



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 22, 2014

Mr. Jeff Robinson
Economic Development Manager
Community & Economic Development
4800 South 188th Street
SeaTac, WA 98188-8605

Re: Ecology Review of Draft Focused Site Assessment Report – Betty Brite Cleaners Site, South 154th Street Transit-Oriented Development Property

Dear Mr. Robinson:

Ecology has reviewed the Draft Focused Site Assessment Report for the Betty Brite Cleaners Site and prepared the following comments.

Characterization of the Site

Based on the information presented in the report, it appears that the release of pentachlorophenol from the Betty Brite Cleaners to soil and ground water has not been fully characterized. The vertical and lateral extent of contaminated soil and ground water has not been determined.

Soil – It is recognized that collecting soil samples inside a building is difficult; however, the vertical extent of potential soil contamination has not been determined. Soil samples collected within the building (beneath and immediately around the dry cleaning equipment) was limited to a maximum depth of exploration of 5 feet below ground surface (bgs). Levels of pentachlorophenol at these shallow depths which were below MTCA Method A Cleanup levels may be more of a reflection of recent operations and not represent releases that may have occurred from historical operations. Soil at deeper depths may have levels of pentachlorophenol that are elevated and may be above MTCA Method A Cleanup levels.

The point of compliance for direct contact for soil is from the surface to 15 feet bgs. The area within the dry cleaner facility has not been fully characterized. The point of compliance for soil leaching to ground water is site-wide throughout the soil profile and may extend below the water table. These are the appropriate points of compliance for the Site.

Ground water – Ground water at the Site was observed to be above MTCA Method A Cleanup levels. The down gradient extent of the pentachlorophenol contaminated ground water plume was not defined in the Draft Focused Site Assessment Report.



The standard point of compliance for ground water is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest depth which could potentially be affected. This is the appropriate point of compliance for the Site.

Page 13 of the Draft Focused Site Assessment Report mentions conditional point of compliance for ground water. In accordance with WAC 173-340-720(8)(c) Ecology may approve a conditional point of compliance that shall be as close as practicable to the source and not exceed the Property boundary. Because the ground water plume extends past the Property boundary a conditional point of compliance for ground water is not appropriate unless it is to protect surface water in accordance with WAC 173-340-720(8)(d).

Comments on Conclusions

Section 7 Conclusions state that "Human and ecological exposure pathways were deemed as incomplete based on the current and unlikely future uses of shallow ground water at the Property and surrounding area". Based on the information provided in the Draft Focused Site Assessment Report, Ecology cannot agree with this statement. Soil beneath the dry cleaner has not been adequately characterized for protection of direct contact and may pose a potential hazard when the building is demolished and soil beneath the dry cleaner facility is removed.

Comments on Cleanup Action Evaluation

Section 8 presents two alternatives to address contaminated ground water (in situ bioremediation and monitored natural attenuation). Based on the information provided, it is difficult for Ecology to fully evaluate the two alternatives. A source of pentachlorophenol contaminated soil may be beneath the building between 5 feet bgs to ground water assumed to be approximately 25 feet bgs and was not identified during the soil sampling. If soil is contaminated at depth beneath the building, it may act as a continual source of pentachlorophenol to ground water and may impact the efficacy of the two cleanup alternatives.

I look forward to working with you as you continue to work on the Betty Brite Cleaners Site, South 154th Street Transit-Oriented Development property. If you have questions please call me at 425-649-7242 or email at libby.goldstein@ecy.wa.gov.

Sincerely,



Libby Goldstein
Site manager, NWRO

cc: YenVy Van, Maul Foster & Alongi
Louise Bardy, Ecology, NWRO
Robert Warren, Ecology, NWRO