



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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August 28, 2018

Electronic Copy

Mr. Stephen Larson
AlSCO Inc.
505 E South Temple
Salt Lake City, UT 84102

Re: Further Action at the following Site:

- **Site Name:** American Linen Tacoma
- **Site Address:** 2011 S Tacoma Way Tacoma, 98409-7837
- **Facility/Site No.:** 14562825
- **Cleanup Site No.:** 13160
- **VCP Project No.:** SW1560

Dear Mr. Larson:

On April 19, 2018, Washington State Department of Ecology (Ecology) received your request for an opinion on the independent cleanup of the American Linen Tacoma facility (Site). On May 24, 2018, your request for opinion was complete and ready for our review. This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), chapter 70.105D Revised Code of Washington (RCW).

Issue Presented and Opinion

Ecology supports pursuing closure of this Site using engineered and institutional controls managed by an environmental covenant. We believe that this Site may qualify for a no further action opinion using this approach. This approach requires you to provide a preferred remedial alternative adequately supported through disproportionate cost analysis within a feasibility study that meets the minimum requirements of MTCA. The comments provided below are intended to help you provide the needed information for Ecology, so Ecology can concur that no further action is appropriate at the Site.

Within the independent cleanup process, Ecology's role is limited to addressing how the cleanup you conduct meets or does not meet the substantive requirements of MTCA regulations. Ecology's Voluntary Cleanup Program (VCP) does not provide oversight or approval. For Ecology's May 18, 2017, and February 1, 2018, opinions, Ecology provided technical assistance so this project's investigation and reporting would better align with the specific requirements of MTCA. Ecology will continue to work in an iterative manner, identifying additional areas to address until this cleanup reaches sufficiency with MTCA.

Ecology has determined that further remedial action is necessary to clean up contamination at the Site. This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, chapter 70.105D RCW, and its implementing regulations, Washington Administrative Code (WAC) chapter 173-340 (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Petroleum and related constituents into the soil, groundwater, and air.
- Chlorinated solvents, related constituents and degradation products into the soil, groundwater, and air.
- Lead and arsenic into the soil.

The parcels of real property associated with this Site are also located within the projected boundaries of the Asarco Tacoma Smelter facility (FSID# 89267963). At this time, we have no information that the parcel is actually affected. This opinion does not apply to any contamination associated with the Asarco Tacoma Smelter facility.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. *Phase II Limited and Targeted Subsurface Investigation Provisional Report*, Aerotech Environmental Consulting, Inc. (Aerotech), October 28, 2015.
2. *Limited Phase II Environmental Site Assessment*, J2Environmental, LLC (J2E), December 30, 2015.
3. *Initial Report*, Environmental Report Tracking System Report Number 662453, Washington State Department of Ecology, January 26, 2016.
4. *Additional Phase II Environmental Site Assessment*, J2E, February 29, 2016.

5. *Limited Phase II Site Assessment, Three Commercial Parcels, 2101, 2013, and 2111 South Tacoma Way*, Geotech Consultants Inc. (Geotech), February 29, 2016.
6. *Re: Underground Storage Tank (UST) Removal: Site Closure Determination, AlSCO Tacoma Facility*, Tacoma – Pierce County Health Department, September 12, 2016.
7. *AlSCO Tacoma Facility (Site) at 2011 S. Tacoma Way, Request for No Further Action Determination*, J2E, November 17, 2016.
8. *Re: Further Action at the following Site: American Linen Tacoma*, Ecology, May 18, 2017.
9. *Cleanup Action Report, AlSCO Tacoma Facility*, J2E, October 10, 2017.
10. *Re: Further Action at the following Site: American Linen Tacoma*, Ecology. February 1, 2018.
11. *Remedial Investigation/ Feasibility Study (RI/FS), AlSCO Tacoma Facility*, J2E, April 18, 2018.

These documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Information on viewing those records can be found on Ecology's web page at <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>. Some site documents may be available on Ecology's web page at <https://fortress.wa.gov/ecy/gsp/SiteSearchPage.aspx>.

Analysis of the Cleanup

Characterization of the Site.

Site Characterization activities completed prior to May 2017 are summarized in Ecology's May 18, 2017, opinion for the Site. In June and September 2017, and March 2018, J2E advanced additional soil borings at the Site and collected and analyzed soil, groundwater, and indoor air samples. In March 2018, two soil borings were advanced and completed as monitoring wells MW-7 and MW-8.

