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May 19, 2010

Mr. Dale Meyers  
Department of Ecology  
3190 160<sup>th</sup> Avenue SE  
Bellevue, Washington 98008

Subject: Response to Request for Additional Information  
LeatherCare Inc.  
901 Elliott Avenue W  
Seattle, Washington  
VCP No. NW1805

Dear Mr. Meyers:

This letter responds to the Department of Ecology's (Ecology) request for additional information in its advisory opinion letter of January 7, 2010 for the above referenced site. The letter was prepared in response to the Remedial Investigation and Focused Feasibility Study for the site dated November 9, 2009, prepared by Camp Dresser & McKee Inc. on behalf of LeatherCare Inc.

In its January 7 letter, Ecology identified six items that it felt required further clarification. The following presents each of Ecology's comments (in italics) and CDM's response.

*At this time insufficient data has been generated to empirically demonstrate that "natural attenuation" is in fact occurring. An additional four-quarter [sic] of groundwater monitoring should be sufficient. Data from each monitoring well should be included in the Mann-Kendal statistical analysis and EPA's Biochlor spread sheet (Excel 2000 version).*

CDM has previously presented clear, empirical evidence that biodegradation is occurring as demonstrated by the presence of cis-1,2 dichloroethene, vinyl chloride, and ethene. In addition, CDM has further shown that geochemical conditions are favorable for biodegradation and that vinyl chloride is not accumulating, instead, ethene is being produced by the breakdown of vinyl chloride. CDM's original contamination assessment and RI/FS both provided an in-depth discussion of the degradation processes for PCE and an evaluation of the site conditions with respect to these processes. Our quarterly monitoring data have consistently substantiated this fact, backed up by a Mann Kendall statistical analysis.

With respect to rerunning the BIOCHLOR model to calibrate with future analytical results, it is CDM's opinion that no useful information can be gained by Ecology beyond the initial results presented in our letter date May 19, 2010. As was indicated in our letter dated, the model is not intended to predict the breakdown of PCE at trace concentrations. The declining





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values in the raw data are easy to see and understand. The cost of this BIOCHLOR modeling, weighed against its lack of applicability and usefulness, is not in any way justified at this site.

*How far does the TCE, PCE, and vinyl chloride plume extend into the railroad right-of-way? CDM acknowledges that the vinyl chloride plume likely extends onto and potentially under the right-of-way. What is the extent of the plume between monitoring wells LC-2 and LC-4R and monitoring wells LC-7, LC-8, and LC-9? Where are the points of compliance to be established for groundwater?*

It is CDM's opinion that the existing monitoring wells define the plume sufficiently. Even if it was necessary to know whether the plume ends 5 feet from LeatherCare's fence line, or 20 feet from the fence line, it is not safe or legally possible for us to install wells between the six sets of railroad tracks between wells LC-2/LC-4R and LC-7/LC-8/LC9. We also obtained concurrence from Ecology before installing these wells that the objective was to define the plume with wells that did not detect cVOCs. That was done. LC-7, LC-8, and LC-9 are all nondetect.

*What is the extent of the contaminate plume under Elliott Avenue West?*

CDM has no knowledge that would lead us to believe there is a plume under Elliott Avenue. Groundwater flow direction is not toward Elliott Avenue, and, based upon the trace concentrations detected in monitoring wells nearest to Elliot Avenue, CDM projects the plume boundary to be within the property boundary.

*Ecology does not concur with the following statement; the low concentrations of residual cVOCs in groundwater at LeatherCare do not pose a threat to human health or the environment. The cleanup level established for the LeatherCare Site at this time is MTCA Method A for unrestricted land use for soil and groundwater. Any concentration which exceeds the cleanup level established for the Site is not protective to human health or the environment.*

Ecology did not quote CDM correctly and took this statement out of context. CDM's exact quote is as follows: "The low concentrations of residual cVOCs *in situ* do not pose a threat to human health or the environment because there are no complete exposure pathways." Simply stated, no one is currently drinking the groundwater, no one is directly exposed to the cVOCs in soil or water because the site is paved, and CDM conducted an evaluation of the soil vapor to air pathway and found no increased risk from this exposure scenario. Nonetheless, the RI/FS is already designed to take this site to compliance with Method A standards.



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*To determine if the groundwater impacted by contaminants is "potable" or "non-potable", refer to and follow WAC 173-340-720 and 173-340-730 for the Site specific determination. Once this is completed the decision as to which cleanup standard for groundwater can be established for the Site.*

CDM presented the basis for justification for classifying groundwater at this site as nonpotable in a letter dated May 19, 2010.

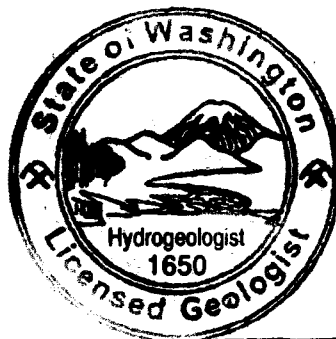
*Re-submit Feasibility Study using the attached "Feasibility Study (FS) Outline" dated June 2009 as a guide. This document was prepared for Shell Oil as a requirement and has been adopted by Ecology as the Standard.*

CDM presented an RI/FS to Ecology in compliance with MCTA. There is flexibility in WAC 173-340-350(6), which states that "the scope of a remedial investigation/feasibility study varies from site to site, depending upon the informational and analytical needs of the specific facility. This requires that that process remain flexible and be streamlined when possible to avoid the collection and evaluation of unnecessary information so that the cleanup can proceed in a timely manner." Ecology has not published this Shell Oil "standard" as a guideline for the general public conducting work under the voluntary cleanup program and therefore LeatherCare is under no obligation to conform to this Shell Oil document. LeatherCare is a small business in the voluntary cleanup program, not Shell Oil. It is CDM's opinion that the RI/FS submitted to date is sufficient for Ecology to make a determination regarding the Site.

CDM offers these clarifications as our response to these information requests. Given the favorable conditions at this site and the remediation progress made to date, we trust these responses are more than adequate.

Very truly yours,

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



cc: Ms. Jo Flannery, Ryan, Swanson & Cleveland, PLLC  
Mr. Steve Ritt, LeatherCare, Inc.