



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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TTY 711 or 800-833-6388 (for the speech or hearing impaired)

November 6, 2006

Mr. Gerald Ostroff
218 Main Street, PMB 488
Kirkland, Washington 98033-6108

**Re: Further Action Determination WAC 173-340-515(5) for the following
Hazardous Waste Site:**

Spic 'n Span Cleaners
652 South Dearborn Street
Seattle, WA 98134
Facility/Site No. 54766547
VCP No.: NW 0945

Dear Mr. Ostroff:

Thank you for submitting your independent remedial action report for the referenced site for review by the Washington State Department of Ecology (we) under the Voluntary Cleanup Program (VCP). We appreciate your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. We are providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the State under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The State does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

- 1) VCP Application, August, 2002 with Ecology File information.
- 2) Fourth Quarter Groundwater Monitoring Results. Spic 'n Span Cleaners, Hart Crowser, April 30, 2001.

- 3) Construction Startup, and First Quarter of Operation Monitoring Report Spic 'n Span Remediation System, Hart Crowser, April 11, 2002
- 4) Notice of Construction and Application for Approval, Spic 'n Span Cleaners, Hart Crowser, May 4, 2001
- 5) Remediation System Design Report and Construction Documents, Hart Crowser, April 19, 2001.
- 6) Third Quarter Groundwater Monitoring Results. Spic 'n Span Cleaners, Hart Crowser, December 11, 2000.
- 7) Second Quarter Groundwater Monitoring Results. Spic 'n Span Cleaners, Hart Crowser, October 4, 2000.
- 8) Well Installation and Groundwater Monitoring Report, Spic 'n Span Cleaners, Hart Crowser. June 15, 2000.
- 9) Early Notice Letter, Ecology, May 10, 1999.
- 10) Mineral Spirit UST Closure Report, Spic 'n Span Cleaners, 652 South Dearborn Street, Seattle, Hart Crowser, December 11, 1998.
- 11) Letter Report, Spic 'n Span Cleaners, Hart Crowser, October 31, 1997
- 12) Environmental Site Assessment Report Spic 'n Span Cleaners, Seattle, Hart Crowser, July 31, 1997.
- 13) Environmental Site Assessment and Subsurface Soil Investigation Spic 'n Span Cleaners, 652 S. Dearborn Street, Seattle DHL Environmental Consulting, June 16, 1997.

The documents listed above will be kept in the Central Files of our Northwest Regional Office (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7239.

The Site is defined by the following releases:

- Mineral Oil, tetrachloroethylene (PCE), trichloroethane (TCE) ethyl benzene, toluene, cis-1, 2 dichloroethylene, 1,2 dichlorobenzene, 1,3 dichlorobenzene, 1,4 dichlorobenzene, xylenes, in soil.
- Mineral Oil, tetrachloroethylene (PCE), trichloroethane (TCE) ethyl benzene, cis-1, 2 dichloroethylene, 1, 1, 2, 2-tetrachloroethane, chloroform, vinyl chloride, and xylenes, in groundwater.

The Site is more particularly described in Enclosures A, B, C, and D which include a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, we have determined that the independent remedial action(s) performed at the Site **are not sufficient** to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site. Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at the Site under MTCA.

The work the Site, described in the documents above, constitutes an interim action under WAC 173-340-430.

The Site does not meet the requirements for a remedial investigation under WAC 173-340-350 (7) because of the following:

- a) A map identifying the property boundaries of the subject property of the VCP application is not in the file.
- b) The tax parcel number of the subject property of the VCP application is not in the file.
- c) The vertical and horizontal extent of Mineral Oil, tetrachloroethylene (PCE), trichlororethane (TCE) ethyl benzene, toluene, cis-1,2 dichloroethylene, 1,2 dichlorobenzene, 1,3 dichlorobenzene, 1,4 dichlorobenzene, xylenes, in soil above Method A levels, has not been delineated on a map or cross-section.
- d) The vertical and horizontal extent of Mineral Oil, tetrachloroethylene (PCE), trichlororethane (TCE) ethyl benzene, Cis-1,2 dichloroethylene, 1,1,2,2-tetrachloroethane, chloroform, vinyl chloride, and xylenes, in groundwater above Method A levels, has not been delineated on a map or cross-section. (Monitoring well No. 4 - an off-property well - has shown the highest concentration of groundwater contamination. Please refer to Table 2 in the April 30, 2001, report.)

The soil vapor pathway has not been addressed under WAC 173-340-740 (3) (iii) (C) (III).

