



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 6, 2017

Ms. Sarah Gregory  
Regency Centers/Columbia Cascade Plaza, LLC.  
One Independent Drive, Suite 114  
Jacksonville, FL 32202

**Re: Further Action at the following Site:**

- **Site Name:** Classic Cleaners Everett
- **Site Address:** 7601 Evergreen Way B4, Everett, WA 98203
- **Facility/Site No.:** 1382746
- **Cleanup Site ID No.:** 4690
- **VCP Project No.:** NW2745

Dear Ms. Gregory:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Classic Cleaners Everett facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

**Issue Presented and Opinion**

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Is further remedial action necessary to clean up contamination at the Site?

**YES. Ecology has determined that further remedial action is necessary to clean up contamination at the Site.**

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

**Description of the Site**

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This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:



- Tetrachloroethene (PCE) in soil.
- PCE, trichloroethene (TCE), naphthalene and chloroform in ground water.

### **Basis for the Opinion**

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This opinion is based on the information contained in the following documents:

1. APEX, February 16, 2017, Results of 2016 Sampling Activities.
2. APEX, February 3, 2016, Data Gap Site Investigation – Classic Cleaners – Cascade Plaza.
3. APEX, July 21, 2015, Site Investigation Report – Classic Cleaners – Cascade Plaza.
4. APEX, August 12, 2014, Site Investigation Work Plan – Classic Cleaners – Cascade Plaza.
5. APEX, June 9, 2014, Progress Report – Classic Cleaners – Cascade Plaza.

The documents listed above are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235, or sending an email to [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

This opinion is void if any of the information contained in those documents is materially false or misleading.

### **Analysis of the Cleanup**

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Ecology has concluded that **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

#### **1. Characterization of the Site.**

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

An initial Site assessment was conducted in June 1997, at this former dry cleaner facility to investigate contamination in soil and ground water due to releases from the facility. The result indicated that PCE was the sole chemical of concern (COC) in soil, while

PCE, TCE, naphthalene and chloroform were present in ground water. To characterize the nature and extent of COCs, multiple investigations were performed between 2002 and 2016.

Based on the most recent soil sampling results obtained in June 2016, concentrations of PCE in a total of 17 samples ranged from 0.001 to 0.023 milligrams per kilogram (mg/kg), below the Method A cleanup level of 0.05 mg/kg. The samples were collected at locations within the building footprint of the former dry cleaner shop, at various depths from 1 to 9 feet below ground surface (bgs). PCE is the only COC in soil identified for this Site as no degradation products have been detected or reported.

Four monitoring wells were installed at the Site for sampling ground water. The COCs detected in ground water included PCE, TCE, and naphthalene. No laboratory data indicated that the COCs exceeded MTCA Method A cleanup levels in all the seven quarterly monitoring events conducted between July 2013 to May 2016.

A soil vapor investigation was conducted in October 2013. The results revealed concentrations in four (VS-1, -2, -3 and -4) of 15 samples exceeded the MTCA Method B soil vapor screening level ( $9.6 \mu\text{g}/\text{m}^3$ ) ranging from 990 to  $3,600 \mu\text{g}/\text{m}^3$  at the depth of three feet below ground surface (bgs). The four samples were collected within the footprint of the former dry cleaner shop.

As follow-up of the further assessments, two additional Tire II soil vapor intrusion investigations were performed in 2014 and 2016. The reports indicated that vapor concentrations in three samples collected at depth of three feet bgs beneath or nearby the former dry cleaner shop exceeded the MTCA Method B soil vapor intrusion screening level ( $321 \mu\text{g}/\text{m}^3$ ). The analytical results ranged from 5,600 to  $10,000 \mu\text{g}/\text{m}^3$ . However, all of the three indoor and ambient-air analyses performed in 2013, 2014 and 2016 did not show exceedance above the intrusion screening level.

## **2. Establishment of cleanup standards.**

Ecology has determined the cleanup levels and points of compliance at this Site are described as follows:

### **a. Cleanup levels.**

#### Soil

Soil cleanup levels suitable for unrestricted land use are appropriate for this Site. For the direct contact and soil-to-ground water pathways, Method A cleanup levels defined in MTCA can be utilized.



