

From: [Winslow, Frank \(ECY\)](#)
To: [Peter Kingston](#)
Cc: [Lisa Thompson](#)
Subject: RE: Pasciuto Property XN0023 - MPE Failure Analysis
Date: Tuesday, May 14, 2024 3:49:22 PM
Attachments: [image001.png](#)

Hi Pete,

Thank you for submittal of this multi-phase extraction (MPE) failure scenario analysis document.

Ecology has briefly reviewed this document. Ecology considers this type of document to be appropriate and necessary since the cleanup of the site will include multi-phase extraction of a significant amount of volatile contamination while the structure is to be occupied. The document indicates that there are scenarios where the primary vapor intrusion mitigation system (VIMS) component, multi-phase extraction (MPE) could fail. Under these failure scenarios, the secondary component, vapor barrier system becomes critical for protection from vapor intrusion, although passive depressurization may also play a role in continued protection. Because of the importance of the vapor barrier system in preventing vapor intrusion during a MPE failure event, it becomes critical that the chemical resistant vapor barrier be an appropriate material, with rigorous attention to detail in installation and testing.

Ecology requests that the remedial action completion report that includes the documentation of the vapor barrier installation include robust documentation of the materials selection, installation methods (including sealing of seams and penetrations), and smoke testing to demonstrate the effectiveness of the barrier. This documentation should include photographs of various stages of construction and testing at representative locations. It will also be critical to ensure that the vapor barrier is well protected during construction, through institutional controls such that heavy equipment or workers cannot damage the installed vapor barrier prior to the vapor barrier being fully protected by other constructed surfaces.

Ecology has not yet determined whether post construction indoor air sampling could be warranted at any locations. In general, within an open parking garage setting, indoor air sampling would have little utility. However, if there are enclosed spaces where workers could temporarily be located, such post construction testing may be warranted.

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

Ecology appreciates the ongoing efforts toward the cleanup of this Site.

Thanks, Frank

Frank P. Winslow, LHG

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From: Peter Kingston <pkingston@farallonconsulting.com>
Sent: Tuesday, May 14, 2024 11:03 AM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Cc: Lisa Thompson <lthompson@farallonconsulting.com>
Subject: Pasciuto Property XN0023 - MPE Failure Analysis

External Email

Hi Frank,

Attached please find the MPE Failure Analysis which was requested in Ecology's Opinion Letter dated November 18, 2022. Please let us know if you have any questions or would like to get on a call to discuss any specifics.

Also, we will be submitting the Contaminated Media Management Plan later this week.

Thanks,
Pete



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