Any further soil sampling at the Site should follow the protocols of our Implementation Memorandum # 5 - Collecting and Preparing Soil Samples for VOC Analysis, June 14, 2004.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The State, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the State, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Mr. Gerald Ostroff
November 6, 2006
Page 4 of 4

Again, we appreciate your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP. Assistance can include identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-7244.

Sincerely,

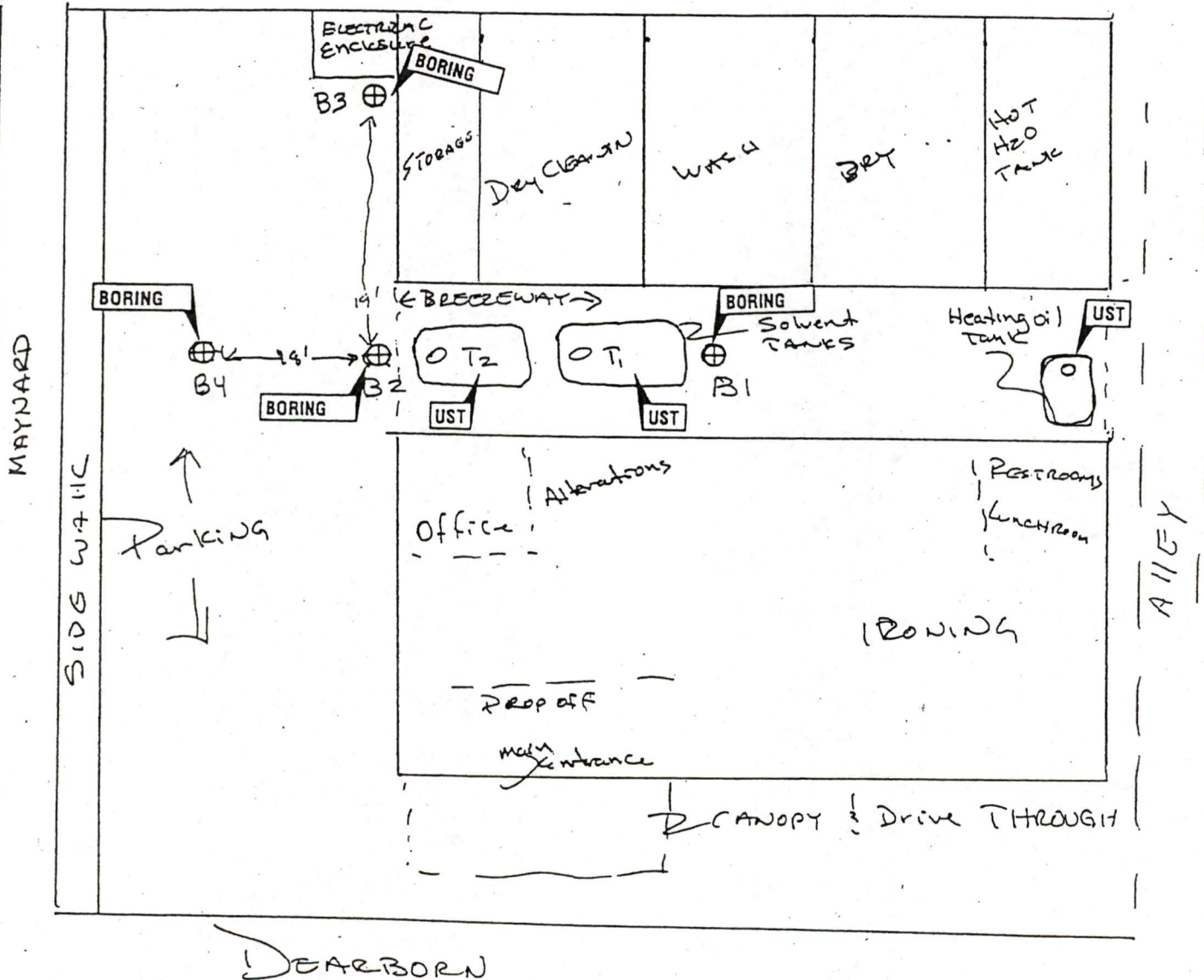
A handwritten signature in cursive script, appearing to read "Michael Kuntz", with a stylized flourish at the end.

