



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 2, 2014

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 ground water.
- PCE, naphthalene, chloroform and 1,1,1 trichlorethane in 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.



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

1. Apex Companies, LLC, *Site Investigation Work Plan – Classic Cleaners – Cascade Plaza*, August 12, 2014.
2. Apex Companies, LLC, *Progress Report – Classic Cleaners – Cascade Plaza*, June 9, 2014.
3. Whitman Environmental Sciences, *Additional Phase II Site Investigation, Former Classic Cleaners Tenant Space*, dated January 21, 2003.
4. Whitman Environmental Sciences, *Floor Drain and Sewer Information, Former Classic Cleaners Tenant Space*, dated November 7, 2002.
5. Whitman Environmental Sciences, *Response to Ecology VCP Questions, Former Classic Cleaners Tenant Space*, dated August 5, 2002.
6. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 2000, Classic Cleaners*, dated August 11, 2000.
7. Whitman Environmental Sciences, *Groundwater Monitoring Results – March 2000, Classic Cleaners*, dated April 25, 2000.
8. Whitman Environmental Sciences, *Classic Cleaners Tenant Space Inspection, Cascade Plaza Shopping Center*, dated January 21, 2000.
9. Whitman Environmental Sciences, *Groundwater Monitoring Results – December 1999, Classic Cleaners*, dated January 17, 2000.
10. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 1999, Classic Cleaners*, dated September 13, 1999.
11. Whitman Environmental Sciences, *Phase II Site Investigation, Classic Cleaners*, dated May 26, 1999.
12. ATC Associates, *Subsurface Investigation, Cascade Plaza Shopping Center*, dated June 20, 1997.
13. 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 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:

- PCE in soil and ground water.
- PCE, naphthalene, chloroform and 1,1,1 trichlorethane in ground water

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:**

- Ecology agrees that this Site qualifies for a Terrestrial Ecological Evaluation (TEE) exclusion (WAC 173-340-7491 (1)(b)), which would require an institutional control to ensure the long-term maintenance of the physical barriers that prevent exposure to soil contamination (WAC 173-340-440). However, Attachment D (July 2014 Aerial Photograph of Site Vicinity) of the *Site Investigation Work Plan*, indicates the Site qualifies for exclusion (WAC 173-340-7491 (1)(c)(i)) based on the absence (less than 1.5 acres) of undeveloped land within 500 feet of the Site. This exclusion does not require institutional controls.
- Ecology agrees with the proposed soil boring locations (Enclosure A). Ecology recommends collecting a minimum of two soil samples; one at the soil water interface and one at approximately eight inches, where previous PCE concentrations exceeded the MTCA Method A cleanup level. Ecology also recommends adding a soil boring at the HB-3 location, where the PCE concentration exceeding the cleanup level was detected, so that current conditions can be assessed.
- Ecology agrees with the proposed ground water sampling plan which states that four consecutive quarters of ground water sampling data demonstrating concentrations below cleanup levels using low flow sampling techniques will be completed prior to requesting a No Further Action determination from Ecology. Ecology recommends modifying the work plan to include the installation of a monitoring well within the building footprint. Preferably, the additional monitoring well should be as close to the historically highest detection, such as in the proposed soil boring located near HB-4.
- Ecology agrees with the proposed additional soil vapor assessment including a revised conceptual Site model, proposed soil gas sampling locations, indoor air sampling, outdoor air sampling and reassessment plan following additional data collection and analysis.

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.**

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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

Enclosure

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

Enclosure A

