

October 30, 2017

Mr. Jeremy Hughes  
Washington State Department of Ecology  
Southwest Regional Office  
PO Box 47775  
Olympia, Washington 98504-7775

**BY MAIL AND E-MAIL**

**RE: ADDENDUM TO SAMPLING AND ANALYSIS WORK PLAN  
WOODWORTH LAKEVIEW FACILITY REMEDIATION  
2800 104<sup>TH</sup> STREET COURT SOUTH, LAKEWOOD, WASHINGTON  
FARALLON PN: 188-002  
VCP IDENTIFICATION NO: SW1012**

Dear Mr. Hughes:

Farallon Consulting, L.L.C. (Farallon) has prepared this Addendum to the Sampling and Analysis Work Plan (Addendum) on behalf of Woodworth Capital, Inc. to provide the additional scope of work to complete the subsurface investigation and groundwater monitoring and sampling required by the Washington State Department of Ecology (Ecology) for the property at 2800 104<sup>th</sup> Street Court South in Lakewood, Washington (herein referred to as the Lakeview Facility) (Figure 1). The Addendum supplements the Ecology-approved scope of work described in *Sampling and Analysis Work Plan, Lakeview Facility, 2800 104<sup>th</sup> Street Court South, Lakewood, Washington* dated September 25, 2017, prepared by Farallon (SAWP). The Addendum has been prepared in response to the letter regarding Review of September 25, 2017 "Sampling and Analysis Work Plan, Lakeview Facility, 2800 104<sup>th</sup> Street Court South, Lakewood, Washington, VCP Identification SW1012" dated October 12, 2017 from Mr. Jeremy Hughes of Ecology to Mr. Branislav Jurista of Farallon (Ecology Letter) (Attachment A).

The results of the scope of work provided in the SAWP and this Addendum will provide sufficient information to complete characterization of the nature and extent of hazardous substances at the Lakeview Facility and to support the technical requirements for regulatory closure for the Lakeview Facility.

**ADDITIONAL FIELD PROGRAM SCOPE OF WORK**

The Ecology-approved scope of work in the SAWP will be modified to include the additional scope of work described below to address each Ecology Comment.

***Item 1: PCBs and PAHs as Constituents of Concern***

Ecology requested collection of soil samples for laboratory analysis for polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) in Areas of Concern (AOC) 1, 2, and 3 and



the areas indicated as the asphalt plant, tar tank, and hot mix plant (Figure 2). The scope of work will include:

- Collecting a soil sample from between 7 and 9 feet below ground surface (bgs) as close as practicable to the location of prior soil sample A1-7040710-6 in AOC-1 for analysis for total petroleum hydrocarbons as diesel-range organics (DRO) and as oil-range organics (ORO), PCBs, and carcinogenic PAHs (see Item 2 below) (Figure 3).
- Collecting a soil sample from 5 feet bgs at the location of prior soil sample A2-040710-3 in AOC-2 for analysis for DRO, ORO, PCBs, and carcinogenic PAHs (Figure 4).
- Collecting a soil sample from 7.5 feet bgs as close as practicable to the location of prior soil sample A3-B2-P-100510-4.5 in AOC-3 and analyzed for DRO, ORO, PCBs, and carcinogenic PAHs (Figure 5).
- Advancing three borings to 10 feet bgs in the areas identified as the asphalt plant, tar tank, and hot mix plant (Figure 6). A minimum of one soil sample collected from each of these borings will be analyzed for DRO, ORO, PCBs, and carcinogenic PAHs.
- Advancing five borings in the area proximate to the reported former location of the Washington State Department of Transportation testing laboratory. A minimum of one soil sample collected from each of these borings will be analyzed for volatile organic compounds (VOCs), DRO, and ORO (Figure 6). Two soil samples with highest concentrations of DRO and ORO from these borings be analyzed for PCBs and carcinogenic PAHs.

### ***Item 2: Addendum Soil Investigation Activities***

A soil sample will be collected from 7 to 9 feet bgs as close as practicable to the location of prior soil sample A1-7040710-6 in AOC-1 (Figure 3).

### ***Item 3: Addendum Groundwater Monitoring and Sampling***

Ecology requested collection of groundwater samples from the locations identified in the SAWP for analysis for VOCs, rather than for analysis for halogenated VOCs; and that monitoring wells MW-10B, MW-12B, and MW-21 and remediation wells AS-9 and AS-10 be included in the groundwater monitoring and sampling field program. Ecology requested that monitoring wells MW-9B and MW-12B be included in the groundwater monitoring and sampling field program, contingent upon detection of trichloroethene in monitoring well MW-23 (Figures 2 and 7). Groundwater samples collected from monitoring well MW-21 will also be analyzed for DRO and ORO.

The SAWP will be amended to include following scope of work, summarized in Revised Table 1 of this Addendum, which replaces Table 1 in the SAWP:

- Groundwater samples collected from the monitoring well defined in Section 3.2 of the SAWP will be analyzed for a full list of VOCs included in the U.S. Environmental Protection Agency Method 8260C;



- Groundwater samples collected from monitoring well MW-21 will be analyzed for VOCs, DRO, and ORO;
- Groundwater samples collected from remediation wells AS-9 and AS-10 will be analyzed for VOCs;
- Groundwater samples collected from monitoring well MW-10B will be analyzed for VOCs; and
- Groundwater samples collected from monitoring wells MW-9B and MW-12B will be analyzed for VOCs, contingent upon detection of trichloroethene in groundwater samples collected from monitoring well MW-23.

***Item 4: Data Compilation and Reporting***

Copies of all boring logs, field forms, and laboratory analytical reports generated by the field investigation will be provided in the Addendum to the Focused Feasibility Study and Disproportionate Cost Analysis Report.

