



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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December 11, 2007

MR GREG SNIDER
COATING UNLIMITED
18320 68TH AVE S
KENT WA 98032

**Re: Further Action Determination under WAC 173-340-515(5) for the following
Hazardous Waste Site:**

- Site Name: COATING UNLIMITED INC
- Site Address: 18420 68TH AVE S STE 110, KENT WA
- Facility/Site No.: 18965792
- VCP No.: NW1172

Dear MR GREG SNIDER:

Thank you for submitting your independent remedial action report for the COATING UNLIMITED INC facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Ecology's Pending Inactive Determination Letter of June 22, 2007
2. EMS Groundwater Monitoring Reports of 9/28/04: 12/27/04 & 3/24/05

The documents listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7190.

The Site is defined by the extent of contamination caused by the following release(s):

- Chlorinated Solvents in the Soil and Groundwater including areas covered by the Sand Blast Grit and the Former Underground Storage Tank

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) performed at the Site are not sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **further remedial action is necessary** at the Site under MTCA.

Further Action is required at this site for the following reasons

- Additional site characterization is needed especially south of the property line in order to delineate the full extent (lateral and vertical).
- Site groundwater should be screened based the beneficial use of the site groundwater, which is the protection of the nearby surface water of the Green River.
- Appropriate remedial alternatives and groundwater monitoring wells must be part of these mitigation efforts.
- The extent of the residual contaminated sand blast grit soils above the Method A cleanup levels under the building foundation is not clear. Please depict this extent using cross sections for our review.
- Please provide rationale for leaving contaminated soils above the cleanup levels behind at this site: If Ecology concurs, a Deed Restriction maybe required for this site
- Please provide a table showing confirmation soil and groundwater sampling results for the Former Underground Storage area.

If you believe these releases: Vinyl Chloride Plume: Sand Blast Grit and the Former UST areas are distinct releases and wish that Ecology consider them as separate VCP sites, please resubmit 3 applications for the three releases and show that they are not commingled with the vinyl chloride or TPH plumes.

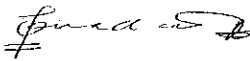
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Further Action Determination
Inactive VCP Site NW1172
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Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements. If you have any questions you may reach me at 360-407-7244.

Sincerely



Nnamdi Madakor, VCP Coordinator
HQ - Toxic Cleanup Program

cc: Russ Olsen, NWRO VCP Unit Manager.
Sara Maser, NWRO Data Coordinator
Delores Mitchell, Ecology (NW1172)

NM:nm

Enclosure