



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 5, 2025

Michael Merlone
MGP X DHP LLC
425 California Street, Tenth Floor
San Francisco, CA 94104
Sent via email: mmerlone@merlonegeier.com

Re: UIC Site Number 39697 – Underground Injection Control (UIC) Program Well
Registration for Voluntary or Independent Cleanup Sites, Town & Country Cleaners
Bellingham (Site), 2814 Meridian Street, Bellingham, WA

Dear Michael Merlone:

Ecology's UIC Program has reviewed your UIC registration for the above-mentioned Site. Based on the information provided in the registration and the additional information provided per Ecology's request, the UIC wells are **Conditionally Rule-Authorized**, and a State Waste Discharge Permit is not required to operate the wells under WAC 173-218 authorities.

The UIC Site Number is 39697. The Site is undergoing independent remedial cleanup activities (IRCA). If the IRCA is to be eventually evaluated by the State to make a determination whether the IRCA has met the substantive requirements of the Model Toxics Control Act (MTCA), Ecology's Voluntary Cleanup Program (VCP) will make that evaluation. The VCP Project Number is NW3255. The Facility Site Identification Number (ID) is 62351534 and the Cleanup Site ID is 2265 under the Site name of Town and Country Cleaners Bellingham.

A prior IRCA involving the injection of approximately 24,000 pounds (41,000 gallons) of 3-D Microemulsion (3DME) and Bio-Dechlor Inoculum (BDI) Plus at 108 injection point locations was registered under UIC Site Number 33647 and Conditionally Rule-Authorized in August 2017.

Review of technical documents that were electronically submitted to the VCP indicates two other IRCAs were reportedly completed in August 2019 and October 2021, but the injection points (UIC wells) associated with these two IRCAs were not registered with the UIC Program. The IRCA completed in August 2019 reportedly consisted of the injection of approximately 800 pounds (1,366 gallons) of 3DME and 18 liters of BDI Plus at four injection point locations. The IRCA completed in October 2021 reportedly consisted of the injection of approximately 4,000 pounds of PlumeStop (liquid activated carbon) and 1,000 pounds of S-Micro Zero Valen Iron (SMZVI) that were mixed with water to create an injectate volume of approximately 9,675 gallons and 18 liters of BDI Plus at 24 injection point locations.

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Review of the *Opinion Pursuant to WAC 173-340-515(5) on Remedial Action for the Following Hazardous Waste Site* letter, dated October 23, 2023, prepared by Ecology's VCP indicated the Site is defined by the nature and extent of contamination associated with the following releases:

- *Tetrachloroethylene (PCE), trichloroethylene (TCE), and cis-1,2-dichloroethene (cis-1,2-DCE) into the Soil.*
- *PCE, TCE, cis-1,2-DCE, and vinyl chloride (VC) into the Groundwater.*

Review of the *UIC Well Registration Form Supplemental Information* document, prepared by Farallon Consulting, uploaded to the registration for UIC Site Number 39697 on April 11, 2025 and other information provided in UIC registration indicates that a total mass of 5,750 pounds of activated carbon slurry with a total injectate volume of 969.5 gallons was reportedly injected at six temporary injection points on April 14, 2025 and a total mass of 23,000 pounds of activated carbon slurry with a total injectate volume of 22,229 gallons will be injected at 23 temporary injection points in May 2025. The completed and proposed injections will be targeted at depths ranging from approximately 7- to 17- feet below ground surface (bgs) to create two activated carbon subsurface barrier treatment walls.

The reviewed supplemental information document indicates performance groundwater monitoring will be completed from groundwater monitoring proximate to the treatment area to evaluate the effectiveness of the carbon barrier injections. The performance groundwater monitoring is proposed to include the following:

- Sampling of monitoring wells MW-1 through MW-4, MW-6 through MW-8, MW-10, and piezometer B5 for chlorinated volatile organic compounds (cVOCs).