**SCHEDULE**

The schedule for implementation of the scope of work in the SAWP and Addendum will be modified in accordance with the following schedule:

<b>DELIVERABLE/WORK ELEMENT</b>	<b>SCHEDULE</b>
Addendum	To Ecology by the end of October 2017
Ecology Comments on the Addendum	Within 15 days of receiving the Addendum (i.e., mid-November 2017)
Soil Investigation Field Work	Within 15 to 20 days of Ecology receipt of the Addendum (i.e., mid-November 2017)
Groundwater Monitoring and Sampling	Within 30 days of Ecology receipt of the Addendum (i.e., end of November 2017)
Receipt of Laboratory Results	Within 15 days of completion of field activities (i.e., mid-December 2017)
Addendum to Focused Feasibility Study and Disproportionate Cost Analysis Report	Within 30 days of receipt of laboratory analytical results (i.e., mid-January 2018)



Electronic Data Submittal to Environmental Information Management database	At approximately the same time as the submittal of the Addendum to Focused Feasibility Study and Disproportionate Cost Analysis Report to Ecology (i.e., mid-January 2018)
Ecology Comments on the Addendum to Focused Feasibility Study and Disproportionate Cost Analysis Report	Within 90 days of receipt of the Addendum to Focused Feasibility Study and Disproportionate Cost Analysis Report and Electronic Data Submittal (i.e., April 2018)

### CLOSING

Farallon appreciates the opportunity to provide the requested information, and trusts that this provides sufficient information to address the comments provided in the Ecology Letter. If you have questions, please contact either of the undersigned at (425) 295-0800.

Sincerely,

**Farallon Consulting, L.L.C.**

Brani Jurista, L.G., P.G.  
Senior Geologist

Peter Jewett, L.G., L.E.G.  
Principal Engineering Geologist

Attachments: Figure 1, *Site Vicinity Map*  
Figure 2, *Site Plan*  
Figure 3, *AOC 1 Soil Sample Locations*  
Figure 4, *AOC 2 Soil Sample Locations*  
Figure 5, *AOC 3 Soil Sample Locations*  
Figure 6, *Boring Locations*  
Figure 7, *Site Plan Detail for Area Around Former WSDOT Testing Lab*  
Revised Table 1, *Groundwater Sampling Matrix*  
Attachment A, Ecology Letter

cc: Jeff Woodworth, Woodworth Capital, Inc. (by e-mail)  
Nicholas Acklam, Ecology (by e-mail)  
Rebecca Lawson, Ecology (by e-mail)

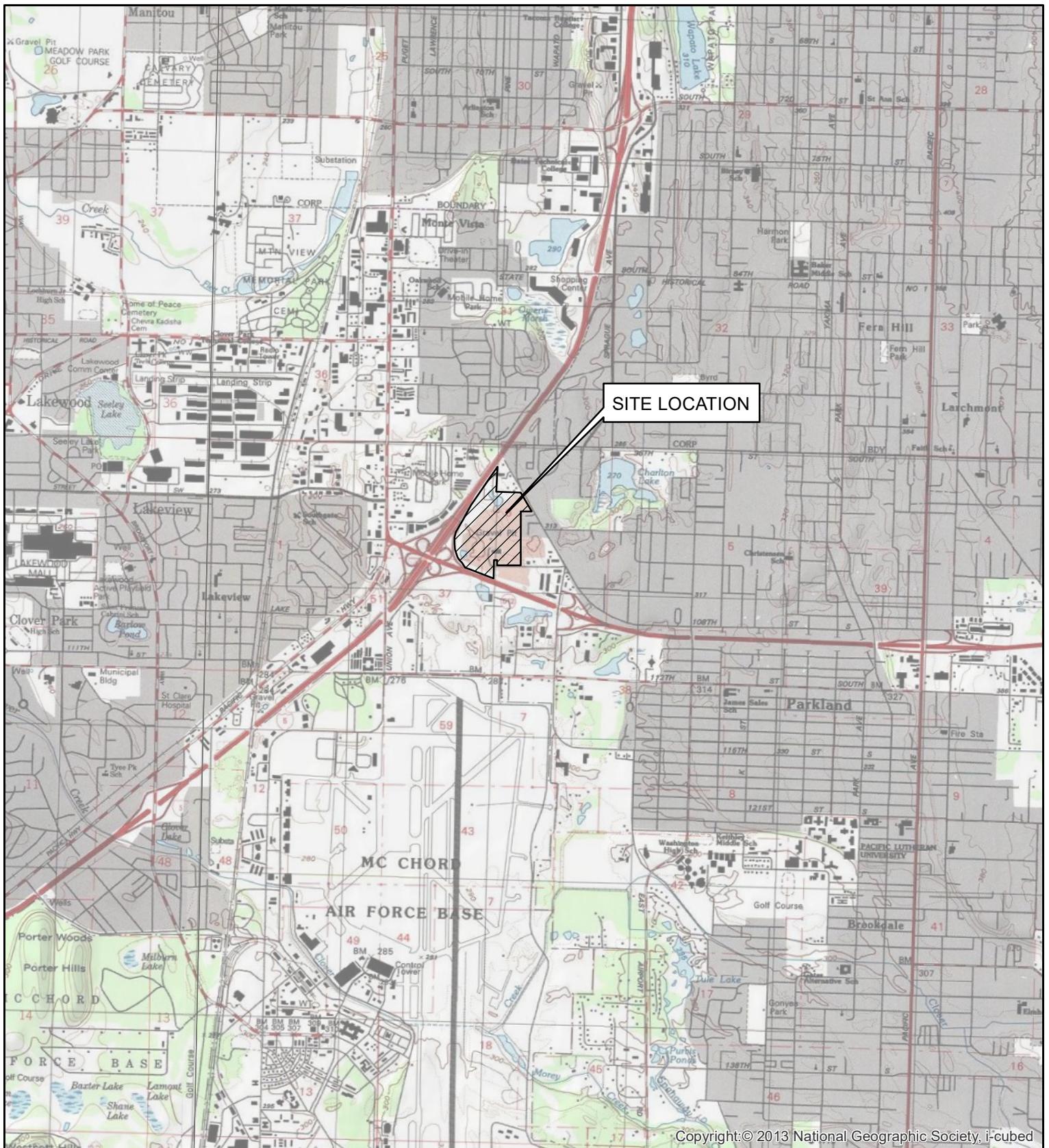
BJ/PJ:tlc

## **FIGURES**

### **ADDENDUM TO SAMPLING AND ANALYSIS WORK PLAN Woodworth Lakeview Facility Remediation 2800 104<sup>th</sup> Street Court South Lakewood, Washington**

