



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office

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March 23, 2026

Amelia Oates  
Geosyntec Consultants, Inc.  
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Seattle, WA 98104  
[amelia.oates@geosyntec.com](mailto:amelia.oates@geosyntec.com)

**Re: Technical assistance for the following contaminated Site**

**Site name:** Morrells Dry Cleaners  
**Site address:** 608 N 1<sup>st</sup> St, Tacoma, WA 98403  
**Facility/Site ID:** 18489568  
**Cleanup Site ID:** 386  
**VCP Project ID:** SW1039

Dear Amelia Oates:

On December 31, 2025, the [Washington State Department of Ecology](https://ecology.wa.gov/)<sup>1</sup> (Ecology) received your request for a written opinion regarding the sufficiency of your independent cleanup of the Morrells Dry Cleaners facility (Site), under the [Voluntary Cleanup Program](https://ecology.wa.gov/vcp) (VCP).<sup>2</sup> This letter provides our opinion and analysis under the authority of the [Model Toxics Control Act](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)<sup>3</sup> (MTCA), chapter [70A.305](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)<sup>4</sup> RCW. This technical assistance is provided under the requirements of WAC [173-340-515](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515)<sup>5</sup>(5).

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<sup>1</sup> <https://ecology.wa.gov/>

<sup>2</sup> <https://ecology.wa.gov/vcp>

<sup>3</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/9406.html>

<sup>4</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

<sup>5</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515>

## Issue presented and opinion

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Questions posed to Ecology for review as part of this response:

1. Does Ecology concur with the decommissioning of monitoring well MW-15D?
2. Does Ecology concur that monitoring well MW-15D does not need to be replaced?

Yes. Ecology concurs that MW-15D has been adequately decommissioned and does **not** need to be replaced. We base our conclusions on the analysis presented below. This letter follows up on the technical assistance emails in July 2025, between Geosyntec and Ecology, about the City of Tacoma's construction project and well decommissioning for MW-15D.

## Site description

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The Site is defined by the nature and extent of contamination associated with the following release(s):

1. The chlorinated solvent tetrachloroethylene (PCE) and its degradation products trichloroethylene (TCE), 1,1-dichloroethylene (DCE); including cis-1,2-DCE and 1,2-trans-DCE, and vinyl chloride.
2. Other volatile organic compounds (VOC) detected during the remedial investigation, including 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, p-isopropyltoluene, sec-butylbenzene, n-propylbenzene, methylene chloride, 1,2-dibromo-3-chloropropane, methyl butyl ketone, bromomethane, CFC-11, CFC-12, chloroethane, chloromethane, methyl ethyl ketone, methyl isobutyl ketone, methylene chloride, tert-butylbenzene, cumene, 1,2,3-trichlorobenzene, 1,2,4-trichlorobenzene, hexachlorobutadiene, hexane, naphthalene, and chloroform.
3. Petroleum Hydrocarbons and related petroleum constituents including benzene, toluene, ethylbenzene, and total xylenes.
4. Metals including lead, arsenic, and chromium.

Identification of other Sites that may affect the parcel(s) of real property associated with this Site:

1. The Property is located within the projected boundaries of the Tacoma Smelter Plume facility (FSID: #89267963).
2. The Property is located adjacent to the Bruce Titus Chevrolet facility (FSID: #3427832).
3. The Property is located southwest of the Key Bank Stadium Branch facility (FSID: #33263239) and east of the North Gas Station facility (FSID: #1265285).

At this time, Ecology has insufficient information to determine if the Site is actually affected. This opinion does not apply to any contamination associated with these other facilities.

Ecology bases this opinion on the information contained in the following documents:

- Geosyntec Consultants, Inc., Groundwater Summary Memo, December 23, 2025.
- Ecology, VCP Further Action Likely Opinion, September 23, 2021.

The documents are available online on the Morrells Dry Cleaners webpage.<sup>6</sup> You can request any documents not found online by filing a [records request](#).<sup>7</sup> For assistance, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040. Please check the Morrells Dry Cleaners webpage before making a request.

This opinion is void if any information submitted to Ecology is materially false or misleading.