Monitoring well MW-8, located adjacent to the location of closed-in-place underground storage tanks, detected diesel and heavy oil range total petroleum hydrocarbons above Method A cleanup screening levels in a groundwater sample obtained after well development.

The following comments are provided to help you meet specific MTCA requirements and complete the cleanup. **Ecology suggests you address each numbered and underlined item below.**

- 1) **Please conduct additional purging and sampling of site monitoring wells MW-1 through MW-8.** The RI/FS asserts that the groundwater analytical data results detecting

diesel and heavy oil obtained from MW-8 are anomalous data.¹ Ecology needs a more specific explanation of the petroleum data results obtained at MW-8, near the location of the closed-in-place USTs. Additional groundwater samples should be collected and analyzed, and groundwater elevations measured in all Site monitoring wells, including MW-8, to help Ecology determine if the diesel and heavy oil groundwater analytical results reported from MW-8 are (1) an artifact of insufficient well development after drilling, or (2) repeatable measurements indicating groundwater conditions below the location of the closed-in-place USTs. Ecology believes that the data from MW-8 groundwater analytical samples likely represent either one of these possibilities:

1. The data are representative of local aquifer conditions in this location of the Site.
2. The data are not representative of local aquifer conditions, due to perhaps smearing of existing soil contamination above groundwater during drilling, combined with insufficient well development, and resulting in concentrations of hazardous substances measurable in groundwater analytical samples.

The boring log for monitoring well MW-8 indicates it was advanced and completed on March 19, 2018. Groundwater samples were obtained from the well on March 22, 2018. Our experience, after review of results from many monitoring wells, is that samples obtained close in time to well development may exhibit hazardous substances in groundwater analytical samples due to smearing of soil in groundwater during the drilling process. Waiting for a longer duration after well development, combined with aggressive well development and sufficient purging of standing water in the borehole prior to sampling, may reduce the impact of soil smearing to groundwater from well development.

- 2) **Please provide soil, groundwater, soil vapor, and indoor air concentration isopleth maps that also include indication of where insufficient data are available to adequately bound contamination extents:** The level of detail needed for site figures to be recorded with an environmental covenant is greater than those provided for this Site's investigation. Ecology needs to concur with clear and accurate data presentation, to support having these figures recorded in the permanent legal record for the Site.

Concentration isopleth (contour) maps will be needed for an environmental covenant providing the extents of hazardous substances at the Site. Within the figures, please indicate where insufficient data are available to determine concentration isopleths with geostatistical confidence. For example, the RI/FS Figure 5.1 groundwater plume is inferred. There is no indication of why MW-8 was determined to be the center of the

¹ Remedial Investigation/ Feasibility Study (RI/FS), AlSCO Tacoma Facility, J2E, April 18, 2018, Pages 19, 20, 24, 35.

groundwater plume. Another example is Figure 6 that shows isopleths to the northwest of location A1 not bounded by data results.

Instead, please indicate where concentration isopleths are not supported with bounding data results using a question mark or similar notation on the isopleth. It is not likely necessary to obtain additional data, only to demonstrate where inference has been made without bounding data or geostatistical confidence. Ecology needs to concur with figures. Show the data used to determine concentration isopleths on each map to help Ecology understand how the concentration isopleths were determined, especially where no bounding data are available.

- 3) **Please provide groundwater elevation and gradient contour maps that support the reported average gradient determination depicted in the RI/FS report.** Several figures include an arrow indicating a southeast groundwater gradient. Please support this assertion with calculated gradients based on seasonal groundwater elevation data. Clearly indicate which wells were used for each individual date gradient determination. Include the data results used to determine gradients on individual well locations. Groundwater elevation isopleth maps for individual seasonal sampling events and a compass rose plot are often used to provide this information to Ecology.
- 4) **Please provide geologic cross sections showing concentration isopleths of hazardous substances in soil and the measured ranges of groundwater elevations from groundwater monitoring.** Geologic cross sections provided for this investigation have not included concentration isopleths, although we have requested this in both our May 18, 2017, and February 1, 2018, opinions for the Site. Ecology needs to concur with your determination of the offset from hazardous substances in soil to groundwater, including location MW-8 where hazardous substances were detected in the one groundwater sample reported. Clearly indicate the extents of hazardous substances in groundwater exceeding proposed cleanup levels, and below proposed cleanup levels.
- 5) **Roman Meal Property:** The data provided for this remedial investigation support excluding additional evaluation of hazardous substances detected at the former Roman Meal Property. Please do not include data from the Roman Meal Property unless determined necessary to include for this remedial investigation.

Establishment of cleanup standards.