Farallon PN: 188-002





REFERENCE: 7.5 MINUTE USGS QUADRANGLE TACOMA SOUTH, WASHINGTON, DATED 2011



0 3,000  
SCALE IN FEET



Quality Service for Environmental Solutions | [farallonconsulting.com](http://farallonconsulting.com)

Washington  
Issaquah | Bellingham | Seattle

Oregon  
Portland | Bend | Baker City

California  
Oakland | Sacramento | Irvine

## FIGURE 1

**SITE VICINITY MAP  
LAKEVIEW FACILITY  
2800 104TH STREET COURT SOUTH  
LAKEWOOD, WASHINGTON  
FARALLON PN: 188-002**

Drawn By: jones

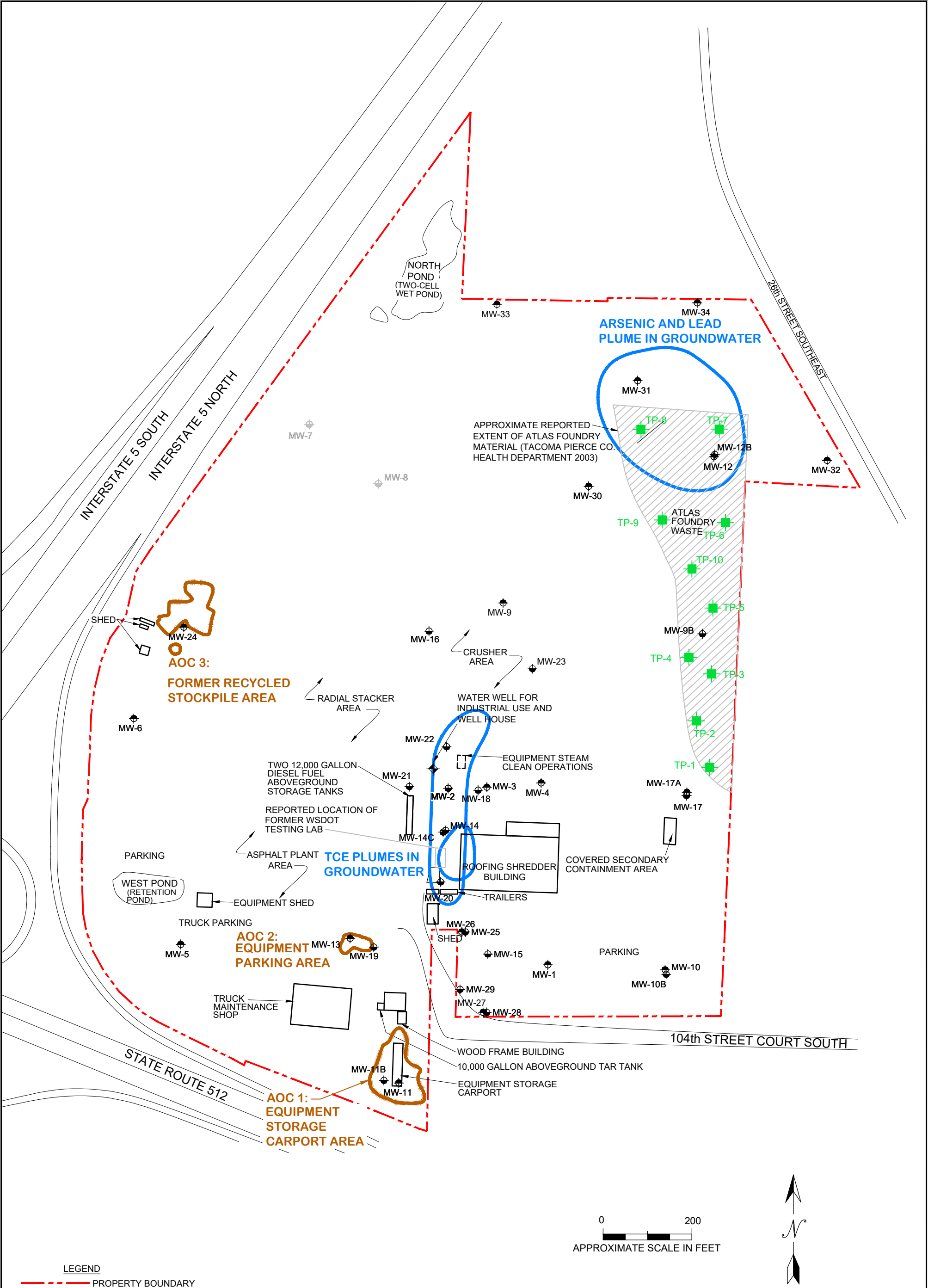
Checked By: BJ

Date: 9/14/2017

Disc Reference:

Document Path: Q:\Projects\188 Woodworth\Mapfiles\FIGURE 1 SITE VICINITY MAP WA.mxd





- LEGEND**
- PROPERTY BOUNDARY
  - APPROXIMATE AREA OF COMPLETED SOIL CLEANUP ACTION
  - APPROXIMATE AREA OF GROUNDWATER CLEANUP ACTION
  - MW-11 MONITORING WELL SCREENED IN SHALLOW WATER-BEARING ZONE
  - MW-15 MONITORING WELL SCREENED IN DEEP WATER-BEARING ZONE
  - MW-8 DECOMMISSIONED MONITORING WELL
  - TEST PIT
  - WSDOT WASHINGTON STATE DEPARTMENT OF TRANSPORTATION
  - TCE TRICHLOROETHENE
  - AOC AREA OF CONCERN
- ALL LOCATIONS OF SITE FEATURES ARE APPROXIMATE.



