



February 20, 2018

Sonia Fernández, LG  
VCP Coordinator  
Washington State Department of Ecology  
Northwest Regional Office  
3190 160<sup>th</sup> Avenue SE  
Bellevue, Washington 98008

**Re: Request for Advisory Opinion on Cleanup Action**

Ballinger Village Shopping Center  
VCP Project No. NW1843  
Aspect Project No. 150144

Dear Sonia:

We are writing to request the Washington State Department of Ecology's (Ecology's) advisory opinion on the status of the ongoing cleanup action for the Ballinger Village Shopping Center in Shoreline, Washington (the Site). Since implementing the cleanup action in 2012, the air sparging and soil vapor extraction (AS/SVE) system has significantly reduced concentrations of perchloroethene (PCE) in groundwater. As of September 2017, concentrations of PCE in groundwater are at or below the remediation levels established in the Feasibility Study and Cleanup Action Plan (FS/CAP) for active treatment. We have shut down the system and are conducting confirmation monitoring to support a No Further Action (NFA) determination from Ecology.

For reference, we have provided the 2017 Annual Progress Report for the cleanup action under separate cover for your review. Previous reports, including the Remedial Investigation (RI) Report, FS/CAP, Engineering Design Report, Construction and Startup Report, and annual progress reports for 2012, 2013, and 2014 are already on file with Ecology. Ecology issued an opinion on the RI Report and the FS/CAP in 2011 approving the site characterization and cleanup action.

As of the end of 2017, the AS/SVE system has removed a total of 671 pounds of chlorinated solvents from soil and groundwater at the Site, and reduced concentrations of PCE in groundwater by 86 percent. A detailed discussion and evaluation of performance monitoring activities performed in 2017 are provided in the attached progress report. After nearly 5 years of active remediation, the remediation system has reached a point of diminishing returns in terms of groundwater treatment and mass removal. The average reduction in PCE concentrations across the Site since startup have remained relatively unchanged from September 2016 to September 2017 (86 percent) and contaminant mass removal has tapered off.

In accordance with our conclusions and recommendations in the attached progress report, the remediation system was shut down in January to begin initial confirmation vapor and groundwater monitoring activities. The results of confirmation monitoring will be used to confirm the

effectiveness of the cleanup action in support of an NFA, and support the transition to monitored natural attenuation as outlined in the preferred remedy in the CAP.

In closing, we believe that this Site is on track for closure and are requesting Ecology's opinion on the sufficiency of the cleanup and an NFA-likely determination for the proposed approach outlined above. It is our goal to work collaboratively with you to define the final steps for closure and ensure protection of human health and the environment. We have attached a completed Request for Opinion Form, as well as updated Change of Contact Forms, so that you may begin reviewing the documentation and update your points of contact for this project. If possible, we would like to meet with you to discuss the Site prior to your detailed review and opinion.

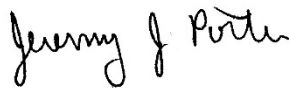
Please let us know your anticipated timeline for a review and opinion, as well as an estimate of those costs, so we may plan accordingly. When the time comes, we look forward to meeting with you to discuss the closure of this Site. In the meantime, should you have any questions during your review, please do not hesitate to contact us.

Sincerely,

**Aspect consulting, LLC**



**Eric Marhofer, PE**  
Senior Environmental Engineer  
emarhofer@aspectconsulting.com



**Jeremy Porter, PE**  
Senior Associate Remediation Engineer  
jporter@aspectconsulting.com

Attachments: Request for Opinion Form  
Change of Contact Form (Property Owner)  
Change of Contact Form (Project Manager)

cc: Jeffrey Borum, TOR Environmental Inc.  
Michael Merlone, Merlone Geier Partners

## **Request for Opinion**



# Voluntary Cleanup Program

## Washington State Department of Ecology Toxics Cleanup Program

### REQUEST FOR OPINION FORM

Use this form to request a written opinion on your planned or completed independent remedial action under the Voluntary Cleanup Program (VCP). Attach to this form the plans or reports documenting the remedial action. Please submit only one form for each request.

#### Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are requesting a written opinion under the VCP. This information may be found on the VCP Agreement.

Facility/Site Name: Ballinger Village Shopping Center

Facility/Site Address: 20024 Ballinger Way NE, Shoreline

Facility/Site No: 4324673

VCP Project No.: NW1843

#### Step 2: REQUEST WRITTEN OPINION ON PLAN OR REPORT

What type of independent remedial action plan or report are you submitting to Ecology for review under the VCP? Please check all that apply.

- ☐ Remedial investigation plan
- ☐ Remedial investigation report
- ☐ Feasibility study report
- ☐ Property cleanup\* plan (\* cleanup of one or more parcels located within the Site)
- ☐ Property cleanup\* report
- ☐ Site cleanup plan
- ☐ Site cleanup report
- ☒ Other – please specify: 2017 Progress Report

Do you want Ecology to provide you with a written opinion on the planned or completed independent remedial action?

