



May 13, 2025

To	David Unruh, VCP Cleanup Project Manager		
Copy to	Corrine Dobbins – Protective Coatings, Inc. Tufan Yuser – Protective Coatings, Inc.		
From	Scott Kranz – GHD Services Mitchell Hatfield – GHD Services	Tel	(503) 816-6643 (425) 412-6262
Subject	Response to Request for Information on Status of VCP Project		
Site	Protective Coatings Inc – 1215 2 nd Ave N, Kent, WA 98032		

Dear David Uruh,

GHD Services Inc. (GHD) has prepared this letter for Protective Coatings, Inc. for the property located at 1215 2nd Ave N, Kent, WA 98032 (Property). This letter is in response to Ecology's letter request for information on the status of the VCP Project for the following Site:

<i>Site Name:</i>	Protective Coatings Inc.
<i>Site Address:</i>	1215 2 nd Ave N, Kent, WA 98032
<i>Facility/Site No:</i>	85155236
<i>CSID No:</i>	12337
<i>VCP Project No.:</i>	NW2843

Project Status and Schedule

GHD is working to complete site investigation activities as proposed in GHD's *Site Investigation Work Plan* dated May 22, 2023. In October 2023, a site investigation was completed at the Protective Coatings, Inc. Property. This investigation included the advancement of 4 soil borings, installation of 1 monitoring well, and installation of 3 shallow soil gas probes. Following this investigation, 3 quarterly groundwater monitoring events were completed. Soil gas samples were attempted to be collected; however, water was encountered in each of the shallow soil gas probes (see Attachment 1 – Ecology Email Correspondence Re. Soil Gas Sampling Challenges).

Additional groundwater monitoring and the installation of vapor pins and soil gas sampling are scheduled for Summer 2025. Environmental investigation activities will be summarized in a report following receipt of analytical data.

Please contact Scott Kranz at (503) 816-6643 or Mitchell Hatfield at (425) 412-6262 if you have any questions or require additional information.

Sincerely,

GHD

Mitchell Hatfield
Project Manager

+1 425 412-6262
mitchell.hatfield@ghd.com

Scott Kranz, LHG
Technical Director

+1 503 816-6643
scott.kranz@ghd.com

Encl.

Attachment 1 - Ecology Email Correspondence Re. Soil Gas Sampling Challenges

Attachment 1

**Ecology Email Correspondence Re. Soil
Gas Sampling Challenges**

From: [Unruh, David \(ECY\)](#)
To: ["Heather Gadwa"](#)
Cc: ["Brian Peters"](#)
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA
Date: Wednesday, March 20, 2024 11:55:26 AM
Attachments: [image001.png](#)

Heather and Brian,

Thank you for the call and update on the Site. Here's a quick summary of what we discussed:

- Soil gas probes were completed to ~4 feet bgs at locations B to D in October 2023 using a vac truck. The probes were completed a little shallower than planned due to refusal on cobbles.
- GHD made attempts to sample the probes on two occasions in late 2023 and one in 2024. During each sampling effort, the probes were saturated with water, and soil gas sample collection was not possible.
- As an alternative, we discussed installing vapor pins at each location. Locations C and D are surfaced with asphalt, which is only a few inches thick. Location B, in one of the former storage bunkers, is surfaced with approximately 4 inches of concrete. Soil gas samples collected from vapor pins will be analyzed for helium tracer gas in addition to Site COCs to evaluate leakage through the asphalt and concrete pavement at each location.

Ecology concurs that installing and sampling vapor pins at the site is an acceptable substitute for soil gas probes at this time. These results may be used along with groundwater quality data from the new monitoring well near location C to evaluate VI risks to the west-adjacent property.

Let me know if you have any clarifications or additions to this summary. Thanks again for your efforts and coordination on this site!

Best,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Unruh, David (ECY)
Sent: Thursday, March 14, 2024 4:25 PM
To: 'Heather Gadwa' <Heather.Gadwa@ghd.com>
Cc: Brian Peters <Brian.Peters@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi Heather,

Sorry to hear that! I'll be flexible all day next Wednesday through Friday (3/20 to 3/22). I'll also be free before 11 am on 3/25, 3/27, and 3/28. If any of those days work for you, feel free to send along

From: [Unruh, David \(ECY\)](#)
To: ["Heather Gadwa"](#)
Cc: ["Brian Peters"](#)
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA
Date: Wednesday, March 20, 2024 11:55:26 AM
Attachments: [image001.png](#)

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Let me know if you have any clarifications or additions to this summary. Thanks again for your efforts and coordination on this site!

