

From: [Vik, Kim \(ECY\)](#)
To: ["Grant Hainsworth"](#)
Cc: [Kyle Siekawitch](#); [Jamie Stevens](#); [Treat, Nick \(ECY\)](#)
Subject: RE: Maralco (VCP NW3339) Revised IAWP
Date: Monday, July 31, 2023 6:04:27 PM

Hi Grant,

Thank you for the submittal of the revised Interim Action Work Plan (IAWP), dated July 25, 2023. I appreciate the revisions that were made based on our conversation and your understanding that Ecology will only concur with dross and indoor stockpile removals under the VCP. The interim action proposed in the revised IAWP consists of two Phases:

- Phase 1 – Removal and offsite disposal of the outdoor dross stockpile and the stockpiles located inside the existing building. Phase 1 is planned to be implemented in the summer and fall of 2023. Based on our conversations, the completion of Phase 1 is estimated to take approximately 2 to 3 months.
- Phase 2 – Removal and offsite disposal of contaminated soil and sediment associated with the stormwater drainage ditches on the property and in the South 202nd Street right-of-way. Phase 2 is planned to be implemented following the completion of Phase 1, and will be subject to the forthcoming Agreed Order (AO).

The revised IAWP also includes Compliance Monitoring (Section 4) which proposes to utilize cleanup standards.

To restate Ecology's position, the only interim actions that Ecology will concur with under the VCP will be those that:

- Are technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance;
- Correct a problem that may become substantially worse or cost substantially more to address if remedial action is delayed; or
- Are needed to provide for the completion of the Remedial Investigation (RI) or design of the cleanup action.

Based on these criteria, Ecology only concurs with the removal and disposal of the black dross and stockpiles located above ground and within the existing building (Phase 1 in the revised IAWP).

Any cleanup action, including subsurface excavation and the removal of contaminated sediment and soil (Phase 2 in the revised IAWP), and any subsequent compliance sampling (Section 4 of the revised IAWP), must be conducted under the AO in order to maintain compliance with the conditions of the permit. Cleanup standards are to be established following the completion of the RI and Feasibility Study (FS). Any proposed cleanup action in the revised IAWP is premature and is not accepted by Ecology prior to the final approved RI/FS, Disproportionate Cost Analysis (DCA), and Cleanup Action Plan (CAP) under the AO. Any interim action other than Phase 1 of the revised IAWP will be subject to the AO and public comment.

Thank you for your continued effort in cleaning up this Site. Let me know if you have any questions regarding this email.

Kim Vik

From: Grant Hainsworth <grant.hainsworth@creteconsulting.com>
Sent: Tuesday, July 25, 2023 5:10 PM
To: Vik, Kim (ECY) <KVIK461@ECY.WA.GOV>
Cc: Kyle Siekawitch <ksiekawitch@bridgeindustrial.com>; Jamie Stevens <jamie.stevens@creteconsulting.com>
Subject: RE: Maralco (VCP NW3339) Revised IAWP

Email 2 with a complete PDF file.

Grant Hainsworth, P.E.
Principal
CRETE Consulting Inc., PC
C 253-797-6323
grant.hainsworth@creteconsulting.com

16300 Christensen Road
Suite 214
Tukwila, WA 98188
www.creteconsulting.com

From: Grant Hainsworth
Sent: Tuesday, July 25, 2023 5:09 PM
To: Vik, Kim (ECY) <KVIK461@ECY.WA.GOV>
Cc: Kyle Siekawitch (ksiekawitch@bridgeindustrial.com) <ksiekawitch@bridgeindustrial.com>; Jamie Stevens <jamie.stevens@creteconsulting.com>
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Kim, we have revised the IAWP to reflect the use of Method B direct contact in soil, disposal of all excavated soil/sediment, and the separating of the IA into Phase 1 and Phase 2 to allow Ecology to OK just the removal and disposal of the indoor and outdoor waste stockpiles (Phase 1) under the VCP.

Attached is a PDF with the text, tables, and figures and RLSO Word versions of the main body text and the QAPP text (Appendix C). I will send a 2nd email that includes a full PDF file with appendices.

While I am on vacation, Jamie Stevens (206-799-2744 and cc'ed) will be your primary contact at CRETE. I will be back in the office Tuesday, August 15.

Grant Hainsworth, P.E.
Principal
CRETE Consulting Inc., PC
C 253-797-6323
grant.hainsworth@creteconsulting.com

16300 Christensen Road
Suite 214
Tukwila, WA 98188
www.creteconsulting.com