STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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June 7, 2016

Lynnwood Public Facilities District
Attn: Grant Dull, Executive Director
3815 196th St SW, Suite 136
Lynnwood, Washington 98036

Re: Contained-in Determination for Contaminated Soils from the Former Alderwood Laundry and Dry Cleaners Site in Lynnwood, Washington (Ecology Cleanup Site ID: 12845)

Reference:

1. Letter Report from F. Khan and D. Carlisle, GeoEngineers to B. Maeng, Department of Ecology, received by email on May 19, 2016
2. Email from F. Khan, GeoEngineers to B. Maeng, Department of Ecology, on May 27, 2016
3. Telephone conversation with F. Khan, GeoEngineers on May 31, 2016

Dear Mr. Dull:

The Washington State Department of Ecology (Ecology) received a contained-in determination request from your environmental consultant, GeoEngineers, for twenty one (21) 55-gallon drums of soils generated during installation of groundwater monitoring wells (MW-5, MW-6, MW-7, MW-8 and MW-9) at the former Alderwood Laundry and Dry Cleaners located at 3815 196th St. SW in Lynnwood, Washington. Analytical data and supplemental information were submitted to Ecology to determine if these soils contaminated with listed dangerous waste constituents (F002) may be exempt from management as dangerous wastes per the "Contained-In Policy"[1].

Based on the information received and reviewed, Ecology has determined that the soils described above are contaminated with F002 listed dangerous waste constituents at concentrations that do not warrant management as dangerous wastes. Ecology understands that these contaminated soils do not designate under federal characteristics (WAC 173-303-090) or State-only criteria (WAC 173-303-100).

Ecology will not require disposal of these soils as listed dangerous wastes at a RCRA permitted dangerous waste treatment, storage and disposal (TSD) facility, provided that all of the following conditions are implemented. This contained-in determination applies only to the contaminated

[1] Washington State Department of Ecology Contained-in Policy, dated February19, 1993

soils, and does not pertain to contaminated water or any mixture of contaminated soils and drilling fluids.

You or your environmental consultant, GeoEngineers, shall:

- Ensure that no standing water is present within each of the drums holding the contaminated soils. All water must be removed to the maximum extent possible from each of the drums and managed as F002 dangerous wastes or as otherwise allowed under Chapter 173-303 WAC;

- Deliver the soils to the Columbia Ridge Landfill in Arlington, Oregon, as proposed (Reference 1). Do not consolidate these contaminated soils with other soils that do not pertain to this contained in determination;

- Dispose of the contaminated soils at the permitted solid waste landfill by July 15, 2016. This contained-in determination letter is no longer valid after July 15, 2016. After this date, the contaminated soils must be managed as dangerous wastes;

- Notify Ecology before disposal of the soil if the amount exceeds the approved amount in this letter. Ecology needs to make sure that the additional soil qualifies for this contained-in determination;

- Provide copies of all signed solid waste landfill receipts or a certificate of disposal issued by the receiving landfill for these contaminated soils to Ecology, attention of Byung Maeng, within 15 days of your receipt. This is an important verification step for you and your consultant to follow in order for this Ecology decision to be valid;

- Provide instructions to the landfill operator that these soils are not to be used for daily, intermediate, or final cover;

- Provide copies of all soil analytical data to the landfill operator, upon request;

- Take measures to prevent unauthorized contact with these soils at all times;

- Plastic line the delivery truck and cover all loads if delivered by truck;

- During transport, take adequate measures to prevent spills and dispersion due to wind erosion; and

- Do not send these contaminated soils to any incinerator, thermal desorption unit or recycling facility unless that facility is a RCRA Subtitle C permitted dangerous waste TSD facility.

Ecology issued this determination based on the information provided and reviewed to date. This written decision only applies to the twenty one (21) 55-gallon drums of soils generated during the installation of groundwater monitoring wells (MW-5, MW-6, MW-7, MW-8 and MW-9 on Figure 2 attached). This written decision does not apply to any

other area or any other media. Any data used for this contained-in determination is intended for use in determining the proper disposal of the 21 drums of soils described above according to the Washington State Dangerous Waste Regulations (Chapter 173-30 WAC) and Ecology Contained-in Policy.

This letter is not a No Further Action (NFA) letter and not written approval for any cleanup action plan you may have submitted. Instead, this letter only addresses the procedures for disposal of the contaminated soils according to the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). Regulatory decisions regarding the cleanup action, applicable soil and groundwater cleanup levels and any other cleanup issues must comply with the requirements under Ecology Model Toxics Control Act (Chapter 173-340 WAC).

Local agencies may have the authority to impose additional requirements on this waste stream.

If you fail to comply with the terms of this letter, Ecology may issue an administrative order and/or penalty as provided by the Revised Code of Washington, Sections 70.105.080 and/or .095 (Hazardous Waste Management Act).

If you have any questions concerning this letter, please contact Byung Maeng (425) 649-7253, bmae461@ecy.wa.gov).

