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DEPARTMENT OF ECOLOGY  
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April 14, 2021

Union Ridge Investment Co.  
c/o Christopher Hermann  
Stoel Rives LLP  
760 SW Ninth Ave, Suite 3000  
Portland, OR 97205  
[chris.hermann@stoel.com](mailto:chris.hermann@stoel.com)

Via email and certified mail: 9489 0090 0027 6092 9911 47

**Re: Final Cleanup at Park Laundry Site:**

- **Site Name:** Park Laundry
- **Site Address:** 122 N. Main Avenue, Ridgefield, Clark County, WA 98642
- **Cleanup Site ID:** 4099
- **Facility/Site ID:** 8100630

Dear Christopher Hermann:

Thank you for working with the Washington State Department of Ecology (Ecology) on the Park Laundry Site (Site). As acknowledged in Ecology's September 16, 2020, letter, Union Ridge Investment Company (URIC) completed the Remedial Investigation (RI), Feasibility Study (FS), and draft Cleanup Action Plan (dCAP) required under Administrative Order 6829, entered in 2009. Ecology thanks URIC for its commitment to studying this Site and planning for its cleanup.

Ecology received a dCAP from URIC dated July 2019, indicating further remedial action on source-area soil and groundwater is necessary at the former Park Laundry property and on two properties to the north of that parcel. Ecology is completing the Cleanup Action Plan and preparing it for public comment. It is important to follow up with the cleanup action close in time to the completion of the RI/FS, so that the cleanup work accurately addresses current site conditions described in the RI.

The Site is ready to enter the cleanup phase. Ecology is prepared to enter into an agreement with Potentially Liable Parties (PLPs) establishing the scope of work and schedule for cleanup.

Ecology named URIC a PLP for the Site on December 1, 2008. Clark County Records indicate that the source property remains titled in the name of "Union Ridge Investment Co," as shown in the deed recorded as document number 4399369. As the current owner of the Site, URIC remains a PLP for all remedial action costs. RCW 70A.305.040(2).

At this time, Ecology invites URIC to negotiate an agreement for the cleanup of the Site. This agreement may take the form of an Agreed Order or Consent Decree. *See* WAC 173-340-510. URIC has expressed interest in a De Minimis Consent Decree. Ecology's policy requires that the PLP submit information to Ecology to demonstrate eligibility for a De Minimis Decree. *See* Toxics Cleanup Program Policy 520C Sec. 3.

Ecology will review a proposal by URIC for a De Minimis Decree. Such proposal must establish eligibility for the De Minimis Decree by establishing that URIC's contribution of hazardous substances is insignificant in amount and toxicity. In addition, the proposal should explain why a De Minimis Decree with URIC will expedite the cleanup and be in the public interest. *See* RCW 70A.305.040(4)(a). In evaluating this question, Ecology will look for:

- The submittal requirements in Policy 520C Section 3.
- The value of the proposed offer.
- Whether the offer is commensurate with the PLP's ability to pay (please provide documentation of URIC's funding sources and funding limitations).
- Whether the settlement would lead to significant savings in time spent on process and logistics;
- Whether the Site is ready to proceed to cleanup, and whether the De Minimis PLP provided names of other PLPs who may perform the cleanup.

*See* Toxics Cleanup Program Policy 520C: *De Minimis* Consent Decrees: Attachment A: *De Minimis* Settlement Factors (Revised Dec. 30, 2016).<sup>1</sup>

Ecology looks forward to URIC's proposal in the next 30 days. Please contact me with a time estimate if you should need more time. If you have questions or would like to discuss, please feel free to set up a time with me and Assistant Attorney General Kara Tebeau.

Sincerely,



Rebecca S. Lawson, PE, LHG  
Section Manager  
Toxics Cleanup Program  
Southwest Regional Office  
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Attachment: Toxics Cleanup Program Policy 520C

cc by email: Jim Maul, MFA  
Kara Tebeau, Office of the Attorney General  
Craig Rankine, Ecology  
Ecology Site File

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<sup>1</sup> Available at: <https://apps.ecology.wa.gov/publications/documents/1609068.pdf>