Michael Kuntz P.G., P.HG.
Toxics Cleanup Program-HQ

Enclosures

EXHIBIT A

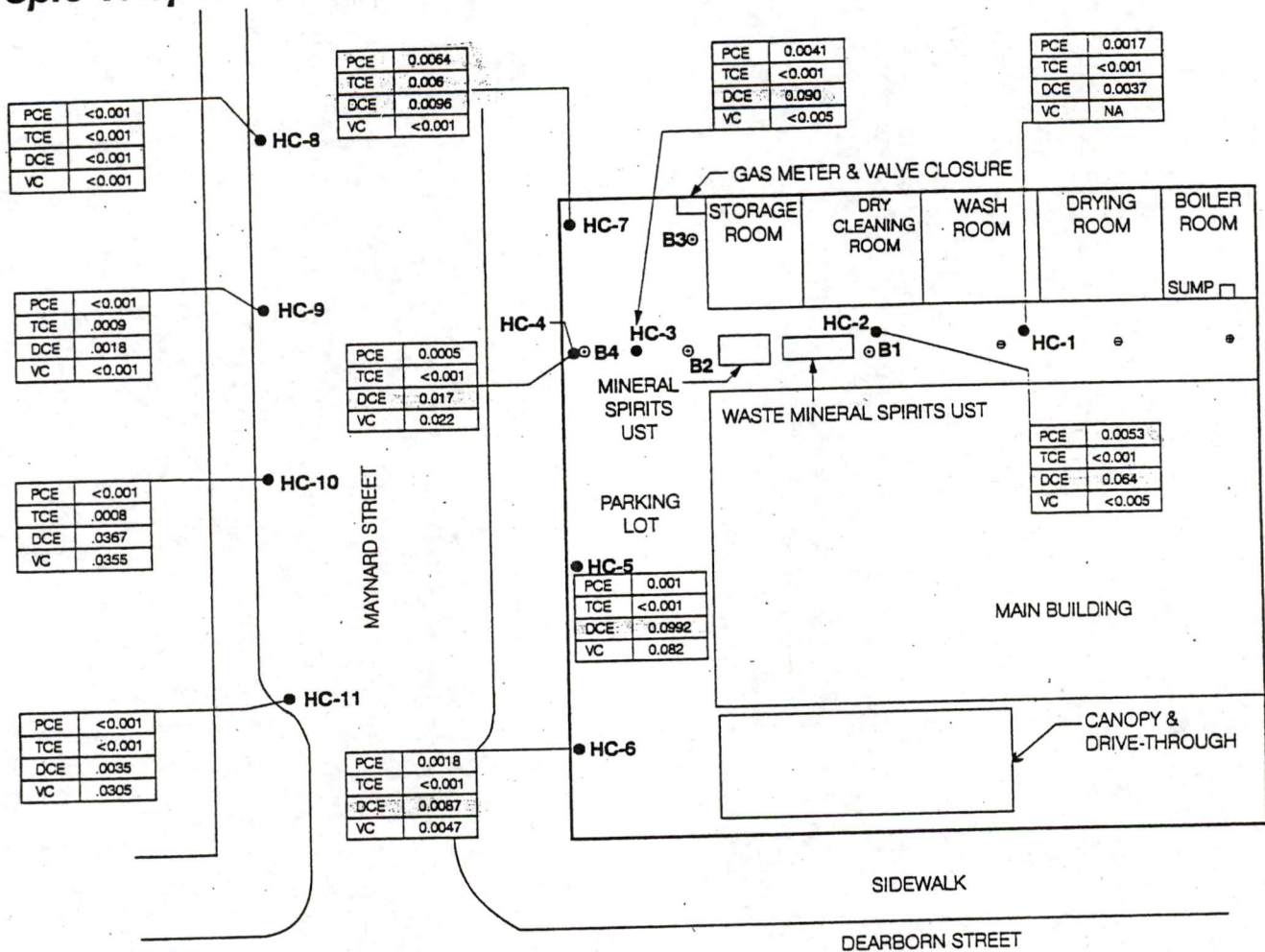
PARKING



SITE SKETCH Soil Boring Locations
NOT-TO-SCALE
DLH 5/97



PCE and Breakdown Products in Groundwater Spic 'N Span Cleaners



● **HC-5** New Exploration Location and Number (Hart Crowser, 1997)

⊙ **B-1** Existing Exploration Location and Number (DLH, 1997)

• Drain

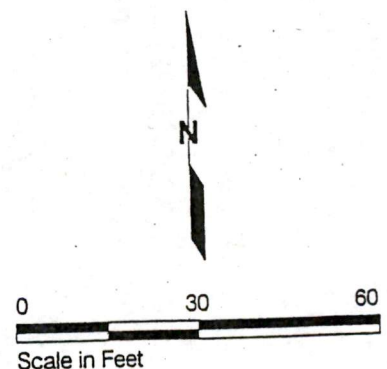
Constituent	Concentration in mg/L
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Method A Cleanup Levels

