

From: [Paul Craig](#)
To: [Fernandez, Sonia \(ECY\)](#)
Cc: [Bardy, Louise \(ECY\)](#)
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)
Date: Monday, November 06, 2017 10:51:56 AM
Attachments: [2011-08-11_Remediation Progress Report.pdf](#)
[2012-08-29_GWM Report.pdf](#)
[2012-08-29_Request for Ecology Opinion, cover letter.pdf](#)
[2012-10-12_Response to Ecology.pdf](#)
[2014-05-23_Response to Ecology.pdf](#)
[VCP No. NW1719_Update Letter_11.24.14.pdf](#)
[VCP No. NW1719_Update Letter_06-11-15.pdf](#)
[VCP No. NW1719_Update Letter_03-31-16.pdf](#)
[VCP No. NW1719_Update Letter_09-23-16.pdf](#)
[VCP No. NW1719_Update Letter_04.27.17.pdf](#)

Hi, Sonia,

Thanks very much for helping to get things back on track for the site. Let's answer your questions first.

- Are you thinking that you close to closure?
We've been working towards tackling one challenge at a time for this site. Gasoline and benzene in groundwater is behind us and we've been air sparging for the past several years to strip out residual gasoline/benzene in soil. We were at the site last week to obtain confirmation soil samples via direct-push borings to evaluate residual gasoline/benzene concentrations in soil. Assuming sample results are less than cleanup levels, we'll next evaluate arsenic in groundwater in our compliance monitoring wells. At some point we'll evaluate indoor air, as well, but that will occur at the end of the other activities.
- Are you requesting an opinion now? Soon?
[https://projects.geoengineers.com/sites/0740800208/Project Management/Historic File Review/Project Documents/2011-08-11_Remediation Progress Report.pdf](https://projects.geoengineers.com/sites/0740800208/Project%20Management/Historic%20File%20Review/Project%20Documents/2011-08-11_Remediation%20Progress%20Report.pdf)We won't need an opinion immediately, but, assuming our soil samples obtained last week are clean, we'll prepare a report and request an opinion. So, a request for opinion is likely within a couple months.
- Could you provide us with a schedule for final remediation and closure?
Assuming soil samples come back clean and the removal of residual petroleum in soil has had a positive affect to reduce arsenic in groundwater, we would need to get 4 quarters of clean groundwater samples for arsenic prior to requesting site closure and an NFA. That would put us out to about September 2018 if all goes well.

Attached are reports and letters that we have submitted to Ecology since 2011. This should help to bring correspondence up to date. If you need anything else, please give me a shout.

Thanks again for your help in getting things straightened out; I'm sure we'll be talking to one another soon. Have a terrific week.

Paul R. Craig, LG
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From: Fernandez, Sonia (ECY) [mailto:sofe461@ECY.WA.GOV]
Sent: Wednesday, November 1, 2017 2:55 PM
To: Paul Craig <pcraig@geoengineers.com>
Cc: Bardy, Louise (ECY) <LBAR461@ECY.WA.GOV>
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi Paul!

I finally was able to talk to my supervisor and we have some questions I hope you can answer and a request for you.

Based on the remediation you have done so far:

- Are you thinking that you close to closure?
- Are you requesting an opinion now? Soon?
- Could you provide us with a schedule for final remediation and closure?

Your answers to these questions will help us determine how we can do this. As I told you in an earlier e-mail, since it has been so long that this happened, we need to have a plan so that we can document our actions.

I did see in the paper file that there are several of your progress reports, the last one was for March 2016. Unfortunately, we only have electronic reports until 2011 in our database so I don't know what we are missing. I need to try to make sure that I can complete both the electronically and in paper file. Having a complete electronic record would help me determine what we are missing in Central Records so that we can work on it on completing them. That is something that a new site manager will need and we can try to do it right now. So here is my request. Would it be possible to get PDFs of the reports you submitted since 8/2011?

So let me know if all of this is possible and we can work together to get you back on track.

Take care!

Sonia
Sonia Fernández, LG

VCP Coordinator
Department of Ecology
Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008
425-649-7233
sofe461@ecy.wa.gov



From: Paul Craig [<mailto:pcraig@geoengineers.com>]
Sent: Tuesday, October 17, 2017 1:55 PM
To: Fernandez, Sonia (ECY) <sofe461@ECY.WA.GOV>
Cc: Meng, Sam (ECY) <same461@ECY.WA.GOV>
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi, Sonia,

I'm glad you made it back safely and I hope your family is doing well.

