



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 5, 2015

Mr. Jamie Dykman  
Protective Coatings, Inc.  
1208 4th 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 2nd 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 report 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 remedial investigation report 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



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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. GHD Services Inc., August 20, 2015, Remedial Investigation Report.

The document listed above is 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).

Based on a review of the 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:**

A supplemental remedial investigation was conducted at this Site in May 2015, where it is located within the general industrial zone classified by City of Kent. Purposes of the investigation were further to characterize nature and extent of the contamination in soil and ground water, and to assess the specific site conditions. An appropriate cleanup alternative, therefore, could be selected in the next remedial phase to cleanup this Site.

Based on the laboratory results of soil and ground water samplings, while no concentrations of the chemicals of concern (COCs) in the soil exceeded MTCA Method C cleanup level for industrial land usage, 1,2-DCE and Arsenic were found in ground water at contaminations above MTCA Method C cleanup levels in MW-3. HGD also concluded that occurrence of the exceeded concentration of Arsenic in ground water results from the higher regional background contamination.

To obtain an Ecology's No Further Action (NFA) determination for this Site, the following conditions must be met: (1) All the COCs in ground water are not at concentration exceeding MTCA Method C cleanup levels; and (2) The exceedances will not be found in ground water for four consecutive quarterly monitoring events; (3) A detailed study will be performed to confirm the exceeded Arsenic in ground water at this Site results from the elevated regional contamination.

In the report, HGD also proposes to conduct further site cleanup actions this Site in the near future, which include: (1) Evaluate cleanup options and implement the effort(s) for ground water remediation; (2) Collect soil vapor samples for analysis; (3) Survey indoor air for COCs; and (4) Monitor ground water. Based on a review of the report, pursuant to requirements contained in

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MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for additional remedial actions implemented at the Site, Ecology approves the proposed works.

**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.**

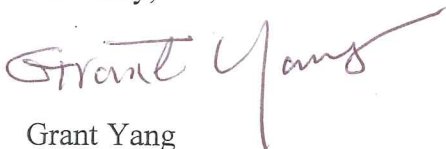
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

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 by email at gyan461@ecy.wa.gov.

Sincerely,



Grant Yang  
Site Manager  
Toxics Cleanup Program

cc: Christina McClelland, GHD Services Inc.  
Sonia Fernandez, VCP Coordinator, Ecology

