



April 27, 2017

Ms. Sonia Fernandez
Voluntary Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

**RE: VOLUNTARY CLEANUP PROGRAM REQUEST FOR ASSISTANCE
FORMER CLEANING CENTER OF REDMOND
15796 REDMOND WAY, REDMOND, WASHINGTON
FORMERLY VCP IDENTIFICATION NO. NW1324
FARALLON PN: 650-001**

Dear Ms. Fernandez:

Farallon Consulting, L.L.C. (Farallon) has prepared the enclosed Voluntary Cleanup Program (VCP) application submittal on behalf of Nelgroup Properties LLC to request the assistance of the Washington State Department of Ecology (Ecology) for the Former Cleaning Center of Redmond property at 15796 Redmond Way in Redmond, Washington (herein referred to as the Property) (Figure 1).

Prior cleanup actions to address a release of the dry cleaning solvent tetrachloroethene (PCE) were conducted at the Property under VCP Identification No. NW1324. The cleanup actions resulted in a Property-specific No Further Action (NFA) determination being issued by Ecology in 2011; however, the NFA determination did not include an area extending off the Property to the northwest. The source area proximate to the dry cleaning facility and an area extending off the Property to the northwest comprise the Site, defined by the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) as areas where the constituents of concern have come to be located at concentrations exceeding applicable MTCA cleanup levels. Provided with this letter is the *Site Closure Report Addendum, Former Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated April 26, 2017, prepared by Farallon (Site Closure Report Addendum) (Attachment A). The Site Closure Report Addendum includes supporting information in the context of the recently published *Implementation Memorandum No. 16, Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water* dated December 2016, prepared by Ecology (Ecology Memorandum), to demonstrate to Ecology that a Site-wide NFA determination rather than the Property-specific NFA determination is warranted.

Farallon understands that Ecology limited the NFA determination to the Property, rather than the entire Site, due to the lack of a delineation well at the leading edge of the PCE plume in groundwater, proximate to the Sammamish River (Figure 2). The Ecology Memorandum allows for selection of the conditional point of compliance for the groundwater to surface water pathway.



Sampling results at the conditional point of compliance, which was selected in the Site Closure Report Addendum, indicate that concentrations of PCE in groundwater associated with the former source at the Former Cleaning Center of Redmond dry cleaning facility are less than the Washington State Surface Water Quality Criteria (Table 240 of Section 240 of Chapter 173-201A of the Washington Administrative Code, updated August 2016) demonstrating that the groundwater to surface water pathway is incomplete. In addition, concentrations of PCE remained less than the applicable cleanup level in groundwater at all other areas associated with the Site for a minimum of four quarters. These data support Farallon's assertion that the cleanup action was successful in remediating the PCE plume in groundwater across the entire Site, and that applicable groundwater cleanup levels were attained at the selected conditional and standard points of compliance.

A path toward receiving the Site-specific NFA determination was developed based on extensive e-mail correspondence between Ms. Louse Bardy of Ecology and Farallon over the past year. Farallon respectfully requests that a hydrogeologist be assigned as the Site Manager for this project because of the complexities associated with the hydrogeology where groundwater discharges to surface water.

The enclosed VCP application submittal includes the VCP Agreement Form (Attachment B), the VCP Application (Attachment C), and the VCP Request for Opinion Form (Attachment D) for the Site. Based on the information provided in the *Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated September 21, 2007, prepared by Farallon, and the Site Closure Report Addendum, Farallon is requesting a written opinion on whether Ecology concurs with Farallon and Nelgroup Properties LLC that a Site-wide NFA determination is warranted for the Site and that the Site be removed from the Ecology Hazardous Waste Sites List.



