

From: [Winslow, Frank \(ECY\)](#)
To: ["Greg Peters"; Peter Kingston](#)
Subject: RE: Expedited VCP Progress Report - Coatings Unlimited Site - VCP Project ID XN0006
Date: Friday, December 13, 2024 11:45:36 AM
Attachments: [image001.png](#)

Hi Greg and Pete,

Thank you for your progress report. Ecology has taken a look at your progress report as well as Ecology's NFA Likely letter dated December 27, 2021. That letter stated:

Ecology has determined that, upon completion of your proposed cleanup, no further remedial action will likely be necessary to clean up contamination at the Site¹.

1 Note that achieving cleanup levels via the proposed remedial technologies and methods carries uncertainties. Determination of no further action by Ecology will be contingent on sampling results confirming that MTCA cleanup levels have been achieved at approved points of compliance..

The NFA Letter also stated:

Ecology concurs with the above cleanup approach, with the following caveats/clarifications.

- The soil excavations should include sufficient confirmation sampling to ensure that all of the soil contamination in these areas has been removed. Disposal receipts should be submitted to Ecology to document proper disposal. Ecology suggests that these excavations proceed as Interim Remedial Actions. Each Interim Remedial Action should be summarized on a report and submitted to Ecology for review and comment.*
- A Cleanup Action Plan (CAP) will be needed providing details on the conceptual design of the proposed AS/SVE systems and refining proposed CPOCs and RELs, this information should also be provided to Ecology for review and comment.*
- A total of five (5) source areas are proposed for AS/SVE treatment at the Site (see attached Figures 20 and 22). Additional Site characterization had been requested by Ecology to confirm source areas requiring treatment at the Site (a list of data gaps was provided by Ecology in an email dated December 3, 2021, and a table listing data gaps is provided in Enclosure A). These data gaps include the need for temporary and/or permanent monitoring wells at selected confirmed or potential source areas, and in areas downgradient of elevated CVOC concentrations where no downgradient monitoring well is currently present. Locations of current monitoring wells are shown on attached Figure 3.*

Once the requested additional data has been collected, Ecology can assess whether or not additional source controls are needed beyond the five (5) source areas currently proposed for remediation. Many of the monitoring wells requested by Ecology also have potential to serve as compliance/performance monitoring points in the future, hence they are not solely needed for characterization purposes.

- The acceptability of the currently proposed remedial approach requires that no contaminated groundwater is leaving the Property. Currently, available data suggests that no groundwater contamination above MTCA cleanup levels is currently leaving the Property; however, this conclusion needs confirmation at several locations (see Ecology's December 3, 2021 email). If groundwater contamination is found to be leaving the Property after installation and sampling of the requested monitoring points, then Ecology will reassess the proposed cleanup approach and this NFA Likely determination.*

- *A disproportionate cost analysis (DCA) will be needed prior to Ecology's approval of the use of CPOCs, and Ecology must concur with that DCA. Otherwise, the presumption under MTCA is that all contaminated groundwater will be cleaned up to below MTCA cleanup levels.*
- *Ecology also notes that the proper design of an AS/SVE system may indicate the need for additional data that could be collected during design data acquisition activities. Such data needs should be discussed within the CAP. This potentially could include additional data to support appropriate spacing of AS and SVE wells (radius of influence analyses).*

Since the NFA Likely letter, Farallon submitted a Status of Cleanup Action letter report dated May 5, 2023. The report included a data gap investigation, continued monitoring, updated conceptual site model, updated contamination extent delineation, air sparge/SVE pilot testing, and updated cleanup action plans. Ecology provided feedback on that document in an email dated May 24, 2023.

Deliverable Expectations:

Since the NFA Likely letter was written in December 2021, Ecology has strived within the expedited VCP process to make expected deliverables more clearly defined within our NFA Likely letters. Because that letter did not make these expectations as clear as we now strive to do, we are providing some deliverable expectations as follows. We recognize that given the complexity of this site, there may need to be some flexibility with respect to these deliverables. In general, we prefer to have plans and completed work documented as soon as possible and submitted to Ecology to allow our timely feedback.

