STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

Rich Felsing
Thurston County Development Services
Building #1, Administration
2000 Lakeridge Drive SW
Olympia, WA 98502

8/18/2022

Re: Inspire Kids Preserve Project, SEPA No. 2020104385, Ecology SEPA No. 202005122

Thank you for the opportunity to provide comments on the Inspire Kids Preserve project. The project property is located at 4849 Johnson Point Rd NE in Olympia, Washington on eight Thurston County parcels covering 108 acres. The proposed project is located in an area with arsenic and lead in the soil because of the air emissions from the old Asarco Smelter in Ruston, Washington.

Capitol Land Trust (CLT) plans to establish this property into a nature preserve focused on environmental education for children. The nature preserve will include a centrally located visitor center with parking and associated utilities. Ecology recommended soil sampling to evaluate the levels of arsenic and lead in the soil prior to project commencement. Ecology also recommended enrollment in the Voluntary Cleanup Program (VCP) if lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) Method A cleanup levels.

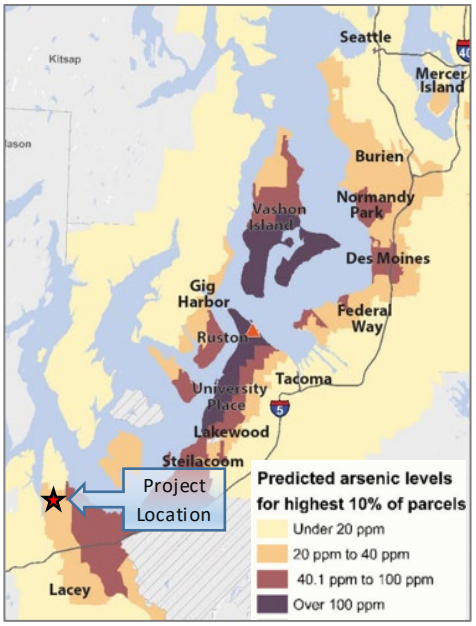

Figure 1. Vicinity Map

On behalf of CLT, ADESA, LLC (ADESA) conducted soil sampling on the project property on June 13 and 14, 2022. ADESA followed the general sampling methodology outlined in the 2019 Tacoma Smelter Plume Model Remedies Guidance modified with consultation with Ecology. ADESA collected 69 soil samples from 54 sampling locations (Figure 2). ADESA collected 54 soil samples from 0 to 6 inches below ground surface (bgs) and 15 samples from 6 to 12 inches bgs. ADESA also collected sediment and duff samples. They collected 18 wetland sediment samples from two depth intervals (0-4 inches bgs and 4-8 inches bgs) and eight six-point composite duff samples.

THE MTCA SOIL CLEANUP LEVELS:
Average arsenic ≤ 20 mg/kg
Average lead ≤ 250 mg/kg
AND
Maximum arsenic ≤ 40 mg/kg
Maximum lead ≤ 500 mg/kg

FRESHWATER SEDIMENT CLEANUP LEVELS:
Arsenic < 14 mg/kg
Lead < 120 mg/kg

ADESA submitted the samples to Spectra Laboratories in Tacoma, Washington for an analysis of arsenic and lead concentrations with an Environmental Protection Agency (EPA) Method 6010D. ADESA prepared a report summarizing the results of the soil sampling[1] and submitted it to Ecology. Ecology reviewed the report and concluded that the average soil concentrations were below the cleanup level of 20 milligrams per kilogram (mg/kg) for arsenic and 250 mg/kg for lead (Table 1). Similarly, no samples exceeded the maximum allowable concentration for a single soil sample of 40 mg/kg for arsenic or 500 mg/kg for lead.

Table 1. Summary of Soil Sampling

Sample Depth (inches)	Arsenic mg/kg (EPA 6010D)			Lead mg/kg (EPA 6010D)		
	Minimum	**Maximum**	**Average**	**Minimum**	**Maximum**	**Average**
0-6 soil	2.5	7.21	3.1	2.5	144	10.81
6-12 soil	2.5	8.74	3.3	2.5	19.4	6.22
0-4 sediment	2.5	2.5	2.5	2.5	8.32	5.48
4-8 sediment	2.5	3.2	2.6	2.5	9.31	5.5
Duff	2.5	4.1	2.7	2.5	16.9	6.2
MTCA Levels		40	20		500	250

Ecology does not recommend this property enter the Voluntary Cleanup Program. No further soil sampling is necessary. No soil remediation for the contamination associated with the Tacoma Smelter Plume is needed for this property.

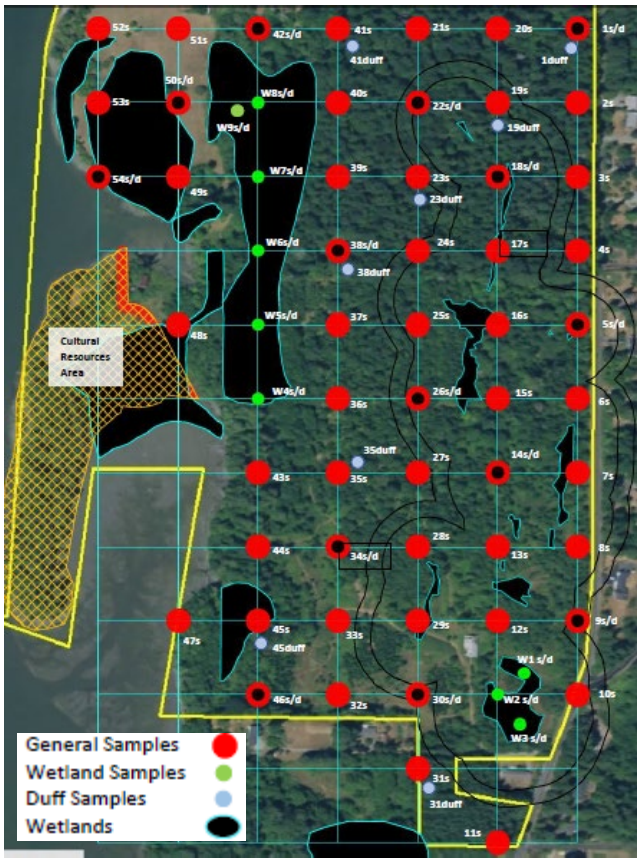

Figure 2. Approximate locations of soil samples

Please note, this not a "No Further Action" determination for the property, since the property was not enrolled into the VCP.

Eva Barber

Technical Assistance Coordinator
Toxics Cleanup Program
Southwest Region Office
Washington State Department of Ecology;
Eva.barber@ecy.wa.gov;
Phone: 360-999-9593

[1] ADESA LLC. *Tacoma Smelter Plume Impact Assessment Conducted On: Proposed Inspiring Kids Preserve.* August 9, 2022.