CLOSING

Farallon trusts that the enclosed VCP application and supporting documentation provide sufficient information for Ecology needs. If you have questions or require additional information, please contact either of the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Branislav Jurista, L.G.
Senior Geologist

Clifford T. Schmitt, L.G., L.H.G.
Principal Hydrogeologist

Attachments: Figure 1, *Site Plan*
Figure 2, *Groundwater Elevation Contours and PCE Concentrations in Groundwater*
Attachment A, Site Closure Report Addendum
Attachment B, VCP Agreement
Attachment C, VCP Application
Attachment D, VCP Request for Opinion

cc: Mr. Thomas Markl, Nelgroup Properties LLC (by e-mail)
Mr. William Joyce; Joyce Ziker Parkinson, PLLC (by e-mail)

BJ/CTS:mm

FIGURES

VOLUNTARY CLEANUP PROGRAM REQUEST FOR ASSISTANCE
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



REFERENCE: 7.5 MINUTE USGS QUADRANGLE KIRKLAND, WASHINGTON. DATED 2014



Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

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FIGURE 1
SITE VICINITY MAP
CLEANING CENTER OF REDMOND
REDMOND, WASHINGTON

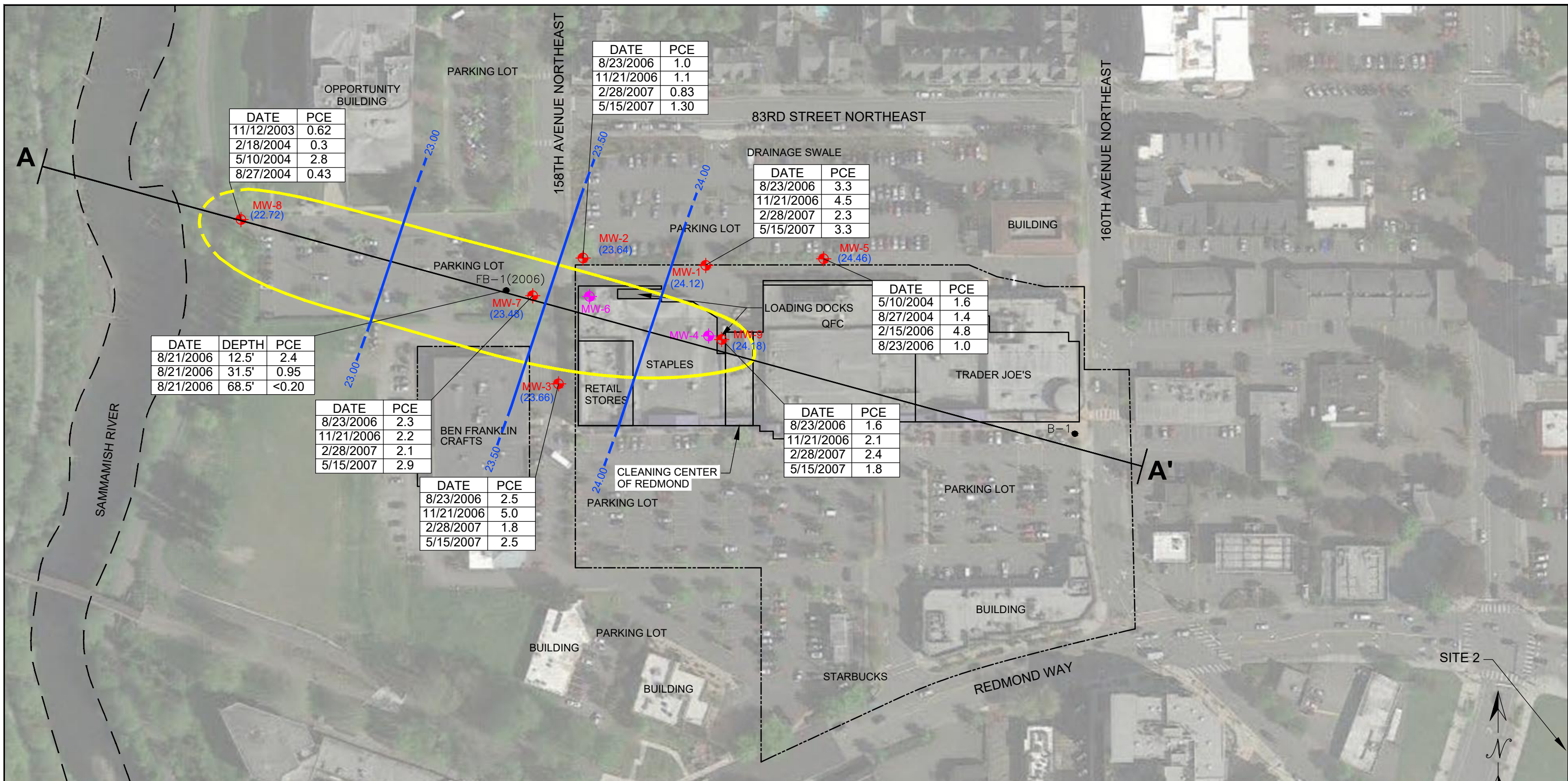
Drawn By: DEW

Checked By: JM

Date: 3/8/2017

Disk Reference: 650-001_00

FARALLON PN: 650-001



DATE	PCE
11/12/2003	0.62
2/18/2004	0.3
5/10/2004	2.8
8/27/2004	0.43

DATE	PCE
8/23/2006	1.0
11/21/2006	1.1
2/28/2007	0.83
5/15/2007	1.30

DATE	PCE
8/23/2006	3.3
11/21/2006	4.5
2/28/2007	2.3
5/15/2007	3.3

DATE	PCE
5/10/2004	1.6
8/27/2004	1.4
2/15/2006	4.8
8/23/2006	1.0

DATE	DEPTH	PCE
8/21/2006	12.5'	2.4
8/21/2006	31.5'	0.95
8/21/2006	68.5'	<0.20

DATE	PCE
8/23/2006	2.3
11/21/2006	2.2
2/28/2007	2.1
5/15/2007	2.9

DATE	PCE
8/23/2006	2.5
11/21/2006	5.0
2/28/2007	1.8
