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September 6, 2007

Mr. Steve Ritt LeatherCare, Inc. 901 Elliott Avenue W. Seattle, Washington 98119

RECEIVED SEP 062007 DEPT. OF ECOLOGY TCP-NWRO

Subject: Catch Basin, Sump, Drain Cleaning LeatherCare, Inc. 901 Elliott Avenue W. Seattle, Washington

Dear Steve:

This letter documents interim remedial actions involving the cleaning of catch basins, sumps and drain lines at the LeatherCare, Inc. (LeatherCare) facility on Elliott Avenue in Seattle. Sludge and water samples collected from these appurtenances were found to contain the dry cleaning solvent tetrachloroethene (PCE) and its degradation products as a result of historical dry cleaning operations that used PCE. LeatherCare no longer uses PCE in its operations, but the PCE had become entrained in the sludge, which required its physical removal. CDM subcontracted with Envirotech Systems, Inc. to perform the work and manage appropriate disposal of the generated waste. CDM oversaw the work, which occurred on March 16, 2007.

Sewage Drainage System Description

The sewer line that services the facility is located in Elliott Ave. W. Because the elevation of Elliott Ave. W. is higher than main floor of the facility, waste water has to be pumped up to the sewer line. Originally because it was an apple processing facility, the building was constructed with a series of concrete trenches, which were used as a fluid-based system of transport for the apples and apple waste products. LeatherCare modified the existing trench and sump system, filling some with pea gravel and concreting them over, and retaining others as needed.

There are two interior sumps; one is located between the spray booth and clothes dryers near the east side of the facility and the second is located near the washer at west end of the facility. Both sumps are concrete, but the second sump contains a metal liner. Water that enters both of these sumps is pumped and conveyed through piping located along the ceilings to the sewer line in Elliott Avenue. Located underneath the dryers near the east end of the building is a vault that contains water which is recirculated through the cooling tower. There is one concrete catch basin located outside the facility next to the natural gas meter.

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Water that enters this catch basin is conveyed to the sump located near the east side of the facility.

The sump on the west end of the facility receives water from a regular household type of washing machine and small floor drains. Based on the condition of the floor drains (i.e., dry, full of lint), they rarely see any water. An open trench extends from the washing machine directly to the sump. The floor drains appear to be connected in series via a pipe — it is believed to have been a modified trench. The pipe then discharges to an open trench that "T's" into the first trench.

The sump at the east side of the facility receives waste water from four sources: 1) the adjacent utility sink, 2) the outside catch basin, 3) a floor drain located next to the washers that are located on the south side of the building, and 4) a partially open trench drain that extends from the boiler room and washers that are on the north/central side of the facility. Except for #4, all of these conveyances appear to be tight-lined. The #4 drain system appears to be part of the original trench drain system, part of which may have been tight-lined and is covered over by the concrete slab flooring. It should be noted that this trench should not have been significantly impacted by PCE because PCE using machines, the still or PCE storage were not located along this line.

The outdoor catch basin captures water from a curtain drain that surrounds an adjacent concrete pad, a roof downspout, two small catch basins in the parking lot next to the store front, and the parking lot itself.

Methods

Envirotech utilized a vactor truck and pressure wash system to conduct the work. The work consisted of vactoring out sludge in the catch basins/sumps/drain lines described above, followed by pressure washing. All wash water generated was also vactored. Photographs taken during the cleaning effort are included as **Attachment A**.

The sumps, cooling water vault, and catch basin were fully cleaned of sludge, soil, and debris. Drain lines on the west side of the facility and the tight-lined drain that extends from the floor drain next to the washers (east side) to the sump were fully pressure washed. At the outdoor catch basin, the upgradient line was cleaned, but the downgradient line encountered an obstruction. The partially open trench drain that extends from the boiler room and washers on the north/central side of the facility was cleaned to the extent practicable. The pressure washer was not able to extend through the portion of the drain line that is covered over by the



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floor slab. Also, the steel plates could not be removed over a portion of the trench drain where the spray booth is located.

The sludge, water, and wash water was disposed of as hazardous waste. A total of 1,928 gallons of sludge and water were generated during this effort. A copy of waste manifest is attached.

Sampling

The volatile organic compound concentrations in the initial water samples collected were not particularly high, containing up to 13 micrograms per liter (μ g/L) PCE and 14 μ g/L vinyl chloride. The initial sample locations were sampled again about a week after the cleaning occurred. The two inside samples contained similarly fairly low concentrations of PCE but the PCE concentration in the outdoor catch basin was an order of magnitude higher. A third sampling conducted in June, showed an undetectable concentration of PCE in the main indoor sump. However, water sampled from the catch basin contained 1,400 μ g/L cis-1,2-dichloroethene, indicating that chlorinated solvents were continuing to leach from the catch basin. Table 1 presents the water data from these three sampling rounds and the sample locations are shown on Figure 1. The analytical reports were included in prior groundwater monitoring reports and are therefore not included here.

To remove any further concerns that residual PCE and/or its degradation products may be entrained within the catch basin, all parties involved have decided that the best course of action is to remove the catch basin entirely and replace it. The catch basin removal is scheduled for August 2007.