Relative to our project and re-entering the VCP, please consider the following when discussing the site with your supervisor:

- We entered the VCP in 2006, have provided many documents to Ecology and been provided with numerous opinion letters.
- The site was active and we have been working in accordance with an Ecology-reviewed work plan (August 29, 2012).
- Michael Kuntz sent a May 5, 2014 letter requesting a status update on the site.
- GeoEngineers responded on May 23, 2014 to the request with a status update and a plan to provide 6-month status update letters to Michael to keep him in the loop with progress at the site and upcoming site events. We have been sending these update letters through 2017 to Michael Kuntz' e-mail address.
- Michael Kuntz wrote on May 27, 2014, "Thank you for the reply. My receipt of your signed letter will constitute my decision to keep the Snelson Property site active in the Voluntary Cleanup Program." We sent a signed, hard copy letter to Michael.
- Nnamdi Madakor, unaware of Michael's May 27, 2014 correspondence, issued a termination letter on June 13, 2014.
- I wrote to Michael on June 18, 2014 to inform him of the termination letter and he spoke with Nnamdi about it.
- Nnamdi Madakor sent an e-mail to me on June 18, 2014 stating, "I will withdraw the termination letter."
- We have actively been air sparging at the site, obtaining confirmation cleanup soil samples, and providing 6-month status update letters to Michael's e-mail address. We never had any

returned e-mails based on Michael no longer working for Ecology or from anyone who may have taken responsibility for his e-mails. We assumed the site was active in the VCP.

We request that the termination letter be removed from the file, as Nnamdi promised to do, and the site be reactivated. We have, in good faith, been abiding by the guidelines set out by Michael Kuntz to keep the site active and feel it would be tremendously unfair to have to go to the back of the VCP line; especially when this started out as an oversight on Ecology's part. I'm available for any questions you may have or to provide backup information to support the timeline listed above.

Thanks very much for your help with this and I look forward to ultimately completing site cleanup through the VCP.

Paul R. Craig, LG
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From: Fernandez, Sonia (ECY) [<mailto:sofe461@ECY.WA.GOV>]

Sent: Tuesday, October 17, 2017 8:47 AM

To: Paul Craig <pcraig@geoengineers.com>

Cc: Meng, Sam (ECY) <same461@ECY.WA.GOV>

Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi Paul!

First of all, sorry I had not communicated with you yet. I went to Puerto Rico to visit family and got trapped by Hurricane Maria. I finally made it back last Saturday so I'm still playing catch up.

I need to talk to my supervisor about this but she has been out sick and just came back. Because this happened so long ago, the termination was never reverted, and things in the program have changed so much since then (even the forms have changed) it is extremely likely that you will need to reapply to the VCP and go through the waitlist. We have people that have been waiting for a long time to get in and we need to do everything in the order received.

Now, let me ask you this; are you seeking for an opinion right now? A deadline you are working

with?

Let me know what your needs are and as soon I can discuss with my supervisor, I'll let you know what I will need to get you back in.

Take care!

Sonia

Sonia Fernández, LG

VCP Coordinator

Department of Ecology

Northwest Regional Office

3190 160th Ave SE

Bellevue, WA 98008

425-649-7233

sofe461@ecy.wa.gov



From: Paul Craig [<mailto:pcraig@geoengineers.com>]

Sent: Monday, October 16, 2017 4:06 PM

To: Meng, Sam (ECY) <same461@ECY.WA.GOV>

Cc: Fernandez, Sonia (ECY) <sofe461@ECY.WA.GOV>

Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Thanks for your help on this, Sam. As the VCP Coordinator, Sonia should be able to help us get back on track.

Have a great rest of the week!

Paul R. Craig, LG

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From: Meng, Sam (ECY) [<mailto:same461@ECY.WA.GOV>]

Sent: Monday, October 16, 2017 4:01 PM

To: Paul Craig <pcraig@geoengineers.com>

Cc: Fernandez, Sonia (ECY) <sofe461@ECY.WA.GOV>

Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi Paul,

Since I wasn't one the previous managers on the site and they all left Ecology, I forwarded the site info and previous communication to our VCP coordinator, Sonia, at Ecology's Northwest Regional Office. I guess she's working on it and will contact you for more information. Her contact info is:

Fernandez Sonia

SOFE461@ecy.wa.gov

(425)649-7233

Thanks. Sorry for not updating you.

Sam

From: Paul Craig [<mailto:pcraig@geoengineers.com>]

Sent: Monday, October 16, 2017 2:35 PM

To: Meng, Sam (ECY) <same461@ECY.WA.GOV>

Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi, Sam,

Just wondering if you've been able to make any headway on this. Please let me know if any questions come up along the way and we'll work through them together.

Thanks very much for your help!

Paul R. Craig, LG

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document is stored by GeoEngineers, Inc. and will serve as the official document of record.

From: Meng, Sam (ECY) [<mailto:same461@ECY.WA.GOV>]
Sent: Tuesday, October 10, 2017 3:57 PM
To: Paul Craig <pcraig@geoengineers.com>
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi Paul,

Just to confirm that I received the info regarding VCP site NW1719. I'll ask around.