☒ Yes ☐ No

Please note that Ecology's opinion will be limited to:

- Whether the planned or completed remedial action at the site meets the substantive requirements of the Model Toxics Control Act (MTCA), and/or
- Whether further remedial action is necessary at the site under MTCA.

### Step 3: REPRESENTATIONS AND SIGNATURE

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to request services from Ecology under the Agreement for this VCP Project.

Name: Eric Marhofer

Title: Sr. Environmental Engineer

Signature: 

Date: 2-20-2018

Organization: Aspect Consulting, LLC

Mailing address: 401 2nd Avenue South

City: Seattle

State: WA

Zip code: 98104

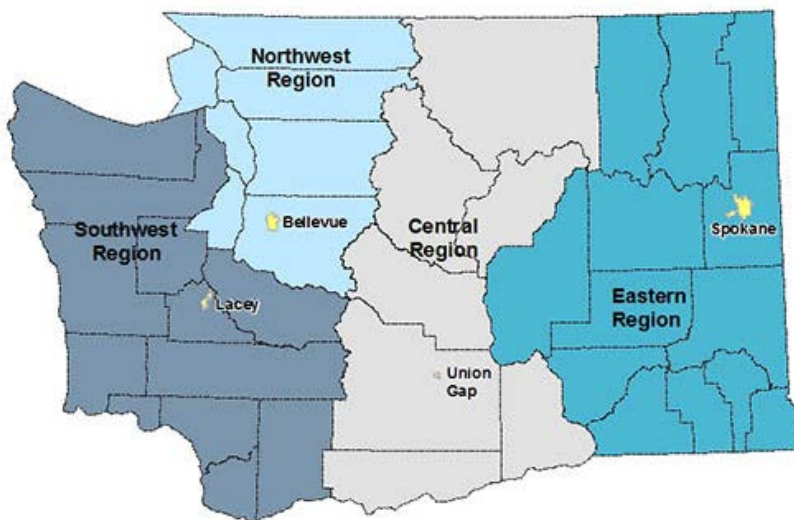
Phone: 206-838-6582

Fax: 206-838-5853

E-mail: emarhofer@aspectconsulting.com

### Step 4: SUBMITTAL

Please mail your completed form and the independent remedial action plan or report that you are requesting Ecology review to the site manager Ecology assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.

**Northwest Region:**

Attn: VCP Coordinator  
3190 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008-5452

**Central Region:**

Attn: VCP Coordinator  
1250 West Alder St.  
Union Gap, WA 98903-0009

**Southwest Region:**

Attn: VCP Coordinator  
P.O. Box 47775  
Olympia, WA 98504-7775

**Eastern Region:**

Attn: VCP Coordinator  
N. 4601 Monroe  
Spokane WA 99205-1295

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

## **Change of Contact Form (Property Owner)**



# Voluntary Cleanup Program

## Washington State Department of Ecology Toxics Cleanup Program

### CHANGE OF CONTACT FORM

Use this form to notify the Department of Ecology (Ecology) of any changes to the designated points of contact for a project under the Voluntary Cleanup Program (VCP). Include any changes to the contact information for those persons (for example: phone number or address). Please submit only one form for each point of contact.

#### Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are providing new contact information. This information may be found on the VCP Agreement.

Facility/Site Name: Ballinger Village Shopping Center

Facility/Site Address: 20024 Ballinger Way NE, Shoreline

Facility/Site No: 4324673

VCP Project No.: NW1843

#### Step 2: IDENTIFY CONTACT PERSON

Please identify the role of the person for whom you are providing new contact information. Check all that apply.

- ☐ Project Manager
- ☒ Project Billing Contact
- ☐ Project Consultant
- ☐ Project Attorney
- ☒ Property Owner
- ☐ Other – please specify:

Please provide below the new contact information for this person:

Name: Michael Merlone

Title: Environmental Project Mngr

Organization: Merlone Geier Partners

Mailing address: 425 California Street, 10<sup>th</sup> Floor

City: San Francisco

State: CA

Zip code: 94104

Phone: 415-362-9206

Fax: 415-693-0480

E-mail: mmerlone@merlonegeier.com

### Step 3: IDENTIFY PRIOR CONTACT PERSON (IF APPLICABLE)

Is the new contact person replacing an existing point of contact?

