

From: [Winslow, Frank \(ECY\)](#)
To: [Peter Kingston](#)
Cc: [Greg Peters](#)
Subject: XN0026 Coatings Unlimited - Ecology Feedback on Status Report
Date: Wednesday, May 24, 2023 11:28:55 AM
Attachments: [image001.png](#)

Hi Pete,

Ecology has completed a review of the submitted status report. The following is our feedback on that report. Ecology appreciates the good work done by Farallon to fill the data gaps identified within our No Further Action Likely opinion letter dated December 27, 2021.

Data Gaps

The data gaps largely pertained to identification and characterization of sources of chlorinated volatile organic compounds (CVOCs) in groundwater and characterization of the extent of the resultant plumes. Overall, it appears that the data gaps have been largely, if not entirely filled. Our December 27, 2021 opinion letter included a statement that "Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action (with the above caveats and clarifications)." If desired, Ecology could prepare an update to that opinion letter to, hopefully, indicate that the caveats and clarifications related to characterization data gaps have been sufficiently filled.

Cleanup of CVOCs in Groundwater

Ecology also appreciates that cleanup efforts are ongoing or complete, including the excavation and disposal of contaminated soils in selected areas, and the installation of air sparge and SVE wells.

I believe that our December 27, 2021 letter may have neglected to mention Ecology's expectation that all SVE work be done in compliance with local or state air quality authorities. I'm sure you are already aware of this but thought it worth mentioning.

A challenging part of this Site is that the sources of CVOCs in groundwater appear to not be attributable to specific operational points of release and appear to be a bit distributed. Hence, I see that the air sparge and SVE points for source control on the provided layout sheet cover a relatively large area. An important part of achieving a No Further Action (NFA) determination will be defining the appropriate performance and compliance monitoring network to establish that cleanup objectives have been met. Ecology's November 27, 2021 letter included the need for a Monitoring Plan, potentially to be included within a Cleanup Action Plan. It will be important to get Ecology's concurrence on the monitoring network, analytes, and schedule that will be needed to allow making a NFA determination in the future.

Potential data needs for remedial design were also discussed in Ecology's November 27, 2021 letter. Ecology has not reviewed the basis for the layout and design of the AS/SVE systems (e.g. lateral extent of treatment and radius of influence). Ecology's NFA Likely opinion letter pertained to the appropriate approach for cleanup of the Site contamination, not an opinion regarding the design of the remediation system. If Ecology's opinion on the system design is desired, then a Cleanup Action Plan providing detailed pilot test information should be submitted.

In order for Ecology to assess proposed performance monitoring of the AS/SVE system, the Monitoring Plan to be submitted to Ecology should include detailed cleanup plan maps for each remedial area (including the most current CVOC data for all current and historical groundwater sampling locations). Please note that without such detailed cleanup plans submitted for Ecology's review, it will be significantly more difficult to assess the sufficiency of a performance and compliance monitoring network.

Monitoring of Arsenic in Groundwater

Ecology also notes that continued monitoring will be needed for dissolved arsenic. The following is from our November 27, 2021 opinion letter:

Ecology has concluded that the arsenic in groundwater above the regional background concentration (8 µg/L) may be from a combination of natural and anthropogenic causes....

Hence, Ecology concludes that the cleanup of contamination at the Site should first focus on contaminants of concern other than arsenic. Long-term monitoring of arsenic in groundwater would be appropriate to observe if concentrations attenuate. If concentrations do not attenuate after other anthropogenic releases have been cleaned up and/or attenuated, then the arsenic may be concluded by Ecology to be of natural origin. Such long-term monitoring should be detailed within a Cleanup Action Plan.

Ecology cannot yet conclude that all dissolved arsenic is of natural origin. Please ensure that dissolved arsenic in groundwater monitoring will continue at the Site, although a sampling frequency for dissolved arsenic less frequent than for CVOCs may make sense at this time.

Ecology notes that some apparent arsenic mobilization has been observed at another site that involved air sparging. Although making the aquifer more aerobic would generally not be expected to mobilize arsenic (arsenic tends to precipitate in aerobic conditions), this was observed at the one air sparging site and the air sparging causality for the mobilization had appeared to be clear. Eventually, it is anticipated that post-treatment, arsenic will return to native conditions and not continue to be mobilized. However, some continued dissolved arsenic monitoring data will be needed at the Coatings Unlimited Site to support an eventual NFA determination.

Conclusions

Overall, Ecology is pleased with the results from the data gap investigations and ongoing monitoring. The groundwater plumes are of relatively low concentration and of limited extent. The ongoing and planned source control measures coupled with natural attenuation still appear to be appropriate cleanup actions to address remaining contamination at the Site. Once the reports you mentioned for the excavation cleanup at the Site have been submitted to Ecology, a decision can be made as to whether an opinion letter is to be requested from Ecology to update our November 27, 2021 (both to hopefully close out the data gaps and to get Ecology's opinion on the sufficiency of the excavation cleanup work). With respect to performance and compliance monitoring, we suggest that separate submittals and correspondence take place with Ecology on that subject.

Please don't hesitate to reach out if you have any questions regarding this feedback.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager
Department of Ecology – Toxics Cleanup Program
1250 W. Alder Street, Union Gap, WA 98903
(509) 424-0543 (cell)

Frank.Winslow@ecy.wa.gov

From: Peter Kingston <pkingston@farallonconsulting.com>

Sent: Thursday, May 18, 2023 3:50 PM

To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

Subject: RE: Coatings Unlimited - VCP Project No. XN0006

Thanks, Frank.

Feedback would be much appreciated. Let me know if you have any questions or need additional information.

Pete Kingston, Principal Geologist

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From: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

Sent: Thursday, May 18, 2023 3:49 PM

To: Peter Kingston <pkingston@farallonconsulting.com>

Subject: RE: Coatings Unlimited - VCP Project No. XN0006

Hi Pete,

Thank you for submitting this "status of cleanup action" letter report. Ecology provided our No Further Action Likely opinion letter for this Site on December 27, 2021. Although no opinion is being requested for this report, since 1) the cleanup at this Site is fairly complex; 2) it has been a while since Ecology provided our opinion letter; and 3) additional data and refined plans are now available, we recommend that Ecology review your letter report and provide feedback via email. I anticipate doing this review within the next few business days.

Thanks, Frank

Frank P. Winslow, LHG

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Frank.Winslow@ecy.wa.gov

From: Peter Kingston <pkingston@farallonconsulting.com>

Sent: Wednesday, May 17, 2023 2:35 PM

To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

Subject: Coatings Unlimited - VCP Project No. XN0006

Frank,

Farallon is submitting the attached letter that provides a summary of the cleanup action being conducted at 18420 68th Avenue South in Kent, Washington. This letter includes a summary of the data gap subsurface investigation activities and results, an updated conceptual site model, and a summary of the necessary modifications to the cleanup action alternatives evaluated based on the updated conceptual site model and future land use.

At this time, we are not requesting an opinion on this report.

Let me know if you have any questions.

Pete

Pete Kingston, Principal Geologist

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