

**Coles Environmental Consulting, Inc.**

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13 July 2009

Mr. Christopher Maurer
VCP Site Manager
Toxics Cleanup Program, HQ
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Maurer:

Regarding: **Status Report on the VCP Project for the Short Stop 1 Site, 6317 California Ave., SW,
Seattle, Washington
(Facility ID No: 92888299; VCP Project No.: NW1610)**

This letter responds to your letter dated 25 June 2009 which was addressed to Mr. Vernon Pontius. In that letter, you requested information on the status of the subject site which presently is managed under Ecology's VCP. On behalf of Mr. Pontius, I provide herein a review of progress at the site to date and our longer term plans. We presently anticipate remaining in the VCP through closure. The project efforts have temporarily slowed, as discussed below, due to our efforts to evaluate several options for a site remedy.

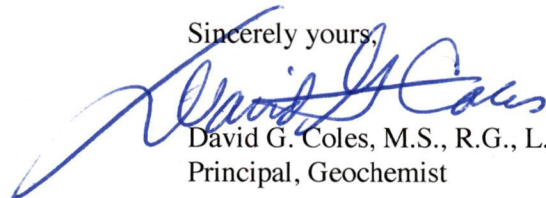
We have completed two additional monitoring rounds since I met with you on 12 June 2008. These events were conducted on 25 August 2008 and 15 January 2009. I have attached a site diagram which shows data flags for all of the six monitoring rounds completed from January 2007 through January 2009. The diagram shows that the concentration of PCE in the groundwater sampled from the five monitoring wells is variable seasonally as well as between wells. Concentrations tend to be higher in the dry season and lower in the wet season. The highest PCE concentrations observed for all 32 samples analyzed (two were duplicates) was 9.26 $\mu\text{g/l}$ (MW-3; 8/25/08). Only four samples have exceeded the MTCA Method A value of 5 $\mu\text{g/l}$. The values are 7.17 $\mu\text{g/l}$ (MW-4; 8/25/08), 5.01 $\mu\text{g/l}$ (MW-4; 1/15/09), 5.44 (MW-5; 11/20/07), and 9.26 $\mu\text{g/l}$ (MW-3; 8/25/08). These higher concentrations were all near the building with the highest value being immediately downgradient from the dry cleaner. The mean and standard deviation calculations also are provided for each monitoring well's data set. These statistics indicate that the mean values are below 5 $\mu\text{g/l}$ but with relatively high deviations from the means as expected given the variable of the analysis results.

The samples collected to date have not been able to demonstrate four quarters of monitoring with concentrations all below 5 $\mu\text{g/l}$. This has been frustrating because the concentrations are barely above this Method A value. Further, there are no receptors to the PCE in the shallow groundwater as domestic water is provided by the City, not from wells. There are no known pathways to ecological receptors at this location. Unfortunately, the MTCA presently does not appear to provide a risk-based methodology for closing a site with such minimal concentrations of PCE. Given the lack of apparent risk we are most interested in any suggestions you might offer for an alternative approach for closure of this site which would not require an expensive site cleanup.

In lieu of an alternative to demonstrating four consecutive quarters of groundwater samples with PCE concentration $< 5 \mu\text{g/l}$ (the usual requirement to achieve site closure), we have been evaluating methodologies for cleanup with the goal to "polish" residual vadose contamination sufficiently to allow the groundwater concentrations to drop consistently below $5 \mu\text{g/l}$. I have asked an experience environmental engineer (Rob Roholt, P.E., Holtech Civil and Environmental Engineering) to begin the design of a remedial system. He also plans to provide estimate costs for installing and operating the equipment. Currently, a simple Soil Vapor Extraction (SVE) system appears to be the most efficaceous. The idea is to surround the dry cleaner portion of the building with a vent pipe at the building's footing and connect it to a vacuum pump.

Again, we welcome any suggestion you may have for resolving this lingering issue of PCE in the shallow groundwater. The goal, as always, is to gain site closure as cost effectively and quickly as possible. Please contact me at 503-636-3102 or at dcolescec@comcast.net with any questions, comments, or suggestions you may have.

Sincerely yours,



David G. Coles, M.S., R.G., L.G.
Principal, Geochemist

Attachment: Site Diagram with Data Flags

cc: Bud Pontius
Rob Roholt, P.E.
Project File

