

From: [Song, Jing \(ECY\)](#)
To: ["Daniel Whitman"; michael@pollarddevelopment.com](#)
Cc: [Trent Mummery](#); [John Funderburk](#); [Ken Lederman](#)
Subject: NW3194 TD Auto Body - Ecology's comments on Groundwater Monitoring Update
Date: Thursday, July 11, 2024 8:26:19 AM

Daniel,

Thank you for submitting the *1st Quarter 2024 Groundwater and Indoor Air Monitoring Summary* report, dated May 10, 2024, and *2nd Quarter 2024 Groundwater Monitoring Summary* report, dated July 9, 2024. Ecology reviewed data provided in these two reports, and concurred with the following:

1. Additional vapor intrusion (VI) evaluation is NOT needed.

Indoor air samples were collected in February 2024 in three indoor and one outdoor (ambient background) locations. One air sample contained a benzene concentration of 0.38 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) after adjusted by the ambient background. This concentration is slightly above the MTCA Method B air cleanup level ($0.32 \mu\text{g}/\text{m}^3$), but is within the range of potential background concentrations (less than $4.7 \mu\text{g}/\text{m}^3$) provided in Ecology's [Guidance for Evaluating Vapor Intrusion in Washington State](#). In addition, this air sample was collected in a relatively enclosed space, with limited ventilation.

All other measured volatile organic compounds (VOCs) concentrations in all indoor air samples, after adjusted by the ambient background, were below the MTCA Method B air cleanup levels.

In Ecology's *Opinion Letter*, dated March 7, 2024, Ecology states that "*All soil vapor samples contained concentrations of volatile organic compounds (VOCs) below the MTCA Method B soil gas screening levels.*"

Therefore, based on the comprehensive review of the indoor air sampling and soil vapor sampling results, Ecology recommends no additional VI evaluation in the building.

2. Ecology concurs with discontinue analyzing for total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and xylenes (BTEX) in groundwater.

As requested by Ecology's March 2024 *Opinion Letter*, TPH and BTEX were analyzed for groundwater samples collected from wells MW-1R, MW-10, MW-17, and MW-18 in first and second quarters of 2024. Only one groundwater sample, collected from well MW-18 in March 2024, contained a low concentration of diesel-range petroleum hydrocarbons (TPH-D) at 58 micrograms per liter ($\mu\text{g}/\text{L}$). This concentration is slightly above the laboratory reporting limit (RL), and significantly lower than the MTCA Method A cleanup

level (500 µg/L). All other TPH and BTEX concentrations were below the laboratory RLs and MTCA Method A cleanup levels in all groundwater samples.

Based on the review of the sampling data, Ecology concurs that the data gaps suggested in Ecology's March 2024 *Opinion Letter* has been adequately addressed. Additional TPH and BTEX analysis is not necessary.

3. Ecology concurs with starting the extended groundwater monitoring program for VOCs.

VOC concentrations have been below the MTCA Method A groundwater cleanup levels for at least four consecutive quarters in all existing Site monitoring wells. It is appropriate to start the extended groundwater monitoring program for VOCs, as provided in Table 4 of the *Compliance Monitoring Plan Update*, dated June 21, 2023.

Ecology noticed that passive diffusion bag samplers (PDBS) are still being used to obtain samples for VOC analysis, due to the high turbidity caused by injections in 2020 and 2022. Ecology recommends switching to low-flow purging and sampling method whenever it becomes practicable, as stated in Ecology's March 2024 *Opinion Letter*.

4. Ecology concurs with continuing arsenic analysis and geochemical parameter measurement in all Site monitoring wells quarterly.

Dissolved arsenic concentrations are consistently above the natural background level of 8 µg/L in all Site monitoring wells, except for wells MW-10 and MW-19. The extents of arsenic plume, especially to the east and south, are not delineated.

Quarterly sampling of dissolved arsenic and geochemical parameters should continue in all Site monitoring wells. The quarterly monitoring data will establish the seasonal trends for arsenic and provide data to determine further delineation and/or remediation.