5/15/2007	2.5

DATE	PCE
8/23/2006	1.6
11/21/2006	2.1
2/28/2007	2.4
5/15/2007	1.8

LEGEND

- PROPERTY BOUNDARY
- FORMER EXTENT OF PCE PLUME IN GROUNDWATER (SITE 1)
- PERFORMANCE AND CONFIRMATION MONITORING WELL NETWORK (DECOMMISSIONED FOLLOWING RECEIPT OF NO FURTHER ACTION DETERMINATION)
- MONITORING WELL (DECOMMISSIONED PRIOR TO CLEANUP DUE TO CONSTRUCTION OF NEW BUILDING)
- BORING LOCATION
- GROUNDWATER ELEVATION RELATIVE TO MEAN SEA LEVEL (MAY 2007)
- GROUNDWATER ELEVATION CONTOUR (MAY 2007)
- APPROXIMATE DIRECTION OF GROUNDWATER FLOW

DEPTH IN FEET BELOW GROUND SURFACE
PCE = TETRACHLOROETHENE
BOLD = INDICATE CONCENTRATIONS EXCEEDED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATIONS (MTCA) METHOD A CLEANUP LEVEL
< = INDICATES ANALYTE NOT DETECTED AT CONCENTRATIONS AT OR EXCEEDING THE LABORATORY PRACTICAL QUANTITATION LIMIT
= DATE SAMPLED AND PCE CONCENTRATION IN GROUNDWATER IN MICROGRAMS PER LITER (ug/L)
ALL LOCATIONS ARE APPROXIMATE

DATE	PCE
8/23/2006	1.6

Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

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FIGURE 2
GROUNDWATER ELEVATION CONTOURS AND PCE CONCENTRATIONS IN GROUNDWATER
CLEANING CENTER OF REDMOND
REDMOND, WASHINGTON

FARALLON PN: 650-001
Date: 3/8/2017 Disk Reference: 650-001_00.dwg

Drawn By: JM Checked By: MB

**ATTACHMENT A
SITE CLOSURE REPORT ADDENDUM
(PROVIDED UNDER SEPARATE COVER)**

**VOLUNTARY CLEANUP PROGRAM REQUEST FOR ASSISTANCE
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Redmond, Washington**

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**ATTACHMENT B
VCP AGREEMENT**

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Redmond, Washington

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