt, and representative sampling of asphalt near the TSA and at other locations at the Site selected at random. In addition, soil sampling beneath the known area of PCB-containing asphalt within the TSA is necessary to determine if the soil is impacted.

Please indicate the anticipated construction diameter of the new monitoring wells in this addendum, as well as the size of auger and the annulus size in the Addendum. The Addendum does not need to be completed prior to commencing work, but should be submitted within 45 days of the date of this letter to avoid delays in field work.

- In the RIWP and the Sampling and Analysis Plan (SAP), you indicate that boring depth may be increased in the field if apparent contamination is observed at the base of each boring. Ecology encourages you to consider extending the boring beyond where you think the vertical limit is based on previous knowledge and/or field screening, and collecting an additional sample to archive. Because of the very low concentrations of the preliminary cleanup levels (PCULs) used for screening at this Site, field screening may indicate that contamination is no longer present, but the associated analytical results may still indicate an exceedance. In this case, the archived sample could be analyzed rather than re-mobilizing to collect additional data.
- Thank you for submitting the Inadvertent Discovery Plan (IDP) as an appendix to the RIWP. Ecology encourages you to submit the IDP for concurrence with the Department of Archeology and Historic Preservation (DAHP). You indicated that DAHP communicates with the tribes, but it is Ecology's understanding that DAHP would only reach out to affected tribes under certain circumstances. As a result, Ecology will notify potentially affected tribes once you have obtained concurrence on the IDP from DAHP.
- With regard to vinyl chloride and sources in soil described in Section 9.10, it is likely that the source of vinyl chloride in soil was tetra- or trichloroethylene (PCE or TCE), but that vinyl chloride is present as a daughter product to one of those compounds that may have been used at the Site historically. Therefore, when interpreting the RI data, please ensure that potential sources of PCE and TCE are also discussed as potential sources of vinyl chloride at the Site.
- Ecology appreciates your desire to comprehensively identify potential data gaps, including sampling for per- and polyfluoroalkyl substances (PFAS) compounds related to

former storage of aqueous film-forming foam (AAAF) at the Site. Please note that EPA Method 537 is the EPA-approved method for determination of PFAS in drinking water by liquid chromatography/tandem mass spectrometry. There currently is no EPA-approved method for PFAS analysis in matrices other than drinking water; modified methods have been developed by individual analytical laboratories to analyze soil and groundwater. Additional sampling may be required when approved methods for other matrices are published.

- Your response on Page 16 of the Response to Comment (RtC) Memo and the text in Section 10.3.1 regarding MW-13R don't agree. If LNAPL is present at any thickness, MW-13R should be installed, as outlined in the RtC Memo. The text indicates that the thickness, not presence, of LNAPL would be the basis for this decision. In cases where there is a decision point during the RI field work (for example whether to install MW-13R), please seek Ecology concurrence before proceeding, as you noted for sample locations that may be altered near the UST nests after a UST closure Site Assessment is performed. We want to work with you to avoid additional mobilizations later that could have been addressed during the RI.
- Ecology hereby clarifies that the borings we recommended at and near the regulated UST tank nests in Areas 2 and 4 are intended to augment, not replace, the sampling required under a Site Assessment during the UST decommissioning. We suggest that final decisions on locations for borings in this area wait until decommissioning has been completed to avoid duplication of sampling, and to address data gaps remaining after the UST decommissioning Site Assessment.

Please contact me by phone at 425-649-7254 or by email at maureen.sanchez@ecy.wa.gov with the schedule for implementing the RIWP, and with any other questions regarding this matter.

Sincerely,



Maureen Sanchez
Site Manager
Toxics Cleanup Program, NWRO

cc: Nels Johnson, AAG, (nels.johnson@atg.wa.gov)
Scott Reisch, Hogan Lovells LLC, (scott.reisch@hoganlovells.com)
Gil Leon, Earle M. Jorgensen, (GLEon@emjmetals.com)