



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 30, 2014

Mr. Jamie Dykman  
Protective Coatings, Inc.  
1208 4<sup>th</sup> Avenue North  
Kent, WA 98032

**Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:**

- **Site Name:** Protective Coatings, Inc.
- **Site Address:** 1215 2<sup>nd</sup> Avenue N, Kent, WA 98032
- **Facility/Site No.:** 85155236
- **Cleanup Site ID No.:** 12337
- **VCP Project No.:** NW2843

Dear Mr. Dykman:

Thank you for submitting the Proposal for Environmental Services regarding your remedial actions at the Protective Coatings, Inc. facility (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 the submitted plan pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following releases at the Site:

- Trichloroethylene (TCE), cis-1,2-Dichloroethene (1,2-DCE), Vinyl Chloride (VC), Arsenic, Cadmium, and Chromium in soil and ground water.

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.



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Ecology's Toxics Cleanup Program has reviewed the following information regarding your remedial actions:

1. Conestoga-Rovers & Associates (CRA), January 6, 2014, Proposal for Environmental Services.
2. Golder Associates, October 1, 2012, Phase II Environmental Site Assessment.

The two documents 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 email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

According to the Phase II Environmental Site Assessment report, several contaminants, including TCE, 1,2-DCE, VC, and arsenic, were found in soil and ground water at concentrations exceeding MTCA Method A cleanup levels. The contamination was determined to be the result of discharges and releases of solvents/metals used in metal surface finishing processes during operations at the facility. CRA recommends conducting a supplemental site investigation at this Site, which would further characterize contamination in soil and ground water, and implement a ground water monitoring program. Ecology considers that the proposed additional work is necessary since the results will be used for deciding if further cleanup actions are required at this Site.

Based on a review of the proposal listed above, pursuant to requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and monitoring the releases at the Site, Ecology approves the work plan. The following requirements must be satisfied before Ecology considers a No Further Action (NFA) determination for this Site:

- Concentrations of the contaminants in the soil and ground water must not exceed MTCA Method A cleanup levels. Or, the impacted soil and/or ground water exceeded must be remediated, followed up with confirmative data demonstrating completion of the cleanup at the Site:
- Contamination in the soil and ground water must fully be characterized at the areas where exceedances of the chemicals of concern (COCs) were found in soil and ground water. In addition, if necessary, more ground water monitoring wells need to be installed for completion of the plume delineation. Ground water samples shall be collected from all of the existing and new installed monitoring wells to analyze for the COCs.
- The work plan proposed to collect ground water samples on a quarterly basis. The sampling interval could be extended to a semiannual or even annual basis if there is not enough water available in the wells to sustain quarterly monitoring.

- Besides appropriate narrative, the site assessment report shall also include, but not be limited to, a geological cross section based on boring logs, tabulated data, contour map(s) of contamination in soil and ground water, and a Site conceptual model of the contamination.

**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.**

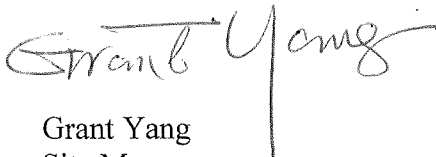
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 a NFA under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7126, or [gyan461@ecy.wa.gov](mailto:gyan461@ecy.wa.gov).

Sincerely,



Grant Yang  
Site Manager  
NWRO Toxics Cleanup Program

cc: Jeff Gaarder, Conestoga-Rovers & Associates  
Sonia Fernandez, VCP Coordinator, Ecology