



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000*

February 5, 1998

Mr. Harlan Borow  
Clayton Environmental  
4636 E. Marginal Way S. Suite 215  
Seattle, WA 98134

Dear Mr. Borow:

Re: Ross Plaza/Crystal Cleaners IRAP Report

Thank you for submitting the IRAP Report for Ross Plaza to the Department of Ecology for review. No other documents have been received or reviewed regarding this site. Ecology has reviewed the report, conducted an Initial Investigation of the facility, and has the following observations and comments:

The evaluation of Lots 7, 8, 11 and 13 is reported. The discovery of releases is reported for Lots 7 and 13, of perchloroethylene and aged 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 the 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. 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 0.5 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 have recommended placing the site, identified as Crystal Cleaners, on the Confirmed and Suspected Contaminated Sites List, as having confirmed soil and groundwater contamination by halogenated solvents. Your client can expect to receive an Early Notice Letter in the near future. At this time, Ecology has determined that Further Action is required at this site, specifically Lot 7. Notice of this determination will be placed in the Site Register.

The contamination on Lot 13 was defined (characterized, identified etc.) by a sample for a single depth in a single boring, and was not repeated in samples collected within 8' of the contaminated sample. 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

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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 exceedance found in B-4 is localized or more widespread. Further definition of the contamination in this area is required, and that additional information must be submitted to Ecology before a determination by Ecology can be made. The levels of contamination encountered might not exceed MTCA cleanup standards if evaluated under Method B interim TPH guidelines, and you may wish to consider resampling to analyze by that analytical method. At this time, Ecology has determined that Further Action is required at this site, specifically Lot 13. Notice of this determination will be placed in the Site Register.

Ecology is changing the way it reviews final cleanup reports for independent remedial actions. Reports previously reviewed under the Independent Remedial Action Program will now fall under this component of the Voluntary Cleanup Program. Requests for review of must include the Request for Review form, Site Summary form, copies of applicable reports and a deposit of \$500. The deposit will cover approximately 8 hours of Ecology's time. If the entire \$500 deposit is not spent for the review, the remaining amount will be refunded. If additional fees are required, the applicant agrees to reimburse Ecology for the additional time spent. I have enclosed a copy of the Request for Review form, Site Summary and fee schedule should you wish to submit additional information on Lot 13 in an effort to obtain an NFA determination. In this case, only new information needs to be submitted with the application.

The evaluation of the former dry-cleaner location in Ross Plaza seems adequate, and no contamination of significance was detected there. You may wish to consider dividing this site into operable units, or "sub-sites" to obtain NFA determinations for those portions of the site not affected by releases. Please advise me prior to March 1, 1998 if you wish to have an NFA determination made for Lots 8 and 11. If a reply is received by that date, Ecology is willing to issue the NFA determination for these two lots without an additional fee. If Ecology is not contacted by you prior to March 1, 1998, the status of this entire site will be designated as "further action required" and the entire site will be listed.

If you have questions, please contact me at (425) 649-7047. Thank you.

Sincerely,



Norman D. Peck ✓  
Investigator  
Toxics Cleanup Program

NP:ll

cc: Dan Cargill, TCP/NWRO  
Brian Kim, Crystal Cleaners  
Mr. Robert O'Neill, Balcro Management Services  
Labroc II Limited Partnership, c/o Balcro Management Services