Ecology appreciates your timely submittal of groundwater and air sampling results. Ecology will continue working with you on determining the next steps of the cleanup and moving Site toward closure. Please feel free to contact me if you have any questions.

Jing Song, LG, LHG

Voluntary Cleanup Program Site Manager | Toxics Cleanup Program | WA Department of Ecology,
Northwest Region

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Cell: (425) 229-2565 | **Email:** jing.song@ecy.wa.gov

From: Daniel Whitman <whitenviro@yahoo.com>

Sent: Tuesday, July 9, 2024 2:28 PM

To: michael@pollarddevelopment.com; Song, Jing (ECY) <JISO461@ECY.WA.GOV>

Cc: Trent Mummery <trent@onetrent.com>; John Funderburk <johnf@uepconsulting.com>; Ken Lederman <ken@mhseattle.com>

Subject: Re: NW3194 TD Auto Groundwater Monitoring Update

External Email

Hi Jing:

Attached to this e-mail are two quarterly groundwater monitoring reports representing the sampling conducted in the 1st and 2nd Quarters of this year. In the 1st Quarter we also conducted some indoor air sampling as part of the overall compliance monitoring.

These two quarters of groundwater sampling continue to show no detectable VOCs in any of the wells. That means all wells throughout the site have met MTCA cleanup levels for at least four consecutive quarters,. The testing you requested for TPH has not shown any detections except low-level TPH-D hits in one well that are most likely attributable to non-petroleum organic matter.

Arsenic is still present and remains above the Puget Sound Basin background level of 8 ug/l in most of the wells. We will continue to monitor quarterly for that.

Indoor air sampling shows a few detections (chloroform and benzene) that are more likely to be attributable to new building construction materials than soil gas. One of our ambient background air sample locations was from the 7th floor of the building and it showed similar conditions as ground floor or outdoor ambient air samples.

Based on the information in these two quarters of testing, we would like to request that we enter the extended groundwater monitoring program for VOCs as outlined in the updated Compliance Monitoring Plan for the site. That would involve a more limited set of wells to be monitored for VOCs semi-annually. The proposed plan would be as shown in Table 4 of the June 21 2023 CMP. A copy is attached.

We would like to discontinue monitoring for TPH, as that data gap appears to have been adequately addressed in the last two rounds of sampling.

We will continue to monitor dissolved arsenic in all wells until enough data has been accumulated to demonstrate seasonal trends and make site specific recommendations for future monitoring or actions.

Is this something you can address in a technical assistance e-mail? We would like a response before the next quarterly round of sampling and it seems like a a formal request for a new opinion letter would take longer than that to process.

Thank you for the opportunity to be of service. If you have any questions or need

anything else, please feel free to contact me.

Thank you,

Daniel Whitman

Whitman Environmental Sciences
303 Woodpecker Lane
Friday Harbor, WA 98250

Phone: (206) 523-3505

On Monday, April 15, 2024 at 10:32:56 AM PDT, Daniel Whitman <whitenviro@yahoo.com> wrote:

Yes, that's what the report will be about. I also include the summary of all monitoring well sampling since 2017 and the time series charts over that time.

During this last quarter we also did some indoor air testing (before the date of your opinion letter saying we didn't need to do any more vapor testing). I'll address those as well.

Thank you,

Daniel Whitman

Whitman Environmental Sciences
6812 16th Avenue NE
Seattle, WA 98115

Phone: (206) 523-3505

On Monday, April 15, 2024 at 08:49:30 AM PDT, Song, Jing (ECY) <jiso461@ecy.wa.gov> wrote:

Dan,

Thank you for the updates.

No need to send the Excel spreadsheet. Will you include the latest sampling data in the upcoming quarterly report?

Jing

From: Daniel Whitman <whitenviro@yahoo.com>
Sent: Thursday, April 11, 2024 4:58 PM
To: michael@pollarddevelopment.com
Cc: Fernandez, Sonia (ECY) <sofe461@ECY.WA.GOV>; Song, Jing (ECY) <JISO461@ECY.WA.GOV>
Subject: Re: NW3194 TD Auto Update

External Email

Hi Jing:

I wanted to give you an update on groundwater sampling and EIM data for the TD Auto site.

