MEMO

Department of Ecology Northwest Regional Office

To: File From: Norm Peck Re: Ross Plaza/Crystal Cleaners "IRAP" Report September 10, 1997

The evaluation of Lots 7, 8. 11 and 13 is reported. The discovery of releases is reported only for Lots 7 and 13, of perchloroethylene and gasoline, respectively.

The cover letter and the Phase II Site Assessment Report (despite the title, the report is of a site investigation, not a remedial action report) disagree on the location of downgradient extent of TCE/DCE plume movement from Crystal Cleaners. The letter states that the plume attenuates on the Ross Plaza property, within Lot 7. In fact the report indicates that the plume extends off-site to the west-southwest, and levels exceeding MTCA standards were present in at least one off-site monitoring well (MW-11). The method detection limit is not specified for EPA Method 8010 in the text, however analytical reports from the lab indicate that the method detection limit for trichloroethene is .5 mg/l, which is also the cleanup standard. This is undesirable in that method error could cause a "ND" to be reported when in fact the concentration in the sample is at or above the cleanup standard. I recommend SIS-listing the site as Crystal Cleaners, confirmed for soil and groundwater contamination by halogenated solvents.

The contamination on Lot 13 was a sample for a single depth in a single boring, and was not repeated in samples collected within 8' of the contaminated sample. In addition, no groundwater was found in borings or wells placed within that distance from the first boring from which contaminated soil samples were collected. The sample of concern was adjacent to the sidewalk and Pacific Highway South (SR-99). It seems likely that the tank removal and soil removal (if any) may have been terminated to protect the integrity of the sidewalk and highway. Additional information is needed to determine whether this contamination extends off the site, and if the groundwater excellence found in B-4 is localized or more widespread. Further definition of the contamination in this area is required before a determination by Ecology can be made.

The evaluation of the former dry-cleaner location in Ross Plaza seems adequate, and no contamination of significance was detected there. No other areas were evaluated.

Notes on Ross Plaza/Crystal Cleaners-Sea Tac

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"Former Dry Cleaners" seems OK, w/ TCE & DCE hits, below MTCA stds. "Former Gas Station" (Current SeaFirst Bank) has one sample confirming soil contamination. The single GW hit seems localized, as a well installed ~8' N or the borehole that contained WTPH-G GW exceedance showed ND. Crystal Cleaners is the source of a large plume with several exceedances of stds., the SE extent of the plume is not well defined. Very localized GW flow anomolies noted, probably due to clay lenses is underlying glacial till.

Crystal Cleaner definitely should be listed. It seems likely that there is PCS contaminated soil extending into the ROW at the former Gas Station location, which site may deserve listing, as soil contamination above MTCA stds. remains. An alternative would be deliniation of contaminated area and placment of a Deed Restriction.