



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 22, 2020

Allison Geiselbrecht, Ph.D.
Whitehead Tyee Site Project Coordinator
Floyd Snider
Two Union Square
601 Union Street, Suite 600
Seattle, Washington 98101

Re: Ecology Comments on Interim Action Completion Report, Whitehead Tyee Site, Prepared for 730 Myrtle LLC and Seattle Iron & Metals Corp., Agreed Order No. DE 13458

Dear Dr. Geiselbrecht:

The Washington State Department of Ecology (Ecology) has reviewed the Interim Action Completion Report (IACR) dated March 2019 prepared by Floyd Snider (FS) on behalf of 730 Myrtle LLC and Seattle Iron & Metals Corp (SIM) for the Whitehead Tyee Site (Site) located at 730 Myrtle Street in Seattle under Agreed Order (AO) DE 13458.

Thank you for addressing Ecology's comments from our letter dated February 1, 2019. Ecology has determined that the IACR is adequate to document the work conducted under the Interim Action Work Plan (IAWP) and can be finalized.

In our approval letter for the IAWP dated April 26, 2017, Ecology recommended, but did not require, not re-using soil at the site due to likely low cleanup levels (CULs) for the Site because of its proximity to the Lower Duwamish Waterway. We realize that SIM utilized general Ecology guidance for re-use, but recognizes that re-used soil may exceed preliminary CULs (PCULs), posted on Ecology's website (<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=1643>), and eventually CULs for this Site. As such, Ecology will review the data for the soil re-used at the Site the same as any other soil remaining at the Site that is, or may be, present at concentrations greater than PCULs throughout the Remedial Investigation (RI) process.

To that end, we request the following in future submittals for the Site:

- Provide more detail, both in text and on figures, regarding the origin and disposition for soils re-used on Site. It would be helpful to be able to identify and limit the areas that

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may be a concern as much as possible. If more detail is not available, please indicate such. Regardless, please add outlines and descriptors to a new figure outlining what is known about the origin areas and placement areas with clear captions for both.

- Be consistent between figures and text regarding locations and labels of excavations, and stormwater equipment. For example, the text says “stormwater detention structure” but Figure 3.4 says “storm capture units”. Is this the same thing?
- The IACR figures outline the excavation areas only for the Interim Action. Please include all excavation areas and depths for all equipment installations, and extent and depth of Interim Action excavations on a single figure so we can easily trace where re-used soil came from and where it was re-used. It will also be helpful for understanding data gaps in the RI Work Plan (RIWP).
- Ecology will evaluate whether additional soil sampling is necessary at the limits of the Interim Action excavations as part of the RIWP that was submitted to Ecology in November 2019. We will consider your response to our previous comments regarding this when we conduct that evaluation.
- In the third paragraph of Section 3.9, please confirm the date of August 27, 2017. It doesn't make sense that this contaminated soil stockpile area was dismantled while Interim Action excavations were ongoing.

Ecology appreciates the diligence of SIM and 730 Myrtle LLC to fulfill the requirements of the AO. Please submit the final IACR by August 14, 2020. If you have questions or require clarification, please contact me at (425) 649-7254 or by e-mail at maureen.sanchez@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen Sanchez", with a stylized flourish at the end.

Maureen Sanchez
Site Manager and Project Coordinator, L.Hg., M.S.
Toxics Cleanup Program, NWRO