

From: Winslow, Frank (ECY)
To: "Morine, Adam"; "mstanton@landauinc.com"
Cc: "Esparra, Mariem"; "Jennifer Cox"
Subject: RE: Letter from Ecology - Faulkenbury & Wright and Edwards on Fifth Sites
Date: Wednesday, May 31, 2023 12:47:28 PM
Attachments: image001.png

Resent with corrected email address for Mike Staton.

From: Winslow, Frank (ECY)
Sent: Wednesday, May 31, 2023 12:44 PM
To: 'Morine, Adam' <AMorine@trccompanies.com>; 'mstanton@landauinc.com' <mstanton@landauinc.com>
Cc: Esparra, Mariem <MEsparra@trccompanies.com>; Jennifer Cox <jcox@gre-m.com>
Subject: RE: Letter from Ecology - Faulkenbury & Wright and Edwards on Fifth Sites

Hi Adam and Mike,

Thank you for your email, Adam.

I did not hear back from the Faulkenbury team on the letter we sent to both parties, but we did mention that they could work directly with you on the data access/sharing question.

I think that it will be critical to have water level data from both Sites on a minimum quarterly basis. Having potentiometric surface maps when pumping and air sparing systems are in operation will be an important part of demonstrating system performance. The attached map illustrates this well. Ideally, these data will help make a case of no continued comingling concerns in the future. The current potentiometric surface (with pumping at F&W and no pumping or sparging at Edwards yet) will be helpful for demonstrating the current status of potential comingling. Note that a report from the F&W site had talked about potential dewatering of the shallow groundwater zone – quarterly water level monitoring will be important to assess whether or not that is happening.

As mentioned in our letter, Ecology requests that all water level data be shared to ensure that potentiometric surface maps include all pertinent data. Ecology suggests that it is premature to limit the data set of wells at this time since development of a robust potentiometric surface map requires consideration of all available data. We recognize that site field work scheduling constraints apply, therefore Ecology would be okay with a synoptic water level round potentially stretching beyond one day, if necessary.

Please ensure that monitoring wells at the two sites share the same vertical datum. Based on previous mapping it would appear that this is the case but worth verifying nonetheless.

One question for Adam – I'm not sure what is meant in your email by "When our system becomes operational, we would expand that monitoring to include periods when the system(s) are operating, as well." We can have a Teams call if it would be easier to explain that way.

As a general comment for the Faulkenbury team, semi-annual groundwater monitoring would appear to be fairly infrequent for a Site that is undergoing pump-and-treat remediation, including targeting removal of DNAPL in groundwater. We recognize that this cleanup work is currently being done as independent cleanup sans Ecology program, but would anticipate eventual enrollment in a VCP or formal process. Although Ecology's guidance focuses on a minimum of eight consecutive quarters of monitoring rounds to demonstrate compliance, consecutive quarterly (and commonly monthly) data collection to demonstrate performance of remedial systems is arguably an industry standard and Ecology would generally consider it to be a reasonable expectation. If groundwater concentrations have been demonstrated to be generally stable during remedial system operations, then perhaps semi-annual water quality monitoring with more frequent water level monitoring could be argued.

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: Morine, Adam <AMorine@trccompanies.com>
Sent: Wednesday, May 31, 2023 11:52 AM

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

Cc: Esparra, Mariem <MEsparra@trccompanies.com>; Jennifer Cox <jcox@gre-m.com>

Subject: Letter from Ecology - Faulkenbury & Wright and Edwards on Fifth Sites

Hello Frank,

I just wanted to give you an update on this. We spoke with Mike Staton at Landau and will be jointly collecting water level measurements at the Site(s) moving forward. Landau is currently collecting groundwater samples on a bi-annual basis and will be sharing their reports with Ecology going forward.

Their next event actually coincides with the timing of our quarterly groundwater event. We will plan on having a TRC employee on the Faulkenbury and Wright site on June 12 when Landau will be collecting their water level data. This way we can share the comprehensive groundwater information with Ecology during a singular event that spans both Sites.

As discussed with Landau, we will access their Site to collect groundwater elevation data from the following five shallow monitoring wells on their property to give us good information on the regional groundwater information in the vicinity of the Edwards Site:

SMW-2
SMW-3
SMW-4
SMW-6 and
SMW-11

Please be aware that they will shut their system down in advance of their groundwater sampling so that they are collecting representative groundwater samples. When our system becomes operational, we would expand that monitoring to include periods when the system(s) are operating, as well.

Please let us know if you have any questions.

Thanks.

Adam Morine, P.E.
Senior Engineer



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

Sent: Tuesday, May 23, 2023 8:09 AM

To: Mark Myers <mmyers@williamskastner.com>

Cc: mstaton@landauinc.com; Jennifer Cox <jcox@goodmanre.com>; Morine, Adam <AMorine@trccompanies.com>; Wyatt, Kathryn (ATG) <Kathryn.Wyatt@atg.wa.gov>; Mitchell, Treasure (ECY) <trmi461@ECY.WA.GOV>

Subject: [EXTERNAL] Letter from Ecology - Faulkenbury & Wright and Edwards on Fifth Sites

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Hi Mark Myers,

Please find attached a letter from Ecology regarding the Faulkenbury & Wright Site (CSID 14831). This letter is only being sent via email, so your acknowledgment of receipt of this email and that you are able to open the attachment would be much appreciated. Also, please forward this letter to appropriate persons (e.g. owner of the F&W property), as appropriate.

Please don't hesitate to contact me if you have any questions or concerns regarding this letter.

Thanks, Frank

Frank P. Winslow, LHG

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