

From: [Winslow, Frank \(ECY\)](#)
To: [Robert Roe](#)
Subject: RE: NW3294 Clean Center - Status
Date: Monday, November 13, 2023 12:14:41 PM

Hi Robert,

Thank you for the Teams call today. That was very helpful for Ecology to better understand the Site.

Unfortunately, Ecology would not be able to issue a No Further Action (NFA) Likely opinion letter at this time. This is because there is still a significant data gap with respect to the extent of contamination. Ecology notes that even when seeking a Property-specific NFA Likely or NFA determination, the extent of contamination, including off-property must be defined.

The data gap in question pertains to the vertical extent of contamination (and thus also uncertainties regarding the lateral extent of contamination). The basis for this data gap is discussed as follows:

1. Site monitoring wells have been completed with a typical screened interval of 5-15 feet below ground surface (ft bgs).
2. At location MW-2, the monitoring well was completed with a screened interval of 5-15 ft bgs; however, there was a PID reading of 42 ppm at 20 ft bgs. In addition, PCE was found in soil at MW-2 at 20 ft bgs at 3.3 mg/kg, a significantly elevated concentration. The vertical extent of contamination at MW-2 has therefore not been defined.
3. Contamination from MW-1 appears to be diving deeper downgradient of MW-1 at MW-2. Although PCE was not found in soil at location DW-1, south of MW-2, it is possible that the contamination is migrating to the southwest of MW-2 toward MW-7. Similarly contamination from MW-4 could be diving deeper toward the vicinity of MW-5.

Ecology therefore requests the installation and sampling of a deeper monitoring well in the vicinity of MW-7. The screened interval of this well should be roughly 20 to 30 ft bgs. A conductor casing to seal the interval from ground surface to 20 ft bgs may be warranted to minimize potential drainage from the shallow aquifer system at about 10 ft bgs.

If the new monitoring well is dry (no measurable water after a minimum of 24 hours following installation), then it would appear that we can conclude that there is no groundwater depth interval.

If MW-7D is dry, and coupled with the data from DW-1, it would appear that the shallow groundwater can be concluded to be perched and separation from the deeper outwash unit would appear to be clear. If MW-7D well does produce water, then a similar offset location in the vicinity of MW-5, downgradient of where *cis*-1,2-DCE was detected at 110 µg/L in MW-4, would appear to be warranted.

During drilling, soil sampling should be done with PID readings on a minimum 2 foot interval (including in the saturated zone) to better define the vertical extent of contamination. If PID readings are above background at 30 ft bgs, then deeper drilling may be warranted. Field adjustments to screened intervals may be appropriate based on field data and observations.

The need for additional data following this requested work would be dependent on the results at

these new installations (MW-7D and MW-5D). If groundwater sampling results in similar or lower concentrations than from the current installations (MW-7S and MW-5S), then Ecology may be able to conclude that the extent of contamination has been sufficiently defined. If increased concentrations are found at these deeper locations, then additional data may be needed to define the extent of contamination. Ecology recommends proceeding with the work to address this data gap.

Ecology could proceed with preparing a "Further Action needed" opinion letter at this time; however, we anticipate that may be of limited utility toward meeting the overall goals of the project. We recognize that a lot of time and money has been spent to characterize and cleanup the Site to date. However, Ecology considers the above data gap to be a critical need at this time. We note that filling this data gap does not preclude performing additional source control measures, such as is currently proposed at the Site within your Remedial Action Progress Update.

With respect to the submitted document requesting a NFA Likely determination, Ecology also requests the following to facilitate our review:

1. An updated version of Table 1 with shaded rows for samples that have been removed, and highlighted rows for samples collected beneath the structure on the Site. Please also add sample dates to Table 1.
2. A map showing all soil sampling results for PCE and TCE in soil by depth (with a data format like 20'-5.5/<1.0). Collocated samples can show only the most recent results.
3. A disproportionate cost analysis (DCE) consistent with 173-340-360(3)(e) comparing the proposed alternative with the most permanent solution (excavation and offsite disposal). The DCA should compare costs and relative benefit scores for at least the alternatives. For contamination beneath the building, Ecology understands that the most permanent solution would not include the removal of the building. We anticipate that cleanup beneath the building would likely need to await a time in the future when the building is no longer present.

Ecology is not requesting revision of the submitted report at this time. The above requested items can be provided as a separate submittal(s).

Please let me know if you have any questions regarding this email.

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

From: Robert Roe <rroe@environmentalassociatesinc.com>
Sent: Tuesday, October 31, 2023 12:34 PM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Subject: RE: NW3294 Clean Center - Status

Hi Frank,

Our latest progress update report for the former Clean Center site located on Bainbridge Island is attached. This report documents additional on and off property explorations, completion of two cleanup actions, and summary of currently ongoing monitoring activities. The findings to date appear to be heading in the right direction and as such the conclusion of the report seeks Ecology's concurrence in the form of a request for an NFA-Likely opinion letter.

Please feel free to contact us anytime to discuss and/or if you require further information regarding any of the reports contents.

Sincerely,

Robert B. Roe
ENVIRONMENTAL ASSOCIATES, INC
1380 112th Avenue NE, Suite 300
Bellevue, Washington 98004

(425) 455-9025 office
(206) 369-4294 cell

rroe@environmentalassociatesinc.com

From: Winslow, Frank (ECY) [<mailto:fwin461@ECY.WA.GOV>]
Sent: Wednesday, December 15, 2021 7:58 AM
To: Robert Roe
Subject: RE: NW2394 Clean Center - Status

Thanks for the update, Robert.

Regards, Frank

Frank P. Winslow, LHG
Toxics Cleanup Program
Department of Ecology – Central Regional Office
1250 W. Alder Street, Union Gap, WA 98903
(509) 454-7835
(509) 424-0543 (cell)

Frank.Winslow@ecy.wa.gov

From: Robert Roe <rroe@environmentalassociatesinc.com>

Sent: Tuesday, December 14, 2021 4:06 PM

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

Subject: RE: NW2394 Clean Center - Status

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

Hi Frank,

Our client informs me that the most recent round of mediation this Fall was successful and they were able to settle with the other potentially responsible parties. However, the funding from the settlement has not yet been finalized. Our client anticipated that it may be at least 6 months before we are ready to proceed with further site characterization. I would ask that you keep the site enrolled in the VCP and check back with us in about 6 months. We'll update you in the event that things move quicker.

Sincerely,

Robert B. Roe
ENVIRONMENTAL ASSOCIATES, INC
1380 112th Avenue NE, Suite 300
Bellevue, Washington 98004

(425) 455-9025 phone

(425) 455-2316 fax

rroe@environmentalassociatesinc.com

From: Winslow, Frank (ECY) [<mailto:fwin461@ECY.WA.GOV>]

Sent: Monday, December 13, 2021 1:39 PM

To: Robert Roe

Subject: RE: NW2394 Clean Center - Status

Hi Robert,

My last record on this site is the below note to file. Is there anything new you can report in terms of overall plans for the site?

Thanks, Frank

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

Sent: Wednesday, July 21, 2021 11:42 AM

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

Subject: Clean Center - Status

Note to file:

Called Robert Roe, consultant. He indicated the planned offsite investigations have been delayed, pending mediation. A mediation meeting is scheduled in August 2021. He will let us know when the investigation work proceeds.

Frank P. Winslow, LHG

Toxics Cleanup Program

Department of Ecology – Central Regional Office

1250 W. Alder Street, Union Gap, WA 98903

(509) 454-7835

(509) 424-0543 (cell)

Frank.Winslow@ecy.wa.gov