



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 14, 2023

Dick Kettlewell
House of Kleen
9227 Fauntleroy Way SW
Seattle, WA 98101
kettlewell@comcast.net

RE: UIC Site 37320– Well Registration and Authorization with the Underground Injection Control (UIC) Program, Voluntary or Independent Cleanup Sites, House of Kleen (Site), 4425 Fauntleroy Way SW, Seattle, WA

Dick Kettlewell:

Ecology's UIC Program has reviewed your UIC registration application for the above-mentioned Site. Based on the information provided in the registration and the additional information provided per Ecology's request, the UIC wells are **Conditionally Rule-Authorized**, and a State Waste Discharge Permit is not required to operate the wells under WAC 17-218 authorities.

The UIC registration number is 37320. The Site is undergoing independent remedial cleanup activities (IRCA). The Department of Ecology, Toxic Cleanup Program (TCP) will evaluate the ICRA work as necessary; the Voluntary Cleanup Program (VCP) Site Number is XN0008. The Facility Site Identification Number is 43881387.

The IRCA work activities include direct-push borings to remediate chlorinated solvent-contaminated groundwater (CSG) and soil. The December 2022 *Groundwater Treatment - Injection Work Plan* (GTWP) for the Site will describe the detail of the IRCA. Fifteen Injection well points will be advanced to approximately 20 feet below ground surface, to deliver the solution to the treatment zone of the CSG. The injection of a zero-valent iron will aid in the passive degradation of the chlorinated solvent.

Conditional Rule-Authorization - Conditions of Use

There are inherent environmental risks associated with injecting compounds into groundwater. It is incumbent upon the owner and their representative to carefully characterize, manage, and monitor the Site surface and subsurface conditions to minimize risk and prevent unforeseen degradation of groundwater quality and other environmental risks.

Ecology will Rule-Authorize a UIC registration to operate when the two UIC Program requirements for Rule Authorization are met:

1. Registration of UIC wells (prior to use), and
2. The UIC well must meet the nonendangerment standard (WAC 173-218-080).

This Site does not meet the nonendangerment standard for Rule Authorization. Additional conditions are needed to allow for Rule-Authorization and the IRCA work to proceed.

The following Site-specific UIC Program requirements for **Conditionally Rule-Authorization** include:

- The interim action is a one-time event, additional injections will require additional authorizations.
- Onsite groundwater is not approved for use to mix with the remediation products for injection into the subsurface.
- The injection activities must follow the GTWP. Any deviations from the GTWP are not allowed unless the VCP Site Cleanup Manager has approved those changes.
- The injections must not cause a further degradation to groundwater quality criteria at the down-gradient monitoring points per state or federal applicable criteria. If such groundwater degradation occurs, the injection activities must discontinue; any environmental release must be reported no later than 24-hours from the release discovery at <https://ecology.wa.gov/Footer/Report-an-environmental-issue> or call 1-800-645-7911.
- Additionally, notification to Ecology's UIC Program of any change in UIC well status is a required element to this registration.
- The planned IRCA start date is for January 2023.

The Site will be **Conditionally Rule-Authorized** for as long as the nonendangerment standard of WAC 173-218-080 will continue to be met and the above items have been completed. Failure to capture any of the performance data required or cause a violation of the applicable cleanup standards may result in a denial, modification, or termination of the UIC registration.

A VCP Site Cleanup Manager will have final authority to determine if the IRCA described in your UIC registration have met the substantive requirement of the Model Toxics Control Act (MTCA) if such an opinion is requested. Ecology's UIC Program will not make that determination.

At any time, Ecology may require you to apply for, and obtain, a State Waste Discharge Permit for the continued use of these compounds. You would need to obtain a formal waste discharge approval for this project through the Ecology's State Waste Discharge Permit Program or Toxics Cleanup Program.

The owner is responsible to keep the UIC registration information current and retain all registration documents, plans, modeling, monitoring results, interim, and final reports. Upon Ecology request, the owner shall provide these documents to the UIC Program.

This UIC registration was evaluated under the presumptive approach, Ecology has presumed the conditions described in the UIC registration and other submitted documents truthful and factual in making the determination the injections will be protective of the Site groundwater quality and will meet the nonendangerment standard requirements of WAC 173-218-080.

Any material misrepresentations or omissions of fact supplied in this application may result in the denial or revocation of this registration authorization. Ecology's UIC Program has the authority to rescind a rule authorization if Ecology determines the system no longer meets the nonendangerment standard.

Please contact Eugene Radcliff at UICwells@ecy.wa.gov if you have any questions. You can find additional information on the UIC Program can at our website:

<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program>

Sincerely,



Eugene Radcliff, LG, LHG
Statewide UIC Program Coordinator
Water Quality Program

Cc:

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