Conditional Rule-Authorization - Conditions of Use

There are inherent environmental risks associated with injecting compounds into groundwater. It is incumbent upon the owner and their representative to carefully characterize, manage, and monitor the Site surface and subsurface conditions to minimize risk and prevent unforeseen degradation of groundwater quality and other environmental risks.

Ecology will Rule-Authorize a UIC registration to operate when the two UIC Program requirements for Rule Authorization are met:

1. Registration of UIC wells (prior to use), and
2. The UIC wells must meet the nonendangerment standard (WAC 173-218-080).

As stand-alone UIC wells, the wells do not meet the nonendangerment standard for Rule Authorization. Additional conditions are needed to allow for conditional rule-authorization and the remedial work to proceed.

The following Site-specific UIC Program requirements for **Conditional Rule-Authorization** include:

- Information in the provided Work Plan and the UIC registration for the Site indicates the injection event is proposed to be completed in May 2025. The Conditionally Rule-Authorized UIC wells are subject to injectate type and volumes listed in the registration for the Site. If additional volumes or a different type of injectate are proposed to be injected, additional review and approval by the UIC Program will be required prior to start of the injection activities. The owner must also seek approval from the VCP Site Cleanup Manager for any proposed additional work.
- Onsite groundwater is not approved for use to mix with the remediation products for injection into the subsurface.
- The injection activities must follow the proposed Work Plan. Any deviations from the approved work plans or other agreements are not allowed unless the VCP Site Cleanup Manager and the Ecology UIC program have pre-approved those changes in writing.
- The injections must not cause a further degradation to groundwater quality criteria at the down-gradient monitoring points per state or federal applicable criteria. If such groundwater degradation occurs, the injection activities must discontinue; any environmental release must be reported no later than 24-hours from the release discovery at [Reporting An Environmental Issue](#)¹ or call 1-800-645-7911.
- Additionally, notification to Ecology's UIC Program of any change in UIC well status is a required element of this registration.
- The planned IRCA start date is for May 2025.

The Site will be **Conditionally Rule-Authorized** for as long as the nonendangerment standard of WAC 173-218-080 will continue to be met and the above items have been completed. Failure to capture any of the performance data required or cause a violation of the applicable cleanup standards may result in a denial, modification, or termination of the UIC registration.

The VCP Site Cleanup Manager will have final authority to determine if the IRCA described in the work plan has met the substantive requirement of the MTCA if such an opinion is requested. Ecology's UIC Program will not make that determination.

At any time if the nonendangerment standard cannot be met, Ecology may require you to apply for, and obtain, a State Waste Discharge Permit for the continued use of the proposed treatment compounds. You would need to obtain a formal waste discharge approval for this project through Ecology's State Waste Discharge Permit Program or Toxics Cleanup Program.

¹ <https://ecology.wa.gov/Footer/Report-an-environmental-issue>

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The owner is responsible for keeping the UIC registration information current and retaining all registration documents, plans, modeling, monitoring results, interim, and final reports. Upon Ecology's request, the owner shall provide these documents to the UIC Program.

This UIC registration was evaluated under the presumptive approach, Ecology UIC has determined the conditions described in the UIC registration and other submitted documents to be truthful and factual when making the determination the injections will be protective of the Site groundwater quality and will meet the nonendangerment standard requirements of WAC 173-218-080. Any material misrepresentations or omissions of fact supplied in this application may result in the denial or revocation of this registration authorization. Ecology's UIC Program has the authority to rescind a rule authorization if Ecology determines the system no longer meets the nonendangerment standard.

Please contact John Bhend at UICwells@ecy.wa.gov if you have any questions. You can find additional information on the UIC Program can at our website:

[Ecology's Underground Injection Control Program](#)²

Sincerely,



John Bhend, LG, LHG
Statewide UIC Program Coordinator
Water Quality Program

cc: Greg Peters, Farallon Consulting, gpeters@farallonconsulting.com
Jing Song, Ecology NWRO VCP, jiso@ecy.wa.gov

² <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program>