



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 17, 2013

Ms. Sarah Gregory
Regency Centers/Columbia Cascade Plaza, LLC
One Independent Drive, Suite 114
Jacksonville, FL 32202

Re: Opinion Pursuant to WAC 173-340-515(5) on Remedial Action for the Following Hazardous Waste Site:

- **Name:** Dirks Fine Dry Cleaning 228th Ave
- **Address:** 701 228th Avenue NE, Redmond, WA 98053
- **Facility/Site No.:** 62894175
- **VCP No.:** NW2746
- **Cleanup Site ID No.:** 1044

Dear Ms. Gregory:

Thank you for submitting documents regarding your proposed remedial action for the Dirks Fine Dry Cleaning 228th Ave (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates 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 a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Tetrachloroethylene (PCE), trichloroethene (TCE) and cis-1,2 dichloroethene (DCE) in soil and groundwater
- Vinyl chloride in groundwater

Ecology is 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 your proposed remedial actions:

1. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 25, 2009.
2. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 29, 2007.
3. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated February 13, 2007.
4. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated January 2007.
5. Whitman Environmental Sciences, *Vapor Extraction Testing, Inglewood Plaza Shopping Center*, dated November 24, 1999.
6. Whitman Environmental Sciences, *Phase II Investigation Report, Inglewood Plaza Shopping Center*, dated May 12, 1998.
7. Whitman Environmental Sciences, *Phase II Site Investigation, Inglewood Plaza Shopping Center*, dated March 9, 1998.
8. Dames & Moore, *Phase II Soil Investigation, Dirk's Dry Cleaning, Inglewood Plaza Shopping Center*, dated December 28, 1995.
9. Dames & Moore, *Phase II Groundwater and Soil Gas Survey, Inglewood Plaza Shopping Center*, dated December 27, 1995.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7235 or sending an e-mail to nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following release(s):

- Tetrachloroethylene (PCE), trichloroethene (TCE) and cis-1,2 dichloroethene (cis-1,2 DCE) in soil and groundwater
- Vinyl chloride in groundwater

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This Site was previously enrolled in the VCP under the following Site names/addresses:

NW0237

Dirk's Fine Dry Cleaner, Inglewood Plaza Shopping Center
705 228th Avenue NE, Redmond, WA 98053
FSID 62894175

NW1795

Inglewood Plaza Shopping Center
705 228th Ave NE, Sammamish, WA 98074
FSID 7645949

The tax parcel numbers associated with the Inglewood Plaza Shopping Center are 3582300010 and 3582300020. The city of Redmond was associated with the address when this location was unincorporated King County. The address changed to Sammamish upon incorporation of the city in 1999. The address for the Inglewood Plaza Shopping Center is 705 228th Avenue NE and the address for the former location of Dirk's Fine Dry Cleaning is 701 228th Avenue NE.

The Site operated as a dry cleaning facility in the late 1980s until the early 1990s (exact years of operation are unclear). PCE used for dry cleaning operations and spot cleaning was released to the concrete floor and underlying soil beneath the former dry cleaning facility, likely as a result of spillage during operation. A five to six gallon release of PCE to the sewer system was reported in 1986. The highest concentration of PCE in soil was 120 milligrams per kilograms (mg/kg) detected at 2.5 feet below the floor slab during 1999 vapor extraction testing. The presence of PCE and daughter products TCE, cis-1,2 DCE and vinyl chloride have been confirmed in the groundwater. A soil vapor extraction system was in operation at the Site from May 2004, and was intermittently running at the time the last report was submitted in June 2009.

The preceding Site description is based solely on the information contained in the documents listed above.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has determined:**

- Monitoring wells from the adjacent leaking underground storage tank (LUST) site, Former Exxon 7-6107 (Facility Site Identification: 91753732) confirmed the presence of a PCE/TCE plume northeast of Dirk's Fine Dry Cleaning. Based on historical data from the Site and the adjacent LUST site, the groundwater flow direction is extremely variable (east, southeast, southwest, northwest). It is not clear if the PCE/TCE plume from the adjacent LUST site is comingled with the plume from Dirk's Fine Dry Cleaning or if

there are two distinct plumes. The contamination in groundwater needs to be fully delineated and it should be determined if contamination is migrating onto the Site from adjacent properties, possibly contributing to Site contamination associated with the former dry cleaning facility.

- Additional groundwater monitoring wells are needed northeast and southwest of MW-1A/B to further delineate the plume, establish seasonal variations in flow direction and to assess current groundwater conditions throughout the Site. A discussion regarding variation in groundwater flow direction based on observations of current and historical flow is needed.
- Quarterly groundwater sampling and monitoring of water levels is recommended at this time. Ecology recommends including a historical rose diagram on groundwater contour maps to illustrate the predominant flow direction.
- The following additional Site setting and background information is needed: regional and Site hydrogeology and geology (including cross sections illustrating stratigraphy and contaminant distribution), isoconcentration maps of the contaminants in groundwater, contaminant concentration versus time diagrams for each groundwater monitoring well, current property use, past and present property use of adjacent properties including potential for contaminant migration/mixing from adjacent properties, and surface water.
- A Terrestrial Ecological Evaluation (TEE) may be required unless it is determined the Site qualifies for an exclusion. The TEE decision-making process must be documented as per WAC 173-340-7490. A TEE process interactive user's guide can be found at: <http://www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm>
- A summary is needed of the soil vapor extraction system (VES) remediation that has occurred to date including estimate of total contaminant mass extracted, dates of operation, Site plan showing locations of vapor extraction points used, flow rates, depth/screened interval of VES wells and current status of system. An evaluation of the effectiveness of the VES system as well as the natural degradation of PCE at this Site over time should be included with the summary.
- The highest concentration of PCE in soil was 120 milligrams per kilograms (mg/kg) detected at 2.5 feet below the floor slab during 1999 vapor extraction testing. Additional soil samples are needed beneath the floor slab of the former drycleaner and at the additional monitoring well locations to assess current subsurface conditions.
- Once additional Site characterization has been completed, a minimum of four consecutive quarters of groundwater sampling with all contaminants of concern below established Site cleanup levels is required under MTCA prior to consideration of a No Further Action determination by Ecology.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site

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or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

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.

Again, Ecology appreciates 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, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7097 or e-mail at desc461@ecy.wa.gov.

Sincerely,



Diane Escobedo
Site Manager
Toxics Cleanup Program

cc: Chris Breemer, Apex Companies, LLC
Sonia Fernandez, VCP Coordinator, Ecology