## Analysis of the cleanup

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Ecology has determined the following about your cleanup, based on review of the documents listed above:

1. Ecology concurs that monitoring well MW-15D was decommissioned in accordance with WAC 173-160. Per an email exchange between Geosyntec and Ecology in July 2025, decommissioning of the monitoring well was needed in advance of road

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<sup>6</sup> <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=386>

<sup>7</sup> <https://ecology.wa.gov/footer-pages/public-records-requests>

work being conducted by the City of Tacoma. Monitoring well MW-15D was located in the City of Tacoma right-of-way, northwest of the main facility Property.

2. Based on data available for Ecology's review, it is our opinion that monitoring well MW-15D does **not** need to be replaced, unless future groundwater data indicate otherwise.
3. Ecology concurs that MW-15D does **not** need to be replaced, as it is cross-gradient to the Site, rather than in a location that is more likely to be directly downgradient. Please review Ecology's comments and rationale below.
  - a. Monitoring well MW-15D was screened in the deep or lower water-bearing zone (WBZ) impacted by the Site.
  - b. Monitoring well MW-15D was sampled once, on July 25, 2023. Of the contaminants analyzed, there were no detections at or above the laboratory method reporting limits.
  - c. Groundwater flow direction at the Site is estimated for both the shallow and deep WBZs to be towards the northwest.
  - d. Geosyntec argues that Wright Park, located upgradient of the Site, acts as a recharge area that flows topographically downslope towards the Thea Foss Waterway. Ecology concurs that this is a likely explanation for the observed distribution of contaminant concentrations in groundwater at the Site. Additionally, the Site is upslope of the Thea Foss Waterway (Puget Sound), and it would be reasonable to infer a groundwater flow direction towards that waterway, in the north or northwesterly direction.
  - e. It would be helpful to Ecology to continue to receive groundwater contour maps and a rose diagram of flow directions, to provide some resolution on whether or not the inferred groundwater flow direction is appropriate.
  - f. Contaminant concentrations in groundwater support a north or northwesterly flow direction at the Site, as contaminant concentrations have been observed in excess of the MTCA cleanup levels along Tacoma Avenue, along the northern Property boundary. It would be helpful for Ecology to see contaminant concentrations in boxes on the figures on a per well basis.

- g. Presuming the inferred north to northwest groundwater flow direction, it appears additional delineation of contaminated groundwater to the north of the current monitoring well network is needed for both the shallow and deep WBZs. Contaminant concentrations in groundwater have exceeded or current exceed MTCA cleanup levels in the shallow WBZ (MW-4, MW-9, and MW-10) and in the deep WBZ (MW-13D and MW-12D). To meet the requirements for adequate characterization under WAC 173-340-350, it appears additional monitoring wells are needed to the north of the monitoring wells in Tacoma Avenue.
4. Ecology encourages the continued use of figures to show the horizontal and vertical extent of contamination in groundwater for both the shallow and deep WBZ at the Site.
5. In the future, Ecology recommends sampling any Site monitoring well immediately ahead of decommissioning to identify current conditions, especially when a sufficient number of compliant groundwater monitoring results have not yet been achieved.

## Limitations of the opinion

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### **Opinion does not settle liability with the state**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion doesn't resolve or alter a person's liability to the state or protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW [70A.305.040\(4\)](#).<sup>8</sup>

### **Opinion does not constitute a determination of substantial equivalence**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you

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<sup>8</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

performed is substantially equivalent. Courts would make that determination.  
See RCW [70A.305.080](#)<sup>9</sup> and WAC [173-340-545](#).<sup>10</sup>

### **Opinion is limited to the planned cleanup**

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of the planned cleanup. To obtain such an opinion, a report must be submitted to Ecology upon completion of the cleanup and an opinion requested under the VCP.

### **State is immune from liability**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.  
See RCW [70A.305.170](#)(6).<sup>11</sup>

### **Contact information**

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Thank you for choosing to clean up your Site under the VCP. If you have any questions about this letter, please contact me at (360) 999-9589 or [tim.mullin@ecy.wa.gov](mailto:tim.mullin@ecy.wa.gov).

Sincerely,



Tim Mullin, LHG  
VCP/II-SHA/LUST Unit Supervisor  
Toxics Cleanup Program  
Southwest Region Office

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<sup>9</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>10</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>11</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

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Ecology Site File