



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 21, 2015

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.
- Naphthalene, chloroform and 1,1,1 trichloroethane 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 Report – Classic Cleaners – Cascade Plaza*, July 21, 2015.
2. Apex Companies, LLC., *Site Investigation Work Plan – Classic Cleaners – Cascade Plaza*, August 12, 2014.
3. Apex Companies, LLC., *Progress Report – Classic Cleaners – Cascade Plaza*, June 9, 2014
4. Whitman Environmental Sciences, *Additional Phase II Site Investigation, Former Classic Cleaners Tenant Space*, dated January 21, 2003.
5. Whitman Environmental Sciences, *Floor Drain and Sewer Information, Former Classic Cleaners Tenant Space*, dated November 7, 2002.
6. Whitman Environmental Sciences, *Response to Ecology VCP Questions, Former Classic Cleaners Tenant Space*, dated August 5, 2002.
7. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 2000, Classic Cleaners*, dated August 11, 2000.
8. Whitman Environmental Sciences, *Groundwater Monitoring Results – March 2000, Classic Cleaners*, dated April 25, 2000.
9. Whitman Environmental Sciences, *Classic Cleaners Tenant Space Inspection, Cascade Plaza Shopping Center*, dated January 21, 2000.
10. Whitman Environmental Sciences, *Groundwater Monitoring Results – December 1999, Classic Cleaners*, dated January 17, 2000.
11. Whitman Environmental Sciences, *Groundwater Monitoring Results – August 1999, Classic Cleaners*, dated September 13, 1999.

12. Whitman Environmental Sciences, *Phase II Site Investigation, Classic Cleaners*, dated May 26, 1999.
13. ATC Associates, *Subsurface Investigation, Cascade Plaza Shopping Center*, dated June 20, 1997.
14. 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](mailto:nwro_public_request@ecy.wa.gov).

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

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 releases at the Site, Ecology has determined:**

- Although Ecology recognizes the limitations of characterizing and remediating contamination under the building footprint, Site characterization must be complete to the extent possible prior to consideration of a No Further Action (NFA) determination with a restrictive covenant, as requested in the July 2015 Site Investigation Report. MTCA requires that the selected cleanup action use permanent solutions to the maximum extent practicable. A cleanup action has not been proposed. If Site contamination at concentrations exceeding MTCA cleanup levels is intended to be left behind, Ecology requires a Feasibility Study which includes a minimum of three cleanup alternatives that are protective of human health and the environment. To select the most practicable permanent solution among those cleanup action alternatives that are protective of human health and the environment requires conducting a disproportionate cost analysis (DCA). A DCA is part of what is required if Ecology is to consider an NFA determination with a restrictive environmental covenant to be placed on the Property.



- The soil vapor intrusion assessment indicates that the source is located beneath the building in the vicinity of the former dry cleaning equipment. Given the results of the vapor intrusion assessment and the dense nature of chlorinated solvents it appears a source remains beneath the building and soil samples from greater depths are needed to complete characterization of the Site.
- Ground water in the source area beneath the building has not been adequately assessed. Only monitoring well MW-4, is located down gradient of the source area. Monitoring well MW-1 is located up gradient and wells MW-2 and MW-3 are located cross gradient of the source area. Although monitoring wells MW-1 through MW-3 are useful in bounding the extent of contamination, one well located approximately 50 feet down gradient of the source is insufficient to characterize PCE in ground water or determine that ground water has or has not been impacted. A ground water sample collected from location HB-4 in 2002 confirmed the PCE concentration in ground water exceeds the MTCA Method A cleanup level. The release of PCE to ground water needs to be fully characterized. Once Site characterization is adequate, a cleanup action plan should be proposed to remediate the ground water contamination.

**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 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.

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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  
NWRO Toxics Cleanup Program

DE: TN

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