

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** "Hinsperger, Nate"  
**Cc:** [Koltes, Eric](#); [Kanon Kupferer](#)  
**Subject:** RE: [EXTERNAL] FW: Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733  
**Date:** Wednesday, January 17, 2024 9:43:37 AM  
**Attachments:** [image001.png](#)

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Hi Nate,

Thank you for submitting the revised Groundwater Assessment Work Plan.

Ecology concurs with the scope of work and locations presented within the Work Plan. Please proceed with executing this work plan as soon as possible, since we understand that site development activities are proceeding.

A few comments regarding this proposed work are provided as follows, and are consistent with our comments within the below email dated December 14, 2023 and previous correspondences. Note that no revision or resubmittal of the work plan is needed.

1. Please adjust monitoring well screened intervals as appropriate based on field conditions, such that the ground water level is within the screened interval. If groundwater at any locations is very shallow (e.g. less than 3 ft bgs), note that a wellpoint less than 10 feet deep can be installed without a well registration (if having the water level within the screened interval presents a concern with respect to installing the required seal interval for a registered resource protection well).
2. Monitoring well screened intervals should be no longer than 10 feet, provided yield is not in question. Ecology does not anticipate yield concerns, based on the sand and gravel reported at the Site.
3. Table 2 list proposed monitoring wells and Ecology suggested monitoring wells. This table is confusing since it is not clear if you are proposing what was in the draft work plan or with the modification Ecology suggested. We understand based on the figure that the Ecology suggested modifications are being incorporated.
4. Please ensure that the laboratory reporting limit for dieldrin in groundwater and surface water samples is no greater than 0.0055 µg/L. This may be worth mentioning again to the lab when samples are submitted.
5. Please include final turbidity field measurements measured during sampling within tables presenting the sampling results.
6. Please email tabulated sampling results and a location map to Ecology as soon as sampling results are available.
7. Please ensure that tables within the report/response to Ecology's January 30, 2023 comments presents results include all historical and current results for all site COCs by media.
8. Please survey the top of casing of the monitoring wells and present a potentiometric surface map for the Site within the report/response to Ecology's January 30, 2023 comments.
9. Ecology is requesting a robust evaluation/discussion of surface runoff and groundwater to surface water pathways within the report/response to Ecology's January 30, 2023 comments. If no groundwater cleanup level exceedances are found, then the groundwater to surface water/sediment pathway can be considered incomplete. The surface runoff to surface water/sediment pathway discussion should include surface water and sediment results, proximity of soil sources, surface cover, and slope.

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)

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**From:** Hinsperger, Nate <NHinsperger@trccompanies.com>  
**Sent:** Tuesday, January 16, 2024 1:03 PM  
**To:** Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>  
**Cc:** Koltes, Eric <EKoltes@trccompanies.com>; Kanon Kupferer <kanon@ichijousa.com>  
**Subject:** RE: [EXTERNAL] FW: Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733

Hi Frank,

Attached is the revised Groundwater Assessment Work Plan. Please let me know if you have any questions regarding any of the revisions. We have addressed most of your comments and any comments that are not addressed that are related to other items not included in this Work Plan will be addressed under separate cover.

I'll keep you posted on the well installation schedule.

Thanks,  
Nate

**Nate Hinsperger, L.G.**

Senior Geologist  
Environmental Engineering, Construction, and Remediation



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**From:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>  
**Sent:** Thursday, December 14, 2023 1:24 PM  
**To:** Hinsperger, Nate <[NHinsperger@trccompanies.com](mailto:NHinsperger@trccompanies.com)>  
**Cc:** Koltes, Eric <[EKoltes@trccompanies.com](mailto:EKoltes@trccompanies.com)>  
**Subject:** RE: [EXTERNAL] FW: Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733

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Hi Nate,

Ecology has some feedback on the Groundwater Assessment Work Plan. Although we have not yet completed the enrollment process for expedited VCP, we are providing this feedback at this time to facilitate mobilization as soon as possible for monitoring well installations, since we understand that the Site has a very aggressive construction schedule.

