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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

May 8, 2025

Dave Graef
1604 Hewitt Avenue
Suite 200
Everett, WA 98201
(dave.graef@skotdal.com)

Re: Evaluation of Trichloroethene Risks at the following Site:

- **Site Name:** Skotdal Enterprises
- **Site Address:** 1419 Avenue D, Snohomish, WA 98290
- **Facility Site No.:** 12775192
- **CSID No.:** 4313

Dear Dave Graef:

Ecology appreciates your responsiveness to our request for information at the Skotdal Enterprises facility (Site) in Snohomish, Washington. We received your letter *Response to Ecology Letter dated March 25, 2025 (March 2025 Response)* on April 24, 2025. Based on our review of data collected to date, additional indoor air and soil vapor sampling is needed to fully evaluate the vapor intrusion (VI) exposure pathway at the Site. We base this request on the following:

- **Groundwater Concentrations**
Groundwater monitoring data included in the *March 2025 Response* indicate that trichloroethene (TCE) remains above the short-term action level for non-residential use (31 µg/L) at MW-10 within the last year. Monitoring well MW-10 is located immediately northwest of the daycare facility that occupies the former dry cleaner location.
- **Previous Indoor Air and Sub-Slab Soil Vapor Samples**
Soil vapor samples were collected in the vicinity of the former dry cleaner in 2016. Your letter indicates that the precise location of sub-slab soil vapor sampling points was unavailable, and the locations displayed on Figure 1A represent “general locations” of samples. It is unclear if sub-slab soil vapor samples were located in the historical dry cleaner.

Based on the concentrations of TCE in groundwater and inconclusive soil vapor sampling data, additional evaluation of the VI pathway is needed at the Site. Ecology recommends collecting indoor air and sub-slab soil vapor samples from buildings located within 100 feet of monitoring wells with concentrations of TCE exceeding the short-term action level for non-residential use¹. Additionally, any buildings located along preferential pathways such as sewer lines or utility corridors should be assessed for VI risk.

Ecology is available to provide you with additional technical assistance through the Voluntary Cleanup Program (VCP)². You may request advisory opinions from the VCP regarding the sufficiency of your cleanup actions including the necessary measures to adequately characterize VI risks at the Site. If you have questions about the VCP, please feel free to contact David Unruh at vcp-nwro@ecy.wa.gov or by phone at 206-459-6287.

Sincerely,



Nick Treat
VCP Unit Supervisor
Toxics Cleanup Program, Northwest Region Office

cc: Craig Skotdal, Skotdal Enterprises (craig@skotdal.com)
Eric Koltes, JS Held (eric.koltes@jsheld.com)
Elmer Diaz, Washington State Department of Health (elmer.diaz@doh.wa.gov)
Lenford O'Garro, Washington State Department of Health (lenford.ogarro@doh.wa.gov)

¹ [Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action](#), Chapter 2.3

² <https://ecology.wa.gov/spills-cleanup/contamination-cleanup/voluntary-cleanup-program>