**FARALLON**  
CONSULTING

Quality Service for Environmental Solutions | farallonconsulting.com

Washington  
Issaquah | Bellingham | Seattle

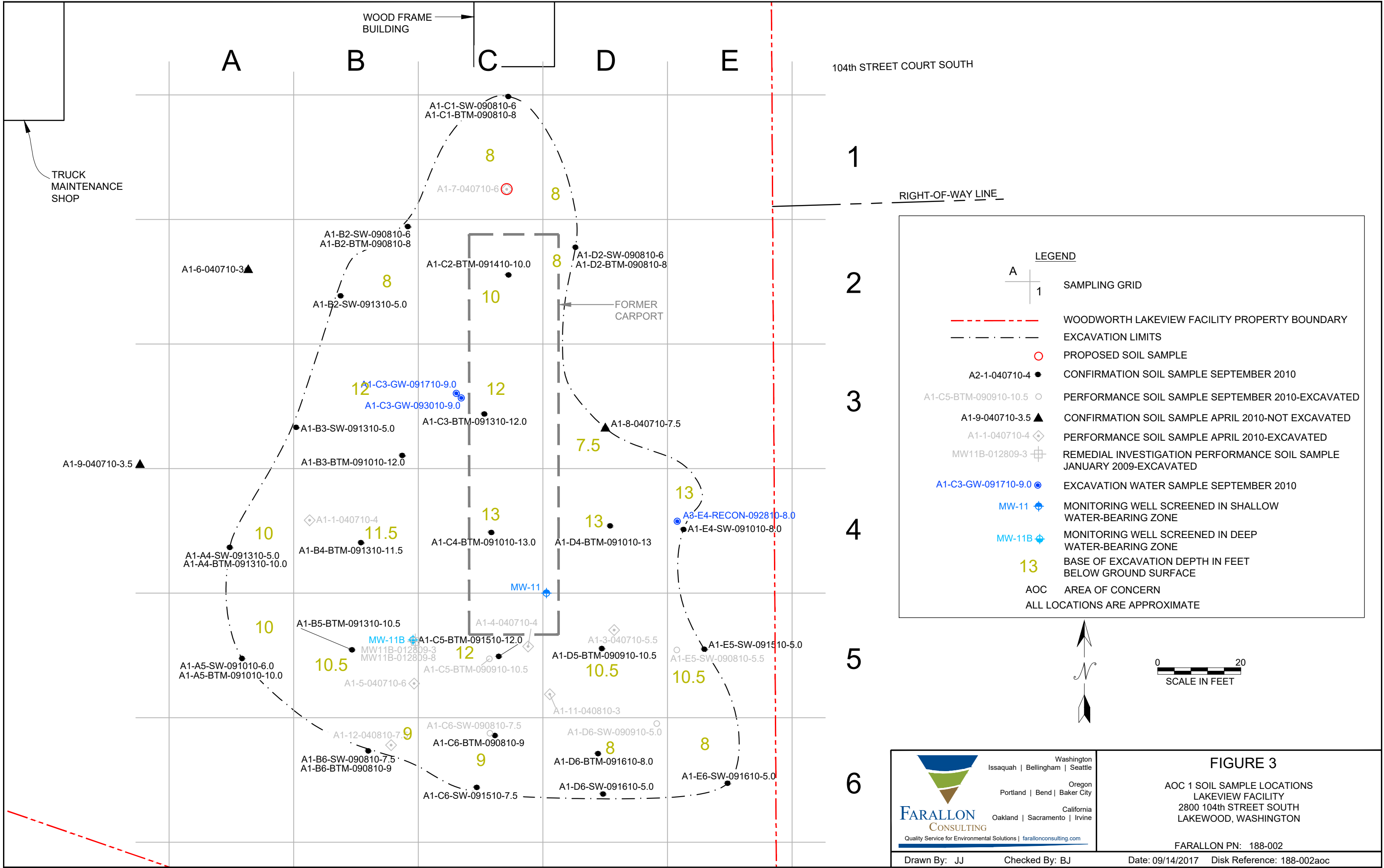
Oregon  
Portland | Bend | Baker City

California  
Oakland | Sacramento | Irvine

**FIGURE 2**

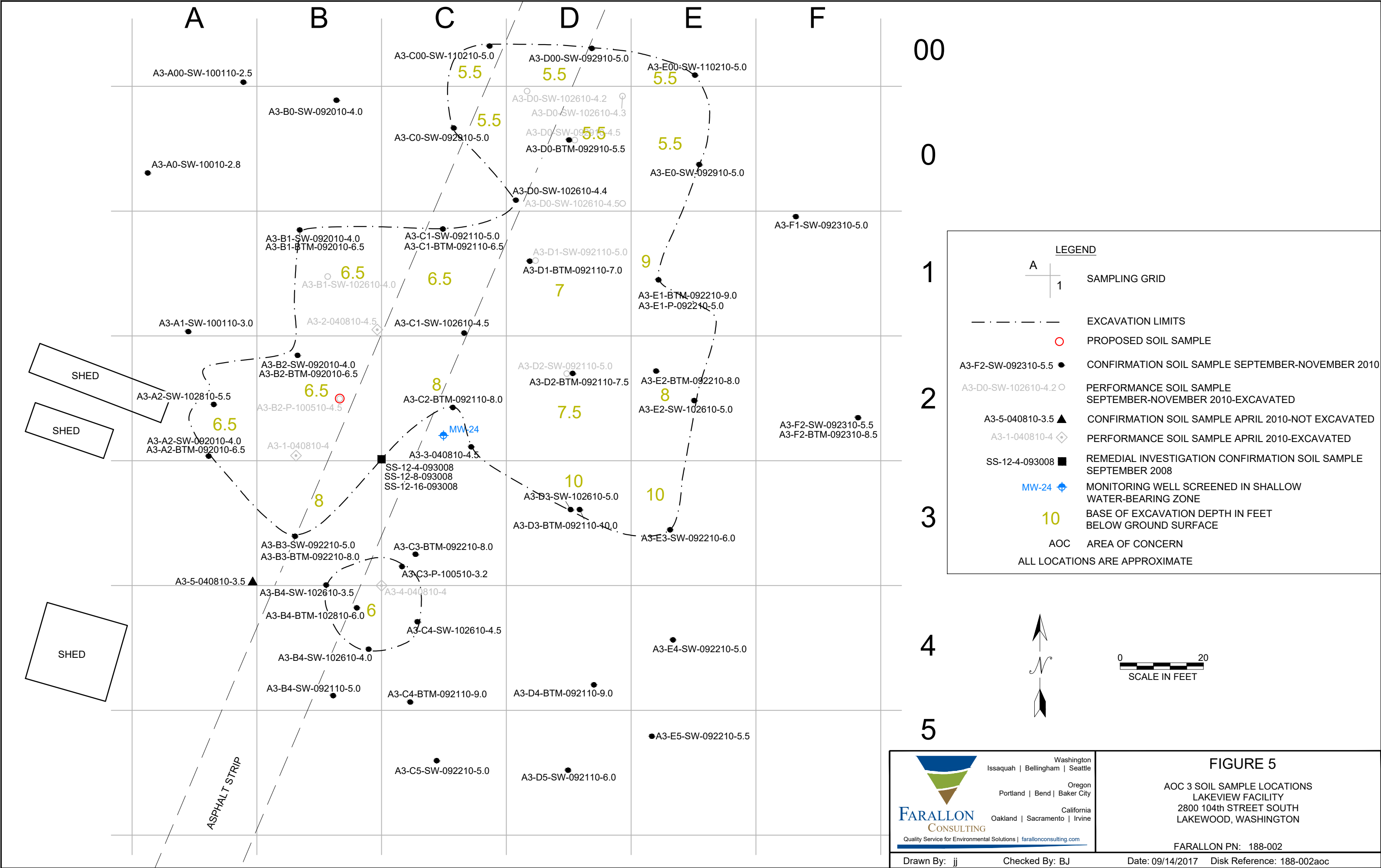
SITE PLAN  
LAKEVIEW FACILITY  
2800 104th STREET COURT SOUTH  
LAKEWOOD, WASHINGTON

FARALLON PN: 188-002

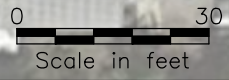












LEGEND

- PROPOSED BORING LOCATION
- BORING LOCATION
- MONITORING WELL SCREENED IN SHALLOW WATER-BEARING ZONE
- MONITORING WELL SCREENED IN DEEP WATER-BEARING ZONE

- SVE-12 SOIL VAPOR EXTRACTION WELL IN SHALLOW WATER-BEARING ZONE
- SVE-2 SOIL VAPOR EXTRACTION WELL IN DEEP WATER-BEARING ZONE
- AS/SVE AIR SPARGE AND SOIL VAPOR EXTRACTION WELL PAIR

**FARALLON**  
CONSULTING  
Quality Service for Environmental Solutions | [farallonconsulting.com](http://farallonconsulting.com)

Washington  
Issaquah | Bellingham | Seattle

Oregon  
Portland | Bend | Baker City

California  
Oakland | Sacramento | Irvine

**FIGURE 6**

BORING LOCATIONS  
LAKEVIEW FACILITY  
2800 104th STREET COURT SOUTH  
LAKEWOOD, WASHINGTON

FARALLON PN: 188-002

Drawn By: JJ      Checked By: BJ      Date: 10/24/2017      Disk Reference: 188002b

P:\188 Woodworth Capital\188002 Woodworth Lakeview Remed\Drawings Plots\188-002b-v2.dwg, 10/27/2017 9:07:51 AM, DWG To PDF.pc3