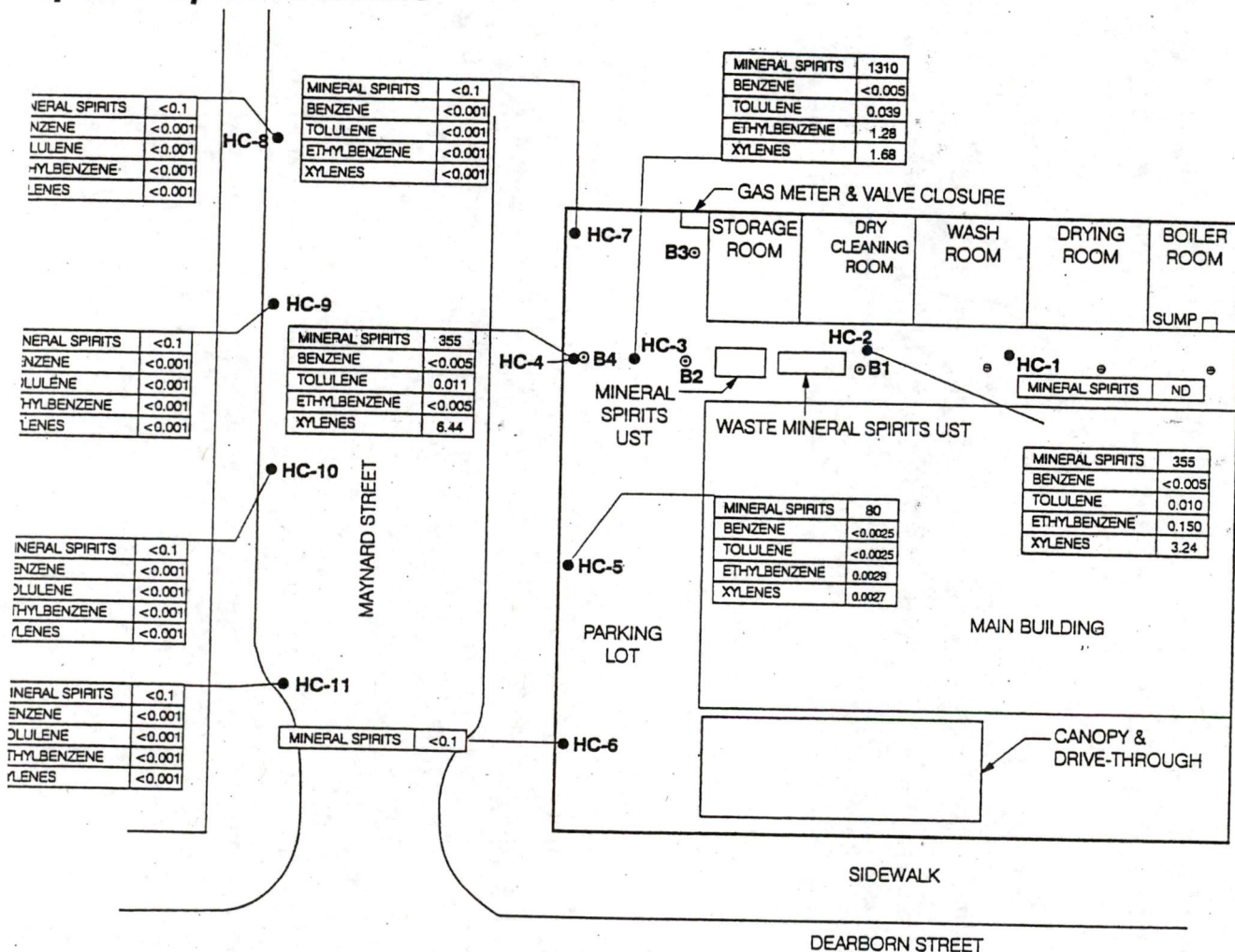
PCE	0.005 mg/L
TCE	0.005 mg/L
DCE	0.005 mg/L
VC	0.0002 mg/L

ND indicates not detected
NA indicates not analyzed

EXHIBIT B



Mineral Spirits and BTEX in Groundwater Spic 'N Span Cleaners



● HC-5 New Exploration Location and Number (Hart Crowser, 1997)

○ B-1 Existing Exploration Location and Number (DLH, 1997)

