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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

December 22, 1999

Mr. Peter Jewett
Farallon Consulting
320 3rd Avenue NE
Suite 200
Issaquah, WA 98027

Dear Mr. Jewett:

Re: Revised Interim Action Work Plan
Lake Forest Park Preschool Property, 6124 NE 181st St., Kenmore, WA
Able Pest Control Site, 18115 62nd Ave NE, Kenmore, WA

This letter is written pursuant to your letter dated December 15, 1999 regarding the Interim Action Work Plan required at the above site. The Department of Ecology (Ecology) has the following comments regarding the Work Plan as outlined in your letter.

- 1) **Excavation Activities:** Please clarify how the excavated soil will be transported from the preschool playground to the soil stockpiled on the former Able Pest Control site (62nd Ave. Property). The plan should describe what will be done to minimize spillage, dust or track-out. A description of who will do this work and a definition for "light excavation equipment" should also be included.
- 2) **Barrier on Preschool:** Prior to excavation of contaminated soils and overlying bark chips on the Lake Forest Park Preschool Property (Preschool), a temporary durable barrier shall be placed over adjacent clean soils on the playground to avoid inadvertent spreading of contamination.
- 3) **Trench Liner:** After obtaining clean confirmation samples in the excavation area on the Preschool Property, and prior to back-filling, an impermeable barrier shall be placed from the fence between the 62nd Ave. Property and the Preschool Property and extend from the fence to the bottom of the interception trench on the 62nd Ave. Property. It shall run from the inside of the fence on the 62nd Ave. Property to the bottom of a north-south interception trench to be constructed (as described in comment 4 below), and the existing east-west trench.



4) **Trench Extension:** An extension of the existing trench shall be constructed northward to intercept shallow contaminated groundwater at the west and south boundaries of the 62nd Ave. Property and direct it to the collection system (proposed for enhancement in the Interim Action Work Plan) currently located near the southwest corner of the 62nd Ave. Property.

- Soils removed in conjunction with placement of the interception trench shall be handled in the same manner as those excavated on the Preschool Property as outlined in the proposed Interim Action Work Plan.
- These soils shall be kept segregated from the Preschool Property soils and separately characterized for disposal.

5) **Impermeable Barrier:** To minimize surface water impacts through the contaminated soil on the 62nd Ave. Property, an impermeable barrier of adequate thickness shall be placed from the fence on the southwest corner of that property, to approximately 50 feet northward. Please see a revised copy of your Figure 1.

- The impermeable barrier shall also extend to the east along the boundary between the 62nd Ave. Property and the Preschool Property and along the southern to the southeastern edge of the residence on the 62nd Ave. Property.
- A separately managed barrier should be placed to cover the east side of the residence to include the area from the southern property boundary that extends northward to the garage. This barrier should be sloped to discharge to the ditch or catch basin on 62nd Avenue. See revised Figure 1.

6) **Water Recovery Systems:** The water recovery systems at the 62nd Ave. Property shall be designed and constructed to separate, to the greatest extent practicable, diverted surface water runoff (clean rain water) from shallow perched groundwater (contaminated shallow groundwater), and to separately discharge each wastewater stream.

Clean Water:

- Clean rain water shall be analyzed on a weekly basis for the first month to confirm the presence or absence of pesticide contaminants. After a trend has been established and reviewed, the scheduling may be revised.
- All sample results from clean rain water and contaminated shallow groundwater sampling shall be submitted to Ecology in writing, together with a statement of data qualifiers of the data/analytical results and QA/QC information, on or before Tuesday of the week following sampling.
- Clean rain water which does not exceed surface water standards may be discharged via the local storm water conveyance system under conditions

specified by the City of Kenmore and/or King County Surface Water Management.

- All known, available and reasonable technology shall be used to assure that clean rain water does not contact contaminated soils and/or contaminated shallow groundwater.