**Surface Water and Sediment**

Overall, the plan appears to be relatively complete with respect to proposed work to address the groundwater pathway concern. However, no work was proposed for surface water and sediment at the Site. Comments were provided for these media in Ecology's opinion letter dated January 30, 2023:

Surface Water.

*The groundwater CUL may also be applied to surface water as it is a realistic upward adjustment to the regulatory surface water PQL.*

*Arsenic, EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site surface water from either the Clover Creek, NFCC, or the main irrigation pond samples. While dieldrin was not detected at or above the laboratory MDL of 0.02 µg/L, that MDL occurred at four orders of magnitude above the CLARC surface water CUL for human health of 0.0000061 µg/L. Please refer to the discussion under Section 2 below.*

Sediment: *EDB, Diazinon, and both Nitrate and Phosphate data do not indicate a concern in on-site sediment at the respective sample locations – although no freshwater sediment cleanup values exist for those compounds. In addition, while arsenic was present at various concentrations in all the collected samples, it occurred below the Ecology Freshwater Sediment Cleanup Objective of 14 mg/kg. Dieldrin was also not detected in any of the sediment samples at the laboratory method detection limits (MDL) of 0.006 mg/kg, and at a level above the Ecology freshwater sediment cleanup objective of 0.0049 mg/kg. Please refer to the discussion under Section 2 below regarding this issue.*

*Based on the CUL discussion above, the lateral and vertical extents of all RI and remedial soil, sediment, groundwater, and surface water data should be reevaluated relative to the suggested CUL's and MDL/PQL.*

Ecology suggest that the apparent surface water/sediment data gap concern be addressed independently of this work plan in order to allow for more rapid mobilization for monitoring well installation. Because the sediment reporting limit was not substantially higher than the laboratory reporting limit, Ecology anticipates that other lines of evidence (e.g. distance from areas of dieldrin application to surface water bodies) could potentially be used to assess the sediments data gap concern.

#### **Monitoring Well Design**

Ecology recommends that monitoring well screened intervals be no longer than 10 feet, provided water levels are expected to be sufficiently stable and the aquifer materials are of a reasonable yield. Based on the gravel and sand units reported in boring logs at the Site, it appears that yield would not likely be a concern. Well screened intervals should target the water level to be in the upper quarter to third of the screened interval. Screened intervals should not include silt units that are apparently present at some locations at the Site.

#### **Monitoring Well Locations**

Ecology requests that Table 2 within the plan be updated per the attached table to more clearly show the rationale for the proposed monitoring well locations. Ecology also requests that the monitoring wells be installed as close as possible to the location of the higher dieldrin in soil concentration for each of the areas as shown in the attached table.

Ecology suggests the following adjustments on the monitoring well locations shown in Figure 2:

- Instead of two monitoring wells in Area 1, move one to sample location Green 17 in Area 5 to target a higher dieldrin in soil concentration and enhance aerial coverage of monitoring wells.
- Move the monitoring well in Area 6 to sample location Tee 8-B in Area 7 to target a higher dieldrin in soil concentration while maintaining a reasonable aerial coverage.
- Instead of two monitoring wells in Area 15, one at location Tee 14-N would appear to be sufficient for this area.

With these adjustments, the proposed monitoring network would target worst-case historical dieldrin soil locations. Ecology notes that this results in 10 rather than 11 proposed monitoring wells.

#### **Turbidity**

Ecology is pleased that removal of turbidity will be targeted during well development. We recommend that field turbidity results during well sampling be tabulated in the report presenting the results of the installations.

#### **Groundwater Flow Directions**

Ecology requests that a potentiometric surface map be prepared for the Site. Groundwater level data should also be presented in a table.

#### **Closing**

Ecology suggests updating the Groundwater Assessment Plan per the above comments and resubmitting it to Ecology. Ecology also suggests proceeding with the execution of the Groundwater Assessment Plan, as modified by the above comments.

