



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Jon Beem
D.R. Horton
11241 Slater Avenue Northeast, Suite 200
Kirkland, Washington 98033

11/7/2023

Re: The Enclave at Oak Tree (aka McAllister Springs) – Arsenic and Lead Soil Sampling and Testing

Thank you for the opportunity to provide comments on The Enclave at Oak Tree (aka McAllister Springs) project. This 36.23-acre property is comprised of three undeveloped Thurston County Tax Parcels 11823430100, 11826110000, and 11826110300, and is located at 2402 Marvin Road Southeast in Lacey, Washington. This project is located in an area predicted to have arsenic and lead in the soil because of the air emissions from the old Asarco Smelter in Ruston, Washington (Figure 1).

D.R. Horton is planning to develop this property. 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.

On behalf of Jon Beem of D.R. Horton, The Riley Group, Inc. (RGI) conducted soil sampling on the property on May 3 and 4, 2023 (Figure 2). RGI followed the recommended guidance in the Department of Ecology's Tacoma Smelter Plume Model Remedies Guidance.

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

In May 2023, a total of 94 soil samples were collected from the Property. Of the 77 locations, eight were duff samples. The remaining 69 locations had soil samples collected from 0 to 6 inches below ground surface (bgs), and 17 samples were also collected from 6 to 12 inches bgs.

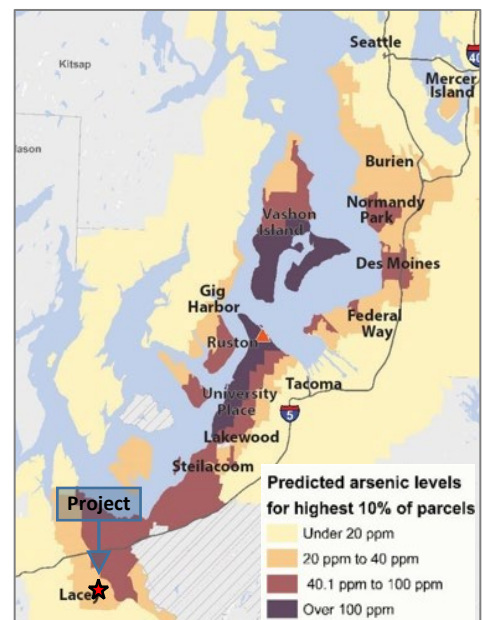


Figure 1. Vicinity Map

RGI submitted the soil samples to Friedman & Bruya, Inc. of Seattle, Washington for an analysis of arsenic and lead using Environmental Protection Agency (EPA) Method 6020B. RGI submitted a report with the results of soil sampling to Ecology¹. 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.

Sample Depth (inches)	Arsenic mg/kg (EPA 6020B)			Lead mg/kg (EPA 6020B)		
	Minimum	Maximum	Average	Minimum	Maximum	Average
0 (duff)	<1	9.92	6.0	1.77	51.8	17.0
0-6 (soil)	1.27	21.2	7.1	2.35	36.7	10.1
6-12 (soil)	2.05	16.5	4.3	2.36	38.0	5.8
MTCA Levels		40	20		500	250

Table 1. Summary of Soil Sampling



Figure 2. Locations of Soil Sampling

¹ The Riley Group, Inc. Arsenic and Lead Soil Sampling and Testing McAllister Springs. May 24, 2023.

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

Please note, this is not a “No Further Action” determination for the property since the property was not enrolled into the VCP with Ecology.

Diana Ison

A handwritten signature in blue ink that reads "Diana Ison". The signature is cursive and fluid.

Technical Assistance Coordinator

[Toxics Cleanup Program](#)

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