



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 27, 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 Proposed 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 ground water;
- Vinyl chloride 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 proposed remedial actions:

1. Apex Companies, LLC, *Work Plan – Dirk's Fine Dry Cleaning – Inglewood Plaza*, dated August 12, 2014.
2. Apex Companies, LLC, *Progress Report – Dirk's Fine Dry Cleaning – Inglewood Plaza*, dated June 9, 2014.
3. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 25, 2009.
4. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 29, 2007.
5. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated February 13, 2007.
6. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated January 2007.
7. Whitman Environmental Sciences, *Vapor Extraction Testing, Inglewood Plaza Shopping Center*, dated November 24, 1999.
8. Whitman Environmental Sciences, *Phase II Investigation Report, Inglewood Plaza Shopping Center*, dated May 12, 1998.
9. Whitman Environmental Sciences, *Phase II Site Investigation, Inglewood Plaza Shopping Center*, dated March 9, 1998.
10. Dames & Moore, *Phase II Soil Investigation, Dirk's Dry Cleaning, Inglewood Plaza Shopping Center*, dated December 28, 1995.
11. 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 releases:

- Tetrachloroethylene (PCE), trichloroethene (TCE) and cis-1,2 dichloroethene (cis-1,2 DCE) in soil and ground water;
- Vinyl chloride 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 the proposed soil boring locations are appropriate for assessing current conditions in areas where PCE was previously detected at concentrations exceeding the MTCA Method A cleanup level. These areas include the former dry cleaning facility where 2014 soil gas concentrations (ranging from 1,000 to 7,100 micrograms per cubic meter) indicate source material likely remains beneath the building. Ecology recommends collecting a minimum of two soil samples in each boring; one at the soil water interface or at the depth of refusal if encountered, and one at the depth of previous PCE exceedances of the MTCA Method A cleanup level.
- The approximate ground water flow direction presented in the Apex *Work Plan* dated August 12, 2014, is based on the most recent ground water monitoring event. Ground water flow at the Site has historically shown significant variation. Ecology recommends monitoring of water levels for all wells during future ground water sampling events. In addition, a historical rose diagram should be provided on future groundwater contour maps to illustrate the predominant flow direction for the Site.
- The proposed installation of an additional monitoring well (MW) MW-7 will provide valuable additional data regarding the Property. MW-7 is proposed in the immediate vicinity of the highest concentration detected at the Former Exxon 7-6107 (Facility Site Identification: 91753732). Due to the proximity to Exxon 7-6107 MW-8, proposed MW-7 is appropriately located to determine if PCE or associated daughter products are migrating onto the Property from an off-Property source. If ground water sampling results indicate a potential off-Property source for chlorinated solvents, additional monitoring wells may be necessary to delineate the two plumes.

- An additional ground water monitoring well is needed southwest of MW-1A/B to further delineate the down gradient extent of the PCE plume.
- 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 barrier that prevents exposure to soil contamination (WAC 173-340-440). However, Attachment F (July 2014 Aerial Photograph of Site Vicinity) of the *Site Investigation Work Plan*, indicates the Site qualifies for a TEE exclusion (WAC 173-340-7491 (1)(c)(i)) based on the absence (less than 1.5 acres) of contiguous, undeveloped land on or within 500 feet of the Site. This exclusion does not require an institutional control.
- Ecology agrees with the proposed ground water sampling plan which states that four consecutive quarters of 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 VES-3.
- 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.**

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.

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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 by phone 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