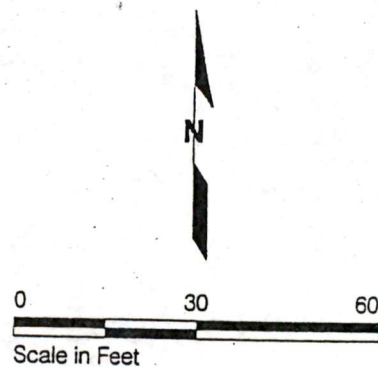
• Drain

Constituent	Concentration in mg/L
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Method A Cleanup Levels

TPH (Mineral Spirits)	1.0 mg/L
Benzene	0.005 mg/L
Toluene	0.040 mg/L
Ethylbenzene	0.030 mg/L
Zylenes	0.020 mg/L

ND indicates not detected



HARTCROWSER

J-4808

7/97

Figure 2

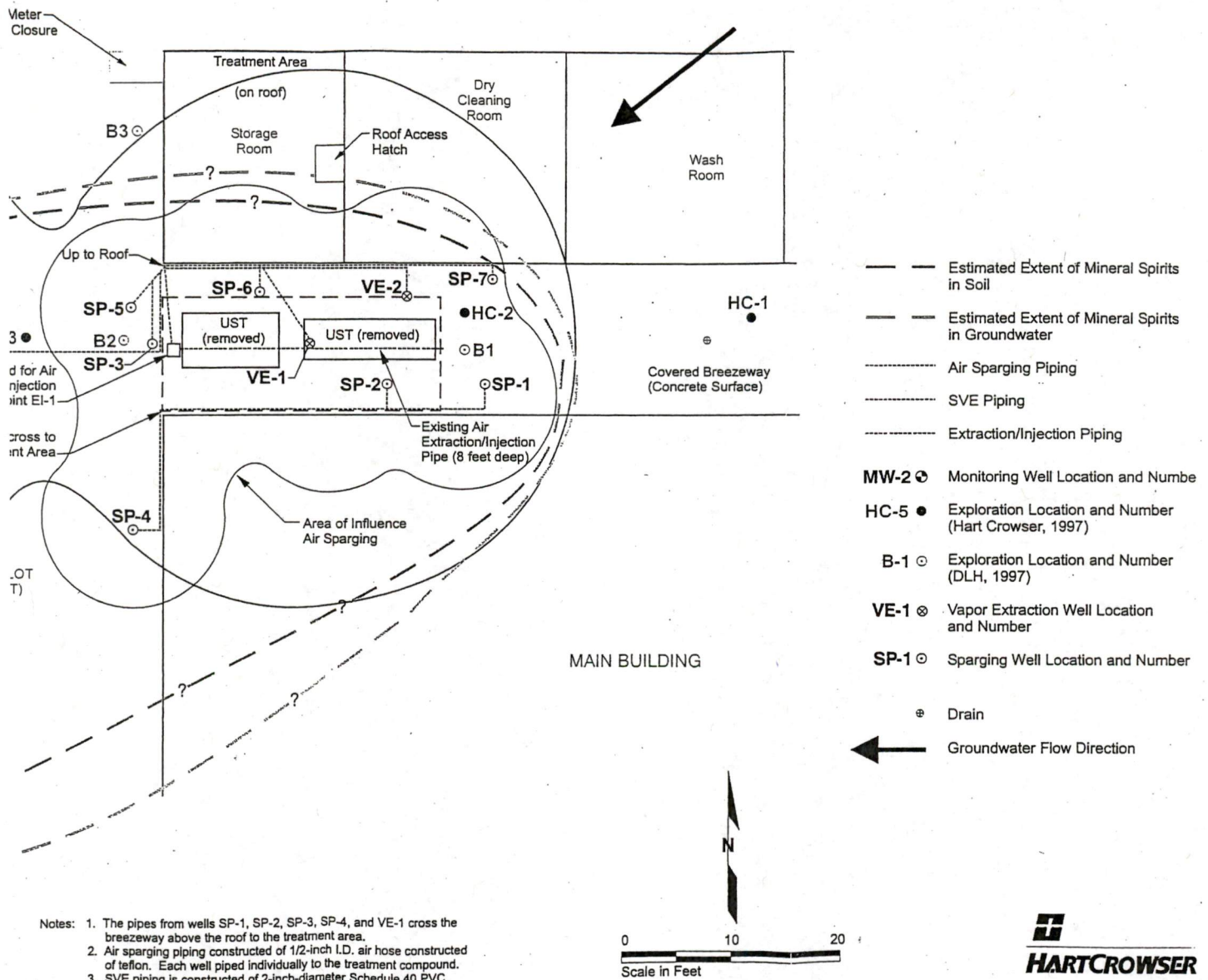


EXHIBIT D