UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL
CLEANUP

September 11, 2015

Mr. Miles Dyer
Acting Director, Environmental Compliance
Senior Staff Environmental Engineer
Jorgensen Forge Corporation
8531 E. Marginal Way S
Tukwila, Washington 98108

Mr. Will Ernst
EO&T EHS Remediation
The Boeing Company
PO Box 3707 M/C 1W-12
Seattle, Washington 98124

Re: US EPA Conditional Approval and Notice to Proceed for the Time Critical Removal Action – Jorgensen Forge Outfall Site Corrugated Metal Pipe Work Plan, Jorgensen Forge Outfall Cleanup, Lower Duwamish Waterway Superfund Site, Seattle, WA

Dear Mr. Dyer and Mr. Ernst:

The US Environmental Protection Agency is conditionally approving the Jorgensen Forge Outfall Site Corrugated Metal Pipe (CMP) Work Plan, dependent on the Jorgensen Forge Corporation and the Boeing Company (Respondents) agreeing to the following QA comments below on the SAP/QAPP and addressing the remaining issues with the CMP Work Plan, documented in this letter:

- In Table E1, the types of PCB Aroclors needs to be listed.
- In Table E2 & E3, the reporting limit needs to be confirmed for Soil PCBs.
- SAP needs to clearly state the GPS coordinates of all sampling locations.
- SAP needs to show ARI's certification for the intended PCBs being analyzed.

Information is also required in the plan regarding excavation of PCB-contaminated soil from the location of boring 2-66-SP-10, which would initiate the time critical removal action. This information is best added to Section 5 that presents the removal action objectives. In addition, a figure is needed that presents confirmational sample locations in this area, prior to these samples being taken.

In addition, Section 5, Page 6 of the Draft CMP workplan requires more detail on the confirmational sampling as listed with the sequencing and timeline section. The level of detail must include number of samples, reference an appropriate figure, describe the appropriate sampling collection protocol and note in all three stages of the cleanup that confirmational sampling is necessary in order to meet the 1 ppm

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cleanup level. It lastly must be noted that if the results indicate that the remaining leave surface is higher than 1 ppm for total PCBs, more cleanup will occur in order to meet cleanup goals.

Along with this conditional approval, the EPA is providing the respondents with a Notice to Proceed with initiating the Time Critical work by excavating soil from the location of boring 2-66-SP-10. Prior to starting the excavation, the Respondents will need to provide EPA with a figure that documents where confirmational samples are expected to be placed, with the understanding that field work may change actual sampling locations. Completion of the work in the unshored excavation area will only occur following EPAs approval of the Final CMP work plan.

Within 15 days upon receipt of this letter a revised workplan will need to be submitted to EPA that addresses the above concerns. If you have any questions, I can be reached at 206 553 4092 or by email at: sanga.ravi@epa.gov. Inquiries of a legal nature may be directed to Richard Mednick @ 206 553-1797 or mednick.richard@epa.gov.

Sincerely,

Ravi Sanga
Remedial Project Manager
Site Cleanup Unit 3
Office of Environmental Cleanup

cc:

Dee Gardner
Sound Earth Strategies, Inc.

Tom Colligan
Floyd Snider

Romy Freier-Coppinger
Ecology