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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
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April 16, 2025

Shaelyn Thomas
Kennedy/Jenks Consultants, Inc.
1500 NE Irving Street, Suite 200
Portland, OR 97232
shaelynthomas@kennedyjenks.com

Re: **Request to Discontinue Groundwater Monitoring and Decommission Wells**

Site name: TETRA PAK
Site address: 3125 Thompson Ave, Vancouver, Clark County, WA 98860
Facility/Site ID: 34822454
Cleanup Site ID: 2615

Dear Shaelyn Thomas:

The Washington State Department of Ecology (Ecology) received your email on January 8, 2025, requesting to cease long-term groundwater monitoring and decommission monitoring wells at the above referenced Site.

I have reviewed the 2024 Long-Term Groundwater Monitoring Report, dated January 7, 2025, and other available Site documents. My review indicated the following:

- Groundwater monitoring is to be conducted at the Site every 18 months in accordance with the Long-Term Groundwater Monitoring Plan, dated January 9, 2009.

- The monitoring well network includes seven monitoring wells (MW-1, -2, -3, -5, -6, -7, and -8); however, samples are not collected from MW-3 due to an obstruction identified in 2021 via a closed-circuit television (CCTV) survey of the well. In addition, MW-1 has not been sampled during the last seven events due to insufficient water.

- Results for monitoring wells MW-2, -5, -6, -7, and -8 have shown concentrations of contaminants of concern (COCs) as non-detect for at least the last seven sampling events. COCs analyzed for include pentachlorophenol (PCP); 2,3,4,6-tetrachlorophenol; 2,3,5,6-tetrachlorophenol; 2,4,5-trichlorphenol; and 2,4,6-trichlorophenol. However, the detection limit for PCP during several events exceeded the cleanup level of 0.22 micrograms per liter (µg/L) with the most recent occurring during the January 2023 sampling event.
- According to the 2009 Long-Term Groundwater Monitoring Plan, groundwater samples collected from monitoring well MW-7 should be analyzed for PCP and dioxins/furans every 5 years. However, it does not appear that any groundwater samples have been collected for dioxin/furan analysis since 2008.
- An environmental covenant was recorded for the Site on August 7, 2012. The covenant notes that residual concentrations of COCs including PCP and dioxins remain in soil at the Site at concentrations exceeding the Model Toxics Control Act (MTCA) Method B cleanup level for soil. The contaminated soil is capped by the west warehouse building and an engineered asphalt cap.

Ecology **does not approve** of your request to discontinue groundwater monitoring and decommission all remaining wells at the Site based on the following:

- Ongoing long-term groundwater monitoring is needed to ensure that the cap over contaminated soil remains effective and continues to protect groundwater.
- Groundwater sampling has not been consistently conducted on an 18-month frequency as required by the 2009 Long-Term Groundwater Monitoring Plan. For instance, prior to the most recent November 2024 sampling event, groundwater sampling was last conducted in January 2023, about 21 months apart. In addition, the 2019 and 2021 sampling events were conducted 2 years apart in the same month. The purpose of the 18-month frequency is to account for seasonal changes.
- Although groundwater results have been non-detect for the last several sampling events, the detection limit for PCP has exceeded the cleanup level in several instances.
- Monitoring well MW-7 has not been sampled for dioxins/furans as required by the 2009 Long-Term Groundwater Monitoring Plan.

Ecology requests the following be conducted at the Site moving forward:

- Groundwater monitoring may be discontinued at monitoring well MW-3 and this well may be decommissioned due to the inability to sample the well as a result of an obstruction.
- During future sampling events, if sufficient water is available, a sample should be collected from monitoring well MW-1 following the standard sampling methodology at this Site. However, if water is limited in this well, it is recommended that another sampling method be used, such as a peristaltic pump with nitrogen tank, bailer, or passive diffusion bag. It is also recommended that the total depth of this well be measured during future sampling events to determine if sediment has accumulated at the bottom of the well and may benefit from redevelopment. If groundwater samples are not able to be collected from this well during future sampling events, it may be necessary to replace the well at a future date.
- The next groundwater monitoring event, to be conducted in May 2026, should include dioxin/furan analysis at monitoring well MW-7, in addition to the standard list of COCs at all wells.
- The frequency of groundwater monitoring should continue at the current rate, pending results of dioxin/furan analysis in May 2026. Following this event, and upon request, Ecology may re-evaluate the groundwater sampling frequency.

If you have any questions, please contact me at (360) 409-6164 or danielle.gibson@ecy.wa.gov.

Sincerely,

Danielle K. Gibson

Danielle Gibson
Site Manager/UECA Coordinator
Toxics Cleanup Program
Southwest Region Office

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Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File

References:

Kennedy/Jenks Consultants, Inc. 2009. Long Term Groundwater Monitoring Plan, Former Strebor Site. January 9.

Kennedy/Jenks Consultants, Inc. 2025. 2024 Long-Term Groundwater Monitoring Report, Former Strebor Property, Cleanup Site ID 2615, Facility/Site ID 34822454, Tetra Pak Vancouver, Vancouver, Washington, Ecology VCP File No. SW0377, KJ 2165020*24. January 7.