



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

January 28, 2008

Mr. Harry Grant
Harris Family Limited Partnership
1001 Fourth Ave Plaza, Suite 4500
Seattle, WA 98154

Dear Mr. Grant:

Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:

- Name: Normandy Park PCE
- Address: 17817-17825, 17827 & 17835 1st Ave S, Normandy Park
- Facility/Site No.: 4181060
- VCP No.: NW1873

Thank you for submitting documents regarding your proposed remedial action for the Normandy Park PCE facility (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether your proposed remedial action is likely to be sufficient to meet the specific substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl chloride in Soil;
- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl in Ground Water.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does



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not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology:

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action(s):

1. Remedial Investigation & Focused Feasibility Study Harris Property, dated August 15th 2005, Prepared by Kane Environmental.
2. Revised Draft Data Gap Investigation Work Plan Normandy Park PCE Project, dated January 14th 2008, prepared by Environmental Resources Management.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at 425.649.7239.

The Site is defined by the extent of contamination caused by the following release(s):

- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl chloride in Soil;
- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl in Ground Water.

The Site is more particularly described in Figures 2, 3, 4 & 5 to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of your proposed remedial action and supporting documentation listed above, **Ecology has determined that the proposed remedial action is likely to be sufficient to meet the specific substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, to address the following release(s) at the Site:**

- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl chloride in Soil;
- Perchloroethylene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene and vinyl in Ground Water.

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This opinion does not represent a determination by Ecology that the proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit an independent remedial action report to Ecology upon completion of the remedial action and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 425-649-4446.

