



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 8, 2022

Pat Milton
c/o Scott D. Johnson
Helsell Fetterman LLP
1001 Fourth Ave, Ste 4200
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The Estate of Lila Rears
c/o Rick Lee, Attorney at Law
Bodyfelt/Mount
319 SW Washington St, Ste 1200
Portland, OR 97204
lee@bodyfeltmount.com

Re: Comments on 2020 Annual Groundwater Monitoring Report

- **Site Name:** Milton's Dry Cleaners
- **Site Address:** 6721 E 4th Plain Blvd, Vancouver, Clark County, WA 98661
- **Facility/Site No:** 19779
- **Cleanup Site ID No.:** 1834
- **Agreed Order No.:** DE4239 07/4-TC-S

Dear Scott Johnson and Rick Lee:

Thank you for submitting the *2020 Annual Report*¹ (the Report) for Department of Ecology (Ecology) review. The purpose of this letter is to provide Ecology's comments on the report.

Comments

1. Groundwater monitoring frequency: Section 7 of the report provides recommendations for groundwater monitoring frequency reductions in selected wells. Ecology has the following comments regarding monitoring frequency:
 - a. Proposed wells to reduce to semi-annual monitoring:
 - i. Ecology agrees that the following wells can be reduced to from quarterly monitoring to a semi-annual frequency: MW-15s, MW-22bs, MW-29bs, and MW-29i.²

¹ Geosyntec Consultants (Geosyntec), *2020 Annual Report, Milton's Dry Cleaners Site – Groundwater Monitoring*, April 16, 2021.

² Previously communicated via email (*Approved frequency reductions for groundwater monitoring*, Email to Cindy Bartlett, Geosyntec, from Steve Teel, Ecology, June 10, 2021).

- ii. Ecology disagrees with reductions in frequency to three wells: MW-30bs, MW-31s, and MW-39i. Therefore, these wells shall remain on a quarterly monitoring frequency.² Well MW-30bs is in close proximity to the former Milton's Dry Cleaners Building and has experienced large unexplained fluctuations in tetrachloroethene (PCE) and trichloroethene (TCE) concentrations. Well MW-31s should remain on quarterly monitoring because it is adjacent to the U-Lock-It Building, which has an operating vapor intrusion mitigation system. Well MW-39i is of particular concern because of its cyclic PCE fluctuations and high TCE concentration (52.1 micrograms per liter [µg/L], December 2020). This well has also had a steadily increasing PCE and TCE concentration trend during 2020.
 - b. Proposed wells to reduce to annual monitoring:
 - i. Ecology agrees that the following wells can be reduced to monitoring on an annual basis: MW-03s, MW-06s, MW-09s, MW-09bs, MW-12bs, MW-16i, MW-18i, MW-19i, MW-19s, MW-20i, MW-20s, MW-21s, MW-22i, MW-24s, MW-27s, MW-30i, MW-32i, MW-37s, and MW-38bs.³
 - ii. Ecology disagrees with proposed reductions in frequency to well MW-28i. Therefore, this well shall remain on a semi-annual monitoring frequency. Of particular concern in this well are concentrations of TCE (14.9 µg/L and 13.4 µg/L for March and September, 2020, respectively).³
 - c. Wells to increase to quarterly monitoring frequency: Ecology has identified one well that needs to be increased to quarterly monitoring frequency due to TCE concentrations: MW-10i.² MW-10i showed the highest intermediate TCE concentration during 2020 (100 µg/L). Also, increasing the frequency of MW-10i to quarterly will match the frequency of intermediate monitoring well MW-39i, which also has elevated TCE concentrations.
2. Thank you for agreeing to include the submittal of the data validation memoranda with each data submittal.⁴
 3. The trend analysis discussed in the report only included PCE concentrations. In the 2021 and future annual reports, please also include trend analyses of TCE and cis-1,2-dichloroethene. Please also to include a discussion of vinyl chloride concentrations and exceedances of screening levels.

³ Previously communicated via email (*Re: Approved frequency reductions for groundwater monitoring*, Email to Cindy Bartlett, Geosyntec, from Steve Teel, Ecology, February 9, 2022).

⁴ *Milton's GWRI – March data packet (revised); Data validation responses*. Email to Steve Teel, Ecology, from Cindy Bartlett, Geosyntec, September 16, 2021.

Contact Info

If you have any questions about this letter, please contact me at (360) 890-0059 or steve.teel@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink that reads "SSTeel".

Steve Teel, LHG
Toxics Cleanup Program
Southwest Regional Office

SST/tam

cc by email: Cindy Bartlett, Geosyntec, cbartlett@geosyntec.com
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Ecology Site File