



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 20, 2018.

Mr. William Beck  
Sr. Project Manager, Corrective Actions  
18000 72nd Ave S, Suite 217  
Kent, WA 98032-1032

Re: Comment and Approval of the *Final Feasibility Study (RI/FS), Stericycle Kent Facility*, Prepared for Stericycle Environmental Solutions (formerly Burlington Environmental and then PSC) by Dalton Olmsted Fuglevand, June 21, 2017, WAD991281767

Dear Mr. Beck:

The Department of Ecology (Ecology) has completed review of the document *Final Feasibility Study, Stericycle Kent Facility*, prepared for Stericycle Environmental Solutions (referred to in this letter as "Stericycle", formerly Burlington Environmental and then PSC prior) by Dalton Olmsted Fuglevand and dated June 21, 2017. Because this document includes the Remedial Investigation it is considered to be an RI/FS document addressing both the nature and extent of contamination and the proposed clean-up alternatives. With this letter, Ecology approves this final feasibility study, providing the following comments for the record:

- A) A public comment period was held from 10/16/2017 to 11/14/2017 for this RI/FS. No comments were received, either verbal or written.
- B) Ecology selects Alternative 1 as the preferred remedy for this site based on continued satisfactory performance in attaining the clean-up levels within a reasonable restoration time frame. This requires satisfactory performance of the geochemical controls as outlined in RI/FS and no changes in the exposure scenarios, which to date indicate limited exposure to site COCs. This includes 3 new monitoring wells.
- C) If performance of Alternative 1 is not adequate, Ecology and Stericycle will need to determine a contingency plan following WAC 173-340-410(3)(b)(ii). This serves as a placeholder to move to a contingent remedy should Alternative 1 fail to attain Cleanup levels in a reasonable restoration time frame.
- D) The RI/FS was presented by Ecology to EPA Region 10 staff on August 8, 2017 in Seattle and included review of remedy selection and dialogue about the site contaminants, site history, and transport mechanisms from groundwater to surface water.
- E) Ecology notes for the record that if spills or releases are observed, it is required to report these following the requirements outlined in the permit.



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- F) Institutional controls. Ecology agrees that the provisions in WAC 173-340-740(6)(f) are applicable for the facility, and that Institutional Controls will be an important component for the remedy and public safety. This is outlined in section 8.1.1.1 of the Final Feasibility Study.
- G) Ecology has a webpage for this project, and for the record, that is noted here:  
<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=12484>

The next steps for the clean-up are outlined in WAC 173-340-380 titled Cleanup action plan. Ecology requests that a draft Clean-up plan be prepared by Stericycle and be submitted to Ecology when possible.

Please contact me if you have any questions regarding this letter at (425) 649-7181 [nhin461@ecy.wa.gov](mailto:nhin461@ecy.wa.gov) or Hideo Fujita at (425) 649-7068 [hfu461@ecy.wa.gov](mailto:hfu461@ecy.wa.gov).

Sincerely,



Neal Hines  
Corrective Action Unit Supervisor  
Hazardous Waste and Toxics Reduction Program,

By certified mail: 9171 9690 0935 0169 7334 02

ecc: Natasya Gray, DOF  
Andy Maloy, Stericycle  
Keith Lund, Stericycle  
Hideo Fujita, Ecology  
Thea Levkovitz, Ecology