



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 8, 2016

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:** 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 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 (cis-1,2-DCE) in soil
- PCE, TCE, cis-1,2-DCE and vinyl chloride in ground water
- PCE and TCE in air



Ms. Gregory
February 8, 2016
Page 2

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 – Former Dirk's Fine Dry Cleaning – Inglewood Plaza*, dated October 12, 2015
2. Apex Companies, LLC, *Work Plan – Dirk's Fine Dry Cleaning – Inglewood Plaza*, dated August 12, 2014.
3. Apex Companies, LLC, *Progress Report – Dirk's Fine Dry Cleaning – Inglewood Plaza*, dated June 9, 2014.
4. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 25, 2009.
5. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated June 29, 2007.
6. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated February 13, 2007.
7. Whitman Environmental Sciences, *Remediation Progress Report, Inglewood Plaza Shopping Center*, dated January 2007.
8. Whitman Environmental Sciences, *Vapor Extraction Testing, Inglewood Plaza Shopping Center*, dated November 24, 1999.
9. Whitman Environmental Sciences, *Phase II Investigation Report, Inglewood Plaza Shopping Center*, dated May 12, 1998.
10. Whitman Environmental Sciences, *Phase II Site Investigation, Inglewood Plaza*

Shopping Center, dated March 9, 1998.

11. Dames & Moore, *Phase II Soil Investigation, Dirk's Dry Cleaning, Inglewood Plaza Shopping Center*, dated December 28, 1995.

12. 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 more particularly described in Enclosure A to this letter, which includes a 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 release(s) at the Site, Ecology has determined:**

- Although Ecology recognizes the challenges and 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 environmental covenant for the Site, as requested in the October 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 (FS) which includes evaluating 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 requires conducting a disproportionate cost analysis (DCA). An FS with 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.

- Indoor air sampling results indicate that at this time indoor air concentrations of all contaminants are below Method B air cleanup levels. However, the soil vapor intrusion assessment indicates that a PCE source in soil and potentially ground water remains beneath the building that has not yet been identified. Soil and ground water samples from greater depths in the vicinity of the former dry cleaning equipment and restroom are needed to complete characterization of the Site. The lateral extent of contamination must also be determined. Once Site characterization is complete and the FS/DCA is prepared, a cleanup action should be selected to remediate the contamination.
- The Site is located within a City of Sammamish wellhead protection area. A cluster of Group A (serves 15 or more connections, 25 or more people), Group B (serves fewer than 15 connections and fewer than 25 people) and private water supply wells are located within a quarter to half mile of the Site to the east and southeast. A well survey should be conducted to determine the number of water supply wells in the vicinity of the Property, current use, distance from the Site, depth to water, production rate, screened interval depth and any available water quality data. Boring logs for the domestic wells should also be obtained. Further discussion regarding the regional hydrogeology relative to potential impacts to ground water associated with the Site should be submitted.

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.

Ms. Gregory
February 8, 2016
Page 5

If you have any questions regarding this opinion, please contact me at 425.649.7097 or e-mail at diane.escobedo@ecy.wa.gov.

Sincerely,



Diane Escobedo
Site Manager
NWRO Toxics Cleanup Program

DE: TN

Enclosure (1): A – Description of the Site

cc: John Foxwell, Apex Companies
Sonia Fernandez, VCP Coordinator, Ecology

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of the letter.

Site: The Site is defined by the release of the dry cleaning solvent tetrachloroethene (PCE) and related degradation products trichloroethene (TCE), cis-1,2 dichloroethene (cis-1,2 DCE) to soil, PCE, TCE, cis-1,2 DCE and vinyl chloride to ground water and PCE and TCE to air associated with the operation of a former dry cleaning facility. The Site is located at 701 228th Avenue Northeast in Sammamish, Washington (Property).

Area and Property Description: The Property corresponds to King County parcel number 3582300010 which is 1.03 acres in size. The Property is occupied by one single-story building. The Property is bounded by 228th Avenue Northeast to the east and Northeast Inglewood Hill Road to the northwest. A bank and dry cleaning facility, Bella Cleaners, are located north of the Property and south of the intersection of Northeast Inglewood Hill Road and 228th Avenue Northeast. The property to the north where Bella Cleaners is currently located was formerly a retail gas station (Exxon Station 7-6107, Cleanup Site 11042). The Site received a No Further Action opinion letter from Ecology in 2012 for the petroleum release. PCE was detected at concentrations greater than the MTCA Method A cleanup level on the southern portion of the former gas station. Bella Cleaners is not listed on Ecology's Confirmed and Suspected Contaminated Sites List and does not have any interactions with Ecology's Hazardous Waste Program. A gas station and storage facility are located to the southwest. Land use surrounding the Site is mixed commercial and residential.

