



November 5, 2015

Ms. Heather Vick
Voluntary Cleanup Program Site Manager
Department of Ecology, Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

**Re: Submittal of Remedial Investigation/Feasibility Study and Request for Opinion
HERS Industrial Park Site (VCP Site No. NW1554)
Project No. 140252**

Dear Heather:

We are reengaging with the Washington State Department of Ecology (Ecology) for the HERS Industrial Park site (Site) at 4403 Russell Road in Mukilteo, Washington. Russell Road Industrial Park, LLC, purchased parcels at the Site on June 29 and July 1, 2005, and enrolled the Site in the Voluntary Cleanup Program (VCP) on January 24, 2006 following Phase I and II environmental site assessments completed from June to December 2005. The Riley Group, Inc. (Riley) submitted Site characterization and interim action documents to Ecology in 2012 and requested an opinion under the VCP on July 23, 2012, which Ecology provided on October 18, 2012. In this opinion, Ecology requested a Remedial Investigation for the Site and identified several investigation data gaps.

Russell Road Industrial Park, LLC, engaged Aspect Consulting, LLC, (Aspect) in September 2014 to assist them with their goal of securing no further action (NFA) determinations for the parcels at the Site. We performed investigation activities at the Site between October 2014 and August 2015 to address data gaps identified by Ecology and prepared a Remedial Investigation and Feasibility Study (RI/FS) for the Site. The RI/FS:

- Defines the Site and summarizes the ownership and operational history of the Site and surrounding parcels;
- Describes the environmental setting;
- Summarizes previous environmental investigations and cleanup actions;
- Provides a conceptual site model for the release and distribution of the chemicals of potential concern;
- Proposes chemicals of concern, cleanup levels, and points of compliance and identifies the impacted media;
- Identifies the remedial action objectives; and

- Screens remedial technologies, develops and evaluates cleanup action alternatives, and recommends a preferred cleanup action alternative.

The impacted and non-impacted Site parcels are summarized in the table below.

Impacted and Non-Impacted Parcels

Parcel Address	Snohomish County Tax Parcel No. (TPN)	Parcel Size (acres)	Owner
Impacted Parcels			
4403 Russell Rd.	00441400004600	1.64	Russell Road Industrial Park LLC
4351 Chennault Beach Rd.	00441400004700	1.59	Russell Road Industrial Park LLC
4424 Chennault Beach Rd.	00548700001700	2.36	International Church of Foursquare Gospel
4424 Chennault Beach Rd.	00548700001701	0.5	International Church of Foursquare Gospel
Non-Impacted Parcels			
4433 Russell Rd.	00441400004502	1.10	Russell Road Industrial Park LLC
4463 Russell Rd.	00441400004400	1.17	Russell Road Industrial Park LLC
4493 Russell Rd.	00441400004300	1.41	Russell Road Industrial Park LLC
4440 Chennault Beach Rd.	00548700001600	1.29	Russell Road Industrial Park LLC
4470 Chennault Beach Rd.	01031600000200	Not recorded	Gonyea Woodworking Inc.
4480 Chennault Beach Rd.	01031600000100	Not recorded	Himalayan Holdings Group, LLC

Based on the findings of the RI, we are seeking property-specific NFA determinations for the non-impacted parcels. The preferred remedy identified in the FS involves interim actions to enhance the natural attenuation of chlorinated solvent contamination on the impacted parcels. After demonstrating the attainment of the cleanup levels on the impacted parcels owned by the International Church of Foursquare Gospel, we plan to request a NFA determination, which includes an environmental covenant for the impacted parcels owned by Russell Road Industrial Park, LLC. The covenant would include a long-term groundwater management plan to confirm the stability and attenuation of the residual contamination on the two parcels. We are seeking

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Ecology's opinion supporting the findings of the RI and concurring that the preferred remedy will likely achieve a Site NFA determination.

We plan to submit Site data to Ecology through the Environmental Information Management (EIM) system in November 2015. We have electronic data deliverables for sampling data collected by Aspect, and hard copies of sampling data collected by Riley from June 14, 2005 to January 13, 2012. As we understand, Ecology requests that sample data collected after August 2005 be submitted to the EIM system. We plan to enter available Site data collected since June 2005.

We look forward to your review and opinion of this RI/FS and our plan of action. Please let me know if I can provide any clarification or assistance.

Sincerely,

Aspect consulting, LLC



Alan Noell, PhD, PE
Associate Remediation Engineer
anoell@aspectconsulting.com

Attachments: Remedial Investigation/Feasibility Study, HERS Industrial Park, November 2015

cc: Jason Bontrager, Russell Road Industrial Park, LLC

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