For independent cleanups conducted under WAC 173-340-515, Ecology needs to concur with cleanup standards, including points of compliance, cleanup levels, and other regulatory requirements that you propose. Under MTCA, cleanup standards consist of three major components.

- **Points of compliance.** Points of compliance are the specific locations at the Site where cleanup levels must be attained.²
- **Cleanup levels.** Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment.³
- **Applicable state and federal laws:** Other regulatory requirements that apply to the Site because of the type of action and/or location of the Site.⁴ These include concentrations, technical and procedural requirements.

Based on the RI/FS⁵, there appears to be inaccurate implementation of MTCA requirements regarding *conditional Method C cleanup levels*, and *conditional points of compliance*.

- *Conditional Method C cleanup levels* are *conditional* because Method C cleanup levels (concentrations) rely on an industrial land use scenario and institutional controls to maintain site use based on increased acceptable risk.
- *Conditional points of compliance:*
 - Groundwater conditional points of compliance are the physical locations at a site where compliance with groundwater cleanup levels will be evaluated; at this Site, possibly a defined subset of groundwater monitoring wells. Conditional points of compliance are justified where it is demonstrated under WAC 173-340-350 through 173-340-390 that:
 - It is not practicable to meet the cleanup levels throughout the site within a reasonable restoration time frame.
 - Where the cleanup action demonstrates that all practicable methods of treatment are to be used in the site cleanup.⁶

To concur with conditional points of compliance for groundwater, Ecology would need to understand the specific monitoring wells that are proposed as conditional points of compliance at this Site, and also concur with the methods and results of the disproportionate cost analysis.

- For soil, points of compliance are determined using WAC 173-340-740(6).

6) **Please clarify the specific points of compliance proposed for this project.** The points of compliance proposed in the April 18, 2018, remedial investigation report are not clear. If conditional points of compliance are proposed, demonstrate why they are needed, specify

² WAC 173-340-200 "Point of Compliance"

³ WAC 173-340-200 "Cleanup level"

⁴ WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c)

⁵ RI/FS Section 5.1, page 31 and Figure 4

⁶ WAC 173-340-720(8)(c)

the specific points of compliance proposed, and include those points of compliance in long term site monitoring requirements as needed.

Points of Compliance **are needed** for each of the following pathways:

- a) Soil – Direct Contact
- b) Soil – Protection of Groundwater
- c) Groundwater
- d) Air Quality

Points of Compliance **are not needed** for the following pathways:

- a) Terrestrial ecological receptors
- b) Sediment
- c) Surface water

For your review, appropriate standard points of compliance for appropriate pathways are provided in the table below:

Media	Standard Points of Compliance
Soil – Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. ⁷
Soil – Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. ⁸
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site. ⁹
Air Quality	Based on the protection of air quality, the point of compliance is ambient and indoor air throughout the Site. ¹⁰

Cleanup levels:

- 7) **Please propose one cleanup level for each hazardous substance evaluated, protective at proposed points of compliance.** Provide one cleanup level each for each hazardous substance for (1) soil, (2) groundwater, and (3) air quality. Select either Method A, B, or C

⁷ WAC 173-340-740(6)(d)

⁸ WAC 173-340-747

⁹ WAC 173-340-720(8)(b)

¹⁰ WAC 173-340-750(6)

(as appropriate, justify use as required), using toxic equivalency quotient or the sum of hazardous substances approaches where appropriate.

For soil pathways, consider the direct contact, protection of groundwater in (1) saturated soils at 13C, and (2) unsaturated soils. Choose a single cleanup level protective of all soil pathways, typically the lowest protective concentration at the Site. You may refer to cleanup levels published in the CLARC database,¹¹ and those published as an attachment to Ecology's vapor intrusion guidance.¹²

In RI/FS Table 4, Methods A, B, and C cleanup levels are provided for several hazardous substances. Because Methods A, B, and C cleanup levels are all listed, it is not clear to Ecology which specific cleanup levels are proposed for each specific hazardous substance at the Site.