Best,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

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To: 'Heather Gadwa' <Heather.Gadwa@ghd.com>
Cc: Brian Peters <Brian.Peters@ghd.com>
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an invite for a meeting.

Thank you,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Thursday, March 14, 2024 4:20 PM
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Cc: Brian Peters <Brian.Peters@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

External Email

Hi David – We were wondering if we could have a quick chat with you to discuss some sampling challenges we are experiencing with the soil gas probes we installed.

Please let us know when you have any availability in the next week or two.

Thanks!

HEATHER GADWA, LG
Project Manager

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D 425-563-6509 M 253-720-2958 E heather.gadwa@ghd.com

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Please consider the environment before printing this email

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Thursday, June 22, 2023 8:10 AM
To: Heather Gadwa <Heather.Gadwa@ghd.com>; Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>
Cc: Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi Heather,

Sorry I'm a little late in getting back to you about this request, I was out on vacation earlier this week! I do have a flexible schedule tomorrow if you all have time for a last-minute meeting. Otherwise, I'll have time Monday the 26th after 3:00 pm and Wednesday the 28th all day.

Thank you,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Friday, June 16, 2023 09:33
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>; Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>
Cc: Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi David – Would you be able to chat for a couple minutes next week regarding the down gradient monitoring well?

HEATHER GADWA, LG
Project Manager

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D 425-563-6509 M 253-720-2958 E heather.gadwa@ghd.com

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Please consider the environment before printing this email

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Thursday, June 1, 2023 4:49 PM
To: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi All,

Thank you again for submitting your work plan for additional investigation at the Protective Coatings

facility in Kent. Ecology concurs with the proposed site investigation with limited additional recommendations:

- Please update groundwater results tables with the Method B cleanup levels discussed in Ecology's November 2022 Opinion letter. Cleanup levels for vinyl chloride, 1,1-dichloroethane, and Chromium VI have not been updated to the appropriate Method B cleanup level. Ecology initially recommended a cleanup level of 5 ug/L for arsenic, but the cleanup level may be adjusted upward to 8 ug/L to account for natural background concentrations.
- As discussed in the November 2022 Opinion Letter, Ecology recommends analyzing groundwater samples from Site monitoring wells for per- and polyfluoroalkyl substances (PFAS) based on current and historical Site use. If available, records detailing the use of PFAS at the Site should be discussed in future reports for the Site.
- Ecology understands that access to the west-adjacent property is not possible at this time. Since installing a groundwater monitoring well is not feasible in the southeast corner of the adjacent property, Ecology recommends relocating the proposed monitoring well at location A to the vicinity of proposed soil gas probe C. This location is better suited to capture potential impacts downgradient of the source area. Monitoring wells MW-6 and MW-7 have delineated the downgradient extent of chlorinated solvents to the southwest of this area.

I will be out of the office tomorrow, but if you have any questions or concerns, I am happy to discuss these recommendations with you when I return to the office next week.

Best,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Unruh, David (ECY)

Sent: Thursday, May 25, 2023 11:51

To: 'Dobbins, Corinne' <Corinne.Dobbins@pccairframe.com>; Heather Gadwa <Heather.Gadwa@ghd.com>

Cc: Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>

Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi Corinne,

Ok great. I'll get started on my review soon. I'll reply to this email chain in a week or two with my comments.

Best,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>
Sent: Thursday, May 25, 2023 11:34
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>; Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi David,

We are good with working thorough the technical assistance feedback process for this stage of the project.

Thank you.

Corinne Dobbins, CSP, CHMM
EHS Manager | PCC Protective Coatings
1208 4th Ave N Kent, WA 98032
O: 253-520-4327 | C: 253-340-7256
E: Corinne.Dobbins@pccairframe.com

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Thursday, May 25, 2023 8:47 AM
To: Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>; Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: [EXTERNAL] RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

External Email

Hi Heather,

Thank you for sending along the Work Plan. I was able to successfully download and open the file. Just to clarify, would you prefer Ecology provide a formal written opinion for this work plan, or would feedback through technical assistance as we discussed during our call the other week work for you? An opinion would include a little more detail on Ecology's opinion, but would likely take a few months. Technical assistance is a much quicker process, but doesn't provide as much detail. If you'd like Ecology to provide an opinion letter, please fill out the [Request for Opinion \[apps.ecology.wa.gov\]](https://apps.ecology.wa.gov) form.

