

January 13, 2011

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**VIA E-MAIL AND U.S.MAIL**

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

**Subject: RI/FS for VCP Site in Arlington, Washington**

Dear Russ:

As we discussed with you last month, enclosed is the final Remedial Investigation/Feasibility Study (the "RI/FS") for a site Brunswick Boat Company ("Brunswick") owns in Arlington, Washington. The enclosed is submitted for formal review and an opinion letter on whether the cleanup alternative proposed in the enclosed RI/FS warrants a "Likely No Further Action" determination.

We wanted to provide you with some background on the Arlington facility and Brunswick's incentives for cleaning up the property. One of Brunswick's primary businesses is recreational boat building (Brunswick is the largest recreational boat builder in the world). Unfortunately the downturn in the economy over the past several years has severely impacted the recreational boat industry. As a result, it was necessary for Brunswick to discontinue manufacturing recreational boats at more than half of its facilities, including the one in Arlington.

To either develop or sell the Arlington facility, Brunswick discovered that it would first need to clean up some isolated groundwater contamination on the property. Brunswick has been marketing the property since late 2009, and has over this time period entered into at least two agreements to sell the property to developers. However, the developers are reluctant to commit to purchase the property without a No Further Action ("NFA") determination. In addition, Brunswick needs to identify with more certainty the extent of cleanup Ecology will require for an NFA in order to make business decisions about the future of the Arlington property and its value as an asset to Brunswick. Obtaining an NFA will eliminate uncertainty for a prospective purchaser of the property, and allow the property to be put back into productive use. As a result, Brunswick entered the Voluntary Cleanup Program ("VCP") with the objective of obtaining an NFA determination.

To date, and as described further in the enclosed RI/FS, the following has been achieved:

- 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;
- The assessment work Brunswick has completed indicates that 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, and prior to this the facility sanitary wastewater discharge was directed to an on-site septic system. A groundwater monitoring well located in the vicinity of the former septic system is one of only two wells on site that have exhibited PCE levels above Method A levels, and the levels exhibited from the well in the former septic field area have been the highest observed. As a result, the source of contamination for the site is believed to be the former on-site septic system.

As we indicated in our phone conference with you, Brunswick believes that given the low levels of contamination that is isolated on the property, MTCA supports a cleanup using only monitored natural attenuation and institutional controls. However, we also understand MTCA (and Ecology) have a preference for treatment of contamination if practicable, and Brunswick is more than willing to treat the PCE at issue here at the source area. However, Brunswick is legitimately concerned that it may not be possible or practicable to remediate PCE throughout the entire site to Method A levels.

Therefore, as indicated in the attached RI/FS Report, Brunswick's preferred alternative (Alternative No. 3) includes a conditional point of compliance, which is warranted because it does not appear it will be practicable to reach Method A levels throughout the entire site within a reasonable restoration time frame. As indicated above, consistent with the requirement (in WAC 173-340-720 (8) (c)) that when a conditional points of compliance is used, Brunswick must "demonstrate that all practicable methods of treatment are to be used in the site cleanup," Brunswick proposes to use treatment (InSitu Chemical Oxidation) in the source area. However, even if the treatment is successful in reducing the PCE to Method A levels throughout the site, Brunswick would like to implement the institutional controls that are a necessary part of a conditional point of compliance. If required, Brunswick would be willing to pay Ecology's costs associated with maintaining the institutional control.

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We appreciate your time in reviewing the 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

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