- 8) **Please provide additional information if proposing Method C cleanup levels:** Method C cleanup levels require additional justification and reporting, sufficient for Ecology to concur on how the Site meets the definition of industrial property in MTCA,¹³ based on the specific definition in WAC 173-340-200 and the additional evaluation described in WAC 173-340-745(1)(a)(i)(A-F).
- 9) **Please do not propose location-specific cleanup levels within the Site:** RI/FS Table 4 appears to propose several location-specific cleanup levels within the Site. There is not sufficient evidence presented to support use of more than one cleanup level for each hazardous substance detected in each media at this Site. The single proposed cleanup level for each media should be evaluated using proposed points of compliance to determine areas of the Site requiring additional remediation.
- 10) **Please provide required information to support use of cleanup levels greater than residual saturation table concentrations:** At this Site, calculated cleanup levels for petroleum exceed table value residual saturation screening levels. RI/FS Table 4 nonetheless proposes cleanup levels exceeding residual saturation table values from MTCA.¹⁴ Ecology previously noted¹⁵ that without additional evaluation, proposed cleanup levels for total petroleum hydrocarbons should not exceed table values. Because no additional evaluation has been provided, Ecology does not concur with the use of cleanup levels exceeding table value residual saturation concentrations at this Site.

¹¹ CLARC Database, available at: <https://fortress.wa.gov/ecy/clarc/CLARCDatatables.aspx>

¹² For current Method B cleanup levels see: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview/Vapor-intrusion-2015-changes-to-the-2009-toxicit>

¹³ WAC 173-340-200.

¹⁴ WAC 173-340-900, Table 747-5.

¹⁵ *Re: Further Action at the following Site: American Linen Tacoma*, Ecology. February 1, 2018, Page 4.

Without additional evaluation, cleanup levels for the sum of diesel and heavy oil fractions should not exceed the published table value of 2,000 mg/kg.¹⁶ One method to evaluate residual saturation is to demonstrate alternate Site-specific residual saturation screening levels using the procedures described in WAC 173-340-747(10). See Ecology guidance for additional information.¹⁷

- 11) **Please use cleanup levels for indoor air quality based on published table values:** Some cleanup levels for air quality in RI/FS Table 4 do not appear to be supported based on Ecology's published tables.¹⁸ There are no published Method A cleanup levels for air quality. Method B, or if justified, Method C indoor air cleanup levels appear appropriate for this cleanup. Please refer to vapor intrusion guidance published by Ecology, which may be obtained from Ecology's website.¹⁹
- 12) **Please report polycyclic aromatic hydrocarbon results** on a toxic equivalency basis and compare the toxic equivalency quotient to proposed cleanup levels.²⁰
- 13) **Please report the sum of naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene** and compare the sum to proposed cleanup levels for naphthalenes.
- 14) **Please evaluate acute risks of trichloroethylene** as part of the overall Site risk using guidelines from US EPA.²¹ Assessments should be designed to determine if indoor air concentrations are higher than action levels protective of toxic, non-cancer effects caused by short-term exposures to the chemical. Consider if pregnant women or children risk exposure from impacted indoor air.
- 15) **Applicable Laws and Regulations:** Please identify all applicable state and federal laws for the cleanup action (WAC 173-340-710(2)). The third component of cleanup standards is applicable state and federal laws, which need to be identified when proposing cleanup standards.

¹⁶ WAC 173-340-900, Table 747-5.

¹⁷ Washington State Department of Ecology, Implementation Memorandum #4, Determining Compliance with Method A Cleanup Levels for Diesel and Heavy Oil, Publication Number 04-09-086, June 4, 2004.

¹⁸ For current Method B cleanup levels see: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview/Vapor-intrusion-2015-changes-to-the-2009-toxicit>

¹⁹ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview>. For current Method B cleanup levels see also: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview/Vapor-intrusion-2015-changes-to-the-2009-toxicit>

²⁰ Washington State Department of Ecology, Evaluating the Human Health Toxicity of Carcinogenic PAHs Using Toxicity Equivalency Factors, Implementation Memo #10, Publication Number 15-09-049, April 2015.

²¹ See U.S. EPA, August 2014, Office of Solid Waste and Emergency Response Memorandum: Compilation of Information Relating to Early/Interim Actions at Superfund Sites and the TCE IRIS Assessment. <https://archive.epa.gov/region9/superfund/web/pdf/r9-tce-interim-action-levels-response-recs-memo-2014.pdf>

Selection of cleanup action.

Cleanup standards, discussed above, need to be established prior to selecting a cleanup action. When cleanup standards are established, Ecology needs to concur with a cleanup action that meets the minimum requirements of MTCA.²² The following are comments regarding selection of a preferred remedial alternative. Please use Ecology's feasibility study checklist²³ to help determine that all needed components of the feasibility study are provided to Ecology for review.