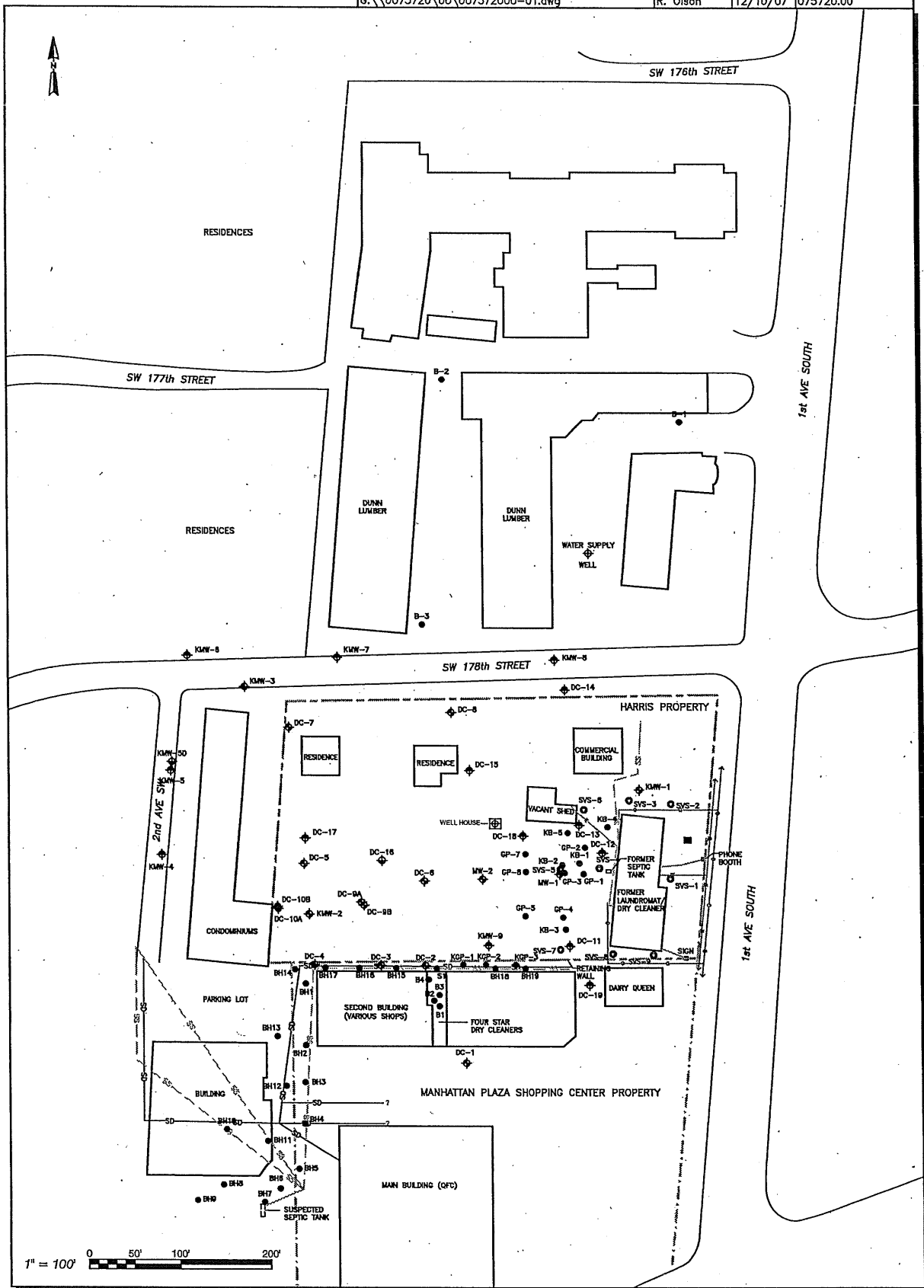
Sincerely,



Dale Myers
NWRO Toxics Cleanup Program

dm/kp

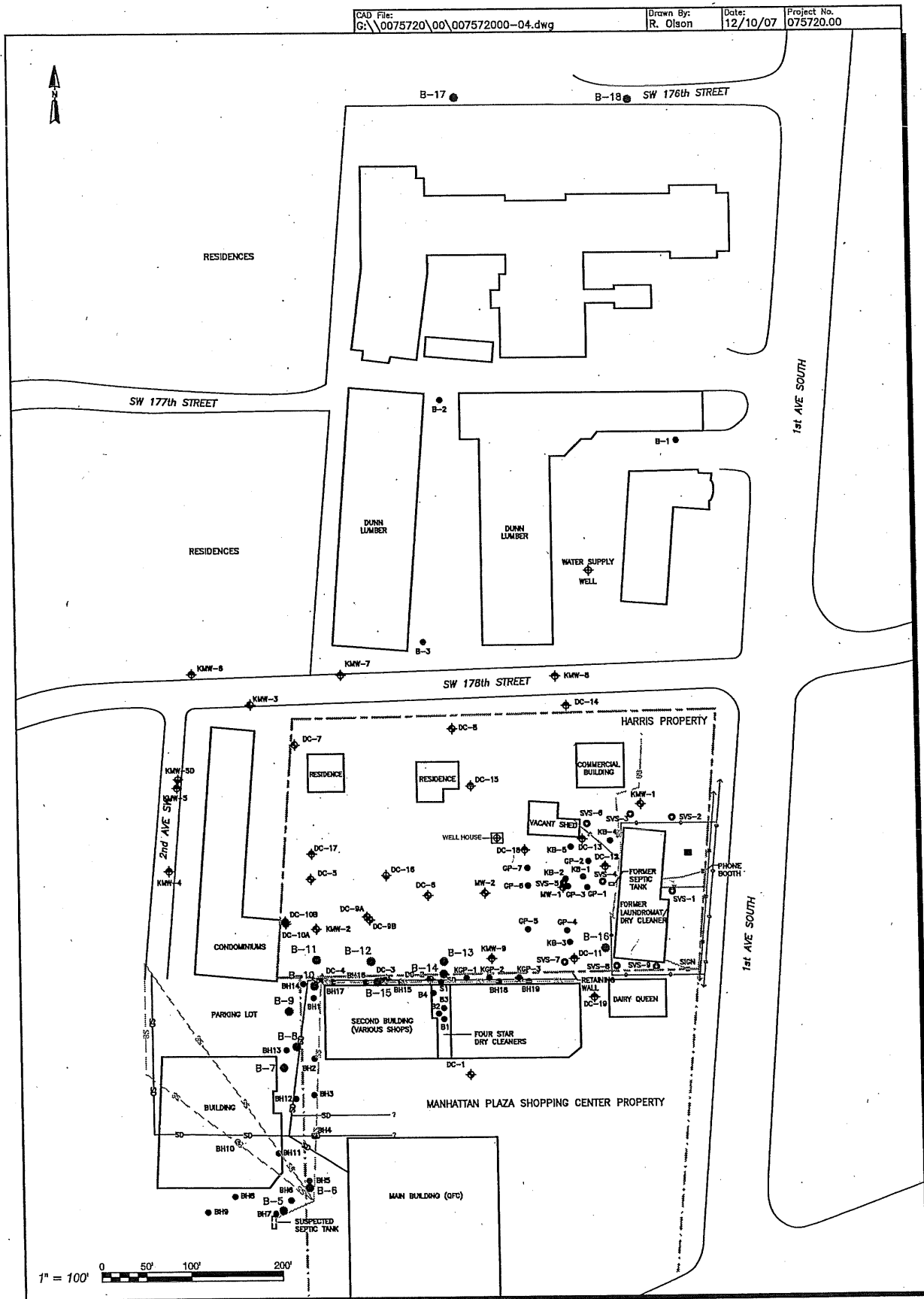
Enclosures: 4



- LEGEND**
- ◆ Monitoring Well
 - ◆ Shallow Monitoring Well
