



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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August 19, 2009

Steve Fuller, L.E.G, P.G.  
Senior Consultant  
Parametrix  
411 108<sup>th</sup> avenue NE, Suite 1800  
Bellevue, WA 98004

Dear Mr. Fuller:

**Re: Amendments to the RI/FS Work Plan for the Bothell Paint & Decorating site, Agreed Order No. 6296**

Please find attached the Department of Ecology's amendments to the Report of Investigation/Feasibility Study (RI/FS) Work Plan for this site.

Upon the implementation of these amendments to the work plan, this letter constitutes Ecology approval of the RI/FS work plan and notice to proceed according to planned schedule.

If you have any questions, please don't hesitate to contact me at (425) 649-7094.

Sincerely,

Jerome B. Cruz, Ph.D., L.G., L.H.G.  
Toxics Cleanup Program

Cc:

Steven Morikawa, City of Bothell Capital Program Manager  
Stephen Anderson, City of Bothell, Deputy City Manager  
Nduta Mbuthia, City of Bothell, Project Engineer



Amendments to Remedial Investigation and Feasibility Study Work Plan Bothell Paint &  
Decorating Facility Bothell, Washington, Project No. 2007-098-700

1. Page 14, under section **4.2.4 Data Gaps**, number 3 refers to well BPMW-4. BPMW-4 is not depicted in Figure 5-1 (Proposed monitoring well locations). Also, in the SAP (Appendix B), under section **2.1.1 Ground Water Monitoring Well Installation**, change first sentence from "Three monitoring wells will be installed ..." to "Four monitoring wells will be installed..."
2. Page 15, under section **5.2.1 Ground Water Flow System Properties**, fourth sentence in paragraph beginning with **Ground Water Monitoring Well Installation**: change MW-2 to BPMW-2?
3. Clarify well construction of monitoring well MW-2 (BPMW-2?) mentioned in section 5.2.1. Will it be drilled to 50 feet, then backfilled/plugged to a completion depth of 25 feet with a 10 foot well screen, like the other wells? Please also clarify well construction of this well in the SAP, where relevant.
4. Page 16, under "Time series groundwater and surface water elevation measurements": Ecology suggests trying to fit in two rounds of groundwater sampling. Although Ecology may consider using previously gathered data to demonstrate seasonal fluctuations in gradient and configuration of water table over time, a full year of continuous quarterly monitoring is still the ideal minimum requirement. The minimum standard would be to have sufficient time series data on water table, gradients and contaminant concentrations needed to develop the site conceptual model and choose the preferred remedial alternative. This same comment applies to page 17, in section 5.2.2 on groundwater sampling, first paragraph, last sentence.
5. Soil Sampling Grid borings BP-1 through 22 are not identified in Figure 5-1.
6. BP-25 appears to be close to BC-10. Both will measure lube oil range and diesel range TPH, although BC-10 will include more analytes. If BP-25 is to characterize TPH around BC-10, it should probably be moved further away for better coverage needed to show spatial variation or to help define a plume if present. Ecology suggests placing BP-25 40 to 50 feet or more further south-southeast of BC-10. This presumes that these wells will have similar screen depths and that groundwater flow is to the south-southeast. The assumption is that BP-25 will detect any TPH in groundwater at a downgradient direction from BC-10. If instead there are other reasons that would justify the existing proposed location, please provide rationale to Ecology.
7. Add HVOC analysis (Method 8260B) to groundwater samples at BPMW-1, BC-25, and BP-24. Previous investigations documented the presence of these compounds in groundwater in this area, so further characterization is needed.

8. In Appendix B Sampling and Analysis Plan, page 3, in section **2.1.1 Ground Water Monitoring Well Installation**, change “Three wells will be installed...” to “Four wells will be installed ...”.
9. Appendix B Sampling and Analysis Plan, **2.1.3 Time Series Ground Water Level Measurements**: Beginning sentence says: “Water level measurements will be collected monthly during the RI.” This does not seem consistent with the revised work plan tasks. Will this be implemented, or will water table measurements coincide with sampling events?
10. Appendix B Sampling and Analysis Plan, Table 2-1, page 17: should not MTCA groundwater cleanup levels be included? MDLs and LDLs should be below cleanup levels and ARARs.
11. Update Table 6-1 “Proposed RI/FS Schedule” as necessary.