

From: [Winslow, Frank \(ECY\)](#)
To: ["Yusuf Pehlivan"](#)
Cc: ["Ryan Deri"](#); ["Brady Thomson"](#); ["Peter Kingston"](#)
Subject: RE: Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)
Date: Thursday, May 23, 2024 9:52:27 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Yusuf,

Thank you for the call with you and Pete this morning. Upon further review Ecology retracts the following comments:

Soil Comment #1 – Excavation at location A-1.

Ecology understands that no excavation is planned at location A-1. The exceedance for PFOS in soil at this location was based on the soil-protective-of-groundwater concentration, and no PFAS exceedance concerns in groundwater have been identified in this area. Hence, an Empirical Demonstration of a lack of groundwater impacts from soil contamination has apparently been made in this area. In addition, an injection array with PetroFix™ is planned for this area. Therefore, as proposed within the Cleanup Action Plan (CAP) and as supported by further groundwater data collected subsequent to the CAP, Ecology concurs that no excavation cleanup to address PFOS in soil at location A-1 appears to be warranted. We therefore retract our comment requesting excavation at location A-1.

Groundwater Comment # 2 – PFAS in MW-3 and MW4.

Ecology suggested that remedial injection take place at monitoring wells MW-3 and MW-4 since PFAS compounds were detected in these wells and to immobilize contamination in the immediate vicinity of these monitoring wells prior to their decommissioning. Farallon requested reconsideration of this request, since remedial injection in these wells would not be consistent with standard injection practices and this could give an appearance of inappropriate remedial methods being applied. The proposed injection barrier wall is expected to result in containment of PFAS contamination on the Property and Ecology has provided concurrence with this approach within our July 19, 2023 NFA Likely opinion letter. Ecology hereby retracts our request for remedial injection within these two monitoring wells.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager
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Frank.Winslow@ecy.wa.gov

From: Winslow, Frank (ECY)
Sent: Thursday, May 16, 2024 10:55 AM

To: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>

Cc: Ryan Deri <rderi@fortress.com>; Brady Thomson <bthomson@fortress.com>; Peter Kingston <pkingston@farallonconsulting.com>

Subject: RE: Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

Hi Yusuf,

Ecology has completed review of the groundwater portion of the Compliance Monitoring Plan. Our comments on the CMP are provided below. We suggest revision and resubmittal of the CMP to address these comments. We also suggest revision of the CMP to address two soil comments provided in the previous email below: 1) adding location A1 for excavation and offsite disposal, and 2) the suggested revision of the sidewall and floor sampling frequency for larger excavations, based on our guidance.

Groundwater Comment #1

The overall groundwater monitoring plan appears to be appropriate. Overall, the locations, proposed analytes, and monitoring schedule generally make sense. Ecology comments are primarily adjustments to the proposed monitoring plan.

Groundwater Comment #2 – PFAS monitoring

If locations MW-3 and MW-4, where PFAS in groundwater concerns were found, are not continued to be monitored (such as due to planned development constraints), Ecology suggests that remedial injection also take place at both of those monitoring wells to address those specific exceedances prior to decommissioning the monitoring wells. Although such injection would not be expected to have an area-wide impact, they would contribute to the overall strategy for PFAS immobilization at the Site. If those wells can be retained, Ecology suggests that continued monitoring for PFAS in groundwater take place.

Ecology requests the addition of FMW-11 to the compliance monitoring network, since this location is downgradient of MW-4, and since the remedial injection barrier for PFAS in groundwater is located slightly cross gradient from this location. If FMW-11 cannot be retained due to site development constraints, then a new monitoring well located downgradient of FMW-11 would appear to be warranted.

Groundwater Comment #3 – Monitoring within Injection Areas

The monitoring wells within the injection areas should be a minimum of half of the distance between injection points. For example, if injection points are spaced 10 feet apart, then the monitoring wells should be a minimum of 5 feet from the closest injection point. Monitoring of appropriate field parameters during injection is suggested at these locations to provide data demonstrating the radius of influence of injection. This comment appears to include FMW-8, FMW-9, FMW-10, and FMW-18, and possibly FMW-17.

Groundwater Comment #4 – Points of Compliance

Ecology anticipates that the points of compliance will be all monitoring wells that are part of the monitoring network. Because contaminant immobilization (for PFAS) is part of the cleanup approach, it is anticipated that although an expectation of groundwater results below cleanup

levels will be used to demonstrate compliance, there could be some remaining contaminated groundwater between the monitoring locations that would be addressed via institutional controls within an environmental covenant (EC).

Groundwater Comment #5 – Monitoring Frequency

Ecology suggest the following adjustments to the proposed monitoring frequency:

We anticipate that a minimum of four quarters of groundwater monitoring data with results below cleanup levels at all points of compliance will be needed prior to NFA issue. With respect to the PFAS monitoring, the remedial approach is primarily based on contaminant immobilization, and continued post-NFA monitoring is anticipated. Hence, we suggest that the Area 3 (PFAS) monitoring language be adjusted such that monitoring will be done on an annual basis until NFA is issued, and a 15 month frequency for 5 years is anticipated following NFA issue (with the need for continued monitoring to be determined by Ecology's periodic reviewer).

