

**From:** [Akeroro, Olu \(ECY\)](#)  
**To:** [Chris Phillips](#); [abixby@maulfooster.com](mailto:abixby@maulfooster.com); [Carolyn Wise](#)  
**Cc:** [Warfel, Michael \(ECY\)](#); [Adam Johnson](#)  
**Subject:** Re: VCP Technical Assistance for Mount Vernon Library Commons (NW3382) Site  
**Date:** Thursday, October 19, 2023 11:07:01 AM

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October 19, 2023

Chris Phillips  
City of Mount Vernon  
1024 Cleveland Avenue  
Mount Vernon, WA 98273  
([cphillips@mountvernonwa.gov](mailto:cphillips@mountvernonwa.gov))

**Re: VCP Technical Assistance for Mount Vernon Library Commons (NW3382) Site**

Your continued effort towards this Site final closure is well appreciated by Ecology. Thank you for the update on the downgradient groundwater monitoring well in W Kincaid Street that is now plug and abandoned (P&A). Following our virtual teams meeting on October 16, 2023, and working towards a possible Site NFA opinion that may require an environmental covenant, Ecology recommends:

1. Plot all the USTs (Chevron USTs and the newly discovered USTs) locations on a single map.
2. Draw a cross-section through the 1,200-gallon tank (the in-place petroleum-contaminated soil) and the two MFA temporary monitoring wells (From B03 – through 1,200-gallon tank – B01).
3. Please include an [empirical demonstration](#) evidence using the groundwater flow velocities to show that contaminants has not and will not migrate offsite, and every other requirements as stipulated in MTCA Cleanup Regulation ([WAC 173-340-747](#)).
4. Make a due diligence effort to determine or estimate the UST (1,200-gallon tank) installation date.

Ecology understands how critical this possible NFA opinion letter is to you in relations to the grant applications, and we will work with you within the anticipated project timelines. As mentioned above, due to the in-place petroleum-contaminated soil (PCS), this Site will likely require an environmental covenant. Ecology will assist and advise further in this regard.

Should you require any additional assistance, please do not hesitate to contact me.

Thank you.

Best regards,

*Olu Akeroro, P.Geo*  
LUST Cleanup Project Manager  
Northwest Regional Toxics Cleanup Program

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