



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 11, 2025

Craig Skotdal
Skotdal Real Estate
1604 Hewitt Avenue
Everett, WA 98201
Sent via email: craig@skotdal.com

Re: UIC Site Number 39778 – Underground Injection Control (UIC) Program Well Registration for Voluntary or Independent Cleanup Sites, Snohomish Square Cleaners (Site), 1419 Avenue D, Snohomish, WA

Dear Craig Skotdal:

Ecology's UIC Program has reviewed your UIC registration for the above-mentioned Site. Based on the information provided in the registration and the additional information provided per Ecology's request, the UIC wells are **Conditionally Rule-Authorized**, and a State Waste Discharge Permit is not required to operate the wells under WAC 173-218 authorities.

The UIC registration number is 39778. The Site is undergoing independent remedial cleanup activities (IRCA). If the IRCA is to be eventually evaluated by the State to make a determination whether the IRCA has met the substantive requirements of the Model Toxics Control Act (MTCA), the Voluntary Cleanup Program (VCP) will make that evaluation. The Site is currently enrolled in the VCP under Site Number NW2740; however, the ongoing environmental assessment and cleanup activities at the Site are not currently undergoing direct review by a VCP Cleanup Site Manager. The Facility Site Identification Number is 12775192. Prior IRCAs were completed at the Site in March 2016 under Rule-Authorized UIC Site Number 33021, in April 2021 under Conditionally Rule-Authorized UIC Site Number 35606; and in 2024 under Conditionally Rule-Authorized UIC Site Number 38684.

Review of the information provided in the registration for UIC Site 39778, indicates that a total volume of 10,260 gallons (86,400 pounds) of 3-D Microemulsion® and MicroZVI will be injected in 18 injection wells. The screened intervals for the injection wells vary from approximately the 5- to 30-foot depth range. The concentrated injectates will be mixed with onsite potable water for a concentration of 9 percent 3-D Microemulsion®/MicroZVI. The injectate will be injected at low pressure and flow rates. The injections are an approved one-time injection event estimated to be completed in 10 days.

The post-injection groundwater monitoring program will include the following:

- Depth-to-groundwater measurements at 19 monitoring wells.
- Groundwater samples collected quarterly for four sampling events from 19 monitoring wells for analysis of chlorinated volatile organic compounds (cVOCs) and select geochemical analyses. These monitoring wells will also include field analysis for temperature, specific conductance, DO, pH, ORP, and turbidity.

Conditional Rule-Authorization – Conditions of Use

There are inherent environmental risks associated with injecting compounds into groundwater. It is incumbent upon the owner and their representative to carefully characterize, manage, and monitor the Site surface and subsurface conditions to minimize risk and prevent unforeseen degradation of groundwater quality and other environmental risks.

Ecology will Rule-Authorize a UIC registration to operate when the two UIC Program requirements for Rule Authorization are met:

1. Registration of UIC wells (prior to use), and
2. The UIC well must meet the nonendangerment standard (WAC 173-218-080).

As stand-alone UIC wells, the wells do not meet the nonendangerment standard for Rule Authorization. Additional conditions are needed to allow for conditional rule-authorization and the remedial work to proceed.

The following Site-specific UIC Program requirements for **Conditional Rule-Authorization** include:

- The injections are an approved one-time injection event estimated to be completed over a period of 10 days. The Conditionally Rule-Authorized UIC wells are subject to the injectate type and volumes listed in the registration for the Site.
- If additional volumes or a different type of injectate are proposed to be injected, additional review and approval by the UIC Program will be required prior to the start of the injection activities. Any deviations from the approved work plans or other agreements are not allowed unless Ecology UIC has pre-approved those changes in writing.
- Onsite groundwater is not approved for use to mix with the remediation products for injection into the subsurface.
- The injections must not cause a further degradation to groundwater quality criteria at the down-gradient monitoring points per state or federal applicable criteria. If such groundwater degradation occurs, the injection activities must discontinue; any environmental release must be reported no later than 24-hours from the release discovery at [Reporting An Environmental Issue](https://ecology.wa.gov/footer-pages/report-an-environmental-issue)¹ or call 1-800-645-7911.
- Additionally, notification to Ecology's UIC Program of any change in UIC well status is a required element of this registration.
- The IRCA is proposed to be completed in July 2025.

¹ <https://ecology.wa.gov/footer-pages/report-an-environmental-issue>

The Site will be **Conditionally Rule-Authorized** for as long as the nonendangerment standard of WAC 173-218-080 will continue to be met and the above items have been completed. Failure to capture any of the performance data required or cause a violation of the applicable cleanup standards may result in a denial, modification, or termination of the UIC registration.

The VCP Site Cleanup Manager will have final authority to determine if the IRCA described in the work plan have met the substantive requirement of the MTCA if such an opinion is requested. Ecology's UIC Program will not make that determination.

At any time if the nonendangerment standard cannot be met, Ecology may require you to apply for, and obtain, a State Waste Discharge Permit for the continued use of the proposed treatment compounds. You would need to obtain a formal waste discharge approval for this project through Ecology's State Waste Discharge Permit Program or Toxics Cleanup Program.

The owner is responsible to keep the UIC registration information current and retain all registration documents, plans, modeling, monitoring results, interim, and final reports. Upon Ecology request, the owner shall provide these documents to the UIC Program.

This UIC registration was evaluated under the presumptive approach, Ecology UIC has determined the conditions described in the UIC registration and other submitted documents to be truthful and factual when making the determination the injections will be protective of the Site groundwater quality and will meet the nonendangerment standard requirements of WAC 173-218-080. Any material misrepresentations or omissions of fact supplied in this application may result in the denial or revocation of this registration authorization. Ecology's UIC Program has the authority to rescind a rule authorization if Ecology determines the system no longer meets the nonendangerment standard.

Please contact John Bhend at UICwells@ecy.wa.gov if you have any questions. You can find additional information on the UIC Program can at our website:

[Ecology's Underground Injection Control Program](#)²

Sincerely,



John Bhend, LG
Statewide UIC Program Coordinator
Water Quality Program

cc: Nathaniel Hinsperger, JS Held, nathaniel.hinsperger@jsheld.com
Donna Kirkman, Ecology NWRO VCP Coordinator, dums461@ecy.wa.gov

² <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-injection-control-program>