- 16) **Scope of Proposed Remedial Alternatives:** Three remedial alternatives were presented in the RI/FS. Insufficient details were provided for Ecology to concur that each alternative meets the minimum threshold and other requirements of MTCA. You must provide sufficient information to show that all remedial alternatives evaluated meet the threshold requirements of MTCA.²⁴
- 17) **Details of Remedial Alternatives:** Please provide sufficient details for Ecology to understand the major components of each proposed remedial alternative.
 - a. As appropriate, include plan view and cross section depictions of the content and extents of proposed remedial actions. Delineate areas proposed for industrial cleanup standards, and engineered or institutional controls as appropriate.
 - b. Include cost details for major components of each remedial alternative, sufficient for Ecology to understand and concur with projected costs of each remedial alternative used in the disproportionate cost analysis.
 - c. Provide the expected restoration timeframes for each remedial alternative evaluated. Provide the expected timeframes for each significant remedial component as appropriate to support the overall restoration timeframe. Consider the number of months or years required to attain cleanup levels at points of compliance, or to fully implement a significant component or the majority of remedial construction. Preference should be given for alternatives that require shorter restoration timeframes.
 - d. Consider ranking and weighting each component in the disproportionate cost analysis. Please refer to Ecology's July 20, 2017, email²⁵ for examples of numerical benefit evaluation in a disproportionate cost analysis specific to MTCA. One way to ranking and weighting is to assign a multiplier for each component, and multiply the ranked score by the multiplier, summing up the component scores. Examples of evaluation and relative benefits criteria ranking of alternatives are provided in Ecology guidance.²⁶

²² WAC 173-340-360(2).

²³ <https://fortress.wa.gov/ecy/publications/documents/1609007.pdf>

²⁴ WAC 173-340-360(2)(a)

²⁵ From: Adam Harris, To: Jerry Jackson, Re: AlSCO Tacoma Facility (VCP SW1560).

²⁶ Ecology, Sediment Cleanup User's Manual II (SCUM II), Publication No.: 12-09-057, revised December 2017, Appendix H.1.4, page 486 of 560. Available at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1209057.html>.

- 18) **Groundwater Monitoring Plan**: If it is determined to be not practicable to remediate groundwater at the Site, please include a long term groundwater monitoring and contingency plan with adaptive management. For example, if groundwater at MW-8 continues to be impacted and it is determined to be disproportionately costly to remediate groundwater at that location of the Site.
- 19) **Please evaluate remedial action components for indoor air**: At this Site, Chloroform exceeds screening levels in sub-slab samples, but not in indoor air. Indoor air measurements indicate that chloroform is not currently impacting indoor air above cleanup levels. Ecology considers that the indoor air pathway has the potential to be completed, except for the building slab foundation acting as a barrier for migration of sub-slab soil vapor to indoor air.

Ecology suggests addressing this potentially complete pathway by including evaluation of two possible remedial action components as part of remedial alternatives evaluated in the feasibility study:

- a. Evaluate engineered controls such as maintaining the existing slab floor, as a component of the preferred remedial alternative, managed by an environmental covenant.
- b. Evaluate chloroform remediation in sub-slab soil vapor to below cleanup screening levels using sub-slab depressurization or soil vapor extraction as one component of remedial alternatives evaluated in the feasibility study. Consider also that the total mass of chloroform in soil may be small, and may be remediated using temporary infrastructure or through a pilot test.
- c. Ecology concurs that the detection of benzene in outdoor and indoor air throughout the Site is related to ambient conditions due to proximity to highways. Benzene is reported present in eight of ten indoor air samples, in all sub-slab samples, and in the outdoor air sample.
- d. Indoor air points of compliance must include manholes, utility vaults, or other structures large enough for a person to fit into at the Site.²⁷ If manholes, utility vaults, or other structures large enough for a person to fit into at the Site are present in areas impacted by soil vapor exceeding indoor air cleanup levels, Ecology will also need to consider exposure to sub-slab chloroform as a completed pathway.

²⁷ WAC 173-340-750(1)(a)

Cleanup.

Interim actions including remedial excavation have been conducted at the Site. Additional remedial investigation and remedial alternative analysis is needed before evaluating the cleanup. Cleanup standards have not yet been met at the Site.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to clean up the Site under the VCP. After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at (360) 407-6528 or at adam.harris@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adam Harris".

Adam Harris, LHG
Toxics Cleanup Program
Southwest Regional Office

AH: tm

By certified mail: 9489 0090 0027 6066 4669 47

cc: Jeremiah Jackson, J2Environmental, LLC
Rob Olsen, TPCHD
Nicholas Acklam, Ecology (via email)
Ecology Site File



January 22, 2019

Dear S L:

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Shipment Details

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Recipient Signature

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