LEGEND

MW-11

MONITORING WELL SCREENED IN SHALLOW WATER-BEARING ZONE

MW-15

MONITORING WELL SCREENED IN DEEP WATER-BEARING ZONE

SVE-12

SOIL VAPOR EXTRACTION WELL IN SHALLOW WATER-BEARING ZONE

SVE-2

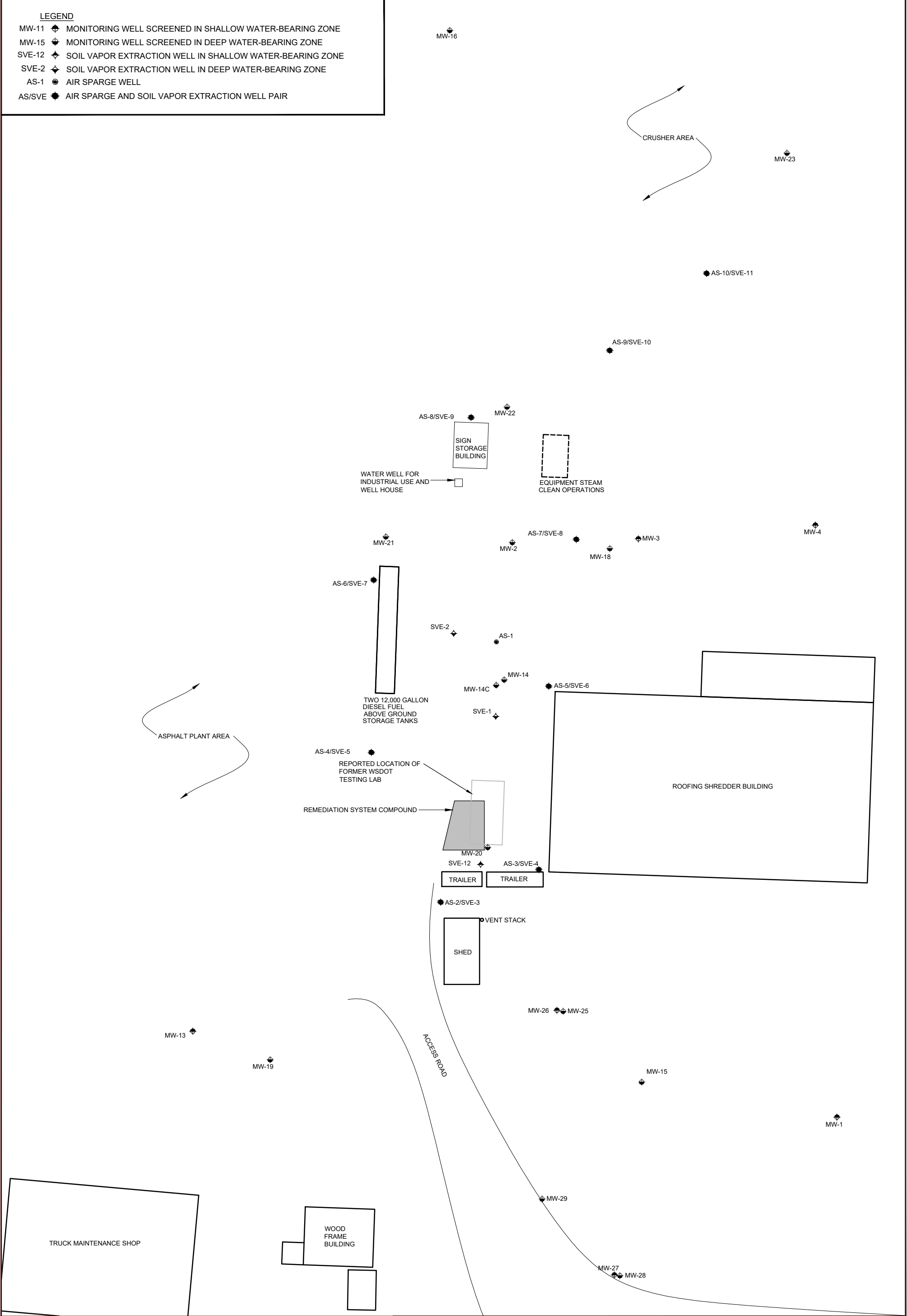
SOIL VAPOR EXTRACTION WELL IN DEEP WATER-BEARING ZONE

AS-1

AIR SPARGE WELL

AS/SVE

AIR SPARGE AND SOIL VAPOR EXTRACTION WELL PAIR





## **TABLE**

### **ADDENDUM TO SAMPLING AND ANALYSIS WORK PLAN Woodworth Lakeview Facility Remediation 2800 104<sup>th</sup> Street Court South Lakewood, Washington**

Farallon PN: 188-002

Revised Table 1  
Groundwater Sampling Matrix  
Woodworth Lakeview Facility Remediation  
Lakewood, Washington  
Farallon PN: 188-002

Well Identification	Water-Bearing Zone	Depth to Water Measurement	DRO <sup>1, 11</sup>	ORO <sup>1, 11</sup>	VOCs <sup>2, 12</sup>	1,4-Dioxane <sup>3</sup>	Total and Dissolved Arsenic <sup>4, 13</sup>	Total and Dissolved Lead <sup>4, 13</sup>	Geochemical and Monitored Natural Attenuation Parameters <sup>14</sup>												Total Organic Carbon <sup>10</sup>
									Dissolved Oxygen <sup>5</sup>	Nitrate <sup>6</sup>	Ferrous Iron <sup>7</sup>	Sulfate <sup>8</sup>	Nitrite <sup>6</sup>	Dissolved Methane <sup>9</sup>	Dissolved Ethane <sup>9</sup>	Dissolved Ethene <sup>9</sup>	pH <sup>5</sup>	Temperature <sup>5</sup>	Specific Conductance <sup>5</sup>	ORP <sup>5</sup>	
MW-1	Shallow	X																			
MW-2	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-3	Shallow	X			X				X								X	X	X	X	
MW-4	Shallow	X																			
MW-5	Shallow	X	X	X					X								X	X	X	X	
MW-6	Shallow	X	X	X					X								X	X	X	X	
MW-7	Deep	Destroyed																			
MW-8	Deep	Destroyed																			
MW-9	Shallow	X					X	X	X								X	X	X	X	
MW-9B	Deep	X			Y																
MW-10	Shallow	X																			
MW-10B	Deep	X			X																
MW-11	Shallow	X	X	X					X								X	X	X	X	
MW-11B	Deep	X	X	X					X								X	X	X	X	
MW-12	Shallow	X					X	X	X								X	X	X	X	
MW-12B	Deep	X			Y		X	X	X								X	X	X	X	
MW-13	Shallow	X	X	X					X								X	X	X	X	
MW-14	Deep	X			X	?			X	X	X	X	X	X	X	X	X	X	X	X	X
MW-14C	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-15	Deep	X			X				X								X	X	X	X	
MW-16	Deep	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-17A	Shallow	X																			
MW-17	Deep	X																			
MW-18	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-19	Deep	X	X	X	X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-20	Deep	X			X	?			X	X	X	X	X	X	X	X	X	X	X	X	X
MW-21	Deep	X	X	X	X																
MW-22	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-23	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-24	Shallow	X	X	X					X								X	X	X	X	
MW-25	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-26	Shallow	X			X				X								X	X	X	X	
MW-27	Shallow	X																			
MW-28	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
MW-29	Deep	X			X				X								X	X	X	X	
MW-30	Shallow	X					X	X	X								X	X	X	X	
MW-31	Shallow	X					X	X	X								X	X	X	X	
MW-32	Shallow	X					X	X	X								X	X	X	X	
MW-33	Shallow	X					X	X	X								X	X	X	X	
MW-34	Shallow	X					X	X	X								X	X	X	X	

Revised Table 1  
Groundwater Sampling Matrix  
Woodworth Lakeview Facility Remediation  
Lakewood, Washington  
Farallon PN: 188-002