☒ Yes  
☐ No

***If you answered "YES" above, please identify below the person who is being replaced:***

Name: Thomas Beeks

Title: Asset Manager

Organization: Ballinger Village, LP

Mailing address:

City:

State:

Zip code:

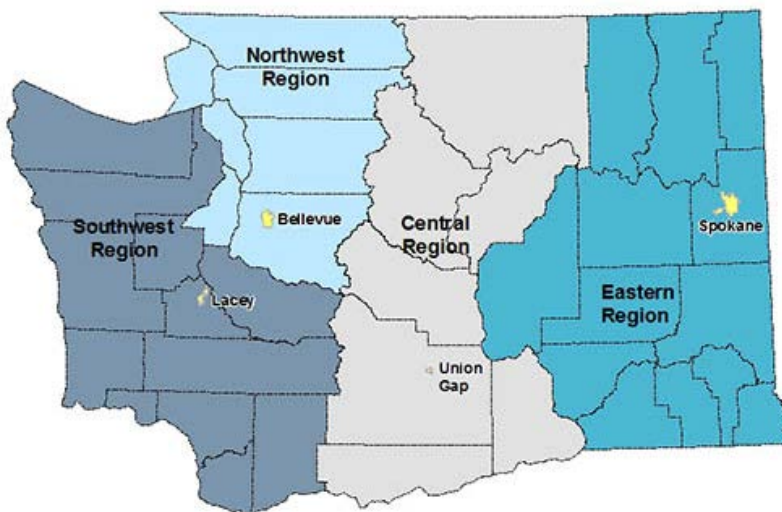
Phone: 206-619-5241

Fax:

E-mail: thomasbeeks@comcast.net

### Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.

**Northwest Region:**

Attn: VCP Coordinator  
3190 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008-5452

**Central Region:**

Attn: VCP Coordinator  
1250 West Alder St.  
Union Gap, WA 98903-0009

**Southwest Region:**

Attn: VCP Coordinator  
P.O. Box 47775  
Olympia, WA 98504-7775

**Eastern Region:**

Attn: VCP Coordinator  
N. 4601 Monroe  
Spokane WA 99205-1295

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## **Change of Contact Form (Project Manager)**



# Voluntary Cleanup Program

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Facility/Site Address: 20024 Ballinger Way NE, Shoreline

Facility/Site No: 4324673

VCP Project No.: NW1843

#### Step 2: IDENTIFY CONTACT PERSON

Please identify the role of the person for whom you are providing new contact information. Check all that apply.

- ☒ Project Manager
- ☐ Project Billing Contact
- ☒ Project Consultant
- ☐ Project Attorney
- ☐ Property Owner
- ☐ Other – please specify:

Please provide below the new contact information for this person:

Name: Eric Marhofer

Title: Sr. Environmental Engineer

Organization: Aspect Consulting, LLC

Mailing address: 401 2<sup>nd</sup> Avenue South

City: Seattle

State: WA

Zip code: 98104

Phone: 206-838-6582

Fax: 206-838-5853

E-mail: emarhofer@aspectconsulting.com

### Step 3: IDENTIFY PRIOR CONTACT PERSON (IF APPLICABLE)

Is the new contact person replacing an existing point of contact?

☒ Yes  
☐ No

***If you answered "YES" above, please identify below the person who is being replaced:***

Name: Doug Hillman

Title: Principal Hydrogeologist

Organization: Aspect Consulting, LLC

Mailing address: 401 2nd Avenue South

City: Seattle

State: WA

Zip code: 98104

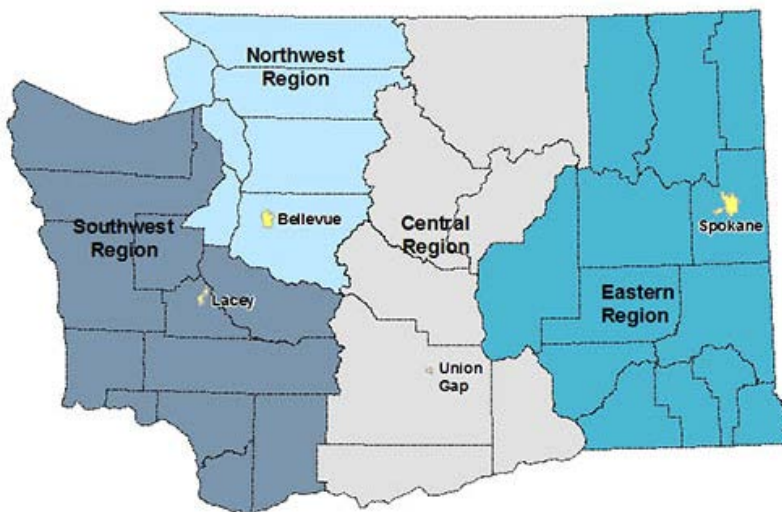
Phone: 206-838-5833

Fax: 206-838-5853

E-mail: dhillman@aspectconsulting.com

### Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



<b>Northwest Region:</b> Attn: VCP Coordinator 3190 160 <sup>th</sup> Ave. SE Bellevue, WA 98008-5452	<b>Central Region:</b> Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009
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