#### Ground Water

This Site is also appropriate to utilize MTCA Method A ground water cleanup levels.

The Site qualifies for an exclusion from conducting a terrestrial ecological evaluation (WAC 173-340-7491(c)(i)); there is no undeveloped land or potential terrestrial habitat on or within 500 feet of the Site. Therefore, protection for terrestrial species is not needed for this Site in accordance with MTCA.

#### **b. Points of compliance.**

##### Soil

The point of compliance for soil contamination is based on the protection of ground water and is applied for Site-wide throughout the soil profile, which will extend below the water table.

##### Ground Water

The point of compliance for ground water is throughout the Site from the uppermost level of the saturated zone extending vertically and horizontally to the lowest depth which could potentially be affected.

#### **c. Remedial action and location-specific requirements.**

At this time, Ecology has determined that the following additional requirements apply to the cleanup based on the type of the action or the location of the Site:

- Soil vapor monitoring at the source area should be performed to evaluate the status of the ground water plume and any soil impacts through the vapor intrusion pathway.
- Further remedial action to treat the impacted soil, such as soil vapor extraction, should be considered if PCE concentrations remain at levels exceeding the screening level.

#### **3. Selection of cleanup action.**

Ecology has determined the cleanup action you selected for the Site do not meet the

substantive requirements of MTCA.

A Phase I Site investigation in 1997 revealed that the COCs in soil and ground water exceeded the MTCA Method A cleanup levels. These COCs included PCE, trichloroethene (TCE), naphthalene and chloroform. Later, multiple efforts were performed to characterize the nature and extent of contamination at this Site (Figure 1).

After completion of the Site characterization, contamination in soil and ground water was defined within the building footprint of the former dry cleaner facility. The analytical results obtained from 1999, 2002 and 2014 to 2016 indicated the concentrations of the COCs in soil (Figure 2) and ground water (Figure 3) were either undetectable, or below the MTCA Method A cleanup levels at the Site.

Three rounds of soil vapor intrusion and ambient air monitoring were conducted between 2013 and 2016. All the reports concluded the vapor plume remained at a small and shallow location adjacent to the former dry cleaner shop. However, residual PCE in soil vapor was present at concentration of 8,800, and 10,000  $\mu\text{g}/\text{m}^3$  at VP-1 and VP-2, respectively, which was above the MTCA Method B soil vapor intrusion screening level (321  $\mu\text{g}/\text{m}^3$ ).

#### **4. Cleanup.**

Ecology has determined the cleanup you performed does not meet the cleanup standard at the Site. To obtain an Ecology No Further Action determination for this Site, the following conditions must be satisfied:

- a. Vapor concentration of PCE in soil and ground water cannot exceed the vapor intrusion screening levels.
- b. Soil vapor extraction, or other treatment methods, should be considered to remove or reduce the PCE level in the soil and ground water in order to expedite the process of remediation.
- c. If after remediation, contamination remains under the building, protective measures need to be undertaken for indoor, direct contact, and soil to ground water pathway. This approach might be resolved through a site-specific environmental covenant.
- d. Also, the additional documents must be prepared and submitted to Ecology for its evaluation to determine an NFA with an environmental covenant. Those documents include a remedial investigation and feasibility report (RI/FS), disproportional cost

analysis (DCA), and cleanup action plan (CAP).

### **Limitations of the Opinion**

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**1. Opinion does not settle liability with the state.**

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

**2. Opinion does not constitute a determination of substantial equivalence.**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

**3. State is immune from liability.**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

### **Contact Information**

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Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

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For more information about the VCP and the cleanup process, please visit our web site: [www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm](http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm). If you have any questions about this opinion, please contact me by phone at (425) 649-7126 or e-mail at [grant.yang461@ecy.wa.gov](mailto:grant.yang461@ecy.wa.gov).