Cleanup Action Report(s) – Ecology prefers that cleanup efforts be documented soon after cleanup work has been performed, so that we can provide any feedback as quickly as possible. Since this site includes many cleanup elements, we would prefer that cleanup action reports be prepared such that there is not an extended period between completion of a remedial action and reporting. This could result in more than one cleanup action report. Some cleanup actions may take place over an extended period - for such cases, additional efforts can be documented within Addenda to a Cleanup Action Report. **Please let us know when you anticipate submitting your Cleanup Action Report(s).**

Monitoring Plan – Monitoring plan should discuss performance and compliance monitoring. In addition to a Cleanup Action Report, **it would appear to also be appropriate to prepare a monitoring plan at this time.** Such a monitoring plan can be updated periodically, as appropriate, with Ecology concurrence. Key elements of this plan are cumulative data tables presenting all historical data, and locations, analytes, and frequency of proposed monitoring, both before and after NFA issue.

Monitoring Data Submittals – Ecology expects that monitoring data will be provided to Ecology following monitoring rounds as soon as the data are available. This should include updated cumulative data tables presenting all historical and current monitoring data, and figure(s) showing sampling locations.

Performance and Compliance Monitoring Report(s) – A monitoring report should be prepared when sufficient data have been collected to request an NFA decision. Earlier submittals of monitoring reports may be appropriate if an opinion from Ecology regarding proposed changes in monitoring are requested. Monitoring reports should include all sampling results from all

media in cumulative data tables, and figures showing all sampling locations.

Operations and Maintenance (O&M) Plan(s) – A draft O&M Plan(s) should be submitted to Ecology for our review and comment as soon as possible, generally prior to operation of remedial systems.

Environmental Covenant – An environmental covenant will likely be a part of the ultimate cleanup of this site. We anticipate a draft EC should be submitted to Ecology prior to submittal of a request for a NFA determination, noting it commonly takes several months to work through this process.

Please let me know if you would like to have a Teams call to discuss this email.

Thanks, Frank

Frank P. Winslow, LHG

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From: Greg Peters <gpeters@farallonconsulting.com>

Sent: Tuesday, December 10, 2024 7:38 AM

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

Cc: Peter Kingston <pkingston@farallonconsulting.com>

Subject: Expedited VCP Progress Report - Coatings Unlimited Site - VCP Project ID XN0006

External Email

Hello Frank,

Farallon prepared the following Expedited Fourth Quarter 2024 Progress Report for the Coatings Unlimited Site located at 18420 68th Avenue South in Kent, Washington. The Coatings Unlimited Site was assigned Expedited VCP Project ID XN0006.

- Description and status of Site characterization or cleanup work (completed during past quarter or ongoing work).

Operation and maintenance of the Southwest and Central AS/SVE systems are on-going and preparations are on-going to bring the Northeast AS/SVE system online. A semiannual groundwater monitoring event was completed in October 2024.

- A list of pending opinion requests to Ecology and expected date for next request for Ecology opinion.

In December 2021, Ecology prepared a No Further Action Likely letter for the proposed cleanup.

- Summary of dates and titles of documents submitted to Ecology for review in the last quarter.

No document or opinion requests were submitted to Ecology during the last quarter.

- Type of documents and opinion requests planned for submittal to Ecology during the next quarter.

A site status summary report is planned for submittal to Ecology during the next quarter.

- Any updates to the project schedule showing the previously mentioned activities and milestones.

The redevelopment of the Property has been postponed. Remedial actions are ongoing independent of redevelopment.

- A description of schedule delays or changes from the prior quarter and reasons for those changes.

There were no schedule delays or changes.

- Changes in key project team personnel.

There were no changes in key personnel.

- Anticipated changes at the Site, such as property ownership, changes to potential future use, new or obsolete access restrictions, or anything that could affect the cleanup.

There are no anticipated changes at the Site.

Please reach out with any questions,

Regards

Greg Peters, Associate Environmental Scientist

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