From:	Winslow, Frank (ECY)
То:	"Scott Woerman"; David Johnson
Cc:	Johnny Sweeney; Brad Haymond; jfelton@northpointkc.com; Barry G. Ziker; Katie Saltanovitz; 1929001@landauinc.tonicdm.com; Kalefern, Kevin
Subject:	RE: Fruhling Sand and Topsoil Site: Data Gap Investigation Work Plan - Proposed Well Point
Date:	Tuesday, March 21, 2023 12:06:43 PM
Attachments:	image004.png

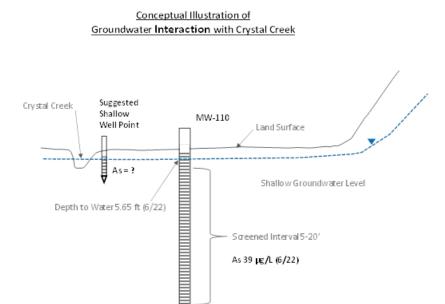
Hi Scott and Dave,

Thank you for submitting your work plan. Ecology Toxics Cleanup Program (TCP) will be reviewing this work plan and getting back to you as well as Ecology Water Quality Program as soon as we can.

The work plan includes the installation and sampling of a monitoring point adjacent to Crystal Creek in the vicinity of MW-110 that Ecology TCP suggested during our March 8, 2023 site visit. I thought that further clarification on this suggested monitoring point is warranted and is provided herein. Ecology concluded within our December 7, 2022 letter:

The downgradient (westerly) extent of groundwater contamination above cleanup levels has been adequately delineated, except at MW-110, near the northwestern Property boundary where dissolved arsenic was detected at 39 μ g/L in June 2022. Monitoring well MW-110 is located immediately upstream of Crystal Creek, therefore, sampling of Crystal Creek in this area is requested by Ecology ...

Essentially, based on the arsenic concentrations in MW-110, Ecology must conclude that the groundwater to surface water pathway is complete in this area. Ecology has prepared the following conceptual illustration regarding potential groundwater surface water interaction in this area:



As shown in this illustration, the well screened interval at MW-110 is fairly long in comparison with the interval of groundwater that would be expected to discharge into Crystal Creek. Based on Ecology's site visit and further review of this question, we are no longer requesting surface water

sampling at this location at time. A significant amount of dilution of groundwater discharging to Crystal Creek would be expected. Rather, installation and sampling of a shallow well point adjacent to the creek is recommended to assess arsenic concentrations in groundwater discharging into Crystal Creek in this area. Calling this a well point rather than monitoring well makes sense to distinguish the installation's design and purpose. This approach is consistent with Ecology TCP's guidance for assessing impacts to surface water from groundwater.

The well point should extend slightly below the base of the channel. No well construction permit would be needed, since this well point would be significantly less than 10 feet deep. Use of a prepacked screen is recommended to minimize turbidity. In addition, when sampling this well point, we would recommend recording field turbidity as well as sampling for both total and dissolved arsenic. We suggest that this installation and the sampling of this well point proceed as soon as it can be scheduled, since this concern should be considered during the development of Feasibility Study options for the Site.

I don't believe that the above discussion significantly affects the scope of work presented within the work plan but rather provides clarification on the rationale and need for this well point.

Please let me know if you would like to schedule a Teams call to discuss this email or any other matter. FYI, I will be out of the office and unavailable from 3/29 to 4/4.

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: Scott Woerman <swoerman@landauinc.com>
Sent: Monday, March 20, 2023 4:42 PM
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1929001@landauinc.tonicdm.com
Subject: Fruhling Sand and Topsoil Site: Data Gap Investigation Work Plan

Good afternoon,

On behalf of NP Snohomish County 228th Apartments, LLC, please find a Data Gap Investigation Work Plan for the Fruhling Sand and Topsoil Site associated with VCPx No. XN005 attached.

If you have any questions following your review, please let us know.

Thank you, Scott Woerman, MBA VICE PRESIDENT D: (206) 631-8688 | M: (206) 571-7028 | swoerman@landauinc.com



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