Sam

From: Paul Craig [<mailto:pcraig@geoengineers.com>]
Sent: Tuesday, October 10, 2017 11:11 AM
To: Meng, Sam (ECY) <same461@ECY.WA.GOV>
Subject: FW: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hi, Sam,

It was nice talking with you earlier. Attached is the termination letter that is still on file for this site and the e-mail chain below that includes Nnamdi's promise to remove the letter. I also included the e-mail I sent to Nnamdi this morning explaining a bit about the activity of the project. If you could help me correct an administrative error on Nnamdi's part, we can get a bit closer to closing this site successfully in the VCP.

Thanks for your help with this and please call as questions come up.

Paul R. Craig, LG
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From: Paul Craig

Sent: Tuesday, October 10, 2017 10:16 AM

To: 'Madakor, Nnamdi (ECY)' <NMAD461@ECY.WA.GOV>

Cc: Kuntz, Michael G. (ECY) <mkun461@ECY.WA.GOV>

Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hello, Nnamdi,

I'm looking for your assistance in correcting an administrative error relative to VCP site no. NW1719. On June 13, 2014 a termination letter was sent to our client closing our site due to inactivity. In our response to Michael Kuntz, we agreed that there were still active remedial activities occurring at the site and we would provide 6-month status update letters to Ecology to keep you in the loop and keep the project active in the VCP. With this information, you replied on June 18, 2014 that you would withdraw the termination letter.

We have been actively remediating residual contamination in soil at the site via air sparging and providing Ecology with twice-yearly update letters to keep our site manager, Michael Kuntz, apprised of our continued progress on the project. As we near cleanup of soil at the site, I discovered that the Ecology database still shows the letter on file and the site terminated in the VCP. I'm hopeful that you'll withdraw the June 13, 2014 termination letter so that we can work through to a successful cleanup and closure of this site.

I'll follow-up with a phone call to you this morning, as well, so we can work through this problem.

Thanks very much for your help in correcting this error,

Paul R. Craig, LG

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From: Madakor, Nnamdi (ECY) [<mailto:NMAD461@ECY.WA.GOV>]

Sent: Wednesday, June 18, 2014 7:41 PM

To: Paul Craig <pcraig@geoengineers.com>

Cc: Kuntz, Michael G. (ECY) <mkun461@ECY.WA.GOV>; David Gaines <dgaines@snelsonco.com>;

Dana Carlisle <dcarlisle@geoengineers.com>; Tony Orme <torme@geoengineers.com>

Subject: Re: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

I will withdraw the termination letter
Nnamdi

Sent from my iPhone

On Jun 18, 2014, at 7:06 PM, "Paul Craig" <pcraig@geoengineers.com> wrote:

Hi, Michael,

Based on the attached termination letter we received today, it looks like Nnamdi was unaware of our attached response to your May 5, 2014 letter concerning keeping this active project open in the VCP. As requested, we followed up with a signed hardcopy of the letter sent to your attention on May 28, 2014. Can you please look into this matter and let me know how we can continue to participate in the VCP for this active project?

Thanks very much for your help with this.

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From: Kuntz, Michael G. (ECY) [<mailto:mkun461@ECY.WA.GOV>]
Sent: Tuesday, May 27, 2014 9:48 AM
To: Paul Craig
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Paul

Please send the hard copy for the file

Thanks

From: Paul Craig [<mailto:pcraig@geoengineers.com>]
Sent: Tuesday, May 27, 2014 9:13 AM
To: Kuntz, Michael G. (ECY)
Cc: David Gaines; Dana Carlisle; Tony Orme
Subject: RE: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Good Morning, Michael,

Thanks for your quick response to our letter. Would you like me to send a signed hardcopy of the letter to you or will the electronic copy sent last week be sufficient?

Thanks again and I'll adjust the address I have on file for you to the one shown below.

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From: Kuntz, Michael G. (ECY) [<mailto:mkun461@ECY.WA.GOV>]
Sent: Tuesday, May 27, 2014 8:47 AM
To: Paul Craig
Subject: FW: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Hello Paul

Thank you for the reply. My receipt of your signed letter will constitute my decision to keep the Snelson Property site active in the Voluntary Cleanup Program. For future communication to me would you please use the following address:

Michael Kuntz
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Sincerely

Mike

From: Paul Craig [<mailto:pcraig@geoengineers.com>]
Sent: Friday, May 23, 2014 10:53 AM
To: Kuntz, Michael G. (ECY)
Cc: David Gaines; Dana Carlisle
Subject: Snelson Companies (SCI Properties), Response to May 5, 2014 Ecology Letter (VCP No. NW1719)

Good Morning, Michael,

Attached is a response to your May 5, 2014 letter inquiring about the status of cleanup activities at the Snelson Companies (SCI Properties, LLC) site located at 601 West State Street in Sedro-Woolley, Washington and tracked as VCP No. NW1719.

Thanks very much for your time in this matter and I look forward to your decision pertaining to providing continued service under the VCP for this active project.

Have a wonderful weekend!

Paul R. Craig, LG
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<Dept of Ecology Letter of Termination 061314.pdf>

<Response to Ecology, May 5, 2014 Letter.pdf>

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