



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

September 27, 2024

Casey Sixkiller, Regional Administrator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

RE: Palermo CERCLA Site Record of Decision Amendment, State Concurrence

Dear Regional Administrator Sixkiller:

This letter communicates the Washington State Department of Ecology's concurrence with the selected remedy for the Operable Unit 2 (Southgate Dry Cleaners) portion of the Palermo Superfund Site, as described in the U.S. Environmental Protection Agency (EPA) Record of Decision Amendment (RODA).

The selected remedy will treat tetrachloroethylene (PCE) contamination in site soils and groundwater and consists of two major components:

- 1) Soil Vapor Extraction of PCE contaminated soils, with horizontal wells beneath the Southgate Dry Cleaners building
- 2) Multiple permeable reactive barriers that will treat PCE contamination by injecting two different amendments:
 - In Situ Sequestration (colloidal activated carbon) promoting adsorption of PCE, and
 - In Situ Chemical Reduction (sulfidated zero valent iron) reducing and destroying PCE without the generation of secondary contaminants.

In addition, the downgradient extent of the PCE groundwater plume is hydraulically contained by a subdrain and subsequently treated via aeration at a treatment lagoon (installed and developed under the original ROD in 1999). This portion of the remedy is considered part of Washington State Department of Transportation Palermo OU-1 Trichloroethene (TCE) Plume.

Ecology looks forward to a partnership with EPA regarding ongoing work related to the remedy. Ecology intends to be involved with EPA during the review, and to comment on the remedial design for various aspects of the PCE cleanup – for example, ongoing performance monitoring of the selected remedy and a rigorous five-year review process to ensure long-term effectiveness. It is our expectation and understanding that work on Palermo OU-2 will strive to meet EPA's goals, Ecology's requirements, and be responsive to any environmental justice concerns for the community.

Ecology expects that EPA will not make significant changes to the cleanup activities at Palermo OU-2 without first consulting with Ecology and providing sufficient assurance that any selected remedy will meet state Applicable or Relevant and Appropriated Requirement(s).

We have appreciated working in partnership with you on the RODA and look forward to seeing progress made.

If you have any questions or would like to discuss any aspect of this letter, please contact John Pearch at 360-819-0460 or john.pearch@ecy.wa.gov.

Sincerely,



Barry Rogowski, Program Manager
Toxics Cleanup Program

cc: Adam Nichols, Region 10 SEMD Remedial Project Manager, U.S. EPA
Anna Laird, Region 10 Assistant Regional Counsel, U.S. EPA
Calvin Terada, Region 10 SEMD Division Director, U.S. EPA
Dean Ingemansen, Region 10 LLB Branch Manager, U.S. EPA
Dustan Bott, Region 10 Superfund Section Manager, U.S. EPA
James Hall, Region 10 SEMD Remedial Project Manager, U.S. EPA, U.S. EPA
Kira Lynch, Region 10 RMB Branch Manager, U.S. EPA
Sheila Fleming, Region 10 SEMD Division Deputy Director, U.S. EPA
Stephen Lukas, Region 10 SEMD Remedial Project Manager, U.S. EPA
Deborah Johnson, Drinking Water Wellhead Protection Program Coordinator, DOH
Derek Threet, Ecology Division Assistant Attorney General, WA State AGO
Connie Groven, TCP SWRO Acting UST/Technical Support Unit Supervisor, Ecology
John Pearch, TCP SWRO Site Manager, Ecology
Marian Abbett, TCP SWRO Section Manager, Ecology