Property History and Current Use: The Property was first developed as farmland in the 1950s. The single-story shopping mall building that is currently present was constructed in 1985. The former dry cleaning facility (Dirk's Fine Dry Cleaning) operated in tenant unit 701 and performed dry cleaning services from 1985 to 1990. The dry cleaning equipment was removed in 1995. Since 1990, the facility (now called Inglewood Dry Cleaners) has served as a drop-off and pick-up location for dry cleaning services that are performed off-Property. The current use of the Property is for Inglewood Plaza, a retail shopping center.

Contaminant Source and History: A 1994 Phase I Environmental Site Assessment identified floor staining attributed to minor spills in the dry cleaners and noted a crack in the concrete floor running near and beneath the machine. Soil and vapor data collected confirmed that releases occurred to the subsurface in association with the former dry cleaning equipment. King County Water and Sewer District No. 82 reported problems with dry cleaning solvent in the sanitary sewer servicing the building indicating disposal of solvent waste products to sanitary sewer. In addition, in March 1986 a letter by the sellers of the Property at that time indicated that 5 to 6

gallons of dry cleaning solvent had been spilled, mopped up and flushed down the toilet. A 1990 preliminary assessment noted two 15-gallon drums of PCE were located outside the rear door of the cleaners.

Physiographic Setting: The Property is located in the eastern portion of the Puget Sound Lowland physiographic province on the Sammamish Plateau. The Puget Sound Lowland is bounded by the Olympic Mountains to the west and the Cascade Range to the east. The topography of the Property is generally flat with a hill rising to approximately 200 feet above the Property to the northwest and a gradual slope to the south-southeast toward George Davis Creek. The Property is at an elevation of approximately 360 feet above mean sea level.

Surface/Storm Water System: The surface water body closest to the Site is George Davis Creek, located approximately 1100 feet to the south. Two storm drains are located on the north side of the strip mall (one in front of the dry cleaning facility) in the asphalt parking lot.

Ecological Setting: The Property and surrounding area are primarily covered in buildings, asphalt and concrete with some backyard area (grass lawns with trees). Wetland areas exist within a mile of the Site.

Geology: Silty sand and sandy gravel were encountered beneath the Site to a maximum explored depth of 36.5 feet below the ground surface (bgs). These materials are likely recessional outwash deposits which commonly overlie the glacial till deposits of the Sammamish Plateau.

Ground Water: Ground water was encountered between approximately 7.60 and 15.10 feet bgs. The inferred ground water flow direction is to the southeast.

Water Supply: The City of Sammamish is serviced by the Sammamish Plateau Water and Sewer District with ground water supply wells (eight wells are located in the Plateau and Lower Issaquah Valley aquifers which service the area south of Redmond Fall-City Road) located throughout the district and Seattle Public Utilities (Cedar and Tolt River watersheds). The Property is located within a class 2 (10-year travel time) well head protection critical aquifer recharge area. A map of nearby water supply wells, the closest of which is approximately 1,000 feet to the east, and the critical aquifer recharge areas relative to the Site are included in Appendix G of the October 2015 Site Investigation Report.

Release and Extent of Soil and Ground Water Contamination: Soil, soil gas and ground water investigations and ground water monitoring activities have been completed at the Site beginning in 1998. The highest concentrations of PCE in soil and soil gas were detected in the vicinity of the former restroom (where the floor drains are located) and former location of the dry cleaning equipment. Soil gas and ground water samples collected in 1995 identified PCE

Ms. Gregory
February 8, 2016
Page 8

contamination north and northwest of the dry cleaner suite. However, a dry cleaner is presently located on the property to the north. It has not been determined if a release occurred in association with the operation of this dry cleaner (Bella Cleaners). The highest concentration of PCE detected in soil was 120 milligrams per kilograms at location VES-1 at a depth of 2.5 feet below ground surface. The highest concentration of PCE (88 micrograms per liter) in ground water on the Property was detected in a sample collected from monitoring well MW 1A, located just outside the door on the southwest side of the building. A soil vapor extraction system operated at the Site from May 2004 through at least June 2009. It is estimated that between April 2004 and June 2006 approximately 0.2 kilograms of halogenated volatile organic compounds were removed from the subsurface.