



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

January 17, 2025

Julie Peoples
490 Stuart Road Northeast
Cleveland, Tennessee 37312
jcpeoples@olin.com

RE: Response to Well Decommissioning Request

- **Site Name:** Frederickson Industrial Park (Site)
- **Site Address:** 18001 Canyon Road East, Puyallup, 98375
- **Facility/ Site ID:** 1301
- **Cleanup Site ID:** 3557

Dear Ms. Peoples,

This work is being done under Agreed Order No. 9514 between Washington State Department of Ecology (Ecology) and Olin Corporation and Mallinckrodt US Holdings LLC (the Companies), and in compliance with the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Thank you for submitting a decommissioning request for nine wells located within the Frederickson Industrial Park Site (Geosyntec, 2024). A few items must be completed before decommissioning can commence. Please see below:

1. Groundwater samples must be collected from monitoring wells P1-S and P1-I to ensure carbon tetrachloride (CTC) levels are still below the MTCA Method B cleanup level of 0.63 µg/L. Please continue to use the methods and procedures outlined in the approved Compliance and Monitoring Work Plan, dated September 2013 (including approved updates).
2. Excluding monitoring wells 11-D, 12-A, and Y-4B, where boring logs are not present, chip in place was requested as the decommissioning method. Although consultant logs are available for monitoring wells MW-2, MW-3, MW-6, P1-S, P1-I, and P1-D, we were unable to locate the official drillers logs which would have been submitted to the Department of Ecology shortly after construction. Unless these logs are located ([Washington State Well Report Viewer](https://apps.wa.gov/wellconstruction/map/WCLSWebMap/default.aspx)¹) and matched with their corresponding

¹ <https://apps.wa.gov/wellconstruction/map/WCLSWebMap/default.aspx>

consultant provided logs, a variance will need to be acquired in order to chip in place. Please work with Garrett Scheuerman, the SWRO Well Construction Coordinator (gash461@ecy.wa.gov) if you would like to pursue a variance to chip in place these wells. Additionally, some drilling contractors in the area provide perforation and pressure grouting services, which could be used in place of over drilling methods or if over drilling is not feasible.

Please note, if site conditions change or CTC rebounds, monitoring well re-installation may be necessary to satisfy cleanup site obligations and monitoring requirements. If you have any questions, please call me at 360-999-9590 or email me at cpen461@ecy.wa.gov.

Sincerely,



Cam Penner-Ash, LG
Cleanup Project Manager
Southwest Region Office
Toxics Cleanup Program

Enclosures: Geosyntec Consultants (Geosyntec). November 21, 2024. Monitoring Well Decommissioning at Brazier Site, Frederickson.

cc: Karen Kampwerth, Mallinckrodt, karen.kampwerth@mnk.com
Deborah Taege, Boeing, deborah.a.taege@boeing.com
Anne Smith, City of Tacoma, asmith2@cityoftacoma.org
David Parkinson, Geosyntec, dparkinson@geosyntec.com
Garrett Scheurman, Ecology, gash461@ecy.wa.gov
Marian Abbett, Ecology, mabb461@ecy.wa.gov
Ecology Site File

21 November 2024

Andrew Smith, P.E., LHG
UST/Technical Services Unit Supervisor
Ecology's Toxics Cleanup Program
Southwest Regional Office
Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

Subject: Monitoring Well Decommissioning at Brazier Site, Frederickson, WA

Dear Mr. Smith:

This letter has been prepared by Geosyntec Consultants on behalf of Olin Corporation and Mallinckrodt US Holdings LLC (the Companies) to request decommissioning of nine monitoring wells at the Frederickson Industrial Park Site (Site) in Pierce County, Washington (Figure 1). This request is in accordance with the Washington Department of Ecology's (Ecology's) Agreed Order (AO) No. DE 9514 (Order).

As part of prior remedial investigation activities, a network of groundwater monitoring wells were installed at the site. The nine wells proposed for decommissioning are not part of the compliance monitoring well network as established in the approved Compliance Monitoring Work Plan (CMWP). These wells have not been monitored for more than ten years and will not be required in the future. These wells will be decommissioned according to State of Washington regulations (WAC 173-160-460)¹. Table 1 summarizes information for these wells and Figure 1 provides locations of these well with respect to the CMWP well network.

The Companies request Ecology approval to proceed with decommissioning these nine monitoring wells. Please feel free to contact either of the undersigned if you have questions or would like to discuss this request.