Well Identification	Water-Bearing Zone	Depth to Water Measurement	DRO <sup>1, 11</sup>	ORO <sup>1, 11</sup>	VOCs <sup>2, 12</sup>	1,4-Dioxane <sup>3</sup>	Total and Dissolved Arsenic <sup>4, 13</sup>	Total and Dissolved Lead <sup>4, 13</sup>	Geochemical and Monitored Natural Attenuation Parameters <sup>14</sup>												Total Organic Carbon <sup>10</sup>
									Dissolved Oxygen <sup>5</sup>	Nitrate <sup>6</sup>	Ferrous Iron <sup>7</sup>	Sulfate <sup>8</sup>	Nitrite <sup>6</sup>	Dissolved Methane <sup>9</sup>	Dissolved Ethane <sup>9</sup>	Dissolved Ethene <sup>9</sup>	pH <sup>5</sup>	Temperature <sup>5</sup>	Specific Conductance <sup>5</sup>	ORP <sup>5</sup>	
SVE-1	Deep	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
SVE-2	Deep	X	X	X	X				X								X	X	X	X	
SVE-3	Shallow	X			X				X								X	X	X	X	
SVE-4	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
SVE-5	Deep	X	X	X					X								X	X	X	X	
SVE-6	Shallow	X			X				X								X	X	X	X	
SVE-7	Deep	X	X	X					X								X	X	X	X	
SVE-9	Deep	X	X	X					X								X	X	X	X	
SVE-10	Deep	X			X				X								X	X	X	X	
SVE-11	Deep	X			X				X								X	X	X	X	
SVE-12	Shallow	X			X				X	X	X	X	X	X	X	X	X	X	X	X	X
AS-1	Deep	X			X				X								X	X	X	X	
AS-2	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-3	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-4	Deep	X			X				X								X	X	X	X	
AS-5	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-6	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-7	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-8	Deep	No groundwater monitoring or sampling planned <sup>11, 12, 13, 14</sup>																			
AS-9	Deep	X			X																
AS-10	Deep	X			X																
Industrial Well	Regional	X			X				X								X	X	X	X	

NOTES:

<sup>1</sup>Analyzed by Northwest Method NWTPH-Dx.

<sup>2</sup>Analyzed by U.S. Environmental Protection Agency (EPA) Method 8260C.

<sup>3</sup>Analyzed by EPA Method 8270D.

<sup>4</sup>Analyzed by EPA Method 200.8.

<sup>3</sup>Collected using a YSI or HORIBA multimeter and flow-through cell.

<sup>6</sup>Analyzed by EPA Method 353.2.

<sup>7</sup>Collected and analyzed in yjr field using a portable ferrous iron test kit.

<sup>8</sup>Analyzed by ASTM D516-07.

<sup>9</sup>Analyzed by EPA Method RSK-175.

<sup>10</sup>Analyzed by Standard Method 5310B/EPA Method 9060A.

<sup>11</sup>Monitoring wells to be sampled for DRO and ORO analysis were selected based on their proximity to areas of concern formerly impacted by total petroleum hydrocarbons and include monitoring wells specifically requested to be sampled by the Washington State Department of Ecology.

<sup>14</sup>Monitoring wells to be sampled for VOC analysis were selected based on their proximity to the area impacted by trichloroethene.

<sup>13</sup>Monitoring wells to be sampled for arsenic and lead analysis were selected based on their proximity to the area impacted by those metals.

<sup>14</sup>Monitoring wells sampled for geochemical and monitored natural attenuation parameters were selected based on the request by the Washington State Department of Ecology. The geochemical and monitored natural attenuation parameters selected for analysis are the most common electron donors and metabolic byproducts of anaerobic biodegradation.

DRO = total petroleum hydrocarbons as diesel-range organics

ORO = total petroleum hydrocarbons as oil-range organics

ORP = oxidation-reduction potential

VOCs = volatile organic compounds

X = Groundwater sample will be analyzed

Y = Contingent upon detection of trichloroethene in groundwater samples from monitoring well MW-23

? = Two groundwater samples with highest detections of trichloroethene will be analyzed for 1,4-dioxane.

Historically, the two highest detections of trichloroethene concentrations were in groundwater samples collected from monitoring wells MW-20 and MW-14.

**ATTACHMENT A  
ECOLOGY LETTER**

**ADDENDUM TO SAMPLING AND ANALYSIS WORK PLAN  
Woodworth Lakeview Facility Remediation  
2800 104<sup>th</sup> Street Court South  
Lakewood, Washington**

**Farallon PN: 188-002**





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

October 12, 2017

Mr. Branislav Jurista  
Farallon Consulting, LLC  
975 5th Avenue Northwest, Suite 100  
Issaquah, WA 98027

**Re: Review of September 25, 2017 "Sampling and Analysis Work Plan, Lakeview Facility, 2800 104<sup>th</sup> Street Court South, Lakewood, Washington, VCP Identification No. SW1012"**

**Site Address:** 2800 104<sup>th</sup> Street Court South, Tacoma, WA 98499  
**Facility/Site No.** 1372  
**Cleanup Site No.** 165  
**VCP Project No.** SW1012

Dear Mr. Jurista:

The Washington State Department of Ecology (Ecology) received your September 25, 2017, ***Sampling and Analysis Work Plan*** (2017 Work Plan) for the Woodworth Lakeview Facility, located at 2800 104<sup>th</sup> Street Court South in Tacoma, Washington (the Site). The 2017 Work Plan was prepared by Farallon Consulting, Inc. (Farallon) on behalf of Woodworth Capital, Inc. (Woodworth) and describes the proposed scope of work to further characterize the nature and extent of chemicals of concern (COCs) in soil and groundwater beneath the Site. The intent of this transmittal is to provide Ecology's comments on the 2017 Work Plan as provided for under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

**Ecology Comments**

***Item 1: PCBs and PAHs as Constituents of Concern***

In Ecology's letter to Farallon, dated May 25, 2017, Ecology requested additional soil testing of polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) in the areas of the Washington State Department of Transportation (WSDOT) asphalt-testing laboratory area, and adjacent features indicated as "asphalt plant", "tar tank", and "hot mix plant areas."