Contaminated Shallow Groundwater:

- The shallow groundwater recovery tank (and/or the water being discharged from this tank to the sanitary sewer), shall be sampled weekly and analyzed for all regulated permit parameters and all pesticides known or reasonably suspected to be present at the 62nd Ave. Property.
- Contaminated shallow groundwater shall be collected separately and discharged to the sanitary sewer. Permission for this discharge may be subject to a confirmed letter of approval from King County which establishes discharge limits including, but not limited to, the maximum allowable concentrations of all pesticide contaminants found at the site and volume limitations. A copy shall be immediately provided to Ecology if the original permit issued on November 23, 1999 is amended.
- Ecology shall receive verbal notice immediately in the event that any discharge limit has been exceeded (in the case of discharge(s) to the sanitary sewer, or surface water criterion, in the case of wastewater discharged to storm water conveyance systems at or near the site), as specified in a permit or letter of permission.
- Any contaminated shallow groundwater exceeding discharge limits shall be transported to a Hazardous Waste Treatment, Storage and Disposal Facility in compliance with all applicable local, state and federal requirements.

7) **Roof Run-off:** In addition to an impermeable barrier on the surface soils, Ecology recommends separately collecting rain water runoff from the roof at the 62nd Ave. Property. This water could be easily collected and diverted to the storm drain system.

- No testing would be necessary if it is collected directly from roof downspouts prior to contact with the ground.
- Approval must be granted from the City of Kenmore or King County Surface Water Management.

8) **Analytical Turn-around:** With respect to confirmation sampling, Ecology expects the analytical turn-around-time to be less than four (4) days, and further expects to receive analytical data with data qualifiers and QA/QC data as soon as data is received by the Potentially Liable Parties (PLPs) or their agents.

Mr. Peter Jewett
December 22, 1999
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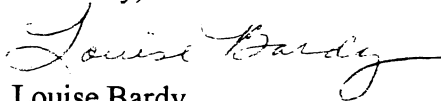
9) **Notification and Split Samples:** Ecology will be notified at least 24 hours (one working day) before this work begins, and at least 24 hours (one working day) before any planned sampling event in order to observe work and/or sampling and have the opportunity to take split samples. A working day is defined in this context as a day on which state government offices are opened for business, and specifically excludes state holidays and weekends.

10) **Dieldrin Concentrations:** The area of the highest concentrations of dieldrin are not located in the area adjacent and to the north of the preschool playground as stated in the proposed interim action outline, but are located in the eastern and southeastern portion of the former 62nd Ave. Property.

11) **Monthly Soil Sampling:** Monthly soil sampling shall include at least 2 samples on the preschool playground adjacent to the fence between the preschool and the 62nd Ave. Property at a location approved by Ecology on a monthly basis as part of the Monitoring and Maintenance requirements until the site had been completely remediated and all confirmation and other long-term monitoring requirements have been met.

Please revise the outline for the interim action work plan to include corrections and inclusions as addressed above. A revised version is due to Ecology by December 28, 1999. All references to "Ecology" in this letter refer to the Ecology Site Coordinator, Louise Bardy or her designated agent, if any, for purposes of notification and submission of data and/or required documents. If you have any questions regarding this letter, please contact me at (425) 649-7209.