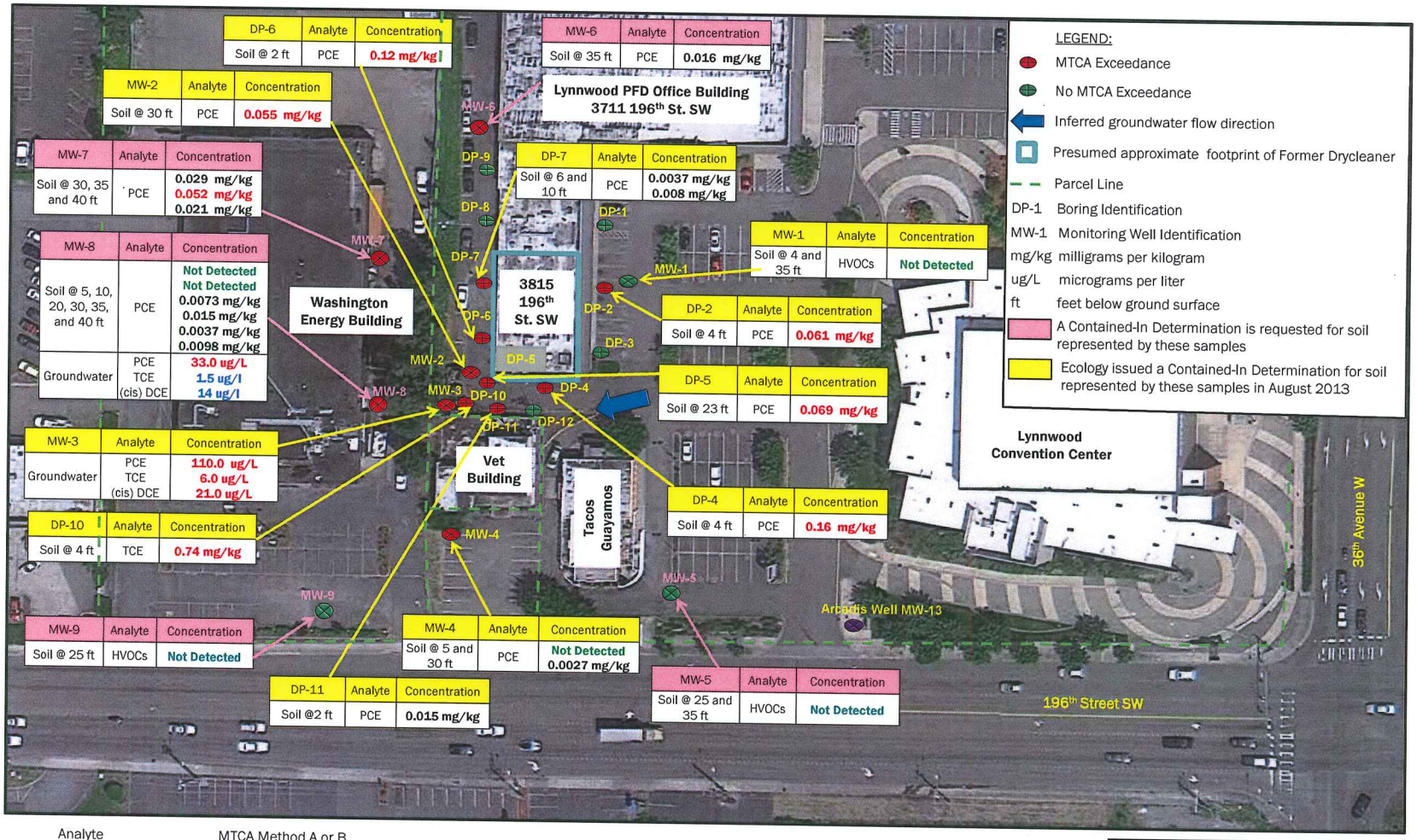
Sincerely,

Byung Maeng, PE
Hazardous Waste and Toxics Reduction Program

By certified mail: 9171 9690 0935 0106 7178 61

Attachment: Figure 2 Site Plan

e-cc: Fasih Khan, GeoEngineers (fkhan@geoengineers.com)
Lisa Brown, Ecology-ERO
Greg Caron, Ecology-CRO
Dean Yasuda, Ecology – NWRO
Byung Maeng, Ecology-NWRO
Mindy Collins, Ecology - BFO
Chuck Hoffman, Ecology-SWRO
Donna Musa, Ecology-TCP
David Christensen, Seattle-King County Public Health (david.christensen@kingcounty.gov)
Darshan Dhillon, Seattle-King County Public Health (darshan.dhillon@kingcounty.gov)



Media	Analyte	MTCA Method A or B Cleanup Level (mg/kg)
Soil	Tetrachloroethene (PCE)	0.05
	Trichloroethene (TCE)	0.03
	(cis) 1, 2-Dichloroethene (DCE)	160

Notes:

1. The locations of all features shown are approximate.
2. This drawing is only for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Site Plan

Alderwood Laundry and Dry Cleaners
3815 196th Street SW, Lynnwood, Washington

GeoEngineers

Figure 2