

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** [wcarroll@arrowenv.com](mailto:wcarroll@arrowenv.com)  
**Cc:** [Radcliff, Eugene \(ECY\)](#); ["Tim Jackson"](#); ["Brian Franklin"](#)  
**Subject:** RE: NW3188 Kelsey Creek Shopping Center - Data Report  
**Date:** Monday, October 16, 2023 10:10:04 AM

---

Hi Bill,

Thank you for your report submittal and request for opinion. Ecology is pleased to see the progress made with the cleanup at this Site.

Ecology Toxics Cleanup Program (TCP) has reviewed the data report and has the following feedback. We understand that this email may suffice for your needs – please let me know if an opinion letter from Ecology is needed.

--Ecology TCP concurs with the appropriateness of a second injection round at location IB-1, IB-2, IB-3, and IB-4. The second injection round is anticipated to increase the likelihood of achieving groundwater cleanup levels within a relatively rapid timeframe. Please proceed with such injection once you have authorization from Ecology's Underground Injection Control (UIC) program.

--Ecology anticipates that a minimum of four consecutive quarters of monitoring data at each existing monitoring well with historical cleanup level exceedances will be need prior to Ecology's issue of a No Further Action (NFA) determination.

--Ecology notes that MW-103S is located downgradient of the injection area, so achieving cleanup levels at that location may take a bit more time. Ideally, all monitoring wells will have results below cleanup levels for four consecutive quarters prior to issue of a NFA. However, Ecology may consider managing remaining low level concentrations of vinyl chloride in MW-103S with an environmental covenant (EC). Such an EC would include a restriction on groundwater use (no drinking water use) on the Property with the remaining contamination. Under this approach, Ecology may request submittal of monitoring data for our 5 year periodic review.

Please forward additional results as they become available. Also, let me know if you have any questions.

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](mailto:Frank.Winslow@ecy.wa.gov)

---

**From:** [wcarroll@arrowenv.com](mailto:wcarroll@arrowenv.com) <[wcarroll@arrowenv.com](mailto:wcarroll@arrowenv.com)>

**Sent:** Thursday, October 12, 2023 8:47 AM

**To:** Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

**Cc:** Radcliff, Eugene (ECY) <erad461@ECY.WA.GOV>; 'Tim Jackson' <tim@pmfinvestments.com>; 'Brian Franklin' <brian@pmfinvestments.com>; 'Andy Zabel' <Andy@houlihan-law.com>

**Subject:** NW3188 Kelsey Creek Shopping Center - Data Report

Frank:

Attached is a copy of the Data Report for the Kelsey Creek Shopping Center Site for your review that summarizes the methods and results of pilot test and groundwater monitoring activities conducted at the Site in 2023. On the basis of the effectiveness of the ZVI injections, we recommend conducting a second injection of ZVI through four soil borings, identical to the previously approved scope of work. I checked the box for an official Opinion Letter, but I think comments and concurrence on the next steps by email would suffice. I cc'd Eugene Radcliff because it's my understanding that additional injections would require either a variance from the UIC Program or a second UIC registration.

Regards,

**William "Bill" Carroll, LG, LHG** | Principal Hydrogeologist

1531 Bendigo Blvd. N. | North Bend, WA | 98045

Office – Direct Line: 425.363.2394

Office - General: 425.888.4990

This correspondence contains confidential and/or privileged information and may be "Attorney-Client Privileged" and protected as "Work Product". The information contained herein is intended for the use of the individual(s) or party named above. If you are not the intended recipient, note that any copying, distribution, disclosure, or use of the text and/or attached document(s) is strictly prohibited. If you have received this correspondence in error, please notify me immediately. Thank you.



Virus-free [www.avg.com](http://www.avg.com)