Ecology is not concluding with this email that the proposed work will address all of our previously provided comments regarding data gaps at the site, but we are hopeful that this scope of work will address the groundwater pathway data gap concern.

Please let me know if you have any questions regarding these comments or any other matters.

Thanks, Frank

**Frank P. Winslow, LHG**

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**From:** Hinsperger, Nate <[NHinsperger@trccompanies.com](mailto:NHinsperger@trccompanies.com)>

**Sent:** Wednesday, December 13, 2023 3:40 PM

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

**Cc:** Koltes, Eric <[EKoltes@trccompanies.com](mailto:EKoltes@trccompanies.com)>; Mitchell, Treasure (ECY) <[trmi461@ECY.WA.GOV](mailto:trmi461@ECY.WA.GOV)>

**Subject:** RE: [EXTERNAL] FW: Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733

Frank,

Thanks for the quick response. Once you let me know that the application is deemed complete, we will exit the standard VCP so that we can enter the eVCP.

Let me know if you have any questions while you're reviewing TRC's Groundwater Assessment Work Plan.

Thanks,

Nate

**Nate Hinsperger, L.G.**

Senior Geologist

Environmental Engineering, Construction, and Remediation

*Please note that I will be out of the office Thursday December 14<sup>th</sup> and Friday December 15<sup>th</sup>.*



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

**Sent:** Wednesday, December 13, 2023 3:34 PM

**To:** Hinsperger, Nate <[NHinsperger@trccompanies.com](mailto:NHinsperger@trccompanies.com)>

**Cc:** Koltes, Eric <[EKoltes@trccompanies.com](mailto:EKoltes@trccompanies.com)>; Mitchell, Treasure (ECY) <[trmi461@ECY.WA.GOV](mailto:trmi461@ECY.WA.GOV)>; Wollwage, Sarah (ECY) <[SWOL461@ECY.WA.GOV](mailto:SWOL461@ECY.WA.GOV)>

**Subject:** [EXTERNAL] FW: Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733

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Hi Nate,

Thank you for submitting your application to the expedited VCP process. We will be reviewing the application and report within the next few days. Once the application has been deemed complete, we will be getting your client an invoice for the application fee. We will not be able to issue our acceptance letter until the existing standard VCP agreement has been closed, but we will let you know when we have deemed the application complete.

After the application fee has been received by Ecology, we will be sending the acceptance letter and scheduling an Intake meeting. In the meantime, I will review the groundwater assessment report and let you know if I have any questions.

Please note that Sarah Wollwage is no longer working in the expedited VCP process (she can be left out of further correspondence). Treasure Mitchell, cc'd, is the VCP-x coordinator who will be processing this application.

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager

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**From:** Hinsperger, Nate <[NHinsperger@trccompanies.com](mailto:NHinsperger@trccompanies.com)>

**Sent:** Wednesday, December 13, 2023 3:22 PM

**To:** Wollwage, Sarah (ECY) <[SWOL461@ECY.WA.GOV](mailto:SWOL461@ECY.WA.GOV)>; Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Cc:** Koltes, Eric <[EKoltes@trccompanies.com](mailto:EKoltes@trccompanies.com)>

**Subject:** Ichijo USA Co., Ltd, Former Brookdale Golf Club (CSID 14894), Expedited VCP Application Submittal | 430733

Frank and Sarah,

Attached are the Expedited Voluntary Cleanup Program application documents for the Former Brookdale Golf Course (CSID 14894).

Frank: Also attached is TRC's Groundwater Assessment Work Plan for your review. Please let me know if you have any questions. Upon acceptance into the EVCP, Ichijo will immediately withdraw from the standard VCP.

Please let me know if hard copies are required as part of the submittal. Some Ecology regions have gotten away from submitting hard copy documents, but if it's required, let me know.

Let me know if you have any questions.

Thanks,  
Nate

**Nate Hinsperger, L.G.**

Senior Geologist

Environmental Engineering, Construction, and Remediation

*Please note that I will be out of the office Thursday December 14<sup>th</sup> and Friday December 15<sup>th</sup>.*



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