

**Ecology Comments on
Ultra Custom Cleaners RI/FS/CAP Report dated May 31, 2024.**

To: Ian Young, GeoEngineers
From: Frank P. Winslow, Ecology
Date: July 1, 2024
Site Name: Ultra Custom Cleaners
CSID: 14334
FSID: 18955
VCP Project: XN0050

The following are Ecology's comments on the RI/FS/Report. Ecology requests that either the RI/FS/CAP be revised or an addendum be issued to address these comments. If the report is revised, please also provide comment responses indicating where these comments have been addressed.

Comment 1 - Figure 2 – Please add all characterization sampling locations to the site plan map. This includes soil, groundwater, and indoor air sampling locations. It is appropriate to exclude excavation confirmation soil sampling locations from this figure due to the density of data.

Comment 2 - Figure 3 – Please add soil sampling results from MW-series locations. Ecology expects that all soil and groundwater sampling locations will be presented on soil and groundwater sampling maps. In general, Ecology prefers concentrations to be presented (e.g. 5.0/3.5/<1/<2 for PCE, TCE, cDCE, and VC) rather than color codes for three categories, although it is appropriate to make cleanup level exceedances more prominent (e.g. via colored dots).

Comment 3 - Groundwater Sampling Location Map – Please add a map showing all groundwater sampling locations. This includes both monitoring wells and temporary sampling locations. Ecology would generally be requesting a potentiometric surface map, but for this site, notes that site data are not indicative of a planar potentiometric surface. Surface topography appears to be the best indicator of shallow groundwater flow in this setting; hence, inclusion of a surface topography map would appear to be warranted.

Comment 4 - Table 3 – please add a column for the screened interval (for monitoring wells) and sampling depth interval (for temporary sampling locations).

Comment 5 - MW groundwater sampling – please discuss the groundwater sampling methods (both temporary locations and monitoring wells) including the set depth of tubing intakes for groundwater sampling rounds. Given the dramatically different results between the SB-series rounds and MW sampling, Ecology is requesting additional sampling of the monitoring wells at the depth interval sampled at SB-3 and SB-5 (further discussed below under Comment #9).

Comment 6 - Boring Logs – Please add the boring log/well completion diagram for MW-1.

Comment 7 - Geology and Hydrogeology Discussion – in order to be considered a sufficiently complete RI report, a discussion of site geology and site hydrogeology is needed. Cross section(s) presenting geologic and hydrogeological information are commonly required within an RI, but in this case, discussion of the site geology and hydrogeology may be sufficient.

Comment 8 - Statistical Analysis – Ecology does not concur with the statistical analysis using soil samples solely collected inside the building. Statistical analyses should utilize all remaining soil data following cleanup (though Ecology may support removing inappropriate locations or depths). Because the soil sampling results from MW-4 6.5-7.5 feet depth were more than twice the Method A cleanup level, statistical analyses are not applicable to demonstrate compliance. Ecology anticipates that the remaining soil contamination beneath the building foundation can be addressed with an environmental covenant.

Comment 9 - Empirical Demonstration for a lack of impact to groundwater by contaminated soils – Ecology does not concur that a sufficient case has been currently made for Empirical Demonstration. High contaminant concentrations were found in groundwater at SB-3 and SB-5 and the monitoring wells samples in this area may represent significant dilution from underlying strata. Low flow sampling of the depth interval sampled at SB-3 and SB-5 is needed to assess current groundwater concentrations at MW-2, MW-3, M-4, and MW-5 prior to Ecology concluding that groundwater contamination is no longer present. This is especially since the dramatic apparent concentration reductions between sampling SB-3 and SB-5 in 2016 and the monitoring wells in 2021 are not commonly observed. If no information are available on the SB-3 and SB-5 sampling depth intervals (i.e. tubing intake depths) then sampling the upper portion of the monitoring well screened intervals would be appropriate.

Comment 10 - Excavation Cleanup of Contaminated Soils – Is there a reason why cleanup of contaminated soil was limited to within the building, and did not address the soil contamination found at locations MW-4 and MW-5? Generally, all accessible contaminated soil would be expected to be cleaned up to be eligible for a NFA determination. Ecology can reassess the potential for empirical demonstration (applying only direct contact-based cleanup level) after the groundwater sampling under Comment #9 has been conducted.

Comment 11 - Indoor Air Sampling Data – Ecology’s vapor intrusion guidance (attached) requires a minimum of two sampling rounds for PCE, or three sampling rounds for TCE to demonstrate a lack of vapor risks. This is because vapor intrusion and indoor air quality can be highly variable over time. Note that indoor air sampling should be conducted in periods with higher vapor intrusion risk.

An alternative would be to collect sub-slab soil gas in proximity to remaining soil contamination. If sub-slab soil gas concentrations are less than the screening level, then the vapor intrusion pathway can be concluded to be incomplete. Sub-slab soil gas sampling is generally preferred to close the vapor intrusion pathway (if data support such) since sub-slab soil gas concentrations tend to be more consistent over time than in indoor air.

Note also that applying commercial-based cleanup levels or screening levels would require an environmental covenant restricting land use to commercial in perpetuity. The unrestricted indoor

air cleanup level for TCE of 0.33 µg/m³ was exceeded in the most recent sampling round at location GAA-1. Ecology also notes that indoor air sampling locations were not depicted on any figures (see comment #1).