If any of the proposed monitoring locations have never had any contaminant detections, then an annual monitoring basis may be appropriate at those locations prior to NFA issue.

For upgradient monitoring well location FMW-13, an annual monitoring basis is suggested prior to NFA issue. The need for continued post-NFA monitoring at specific locations can be determined within Ecology's NFA opinion letter, when issued.

Groundwater Comment #6 – Water Level Measurement and Well Decommissioning

Ecology suggests that all monitoring wells that can be preserved be retained for continued water level measurements. Water level measurements should be taken on a quarterly basis until NFA issue, and potentiometric surface maps prepared from the data. If there are monitoring wells that must be decommissioned due to site development activities, this should be done by a licensed well driller and Ecology Toxics Cleanup Program (TCP) should be notified of such.

Groundwater Comment #7 – Off-Property Locations

Ecology has been in discussions with Farallon and the off-site property owner regarding off-property sampling. Off-property contamination characterization is still expected by Ecology and results from such characterization activities have potential to affect this monitoring plan. Ecology requests periodic updates from Farallon regarding progress on this front.

Groundwater Comment #8 – Reporting

Ecology suggests that a groundwater monitoring report be prepared after sufficient data have been collected to support an NFA request for the Site (or potentially Property).

Please let me know if you have any questions regarding the above comments or any other site matters.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager

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From: Winslow, Frank (ECY)
Sent: Wednesday, May 15, 2024 1:45 PM
To: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Cc: Ryan Deri <rderi@fortress.com>; Brady Thomson <bthomson@fortress.com>; Peter Kingston <pkingston@farallonconsulting.com>
Subject: RE: Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

Hi Yusuf,

Thank you for submitting this compliance monitoring plan (CMP). Ecology has performed an initial review on the soil components of the CMP and we are providing the following feedback solely on soil component of the CMP. We are not requesting revision and reissue of the CMP, but rather that our comments be incorporated within the execution of the CMP.

Our feedback on the groundwater component of the CMP, which is more complex and needs further review, will follow under separate cover.

Comment #1

The plan discusses cleanup excavation at locations A2, A22, FB-05, and FMW-10. Exceedances at these locations were as follows:

Location	Depth	Exceedance (mg/kg)	Performance/Confirmation Sample Analysis
A2	0.5 ft	26,100 ORO	NWTPH-Dx
A22	1.0 ft and 8.0 ft	0.0760 and 0.0547 Benzene	BTEX by 8260
FB-05	3.0 ft	0.120 TCE	VOCs by 8260
FMW-10	7.0 ft	0.0832 PCE and 0.0451 TCE	VOCs by 8260
A1	0.5 ft	380 pg/g PFOS	PFAS*

*See Ecology's PFAS guidance document dated June 2023.

Ecology notes that the exceedance for PFOS at A1 was not included in the list of excavations within the CMP. Ecology recommends conducting an excavation to clean up the soil contamination at this location. Ecology also notes that sidewall samples should be at the midpoint of the sidewall, unless field observations suggest greater potential for contamination at a different depth.

Comment #2

Ecology concurs that performance and confirmation soil sampling at the four excavation areas can focus on the analytes that had exceedances at those locations, unless other observations during excavation (e.g. oily soils or PID readings) suggest additional analytes may be warranted.

Comment #3

Ecology notes that additional locations with soil contamination could be identified during Site regrading work as discussed in Section 2.3 of the CMP. If additional soil contamination is found, Ecology recommends that it be characterized, excavated and disposed offsite, and performance and confirmation soil samples be collected consistent with the CMP.

Comment #4

Ecology notes that the plan indicates additional sidewall sampling for additional 30 feet of sidewall, and additional base samples for additional 900 square feet of bottom. Ecology's Guidance for Remediation of Petroleum Contaminated Sites states:

For larger excavations, try to take additional samples so there is at least one sample every 20 feet horizontally along the sidewalls, and one sample for every 400 square feet of exposed bottom (i.e. each 20 ft X 20 ft bottom area should have at least one soil sample). Multiple samples may need to be taken vertically along the sidewalls in deeper excavations.

Ecology recommends following the guidance for larger excavations for additional sidewall or floor samples.

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

Thanks, Frank

Frank P. Winslow, LHG

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Frank.Winslow@ecy.wa.gov

From: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>

Sent: Tuesday, May 14, 2024 2:51 PM

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

Cc: Ryan Deri <rderi@fortress.com>; Brady Thomson <bthomson@fortress.com>; Peter Kingston <pkingston@farallonconsulting.com>

Subject: Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

External Email

Frank,

Please find attached Farallon's Compliance Monitoring Plan for the Washington Cold Storage Property. This Compliance Monitoring Plan presents the scope of work for soil and groundwater performance and compliance monitoring, and procedures for addressing unforeseen conditions that may be encountered during cleanup and/or development activities.

Remedial injection activities were conducted in April 2024 in accordance with the scope of work presented in the Remedial Injection Basis of Design Report that was previously submitted to Ecology. The first post-injection groundwater monitoring event is anticipated to be conducted in August 2024.

Feel free to reach out if you have any questions.

Thank you



Yusuf Pehlivan, L.G.

Senior Geologist

Farallon Consulting

975 5th Avenue Northwest

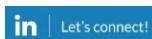
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