

From: [Winslow, Frank \(ECY\)](#)
To: ["Nate Hinsperger"](#)
Cc: ["Eric Koltes"](#); ["Austin York"](#); ["Kanon Kupferer"](#)
Subject: RE: Ichijo USA, Former Brookdale Golf Course, Site Status Letter | 240102403
Date: Wednesday, July 3, 2024 3:00:14 PM
Attachments: [image001.png](#)
[24.06.24 240102403 Site Status Letter.pdf](#)

Hi Nate,

I have met with our Southwest Region peer reviewer and discussed the Site data with them.

Comment #1 – Extent of Groundwater Contamination

Our peer reviewer is concerned that the extent of groundwater contamination at location JSH-MW-7 has not been defined, and they are requesting additional groundwater characterization to define the extent. Their request makes sense and is consistent with Model Toxics Control Act (MTCA) requirements. Although the extent of the groundwater contamination is expected to be limited, similarly, we were not expecting to see dieldrin in groundwater at JSH-MW-7.

We recommend that groundwater samples be collected at locations offsetting from JSH-MW-7. Since the dieldrin contamination appears to be due to dieldrin application to the golf green, such offset locations should be outside of the golf green area to the extent possible. It would be helpful to have a map that overlays the current aerial photograph and the historical golf green in this area. If you could prepare such a map with proposed sampling locations, we would appreciate it.

I would expect that one sampling round may be sufficient to make the case of defining contamination extent, presuming results are non-detect (and appropriate detection limits). Since we recognize monitoring wells are costly, and since direct push sampling locations would have a greater likelihood of a cleanup level exceedance due to turbidity, one approach might be to install monitoring wells with an appropriate filter pack, but waiting to install a permanent surface completion later, only if needed. Such monitoring wells should be developed to reduce turbidity to the extent possible.

Comment #2 – Need for Disproportionate Cost Analysis (DCA)

A second comment from our peer reviewer pertains to the ultimate solution for the dieldrin in groundwater. In order to support a monitoring and environmental covenant approach for the dieldrin in groundwater, they would expect a disproportionate cost analysis (DCA) consistent with MTCA requirements that demonstrates the proposed remedial action to be the most permanent solution that is not disproportionate in costs relative to incremental benefits. Such a DCA should be presented within a Feasibility Study report. Their request makes sense and is consistent with MTCA requirements.

A DCA should include the most permanent practicable option (generally excavation and offsite disposal, unless not practicable at a site). Ecology has boring logs for the Site from the May 29, 2020 Supplemental RI Report. These boring logs show gravel with sand lithologies to a depth of 10-20 feet below ground surface (ft bgs), although a silt unit was shown at location B-3 from a depth of 12-15 ft bgs. I do not believe that Ecology has received boring logs for the new monitoring wells. Based on the lithologies reported in 2020 and depth to water at JSH-MW-7,

(7 to 9 ft bgs) it appears that excavation and offsite disposal would not likely be a practicable remedial approach for the dieldrin in groundwater.

Therefore, a DCA should include other potentially practicable options (e.g. pump-and-treat, remedial injections, etc.), as well as monitoring and institutional controls memorialized within a recorded environmental covenant. Ecology cannot provide our concurrence on the selection of a remedy of monitoring and institutional controls memorialized within a recorded environmental covenant unless the DCA shows that it is the most permanent option that is not disproportionate in cost when compared to relative benefits. Note that the extent of contamination needs to be verified prior to preparing and Ecology reviewing such as DCA.

Comment #3 – Proposed Area of Environmental Covenant

Presuming that Ecology concurs with a FS/DCA proposing monitoring and institutional controls memorialized in an environmental covenant (EC), we anticipate that the proposed EC area provided in attached Figure 2 would likely need to be expanded to include Tract F, unless data was collected to demonstrate that dieldrin was not present in groundwater at Tract F. Tract F is close to monitoring well JSH-MW-7.

As a side note, Figure 2 has a closed potentiometric contour (316.0) at location JHS-SW-1. No water level data was reported in Table 4 for surface water locations, so it is uncertain what the basis for this closed contour is (it may be an artifact of the contouring software used).

Closing

I hope this email provides sufficient clarity on next steps at the Site. We recognize that it has been a long and potentially frustrating process; however, this is at least in part due to the nature of the dieldrin contamination in the subsurface at the Site, which is not always predictable. We will continue to work with you to find the most expeditious pathway toward a no further action (NFA) determination for the Site.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager
Department of Ecology – Toxics Cleanup Program
1250 W. Alder Street, Union Gap, WA 98903
(509) 424-0543 (cell)

Frank.Winslow@ecy.wa.gov

From: Winslow, Frank (ECY)

Sent: Tuesday, June 25, 2024 1:19 PM

To: 'Nate Hinsperger' <Nathaniel.Hinsperger@jsheld.com>

Cc: Eric Koltes <Eric.Koltes@jsheld.com>; Austin York <Austin.York@jsheld.com>; Kanon Kupferer <kanon@ichijousa.com>

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Hi Nate,

Thank you for your submittal. I will be discussing this with my peer reviewer and get back to you as soon as possible.

Regards, Frank

Frank P. Winslow, LHG

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From: Nate Hinsperger <Nathaniel.Hinsperger@jsheld.com>

Sent: Monday, June 24, 2024 2:59 PM

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

Cc: Eric Koltes <Eric.Koltes@jsheld.com>; Austin York <Austin.York@jsheld.com>; Kanon Kupferer <kanon@ichijousa.com>

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External Email

Hi Frank,

Please see the attached Site Status Letter for the former Brookdale Golf Course. The letter summarized the findings of the recent groundwater assessment and addresses the items we discussed on our last call regarding site status and next steps. Please review when you have a chance and let me know if you have any questions.

Once you complete your review, let us know when you want to get on a call to discuss any of the details and what the plan is going forward.

Thanks,
Nate

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50 & Forward: Watch the J.S. Held story from foundation to future

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