From: Winslow, Frank (ECY)
To: "Nathan O"Leary"
Subject: RE: Nathan O"Leary shared "NWMS (17046) Remedial Investigation Report - 2024" with you
Date: Tuesday, November 5, 2024 11:01:41 AM
Attachments: image001.png
image002.png
image003.png
1009057_Remediation of Petroleum Contaminated Sites.pdf
Toxics Cleanup Program Procedure 440A Establishing Environmental Covenants under the Model Toxics Control Act.docx
image004.png

Hi Nathan,

Thank you for submitting your Additional Remedial Investigation Report.

Your report concluded:

> *As such, H&H is recommending that PCE and TPH-RRO impacted soil be excavated to minimize the future soil to groundwater pathway and that environmental covenants be recorded on the property deed restricting use of the Site for commercial and industrial purposes to minimize the future vapor intrusion exposure pathway in the future. A Remedial Action Work Plan will be submitted under separate cover.*

If excavation and offsite disposal are to be implemented, please provide soil confirmatory sampling results and disposal receipts within a Cleanup Action Report. Generally, a minimum of four confirmatory soil samples will be needed (four sidewall and one floor) for a fairly discreet excavation area. More information can be found in the attached guidance document. No work plan is expected by Ecology for this work.

Ecology notes that the vertical extent of the heavy oil in soil contamination at location SB-5R was not found, since drilling could not be conducted inside the building. Hence, excavation in this area may be uncertain with respect to achieving clean floor sample(s) for heavy oil in soil. Ecology also notes that the map showing location SB-3R shows that location to be distant from SB-3 (approximately 12 feet based on Figure 3). Hence, there is uncertainty with respect to the vertical extent of PCE in soil contamination at location SB-3. Previous drilling at SB-3 only had PID readings to 4 feet depth, and no deeper sampling then 2-3 feet, where PCE was found at 1.3 mg/kg. Unless SB-3R was located significantly closer to SB-3 than is shown on Figure 3, then there appears to be significant uncertainty with respect to the vertical extent of PCE in soil at this location. Ecology also notes that the current report appears to show location SB-6 as co-located with SB-3, whereas the previous report shows them at separate locations. An inset may may be warranted to show the sampling locations more precisely.

Because of the current uncertainties regarding the vertical extent of soil contamination, an additional round of sampling for downgradient monitoring well MW-5 for VOCs and heavy oil (NWTPPH-Dx analysis) appears to be warranted. As mentioned in our email dated 7/9/24:

> *Based on Ecology's initial review, it does not appear that the soil contamination has resulted in contaminated groundwater. However, Ecology needs additional information to verify this conclusion. The vertical extent of contamination at locations SB-3 and SB-5 (both PCE and heavy oil) needs to be defined with laboratory analytical data. Previous sampling at locations SB-3 and SB-5 went to 15 ft and 4 ft below ground surface (ft bgs) respectively. In order for Ecology to issue a NFA determination, the extent of*

contamination must be defined.

Ecology notes that if PCE is to be disposed of under a contained-in determination https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/contained-in-determinations#:~:text=How%20are%20contained%2Din%20determinations,Toxics%20Control%20Act%20(MTCA), then Ecology Toxics Cleanup Program (TCP) should be copied with correspondence with Ecology Hazardous Waste and Toxics Reduction (HWTR) program. This process can result in significant cost reductions for soil disposal when compared to disposal of soil as listed hazardous waste.

Please note for future submittals, Ecology expects that report tables include all previous and current sampling results for each media rather than just the results from the most current sampling event. This is important so that we can review all of the Site data concurrently.

Ecology notes that the sub-slab soil gas data includes exceedances of the unrestricted land use-based screening level for PCE. In order to apply the commercial (worker) based screening level, then an environmental covenant (EC) with a with a restriction of land use to commercial uses in perpetuity will be needed. If cleanup of all contaminated soil is completed, then soil restrictions may not be needed. We anticipate that an EC would also include a prohibition on drinking water wells, based on the observed soil contamination. If excavation cleanup of all contaminated soil occurs, then this cleanup work may potentially address the soil gas contamination. If so, then resampling of sub-slab soil gas following excavation cleanup may be warranted with a hope of eliminating the need for an EC. Our EC boilerplate is attached for when you are ready to begin this process.

Please let me know if you have any questions regarding this feedback.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager
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Frank.Winslow@ecy.wa.gov

From: Nathan O'Leary <noleary@harthickman.com>
Sent: Thursday, October 31, 2024 10:24 AM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Subject: Nathan O'Leary shared "NWMS (17046) Remedial Investigation Report - 2024" with you

Nathan O'Leary shared a file with you

Frank,
The final Remedial Investigation Report for the Northwest Motorsports facility in Puyallup (Cleanup No. 17046) is available at the provided link. If you have any issues opening the file, or if you need a hard copy, please let us know.

Thanks,
Nathan

NWMS (17046) Remedial Investigation Report - 2024

This link only works for the direct recipients of this message.

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