 - ◆ Deep Monitoring Well
 - Soil Boring
 - ⊕ Soil Vapor Extraction Well
 - ⊕ Domestic Well
 - Storm Water Catch Basin

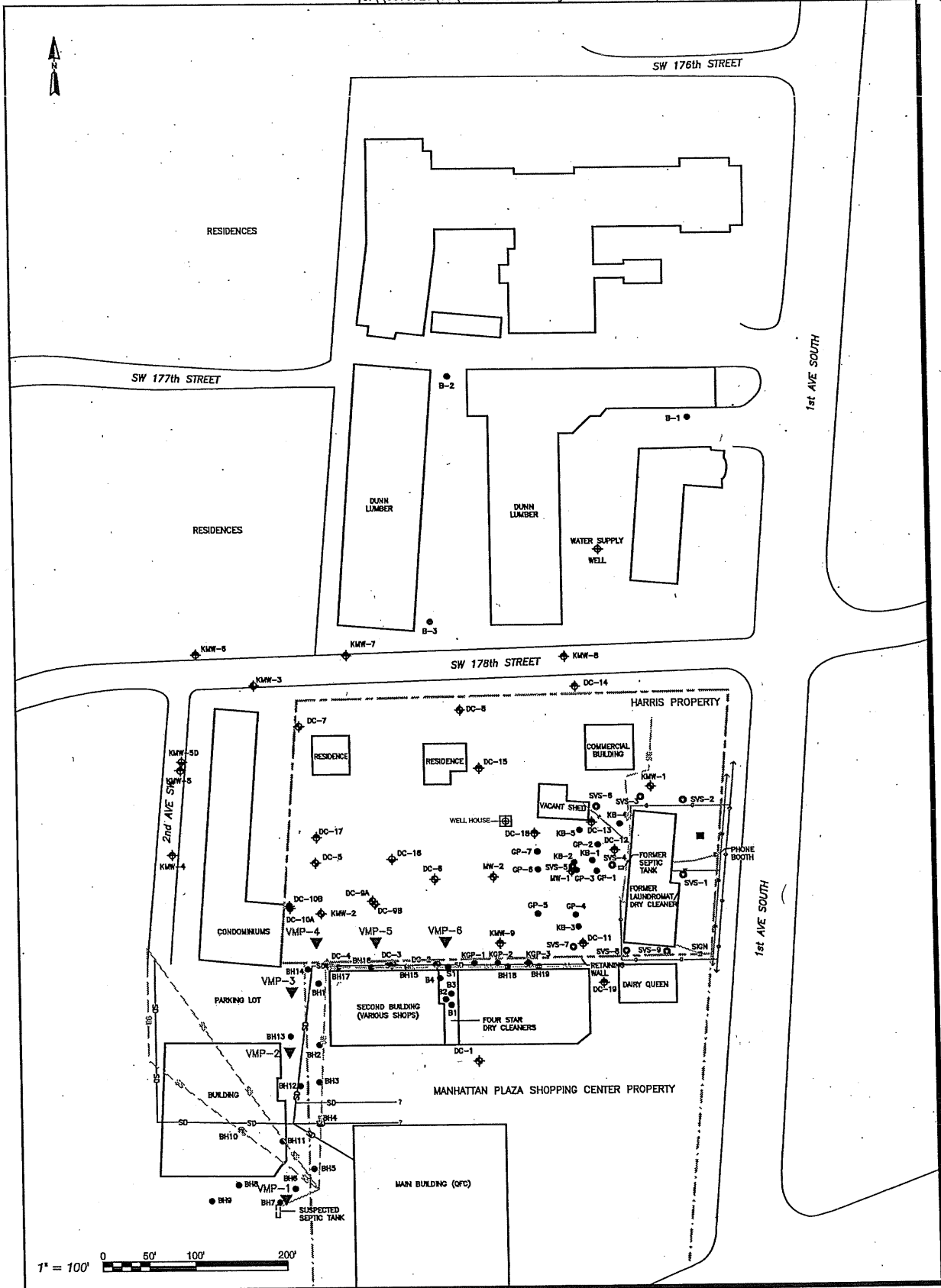
- Approximate Harris Property Boundary
- Approximate Manhattan Plaza Shopping Center Property Boundary
- Underground Electrical Utility
- Underground Natural Gas Utility
- SS — Underground Sewer Utility
- SD — Underground Storm Drain Utility
- W — Underground Water Utility