Sincerely,



Grant Yang, VCP Site Manager  
Toxics Cleanup Program, NWRO

cc: John Foxwell, APEX  
Sonia Fernandez, VCP Coordinator, Ecology



Figure 1 Location of the Site

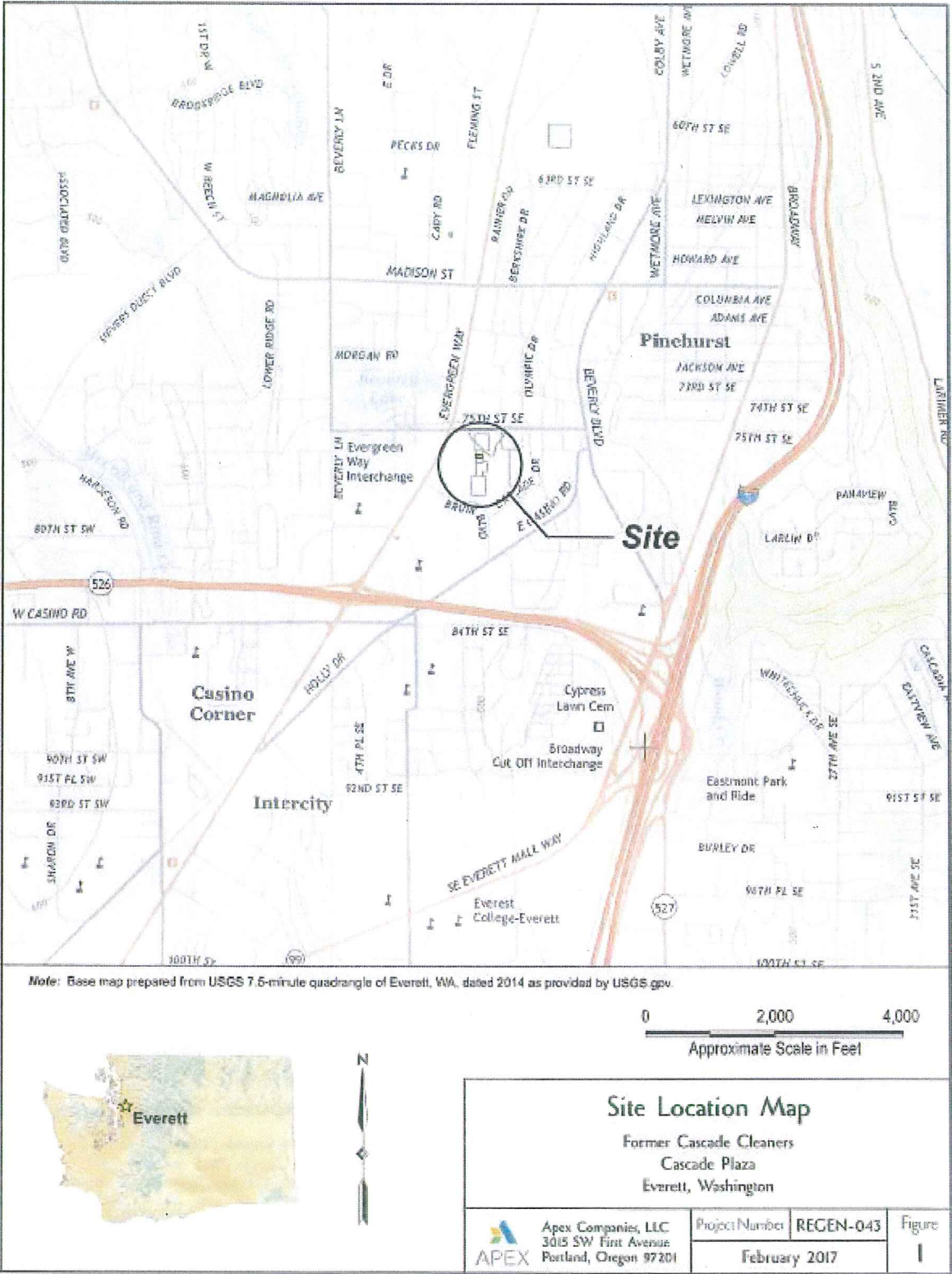




Figure 2 Locations of Soil, Soil Vapor and Ambient Air Sampling

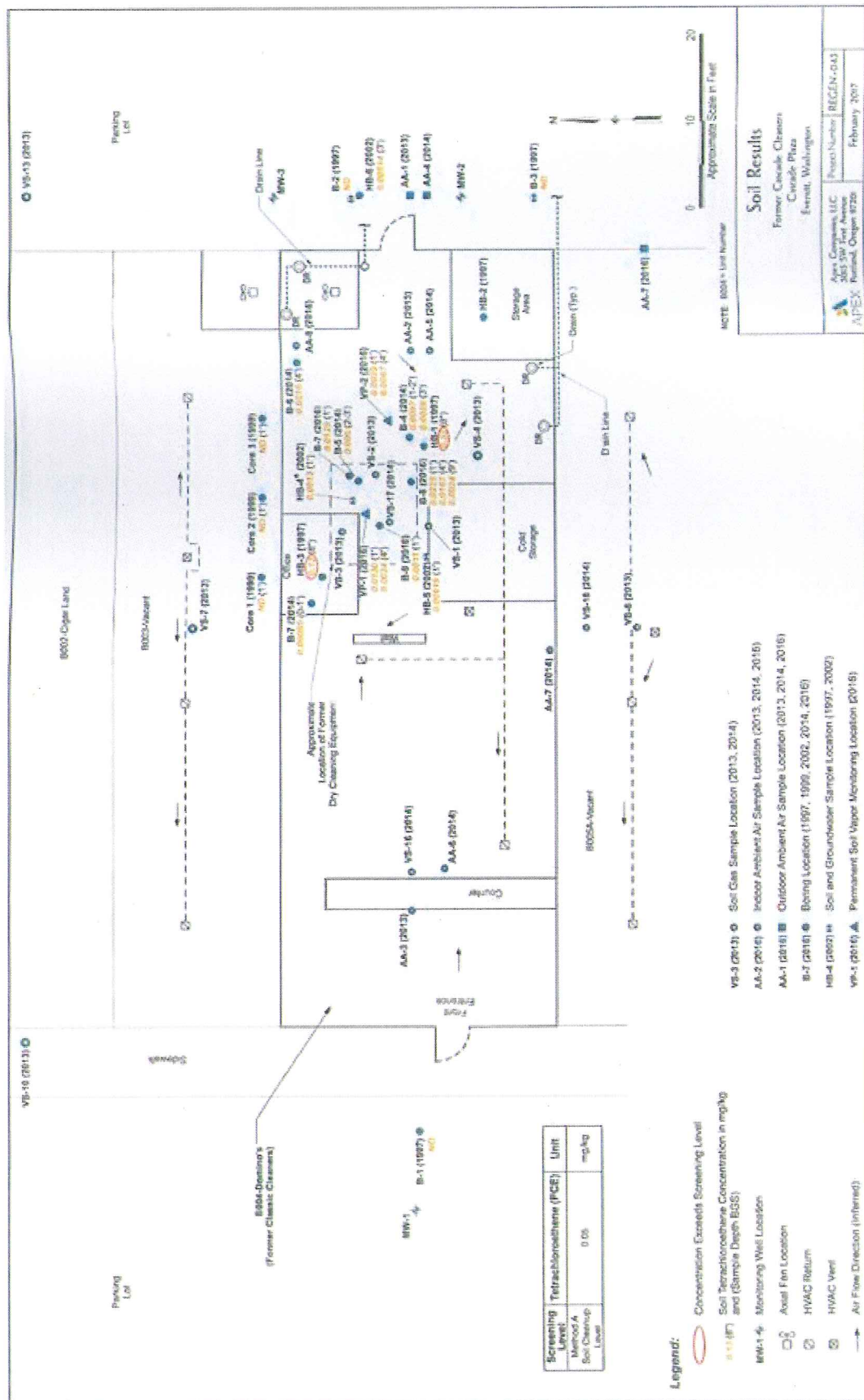


Figure 3 Locations of Ground Water Sampling

