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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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July 26, 2023

Pat Milton
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The Estate of Lila Rears
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Re: Comments on March 2023 Data Submittal

- **Site Name:** Milton's Dry Cleaners
- **Site Address:** 6721 E. 4th Plain Blvd., Vancouver, Clark County, WA 98661
- **Facility/Site No.:** 19779
- **Cleanup Site ID No.:** 1834
- **Agreed Order No.:** DE4239 07/4-TC-S

Dear Scott Johnson and Rick Lee:

Thank you for submitting the March 2023 data submittal for Department of Ecology (Ecology) review.¹ The purpose of this letter is to provide Ecology's comments on the data submittal.

Comments

1. 1,4-Dioxane blank contamination: As requested by Ecology, additional samples for 1,4-dioxane analysis were collected during the sampling event from six selected wells. The purpose of these samples was to assess the distribution of this constituent within the groundwater plume using reliable sampling and analysis methods that are consistent with current Interstate Technology & Regulatory Council (ITRC) guidance² and were not used in previous sampling. However, there were data quality issues with all these samples due to blank contamination and/or quality control criteria exceedance that resulted in estimated values, elevated reporting limits and positive bias. These quality issues make the results of these data of limited use for the remedial investigation, particularly in consideration of

¹ Milton's – March Data Submittal, email from Ashley Sutton, Geosyntec, to Steve Teel, Ecology, June 22, 2023.

² ITRC, Technical Resources for Addressing Environmental Releases of 1,4-Dioxane, <https://14d-1.itrcweb.org/#gsc.tab=0>, published February 2021.

1,4-dioxane's low MTCA Method B (cancer) cleanup level (0.440 micrograms per liter [$\mu\text{g/L}$]). Two of the estimated values exceeded this cleanup level. **Therefore, sampling for 1,4-dioxane will need to be repeated during the upcoming September 2023 sampling event from all six locations.**

2. Review of the groundwater elevation summary table shows that there appears to be an anomalous elevation result (182.12 feet) for well MW-37bs on June 29, 2021. The other elevation results in the table for this well range from 145.16 to 148.51 feet. Table 3 from the 2021 Annual Report (Geosyntec 2021) also shows this elevation result for MW-37bs.³ However, the June 2021 map in Figure B6 from Geosyntec (2021) shows an elevation of 147.21 for this well. Please check your field notes for this elevation measurement and correct future data tables accordingly.

If you have any questions about this letter, please contact me at 360-890-0059 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Region Office

SST/jc

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Ecology Site File

³ Geosyntec, 2021. 2021 Annual Report, Milton's Dry Cleaners Site – Groundwater Monitoring. September 12.