

## Memo

**JN:** 15492E-2  
**To:** Aaren Fiedler  
**From:** Timothy A. Johnson  
**Company:** Washington Department of Ecology  
**Date:** December 11, 2020  
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**RE:** SW1720 Supplemental Information

Aaren:

Please find additional information regarding establishment of cleanup standards you requested in an email dated November 12, 2020. Sampling and analysis completed at the two commercial properties addressed 2103 and 2111 South Tacoma Way, Tacoma, Washington (SW1720).

The applicable and relevant law cited are requirements under the Model Toxics Control Act (Chapter 70.105D), its regulation (Chapter 173-340 WAC) and guidance provided under the Tacoma Smelter Plume Model Remedy Guidance document, Publication Number 12-09-086-A.

Standard points of compliance were selected for the site. For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance was established in the soils throughout the Site from the ground surface to 15 feet below ground surface (bgs). For soil, the cleanup levels were based upon human exposure via direct contact during excavation for planned redevelopment of the site. As the recent sampling demonstrated, no concentrations of arsenic or lead exceeded Method A Cleanup levels from 21 samples analyzed in the near surface soil (6" to 18") below the existing ground surface.

We identified the cleanup levels for the indicator hazardous substances (arsenic and lead) in soil as those published in Table 740-1 *Method A Soil Cleanup Levels for Unrestricted Land Uses*. The following table presents the indicator substances and applicable cleanup levels.

Compound	Soil Method A <sup>1</sup>
Arsenic	20 ppm
Lead	250 ppm

Notes:

1. Method A Soil Cleanup Levels for Unrestricted Land Use: MTCA Table 740-1.
2. ppm denoted parts per million

This memo has been prepared for specific application to this project in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently

practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our Contract for Professional Services dated March 19, 2020. No warranty is expressed or implied. If new information is developed in future site work, which may include excavations, borings, or studies, Geotech Consultants, Inc. should be allowed to re-evaluate the conclusions of this memo and provide amendments as required.

We appreciate this opportunity to provide environmental consulting services on this project. If you have any questions, or if we can be of further assistance, please do not hesitate to contact us.

Respectfully submitted,

GEOTECH CONSULTANTS, INC.



Timothy A. Johnson  
Hydrogeologist

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References:

Geotech Consultants, Inc. *Limited Phase 2 Site Assessment, Two Commercial Parcels, 2103 and 2111 South Tacoma Way, Tacoma, Washington*. July 13, 2020.

Smith, Mackey. *Geologic Map of the City of Tacoma, Washington*. Washington State Department of Natural Resources, Division of Geology and Earth Resources. 1977.

Washington Department of Ecology. *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action, Publication no. 09-09-047*. October 2009.

Washington Department of Ecology. *Model Toxics Control Act Cleanup Regulations Chapter 173-340 WAC*. Publication #94-06. Revised November 2013.

Washington Department of Ecology. *Tacoma Smelter Plume Model Remedies Guidance, Sampling and Cleanup of Arsenic and Lead Contaminated Soils*. (Publication Number 12-090986-A. June 2012).