Very truly yours,

Pamela J/Morrill, CHMM, LHG Project Manager Camp Dresser & McKee Inc.

Attachments

cc: Ms. Jo Flannery, Ryan, Swanson & Cleveland, PLLC Mr. Dale Myers, Department of Ecology



Table

Table 1Sump and Catch Basin Water Analytical SummaryLeatherCare, Inc.Seattle, Washington

					cis-1,2-	trans-1,2-		
Sample			Tetrachloroethene	Trichloroethene	Dichloroethene	Dichloroethene	1,1,-Dichloroethene	Vinyl Chloride
Location	Sample ID	Date			μ	<u></u> γ/L	· · · · · · · · · · · · · · · · · · ·	
CB1	CB1	2/13/2007	13	<0.2	<0.2	<0.2	<0.2	<0.2
	CB1a	3/22/2007	7.1	<0.2	<0.2	<0.2	<0.2	<0.2
CB2	CB1	2/13/2007	8.1	6.9	52	0.6	<0.2	14
	CB2a	3/22/2007	14	7.4	3.8	<0.2	<0.2	<0.2
	Sump	6/20/2007	<1.0	<1.0	1.4	<1.0	<1.0	<1.0
CB4		2/13/2007	NS	NS	NS	NS	NS	NS
	CB4a	3/22/2007	290	20	27	<2.0	<2.0	<2.0
	Drain	6/20/2007	10	15	1,400	8.2	2.0	10

Notes:

February 13, 2007 data is prior to sump/catch basin cleaning. All other samples collected subsequent to sump/catch basin cleaning.

NS - not sampled, insufficient water for sampling.

< - analyte not detected at or greater than the listed concentration.

µg/L - micrograms per liter.





Figure



RYAN SWANSON & CLEVELAND PLLC LEATHERCARE SEATTLE, WASHINGTON

CDM

LEGEND:

MW1 MONITORING WELL LOCATION AND DESIGNATION AND ELEVATION IN FEET

----- FENCE

++++++++++++++++++ RAILROAD TRACKS

- CB4 △ SUMP/TRENCH/CATCH BASIN SAMPLE LOCATION AND DESIGNATION, SLUDGE AND/OR WATER
- CB3▲ SUMP/TRENCH/CATCH BASIN SAMPLE LOCATION AND DESIGNATION, SLUDGE ONLY
 - CATCH BASIN



HISTORICAL FEATURES

Figure No. 1 SUMP/TRENCH/CATCH BASIN SAMPLE LOCATION MAP



Attachment A Field Photographs

February 2, 2007

Photograph No. A1

Photographed By: Pam Morrill

Description: Pressure washing outside trench to catch basin.



February 2, 2007

Photograph No. A2

Photographed By: Pam Morrill

Description: Vactoring outside catch basin.





February 2, 2007

Photograph No. A3

Photographed By: Pam Morrill

Description: Trench drain at west end of building before cleaning.



February 2, 2007

Photograph No. A4

Photographed By: Pam Morrill

Description: Same trench drain at west end of building after cleaning.





February 2, 2007

Photograph No. A5

Photographed By: Pam Morrill

Description: Cleaning the trench that extends from the boiler room to the sump at the east side of the building.





February 2, 2007

Photograph No. A6

Photographed By: Pam Morrill

Description: Cleaning the vault that contains the cooling tower water.



February 2, 2007

Photograph No. A7

Photographed By: Pam Morrill

Description: Cleaning the sump at the east side of the building.







Attachment B Waste Manifest

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	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper chipping nome, and are classified, packaged, marked and labeled/placamped, and are in all respects in proper condition for transport according to applicable international and hadronal governmental regulations. If export shipping nome, and are classified, packaged, Exporter, I cathly that the dontents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.													
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Tracy Williams

From:	RBarrick@entrix.com
Sent:	Wednesday, August 29, 2007 3:18 PM
То:	damy461@ecy.wa.gov
Cc:	Kim Johannessen; Pete Parker; Tracy Williams
Subject:	DNAPL potential at Darigold VCP #NW 1267 boring logs
Attachments	: KleinfelderDarigold 635 Elliott boring logs.pdf

Hi Dale ---

Attached are boring logs for the geotechnical work that was completed by Kleinfelder. Those 14 boreholes are shown on Figure 1 as locations K-1 through K-14 attached to the letter in my previous e-mail I sent this morning. In the attached file they are labeled B-1 through B-14. <u>They were relabeled</u> for Figure 1 to avoid duplication of a B-xx series used by ENTRIX.

The attached are the only prepared boring logs for the deep subsurface work conducted at the Darigold property. The other drilling and push-probe work was conducted for exploratory purposes and documented by field notes and laboratory analyses of some soil intervals. Figure 1 of the letter submitted to you summarizes observations and results for chlorinated solvents from that information.

If you have any questions, please do not hesitate to call me. Best regards,

Rob

Robert C. Barrick Senior Consultant ENTRIX, Inc. 2701 First Avenue, Suite 500 Seattle, WA 98121

Tel: (206) 269-0104 ext 555 Direct Tel: (206) 418-1260 Direct Fax: (206) 418-1261 Cell: (206) 779-5339 rbarrick@entrix.com www.entrix.com

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