Sincerely,



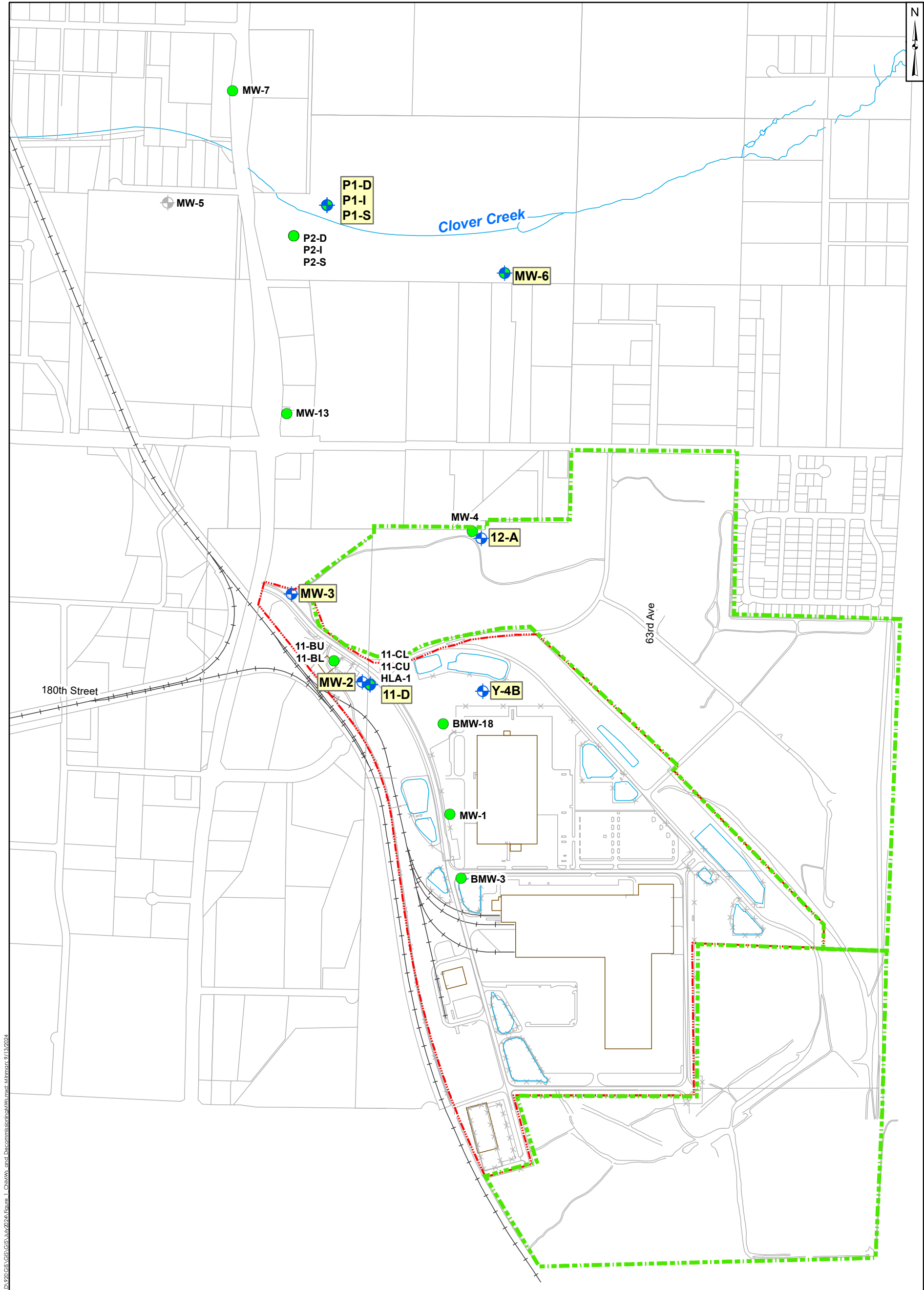
James J. Deitsch, Ph.D.
Senior Principal



David L. Parkinson, Ph.D., L.G. (WA)
Principal

¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

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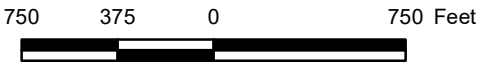


PA:Project\Olin Corporation\PH0861 - Border GW Frederickson WA 880 GIS and CAD\Y20 GIS\GIS July 2024\Figure 1 CHMWs and Decommissioning\MW.mxd; Mirman: 7/13/2024

Legend

- Monitoring Well Considered for Decommissioning
- Monitoring Well in Compliance Network
- Co-Located Monitoring Wells Considered for Decommissioning and in Compliance Network
- Monitoring Well Not Found
- Panattoni Property
- Boeing Property

MWs Proposed for Decommissioning



Monitoring Wells in Compliance Network and
Monitoring Wells Considered for Decommissioning
Frederickson Industrial Park
Frederickson, WA

Geosyntec
consultants

Kennesaw, GA

November-2024

Figure
1

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Table 1.
Monitoring Wells Considered for Decommissioning
Brazier Site, Frederickson, Washington

Well	Date of Installation	Installed By	Comments	Depth	Construction Log	Surface Features	Comment
Monitoring wells to be decommissioned							
MW-2	Aug-2000	Companies/CRA	Existing MW; not presently monitored	157	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
MW-3	Aug-2000	Companies/CRA	Existing MW; not presently monitored	100	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
MW-6	Aug-2000	Companies/CRA	Existing MW; not presently monitored	118	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
11-D	Aug-1989	AHR	Existing MW; not presently monitored	100		To be Confirmed	Construction log missing; decommissioning will require overdrilling
12-A	Aug-1989	AHR	Existing MW; not presently monitored	100		To be Confirmed	Construction log missing; decommissioning will require overdrilling
P1-S	Oct-2000	Companies/CRA	Existing MW; not presently monitored	27	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
P1-I	Oct-2000	Companies/CRA	Existing MW; not presently monitored	70	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
P1-D	Oct-2000	Companies/CRA	Existing MW; not presently monitored	110	Y	Stickup/bollards	Construction log exists - can decommission with bentonite chips
Y-4B	Aug-1990	GEN	Existing MW; not presently monitored	100		To be Confirmed	Construction log missing; decommissioning will require overdrilling

Source: 1998 CRA RI/FS Work Plan

AHR = Adams, Hodsdon, Robinson Engineers

GEN = GeoEngineers