Figure 2
 Site Plan Map
 Normandy Park PCE
 Normandy Park, Washington



- LEGEND**
- Proposed Direct-Push Boring
 - ◆ Monitoring Well
 - ◆ Shallow Monitoring Well
 - ◆ Deep Monitoring Well
 - Soil Boring
 - Soil Vapor Extraction Well
 - ◆ Domestic Well
 - Storm Water Catch Basin
 - Approximate Harris Property Boundary
 - Approximate Manhattan Plaza Shopping Center Property Boundary
 - E— Underground Electrical Utility
 - C— Underground Natural Gas Utility
 - SS— Underground Sewer Utility
 - SD— Underground Storm Drain Utility
 - W— Underground Water Utility

Figure 3
 Proposed Direct-Push Boring Location Map
 Normandy Park PCE
 Normandy Park, Washington

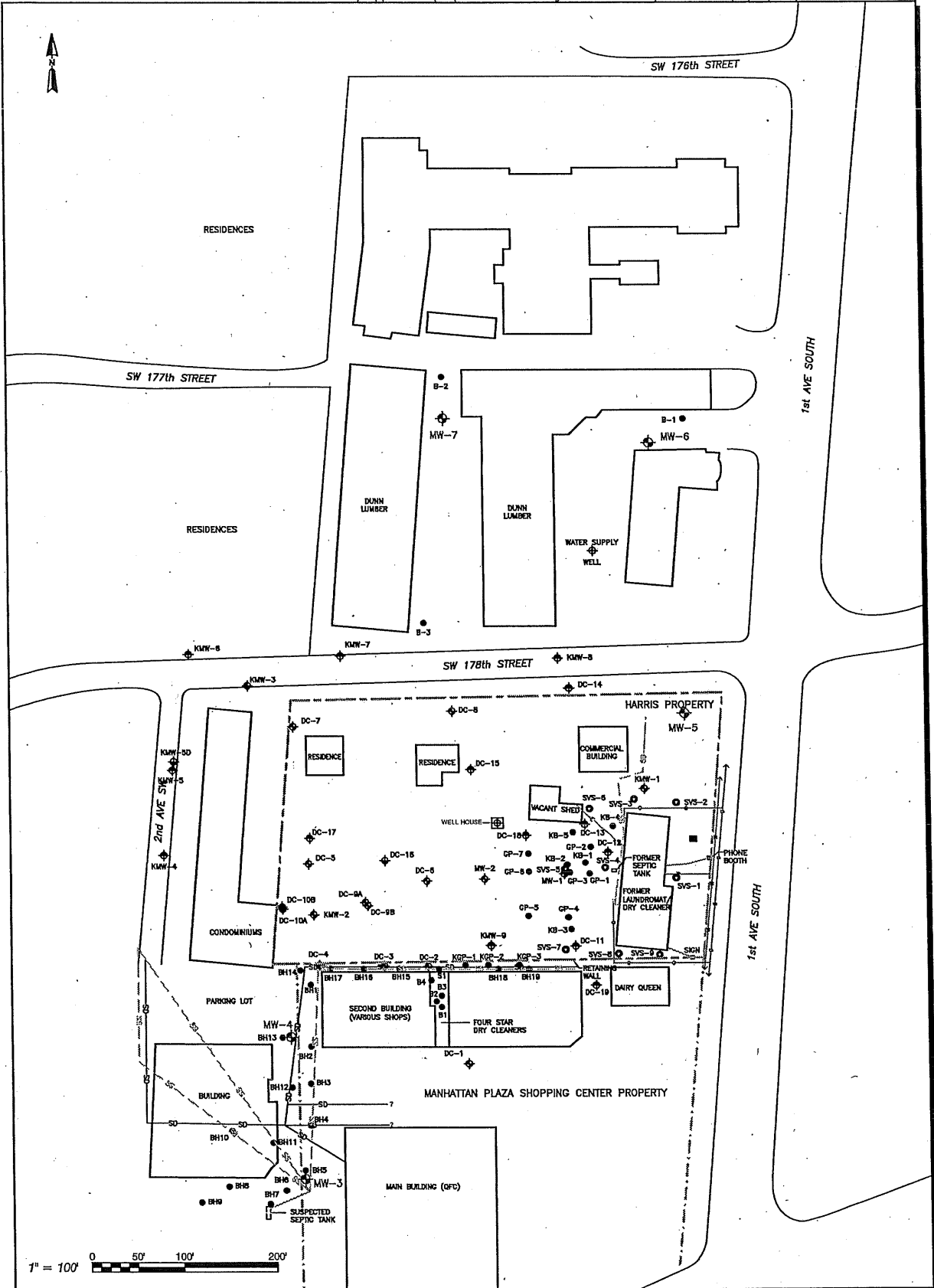


- ▼ Proposed Vapor Monitoring Point
- ◆ Monitoring Well
- ◆ Shallow Monitoring Well
- ◆ Deep Monitoring Well
- Soil Boring
- Soil Vapor Extraction Well
- ◆ Domestic Well
- Storm Water Catch Basin

LEGEND

- Approximate Harris Property Boundary
- Approximate Manhattan Plaza Shopping Center Property Boundary
- Underground Electrical Utility
- Underground Natural Gas Utility
- Underground Sewer Utility
- Underground Storm Drain Utility
- Underground Water Utility

Figure 4
 Proposed Vapor Monitoring Point Location Map
 Normandy Park PCE
 Normandy Park, Washington



- | | | | |
|---|----------------------------|-----|---|
| ◆ | Proposed Monitoring Well | --- | Approximate Harris Property Boundary |
| ◆ | Monitoring Well | --- | Approximate Manhattan Plaza Shopping Center Property Boundary |
| ◆ | Shallow Monitoring Well | --- | Underground Electrical Utility |
| ◆ | Deep Monitoring Well | --- | Underground Natural Gas Utility |
| ● | Soil Boring | --- | Underground Sewer Utility |
| ● | Soil Vapor Extraction Well | --- | Underground Storm Drain Utility |
| ◆ | Domestic Well | --- | Underground Water Utility |
| ■ | Storm Water Catch Basin | | |

Figure 5
 Proposed Monitoring Well Location Map
 Normandy Park PCE
 Normandy Park, Washington