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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office

PO Box 47775 • Olympia, WA 98504-7775 • (360) 407-6300

July 19, 2022

Laurie Olin
Vice President Operations
Port of Ridgefield
PO Box 55
Ridgefield, WA 98642

Re: Ecology Response to October 15, 2021, letter regarding August 2021 Groundwater Monitoring for the Former Pacific Wood Treating Co. Site, Port of Ridgefield, Lake River Industrial Site

- **Site Name:** Pacific Wood Treating Corp (a.k.a. Lake River Industrial Site)
- **Site Address:** 111 W Division St, Ridgefield, Clark County, WA 98642
- **Facility Site ID:** 1019
- **Cleanup Site ID:** 3020
- **Agreed Order No:** 01TCPSR-3119

Dear Laurie Olin:

This letter provides the Department of Ecology's (Ecology) response to the above referenced report which documents historic groundwater analytical results through August 2021 from monitoring wells on the Port of Ridgefield's (Port) Lake River Industrial Site (LRIS) property, formerly used by Pacific Wood Treating Co. (PWT) and on the Ridgefield National Wildlife Refuge (RNWR). The report proposes changes to the number of analytes and groundwater-sampling frequency from that outlined in Ecology's last response on this same subject in August 2019.

The tables in the groundwater monitoring report do not consistently list the wells that are on this Site. For consistency, Ecology requests the data from all monitoring wells be included in these tables, regardless of their monitoring status.

The method reporting limit for pentachlorophenol (PCP) is above the 0.73 micrograms per liter ($\mu\text{g/L}$) cleanup level (CUL) provided in Table 3-1 of the Cleanup Action Plan in Consent Decree 13-2-03830-1. PCP analytical method reporting limits need to meet the CULs listed on Table 3-1. Method reporting limits need to meet the cleanup levels for all compounds listed on Table 3-1.

Model Toxics Control Act (MTCA) Method B Vapor Intrusion (VI) Levels are provided at the top of Table 3. Method B Groundwater CULs are provided at the top of Tables 4, 5, and 6. Site CULs are provided in Table 3-1 of the Cleanup Action Plan and should be listed in addition to the MTCA Method B VI and groundwater CULs.

Please include documentation regarding the amount of water removed from wells that were redeveloped before the January 2020 sample event and development field sheets. Ecology would appreciate receiving that in an email submittal.

Regarding the changes to the analyte listed on Table 7: Ecology agrees with those changes with the following exceptions.

- For MW-55, Ecology is requesting to analyze for VOCs and PCP only.

Please revise Table 7 in response to Ecology's comments above and submit in an email to Ecology with redevelopment documentation requested above. In the future, when requesting changes to the analyte list, it would save considerable review time to include both the present and request for changes on the same table.

Regarding the changes to the monitoring frequency: Ecology allows the expansion to a 30-month sampling interval, the next sampling events being in January 2024 and August 2026.

Regarding sampling using standard purge methods of purging a minimum of three pore volumes prior to sample collection: It is not clear if this is a request to change the purging method or leave it the same. Please clarify in the same email response to Ecology containing the revised Table 7 and redevelopment documentation requested above.

Please feel free to contact me at (360) 485-3987 or andrew.smith@ecy.wa.gov with any questions regarding issues discussed above.

Sincerely,



Andrew Smith P.E., LHG
Unit Supervisor
UST/Technical Support Unit
Toxics Cleanup Program
Southwest Region Office

cc by email: Andrew W. Vidourek, Maul Foster & Alongi, avidourek@maulfoster.com
Rebecca S. Lawson, P.E., LHG, Ecology, rebecca.lawson@ecy.wa.gov
Ecology Site File