

From: [Winslow, Frank \(ECY\)](#)
To: ["Yusuf Pehlivan"](#)
Cc: [Peter Kingston](#); [Sarah Hazani](#); [Brady Thomson](#)
Subject: RE: Revised Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)
Date: Thursday, July 25, 2024 8:35:13 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Yusuf,

Thank you very much for submitting the comment responses document that supplements the revised Compliance Monitoring Plan dated July 9, 2024. That was extremely helpful.

Ecology concurs with the scope and contents of the revised Compliance Monitoring Plan.

Ecology notes that adjustments to the monitoring plan could be warranted in the future if new data or information suggest such. We request that prior to NFA issue, tabulated monitoring results (including historical data) be submitted to Ecology following each monitoring round when such data are available.

There is one comment response that Ecology would offer a clarification on. Page 4 of the comment responses indicated that institutional controls "may be warranted". As stated in Ecology's NFA Likely letter dated July 19, 2023, prior to NFA issue, implementation of engineered and institutional controls memorialized within a recorded environmental covenant (EC) signed by Ecology will be needed. Specific restrictions that are anticipated in that letter included:

- Commercial land use of the Property in perpetuity.
- Prohibition on use of groundwater from the Property for drinking water purposes.
- Long-term protection of the vapor intrusion mitigation system.
- Prevention of exposure to subsurface soils.

Although known soil contamination is anticipated to be removed, the subsurface soil (capping) restriction is anticipated since the contamination releases were highly variable (spotty) and therefore it is possible that some soil contamination could remain following the excavation cleanup. The soil vapor intrusion mitigation protection requirement is based on a similar concern, although as discussed in Ecology's letter, post construction sub-slab soil gas sampling could be a means to eliminate that restriction. Groundwater restrictions will be needed since groundwater cleanup approach is based on containment and cleanup level exceedances in groundwater may be persistent. Finally, a commercial land use restriction is anticipated due to uncertainties regarding remaining contamination following cleanup.

Ecology suggests proceeding with the planned post-injection groundwater monitoring. As mentioned in your email dated 7/24/24, we understand that assistance from Ecology is requested with respect to access requests for the adjacent property to the north. Ecology will be following up on that and will keep you updated regarding our communications.

Ecology appreciates the ongoing work toward cleanup of this 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: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Sent: Tuesday, July 23, 2024 2:18 PM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Cc: Peter Kingston <pkingston@farallonconsulting.com>; Sarah Hazani <shazani@fortress.com>; Brady Thomson <bthomson@fortress.com>
Subject: RE: Revised Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

External Email

Frank,

Please find attached a document which summarizes Farallon's responses to Ecology's comments and clarifies which sections of the Compliance Monitoring Plan were revised to address Ecology's comments.

Feel free to reach out if you have any questions.

Thank you

Yusuf Pehlivan, L.G.

Senior Geologist

Phone 949-351-6163

From: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Sent: Wednesday, July 10, 2024 2:03 PM
To: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Cc: Peter Kingston <pkingston@farallonconsulting.com>; Sarah Hazani <shazani@fortress.com>; Brady Thomson <bthomson@fortress.com>
Subject: RE: Revised Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

Hi Yusuf,

I have given this revised monitoring plan a cursory examination. Unfortunately, I won't have time to look at this more closely until my return on 7/19/24 (out-of-office 7/11-7/18).

One thing that would facilitate our review at that time appears to be a brief comment response document that indicates where each of Ecology's comments was incorporated (or if there were any comments which were not incorporated). I see you stated in your report that Ecology retracted a few comments during a Teams call – if you could elaborate on that within the comment responses that would also be helpful.

If you could provide this requested comment responses document I believe that will help us to work through this revised document more efficiently.

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: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>

Sent: Tuesday, July 9, 2024 5:14 PM

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

Cc: Peter Kingston <pkingston@farallonconsulting.com>; Sarah Hazani <shazani@fortress.com>;
Brady Thomson <bthomson@fortress.com>

Subject: Revised Compliance Monitoring Plan - Washington Cold Storage (Expedited VCP ID No. XS0012)

External Email

Frank,

Please find attached Farallon's revised Compliance Monitoring Plan for the Washington Cold Storage Property in Puyallup. This Compliance Monitoring Plan has been revised to address Ecology's comments on the original submittal. Ecology's email comments have been included as an Appendix to the document.

Please feel free to reach out if you have any questions.

Thank you



Yusuf Pehlivan, L.G.

Senior Geologist

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