

April 13, 2011

VIA E-MAIL AND U.S.MAIL

Mr. Russ Olsen
Washington Department of Ecology
3190 - 160th Ave. SE
Bellevue, WA 98008-5452

Subject: Withdrawal of Previously Submitted RI/FS for VCP Site in Arlington, Washington, and Substitution of Enclosed Revised RI/FS

Dear Russ:

I am writing on behalf of Brunswick Boat Company ("Brunswick") to formally withdraw the Remedial Investigation/Feasibility Study Report (the "RI/FS") Brunswick submitted to you on January 13, 2011 related to the remediation of groundwater contamination at property Brunswick owns in Arlington, Washington (the "Property"). Brunswick requests that the Department of Ecology ("Ecology") not base any formal opinion letter on the RI/FS Brunswick submitted on January 13th.

Instead, Brunswick would like to substitute the enclosed Revised RI/FS, and asks that Ecology provide its formal opinion on whether the cleanup alternative proposed in the enclosed Revised RI/FS warrants a "Likely No Further Action" determination. Brunswick believes the enclosed Revised RI/FS proposes a cleanup alternative that is more likely to achieve Brunswick's ultimate goal of receiving a "No Further Action" determination for the Property.

As indicated in our prior correspondence, to date the following has been achieved at the Property:

- Brunswick has determined the only contaminant of concern at the site is an isolated pocket of Perchloroethene (PCE);
- The vertical and horizontal extent of contamination has been determined, and the contamination is isolated to the property;
- Groundwater monitoring has been conducted for a full year on a quarterly basis, and the results of this monitoring indicate that the contamination plume is stable and not migrating off-site;

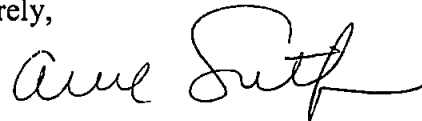
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- Assessment work Brunswick has completed indicates the contamination resulted from a small release of PCE that most likely occurred sometime prior to 1985. Connection of the facility's sewer systems to the City began in 1985, prior to which the facility's sanitary wastewater discharged to an on-site septic system. A groundwater monitoring well in the vicinity of the former septic system is one of only two wells on site that have exhibited PCE above Method A levels, and the PCE levels in the well in the former septic field area have been the highest observed. As a result, the source of contamination at the Property is believed to be the former on-site septic system.

The cleanup alternative Brunswick proposes in the attached Revised RI/FS (Alternative No. 3) involves treatment of PCE in the source area with the goal of reducing the PCE to below MTCA Method A levels. Because it may not be possible or practicable to remediate PCE throughout the entire site to Method A levels within a reasonable restoration time frame, however, the Revised RI/FS also analyzes and provides the justification for potential future use of a conditional point of compliance and institutional controls. Brunswick recognizes that once treatment in the source area has been completed, it will need to revisit this issue with Ecology.

We appreciate your time in reviewing the Revised RI/FS and your consideration of Brunswick's desire to get some measure of certainty and definition about what remedial steps Ecology thinks are necessary for Brunswick to obtain an NFA for this property. Please do not hesitate to contact us if you have any questions or would like additional information.

Sincerely,



Alexandra Smith
of LANE POWELL PC

Enclosure - Revised RI/FS in hard copy and on CD-ROM

cc: Dave Selig (Brunswick Boat Company, via e-mail, w/o enclosure)
John McInnes (SECOR, via e-mail, w/o enclosure)