Despite Ecology's requests to collect these data, the 2017 Work Plan provided a "*technical rationale that confirms PCBs and PAHs are not constituents of concern for the Lakeview Facility*" and cited Footnote 15 from Table 830-1 of MTCA (Required Testing for Petroleum

Mr. Branislav Jurista

October 12, 2017

Page 2

Releases), which states that *“testing for PCBs is required unless it can be demonstrated that...oil containing PCBs was never used in the equipment suspected as the source of the release.”* No such definitive demonstration has been made regarding the historical use of PCB-containing oil at the Site to date. Additionally, the documented presence of PCBs in some asphalt sealants also constitutes a potential source of these constituents in shallow soil in areas where recycled asphalt was processed at the Site. To demonstrate such PCB-containing materials have not been historically handled at the Site, please provide appropriate analytical data, testing documentation, or facility records regarding these historically-managed materials.

Farallon also asserts that *“based on the operational history and sources of contamination limited to vehicle maintenance and releases of used motor oil, PCBs are not considered a constituent of concern for the Lakeview Facility.”* Footnote 15 of Table 830-1 provides *“examples of equipment where PCBs are likely to be found”*, including *“electric motors”* and *“hydraulic systems”*; both of which have been historically housed and maintained at the Site. Additionally, in accordance with Table 830-1 (Footnote 8), **testing of PCBs for waste oils (i.e. used motor oil), “is required in a sufficient number of samples to determine whether this chemical is present at concentrations of concern.” This sampling has not been performed for PCBs at the Site,** to date.

It should be noted that Footnote 8 **also requires sampling of PAHs at sites where waste and used motor oils have been released.** As noted in an e-mail from Ecology to Farallon (March 10, 2016), *“Ecology does not consider two samples being analyzed for cPAHs as adequate, let alone representative, of the areas investigated”* (i.e. a sufficient number of samples was not obtained). Only 2 of the 127 samples previously collected from AOCs 2 and 3 were submitted for PAH analysis; a number which Ecology does not consider representative given the size of the Site and location of potential source areas of this contaminant. Additionally, the soil sample located closest to the suspected source areas (asphalt plant, tar tank, and hot mix plant areas) revealed detections of PAHs (sample A2-B1W), whereas the sample located distal to those areas (sample A3-B2, located along the western edge of the property) did not detect concentrations of PAHs above their respective PQLs.

Based on the above information, and due to the PCB- and PAH-containing nature of substances historically handled at the Site (as distinct from use or documented releases of these constituents), **Ecology continues to request soil testing for PCBs and PAHs in the areas previously described as required in Table 830-1 (and associated footnotes) of MTCA.**

Ecology is not requesting analysis of PCBs and PAHs in groundwater beneath the Site at this time.

Based on the requirements described in MTCA and multiple requests from Ecology personnel, the 2017 Work Plan should be revised to include these analyses. This work plan will not receive Ecology-approval until these sampling elements have been included.

***Item 2: Proposed Soil Investigation Activities***

Ecology generally concurs of the scope of work presented in the 2017 Work Plan regarding AOCs 1 through 3, with the following exception:

- The current proposed depth (“approximately 7 feet bgs”) for sample collection associated with former location A1-7040710-6 (AOC-1), should be increased to account for the approximate depth of excavation within this area (approximately 8 feet below ground surface [bgs]). Soil samples obtained at this location should be collected from at least 9 feet bgs.

***Item 3: Proposed Groundwater Monitoring and Sampling***

Ecology is requesting that Section 3.2 of the 2017 Work Plan be revised to address or include the following:

- Section 3.2 of the 2017 Work Plan discusses analysis of volatile organic compounds (VOCs) for site monitoring and remediation wells; however, Table 1 (*Groundwater Sampling Matrix*) provides for analysis of halogenated VOCs, only. The 2017 Work Plan should be revised to include analysis of VOCs for all locations currently proposed for HVOC analysis;
- Addition of monitoring location MW-21 for sampling and analysis of VOCs and TPH to evaluate the western extent of dissolved-phase trichloroethylene (TCE) and potential presence of petroleum hydrocarbons adjacent to the diesel fuel above-ground storage tanks (ASTs), respectively, in deeper-groundwater;
- Addition of well locations AS-9 and AS-10 for sampling and analysis of VOCs to evaluate the current dissolved-phase TCE plume geometry in deeper groundwater beneath the Site;
- Addition of monitoring location MW-10B for analysis of VOCs to evaluate for potential upgradient, off-property sources of TCE; and
- Analysis of VOCs in deeper groundwater monitoring wells MW-9B and MW-12B, contingent upon detection of TCE in the groundwater samples collected from MW-23.

***Item 4: Data Compilation and Reporting***

Ecology is requesting that Section 4.0 of the 2017 Work Plan (*Data Compilation and Reporting*) be revised to include the attachment of copies of all boring logs, field forms, and laboratory analytical reports generated during completion of the activities proposed therein.

Mr. Branislav Jurista  
October 12, 2017  
Page 4

## Closing

Please note that requests for site-closure determinations (i.e. No Further Action) through the Voluntary Cleanup Program (VCP) are contingent upon compliance with requirements and directives provided through that Program.

As noted under Ecology's Reservation of Rights in the VCP Agreement "Ecology reserves all right under MTCA, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environmental and to issue order requiring such remedial actions."

## Contact Information

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 transmittal, please contact me by phone at (360) 407-0276 or e-mail at [jeremy.hughes@ecy.wa.gov](mailto:jeremy.hughes@ecy.wa.gov).

Sincerely,



Jeremy Hughes, LG  
SWRO Toxics Cleanup Program

JJH: lk

By Certified Mail: 91 7199 9991 7033 1283 3822

cc: Jeff Woodworth, President, Woodworth Capital, Inc.  
Nicholas M. Acklam, Ecology  
Stephanie Bussell, Ecology  
Rebecca Lawson, Ecology