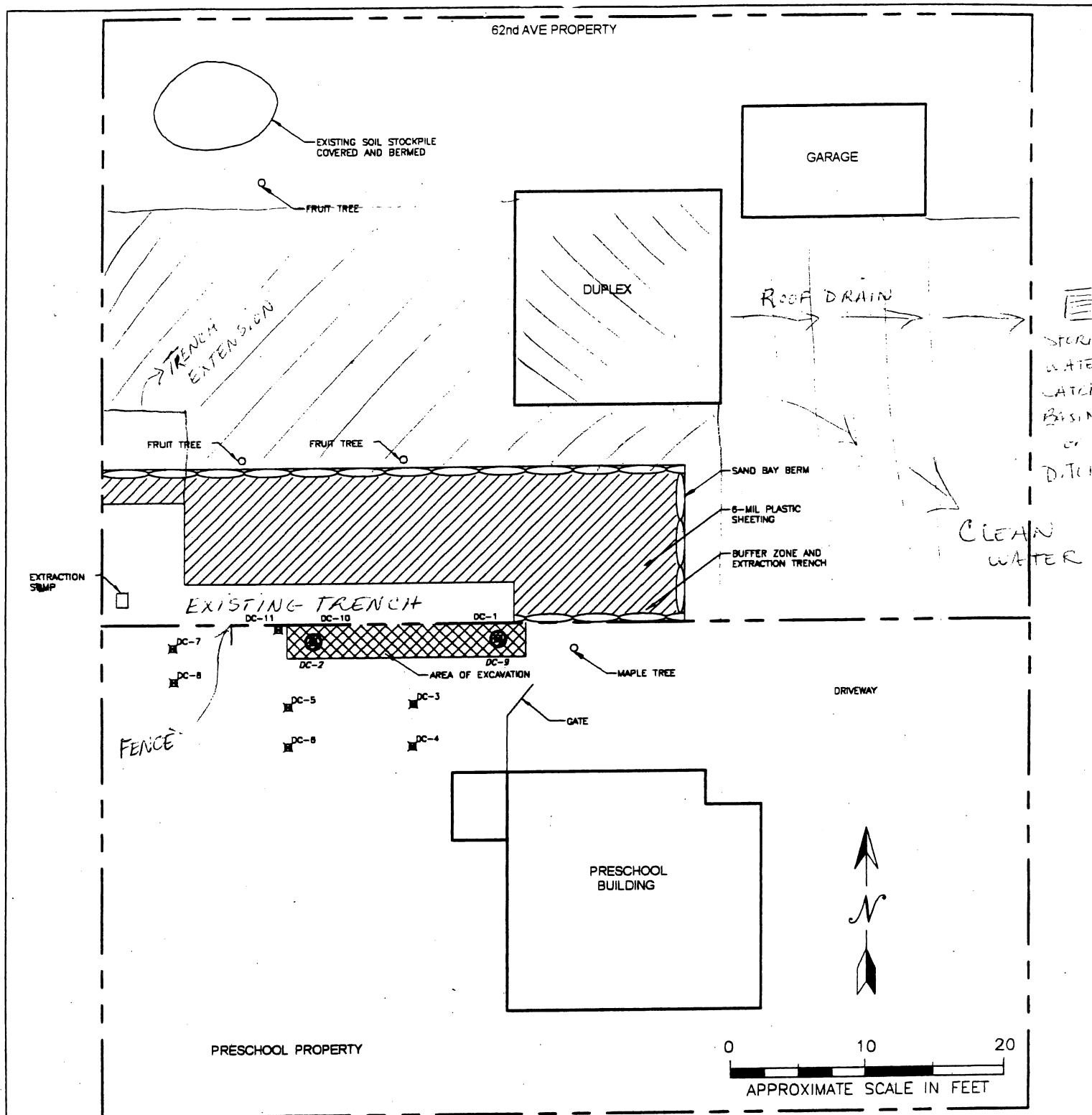
Sincerely,




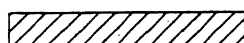
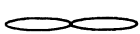


Louise Bardy
Project Coordinator
Toxics Cleanup Program

LAB:lb

cc: Norm Peck, Ecology
Ken Ledeman, ATG
Howard Jensen, Atty
John Wiegenstein, Atty



LEGENDS

-  AREA OF PROPOSED SOIL REMOVAL
-  AREA OF 6-MIL PLASTIC COVER
-  SAND BAG OR HAY BALE BERM
-  DC-9 SAMPLE LOCATIONS, NOVEMBER 22, 1999
-  DC-8 SAMPLE LOCATIONS, DECEMBER 8, 1999



FARALLON CONSULTING
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Issaquah, WA 98027

REVISED **FIGURE 1**

REMEDIAL INVESTIGATION/FEASIBILITY STUDY
ABLE PEST CONTROL SITE
KENMORE, WASHINGTON

FARALLON PN: 602-001

Drawn By: QDD

Checked By: PJ

Date: 12/14/99

Disk Reference: 602001A

