



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

September 18, 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:** Classic Cleaners Everett
- **Address:** 7601 Evergreen Way B4, Everett, WA 98203
- **Facility/Site No.:** 1382746
- **VCP No.:** NW 2745
- **Cleanup Site ID No.:** 4690

Dear Ms. Gregory:

Thank you for submitting documents regarding your proposed remedial action for the Classic Cleaners Everett (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:

- Tetrachloroethene (PCE) in soil and groundwater.
- Naphthalene, chloroform and 1,1,1 trichlorethane 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 remedial actions:

1. Whitman Environmental Sciences, *Additional Phase II Site Investigation, Former Classic Cleaners Tenant Space*, dated January 21, 2003.
2. Whitman Environmental Sciences, *Floor Drain and Sewer Information, Former Classic Cleaners Tenant Space*, dated November 7, 2002.
3. Whitman Environmental Sciences, *Response to Ecology VCP Questions, Former Classic Cleaners Tenant Space*, dated August 5, 2002.
4. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 2000, Classic Cleaners*, dated August 11, 2000.
5. Whitman Environmental Sciences, *Groundwater Monitoring Results – March 2000, Classic Cleaners*, dated April 25, 2000.
6. Whitman Environmental Sciences, *Classic Cleaners Tenant Space Inspection, Cascade Plaza Shopping Center*, dated January 21, 2000.
7. Whitman Environmental Sciences, *Groundwater Monitoring Results – December 1999, Classic Cleaners*, dated January 17, 2000.
8. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 1999, Classic Cleaners*, dated September 13, 1999.
9. Whitman Environmental Sciences, *Phase II Site Investigation, Classic Cleaners*, dated May 26, 1999.
10. ATC Associates, *Subsurface Investigation, Cascade Plaza Shopping Center*, dated June 20, 1997.
11. ATC Associates, *Phase I Environmental Site Assessment for Metropolitan Life Real Estate Investments of Cascade Plaza Shopping Center*, dated May 19, 1997.

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

Ms. Sarah Gregory
September 18, 2013
Page 3

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 releases:

- Tetrachloroethene (PCE) in soil and groundwater.
- Naphthalene, chloroform and 1,1,1 trichloroethane in groundwater

Classic Cleaners Everett was previously enrolled in the VCP under project number NW 0869. The Site was terminated from VCP in December 2004 due to inactivity after withdrawing their request for an opinion letter. Classic Cleaners was located in Cascade Plaza Shopping Center. The Site operated as a dry cleaning facility from the early 1980s to 1999. The current Site use is unknown but was last reported (January 2003) to be occupied by Domino's Pizza. Subsurface investigations and groundwater monitoring from 1997 to 2003 confirmed soil and groundwater beneath and surrounding the former dry cleaning facility was contaminated with PCE (soil and groundwater), naphthalene, chloroform and 1,1,1 trichloroethane (groundwater). Groundwater monitoring wells MW-1 through MW-3 are located up gradient of the source. Monitoring well coverage is insufficient to fully characterize down gradient conditions. Monitoring wells MW-1 through MW-4 were last sampled in August 2000. During a December 2002 subsurface investigation, PCE concentrations in a groundwater sample collected from beneath the former dry cleaning facility was above the MTCA Method A cleanup level. This additional phase II was the last activity reported for this Site.

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:**

- 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/TEHome.htm>
- A map indicating the location of the floor drain and sewer line relative to soil sampling locations should be submitted.
- PCE was not detected above the MTCA Method A cleanup level in soil samples collected from beneath the dry cleaning facility at a depth of 1 foot. However, PCE and

chloroform have been detected in ground water at concentrations above MTCA Method A cleanup levels. The soil beneath the former dry cleaning facility has not been adequately characterized. Due to the denser nature of PCE and the potential for downward migration in the subsurface, Ecology recommends collecting deeper soil samples beneath the former dry cleaner.

- Following characterization of soil beneath the former dry cleaning facility, an evaluation to determine if vapor intrusion is impacting indoor air quality may be needed. Ecology recommends conducting a Tier 1 Assessment. Ecology's Guidance for Evaluating Soil Vapor Intrusion in Washington State can be found here:
http://www.ecy.wa.gov/programs/tcp/policies/VaporIntrusion/VI_guid_rev5_final_10-9-09.pdf
- Ecology recommends submitting stratigraphic cross sections to illustrate subsurface conditions and to aid in determining if well depth and screening is appropriate to assess vertical contamination in groundwater.
- Groundwater sampling is needed to assess current conditions and determine if the groundwater flow direction is consistent with previous observations. Ecology recommends including a historical rose diagram to plot the flow directions determined from groundwater elevation contour maps submitted with previous quarterly monitoring reports. Based on the historical and current flow directions, it may be necessary to install an additional down gradient monitoring well to the west of MW-4, closer to the previous dry cleaning facility.
- A minimum of four consecutive quarterly ground water monitoring rounds demonstrating concentrations below cleanup levels are needed for consideration of a No Further Action determination for the Site.

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 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.

Ms. Sarah Gregory
September 18, 2013
Page 5

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,

A handwritten signature in black ink, appearing to read 'Diane Escobedo', with a stylized, flowing script.

Diane Escobedo
Site Manager
Toxics Cleanup Program

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

