

From: [Winslow, Frank \(ECY\)](#)
To: ["Yusuf Pehlivan"; Peter Kingston](#)
Subject: RE: WA Cold Storage - Planned PFAS Investigation
Date: Friday, May 2, 2025 4:25:41 PM

Hi Yusuf,

Thank you for your email. Your proposed scope of work appears to be consistent with the data gaps Ecology identified in our April 25, 2025 emails.

Since the PFOS detect in soil at A-1 was at a depth of 0.5 feet below ground surface (ft bgs), it would appear that the proposed borings may not need to go very deep. We would advise collecting reserve samples and submitting them only if needed to verify lateral and vertical extent. I'm not sure what holding times are, so how this could affect a sampling and analysis strategy.

Thanks, Frank

Frank P. Winslow, LHG

WA Expedited VCP Site Manager
Department of Ecology – Toxics Cleanup Program
1250 W. Alder Street, Union Gap, WA 98903
(509) 424-0543 (cell)

Frank.Winslow@ecy.wa.gov

From: Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Sent: Friday, May 2, 2025 4:12 PM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>; Peter Kingston <pkingston@farallonconsulting.com>
Subject: WA Cold Storage - Planned PFAS Investigation

External Email

Hi Frank,

Following up on your previous email, Farallon is proposing the following scope to evaluate PFAS and HVOCs in soil and/or groundwater at the Washington Cold Storage Property:

- Advancing up to 8 shallow borings proximate to boring A-1 where PFOS was previously detected in shallow soil at a concentration exceeding the MTCA Method B cleanup level for protection of groundwater. Samples collected from these borings will be used to characterize the nature and extent of PFAS exceedances proximate to boring A-1 and will be used to define the extent of potential excavation.
- Addition of monitoring wells FMW-8 and FMW-10 to the PFAS groundwater monitoring

program. Farallon plans to conduct four quarters of groundwater monitoring for analysis of PFAS at monitoring wells FMW-8, FMW-10, FMW-11, FMW-14, FMW-17, and FMW-18.

- Three additional quarterly groundwater monitoring events for HVOCs at monitoring well FMW-16, where concentrations of vinyl chloride in groundwater previously exceeded the MTCA Method A cleanup level but were reported non-detect at the laboratory PQL during the most recent groundwater monitoring event in February 2025.

The proposed boring locations proximate to A-1 and the monitoring wells retained for PFAS and/or HVOC groundwater monitoring are shown on the attached figure. Let us know if you have any questions or feedback regarding the planned scope.

Thank you,

Yusuf Pehlivan, L.G.

Senior Geologist

Phone 949-351-6163

From: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

Sent: Friday, April 25, 2025 12:56 PM

To: Peter Kingston <pkingston@farallonconsulting.com>; Yusuf Pehlivan <ypehlivan@farallonconsulting.com>

Subject: RE: WA Cold Storage - PFOS in soil

Hi Pete and Yusuf,

It appears that four consecutive groundwater monitoring rounds with results below cleanup levels will be needed at location FMW-8, FMW-11, and FMW-17 prior to NFA issuance. (Ecology anticipates using these wells as conditional points of compliance). These wells were out of compliance during the last (pre-remedial injection) sampling round, based on the current PFAS CULs. FMW-8 was out of compliance for PFOS, and FMW-11 and FMA-17 were out of compliance for PFOS and PFOA. Assuming the remedial injections have addressed these exceedances, then three additional following quarterly rounds would be anticipated to be sufficient for NFA issue. If needed, Ecology can provide a NFA Likely update following excavation cleanup (and documentation of proper disposal and confirmation soil samples) and following the post injection sampling round demonstrating compliance at FMW-8, FMW-11, and FMW-17.

I reviewed the CLARC CULs for PFAS compounds and the values selected in the attached table appear to be correct. I didn't find the last two compounds in the table (6:2 FTS and GenX) within our CLARC table so am not certain of the source Farallon used, so was not able to validate those CUL values.

The other site contaminants all have at least four rounds below CULs for all constituents except for VC at well FMW-6. I would recommend sampling this well for CVOCs in an upcoming

monitoring round as well as following rounds until 4 consecutive quarters have been achieved at that location. Ecology is not requesting sampling at monitoring wells that have at least four rounds of monitoring data with no cleanup level exceedances.

As discussed during a call today, Ecology recommends sampling monitoring wells FMW-8, FMW-10, FMW-11, FMW-14, FMW-017, and FMW-18 for PFAS compounds as soon as possible, rather than waiting until the original planned event in August 2025. As discussed in our NFA Likely letter and during the call today, because groundwater contamination will remain on the property following cleanup, we anticipate the NFA to include a requirement for post-NFA monitoring. Although we worked through a Compliance Monitoring Plan in 2024 with you, the possibility of adjustments to the CMP's proposed post-NFA monitoring, based on new data or revised cleanup levels, cannot be precluded at this time. We will reassess post-NFA monitoring requirements when it is time for NFA issue.

Thanks, Frank

From: Peter Kingston <pkingston@farallonconsulting.com>
Sent: Friday, April 25, 2025 12:10 PM
To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>; Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Subject: RE: WA Cold Storage - PFOS in soil

External Email

Hi Frank,

Thanks for checking on that.

Would it be possible for Ecology to prepare a letter following upcoming excavations and compliance groundwater monitoring that cleanup standards for HVOCs and TPH have been achieved? It could acknowledge that additional investigation and potential cleanup for PFAS/PFOS may be required. I think that letter could be very helpful so that project stakeholders understand that the cleanup is partially complete, but future work for PFAS/PFOS is still required.

Let us know your thoughts.

Thanks,
Pete

Pete Kingston
Principal Geologist

Phone 206-200-2346

From: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>
Sent: Friday, April 25, 2025 12:04 PM
To: Peter Kingston <pkingston@farallonconsulting.com>; Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Subject: RE: WA Cold Storage - PFOS in soil

Hi Pete and Yusuf,

I was able to get with Ecology Toxics Cleanup Program (TCP's) lead toxicologist. They concurred with the application of the EPA MCL for PFOS of 4 ng/L, which is practical quantitation limit (PQL) based, rather than the Method B CULs, which are below that PQL. Our CLARC table even has a column which I missed which is titled "*Ground Water Method B Potable Groundwater Cleanup Level (Target for Soil to Groundwater Pathway) see guidance (µg/L)*". That column selected the MCL as the appropriate target. There are several links in CLARC which provide additional information.

I will check the other PFAS compounds to ensure the appropriate cleanup levels are in the PFAS in Groundwater table you provided.

Thanks, Frank

Frank P. Winslow, LHG

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From: Winslow, Frank (ECY)
Sent: Friday, April 25, 2025 9:40 AM
To: Peter Kingston <pkingston@farallonconsulting.com>; Yusuf Pehlivan <ypehlivan@farallonconsulting.com>
Subject: WA Cold Storage - PFOS in soil

Hi Pete and Yusuf,

It looks like the 380 pg/g at A-1 is still below the direct contact-based CUL, but the statement in the RI/FS/CAP of no PFOS impact to groundwater meaning no application of the soil-protective-of-groundwater based CUL is now contradicted by PFOS in groundwater data at FMW-08.

Therefore, Ecology advises to include excavation at location A-1 for the PFOS in soil at that location. Note this exceedance was at only 0.5 feet depth, so an excavation at A-1 may be fairly limited in extent.

Thanks, Frank

Frank P. Winslow, LHG

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