We completed the 1st Quarter sampling including the four wells that you requested we test for TPH-D. Three of those wells had no detectable diesel or oil range TPH. The fourth well MW-18 (at the south boundary) contained 58 ug/l of diesel range TPH which the lab flagged as not resembling their diesel standard. This has been the case all over that site, with most diesel detections actually representing organic matter in the soil or groundwater. Let me know if you want us to test for that again this quarter.

Other than that, we had no VOC detections in any well. We had arsenic within the ranges that have been previously detected, with only three of 11 wells below the 8 ug/l Puget Sound Natural Background level. Some seasonal trends are starting to be apparent so we'll have to keep monitoring that for the foreseeable future.

Looking at the field parameters I think we will be able to stop using the permeable bag samplers for VOCs in a number of the wells for this current quarter, but not all of them. GEO B-9, MW-12R and MW-15R in particular still remain quite turbid with black carbon sludge.

I'll be issuing my quarterly report on it all next week.

I uploaded another large batch of groundwater data to EIM at the end of March. So all but this most recent groundwater data is now waiting to be loaded by the system administrators. I see that they have not yet loaded the soil cleanup data from January 2023, so it may be a while until it is all available through the system.

(I have data from other sites that have been waiting since 2021 and 2022 that have never been loaded even though NFA letters have already been issued, so no big surprise there.) Would you like me to send you the Excel spreadsheets of it all so you can use the data?

Thank you,

Daniel Whitman

Whitman Environmental Sciences

6812 16th Avenue NE
Seattle, WA 98115

Phone: (206) 523-3505

On Monday, March 11, 2024 at 05:06:55 PM PDT, Daniel Whitman <whitenviro@yahoo.com> wrote:

Hi Jing:

Thank you for the prompt work on the opinion letter. We are still looking through it and setting up the monitoring requirements for this quarter. I wanted to respond to two things in the letter, your numbered items 6 and 7, regarding a TEE form and EIM data submittal.

A TEE form was submitted in the early stages of this project in 2018, at the time we applied to the VCP. A copy is attached. At that time the site had not yet been assigned a VCP number and was not referred to as "TD Auto" as has become the common name since that time. The TEE concluded that the site qualified for an exclusion from further evaluation.

Additional EIM data, including the results and locations of all of the soil sampling conducted during the site cleanup were uploaded and validated by the EIM system in January 2023. However, I checked the status today and they have not yet been loaded to the database by the system administrators. You might be able to give them a bump to get some progress on that. There are more recent groundwater samples that I haven't compiled yet, but will be able to upload those soon.

Again, thank you for the well thought out letter. We all appreciate your effort on that!

Thank you,

Daniel Whitman

Whitman Environmental Sciences

6812 16th Avenue NE
Seattle, WA 98115

Phone: (206) 523-3505

On Thursday, March 7, 2024 at 04:05:23 PM PST, Daniel Whitman <whitenviro@yahoo.com> wrote:

Thank you! We will review and let you know if we have any questions.

Thank you,

Daniel Whitman

Whitman Environmental Sciences

6812 16th Avenue NE
Seattle, WA 98115

Phone: (206) 523-3505

On Thursday, March 7, 2024 at 01:59:28 PM PST, Perez, Vivian (ECY) <vper461@ecy.wa.gov> wrote:

Good afternoon,

Ecology's staff is currently working remotely. In an attempt to continue to provide timely service, we are issuing the attached letter via email.

Please reply directly to this email to let us know you received it and were able to open the attachment, or if you need assistance to do so.

If you have any questions about the content of the attachment, please contact Jing Song directly.

Thank you,

Vivian Perez on behalf of Jing Song

Secretary Senior

Toxics Cleanup Program/NWRO

TEL: 206-594-0096/CELL: 425-457-3146

vivian.perez@ecy.wa.gov