From: Janet Knox <janet@PGWG.COM>
Sent: Tuesday, July 14, 2020 1:18 PM
To: Maurer, Christopher (ECY) <cmau461@ECY.WA.GOV>
Subject: Scougal Rubber VCP NW1707 Vapor Samples

Chris,

We received the vapor samples from subslab sampling near the Ewing building. As shown in the attached tables, the results exceed the Method C sub-slab cleanup level. However, the Ewing building is an open, warehouse-style retail store like a Home Depot with big garage doors that are often open for loading. It is built on a concrete slab that extends from 2 to 10 feet beyond the building on all sides, surrounded by asphalt parking lot.

The attached picture shows the transition between the concrete and asphalt. The white marked area is where SV-2 was collected. The concrete is unreinforced, according to the private locator.

These vapor concentrations are high, but the building is not an enclosed space. The Ewing Irrigation building is an open, warehouse-style retail store like a Home Depot with big garage doors that are often open for loading.

The main building is heated by large gas heaters. The offices have a heat pump for A/C and heat with the intake outside of the building.

Scougal would like to seek a No Further Action from Ecology for its Site, which extends ~30 feet onto the northern ~100 feet of the Machinists' property (so, roughly 3000 sq feet). After many technologies (excavation, AS/SVE, oxidants, ozone) of groundwater and soil treatment, soil received a No Further Action, but groundwater residual in the aquifer continues to keep concentrations above cleanup levels.

Scougal would like to seek a No Further Action with an Environmental Covenant with a deed restriction that is attached to the property. Scougal has a longtime good relationship with its

neighbor and the owner of the property that Ewing rents from has agreed that a deed restriction would be acceptable.

At other warehouse-like buildings, Ecology has not required mitigation. Further, as the heating system for this building is positive pressure, meaning that air is blown into the building in the winter, which minimizes the "stack effect".

What are the next steps? We have not reporting in a while and you gave us an extension on our annual report last year, so perhaps a final report is the next step. Do you have other questions or suggestions regarding the next steps?

Table 1. Sampling Results Summary

Scougal Rubber Corporation, Seattle, Washington

December 2019 Groundwater Sampling

Sample	Sample Date	TCE	DCE	Vinyl chloride
		ug/L	ug/L	ug/L
MW-11	12/5/2019	4.3	*<1 U*	*<0.2 U*
MW-12	12/5/2019	*<1 U*	1.1	0.82
MW-13	12/5/2019	**5.3**	13	**4.1**
MW-14	12/5/2019	**9.5**	2	**5.8**
MW-17	12/5/2019	**14**	5.2	0.89

February 2020 Groundwater Sampling

Sample	Sample Date	TCE	DCE	Vinyl chloride
		ug/L	ug/L	ug/L
MW-11	2/11/2020	**5.3**	*<1 U*	*<0.2 U*
MW-12	2/11/2020	*<1 U*	1.3	0.95
MW-13	2/11/2020	**28**	*<1 U*	*<0.2 U*
MW-14	2/11/2020	**16**	1.5	2.6
MW-17	2/11/2020	**21**	1.2	*<0.2 U*
MTCA Method B Surface Water		4.9	n/a	3.7

2020 Soil Vapor Sampling

Sample	Sample Date	TCE	DCE	Vinyl chloride
		(µg/m³)	(µg/m³)	(µg/m³)
SV-1	2/11/2020	**1600**	*< 15 U*	***< 10 U***
SV-2	4/6/2020	**2500**	48	***< 11 U***
AA-1 (ambient air)	2/11/2020	*<2.3 U*	*< 3.4 U*	*< 2.2 U*
AA-2 (ambient air)	4/6/2020	*<2.3 U*	*< 3.3 U*	*< 2.1 U*
MTCA Method C Sub-Slab		200	n/a	95

1. **Bold** indicates an exceedance of MTCA Method B Screening Level
2. U indicates the analyte is not detected at the shown reporting limit.
3. The chlorinated VOCs PCE, trans-1,2-DCE, 1,1-DCA, 1,1-DCE, 1,1,1-TCA, 1,2-DCA (EDC), chloroethane, and methylene chloride were not detected above reporting limits.

Table 2. Historic Metals Concentrations

Scougal Rubber Corporation, Seattle, Washington

Well	Date	Arsenic Dissolved ug/L	Arsenic Total ug/L	Iron Dissolved ug/L	Iron Total ug/L	Manganese Dissolved ug/L	Manganese Total ug/L
MCL		***10***	***10***	***300***	***300***	***50***	***50***
MW-11	June-08	-	-	***385***	**-**	***384***	**-**
MW-11	September-08	-	-	***436***	**-**	***322***	**-**
MW-11	August-17	< 1 U	< 1 U	129	156	13.6	25.1
MW-12	June-08	-	-	***23700***	**-**	***944***	**-**
MW-12	September-08	-	-	***37800***	**-**	***1140***	**-**
MW-12	August-17	8.04	8.03	***15400***	***15800***	***784***	***774***
MW-13	June-08	-	-	-	-	-	-
MW-13	September-08	-	-	-	-	-	-
MW-13	August-17	< 1 U	< 1 U	***7460***	***9240***	***114***	***135***
MW-14	June-08	-	-	***U (250)***	**-**	***2190***	**-**
MW-14	September-08	-	-	***2850***	**-**	***2660***	**-**
MW-14	August-17	< 1 U	< 1 U	51.8	***385***	39.6	***157***
MW-17	June-08	-	-	-	-	-	-
MW-17	September-08	-	-	-	-	-	-
MW-17	August-17	< 1 U	< 1 U	55.7	55.4	6.65	6.4