Let me know if you have any questions!

Thank you,

David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager

Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov

PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>

Sent: Thursday, May 25, 2023 08:29

To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>

Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>

Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Good Morning David – Please see the link below to GHD's *Site Investigation Work Plan* for FSID 85155236 – 1215 2nd Avenue, Kent, Washington for your review and opinion.

As discussed in our meeting, GHD has provided a rose diagram depicted on Figure 2, which resulted in a predominant southwesterly flow. Given these results, we are recommending advancing a monitoring well southwest of the remedial excavation area and Bunker 2 on the PCC property. Additional details are provided in the document for your review.

Please contact Corinne Dobbins with PCC or GHD if you have any questions regarding the document and proposed scope of work.

We look forward to working with you on this project, thank you!

Use the following links to download your file(s).

<https://ghd.sendthisfile.com/1lstrJ7tjDZhH4x5s7kGTS6v> [ghd.sendthisfile.com]

Note: These files will expire in 14 days from the time this email was generated.

HEATHER GADWA, LG
Project Manager

GHD

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D 425-563-6509 **M** 253-720-2958 **E** heather.gadwa@ghd.com

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From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Thursday, May 4, 2023 2:23 PM
To: Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Thank you all for the productive meeting. I look forward to seeing your finalized work plan.

Best,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Thursday, May 4, 2023 14:06
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Thank you David again for your time today.

We will be finalizing our work plan in the next couple weeks and will submit to you for review and comment.

If you have any questions in the meantime please do not hesitate to GHD or PCC.

Have a great weekend!

HEATHER GADWA, LG
Project Manager

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D 425-563-6509 **M** 253-720-2958 **E** heather.gadwa@ghd.com

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From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Monday, April 24, 2023 11:40 AM
To: Heather Gadwa <Heather.Gadwa@ghd.com>

Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Good morning Heather,

That's no problem at all. That date and time work great for me.

Thanks,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Monday, April 24, 2023 11:33
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi David – Apologies for the change, GHD and PCC would like to know if we can switch this to May 4th at 10am?

Please let us know, thanks!

HEATHER GADWA, LG
Project Manager

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From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Thursday, April 20, 2023 4:00 PM
To: Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
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Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Heather,

Any time in that window would work for me. If you'd like to send an invite over, that would be great.

Thank you,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Thursday, April 20, 2023 15:51
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi David – PCC and GHD are available on Friday 5/28 between 9am and 1pm.

Would you like us to send the meeting invitation out?

Thank you,

HEATHER GADWA, LG
Project Manager

GHD
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9725 3rd Avenue NE Ste 204 Seattle WA 98115 USA
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D 425-563-6509 **M** 253-720-2958 **E** heather.gadwa@ghd.com

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Please consider the environment before printing this email

From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Tuesday, April 18, 2023 8:55 AM
To: Heather Gadwa <Heather.Gadwa@ghd.com>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: RE: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Hi Heather,

Thank you for reaching out, I'm glad to hear that you all have additional work planned to further characterize the Site. At the moment, I have flexibility in my schedule all day Tuesday the 25th to Friday the 28th. I'll also be available May 3-4 all day. If those times would work for you all to meet, feel free to send me an invitation. Otherwise, let me know what other days would work better and we can find a time that will work for everyone.

Thank you,
David

David Unruh, LG (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716

From: Heather Gadwa <Heather.Gadwa@ghd.com>
Sent: Tuesday, April 18, 2023 08:36
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Cc: Dobbins, Corinne <Corinne.Dobbins@pccairframe.com>; Brian Peters <Brian.Peters@ghd.com>;
Yasar, Tufan <Tufan.Yasar@pccairframe.com>; Scott Kranz <Scott.Kranz@ghd.com>
Subject: NW2843 / FSID85155236- PCC Aerostructures - 1208 4th Avenue North, Kent, WA

Good Morning David – GHD is contacting you on behalf of PCC Aerostructures (PCC) for the voluntary cleanup program project located at 1208 4th Avenue N, Kent, Washington (Project No. NW2843).

PCC has retained GHD to address the data gaps identified in Ecology's Further Action Letter dated November 28, 2022.

GHD and PCC would like to request a conference call to discuss the opinion letter and our tentative approach for the additional site investigation activities requested. At your convenience please let us know your availability.

We appreciate your time, thank you!

HEATHER GADWA, LG
Project Manager

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