



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

January 11, 2018

Ms. Dana Cannon  
West of 4<sup>th</sup> Project Coordinator  
Aspect Consulting  
401 2nd Ave S, Suite 201  
Seattle, WA 98104

Re: **West of 4<sup>th</sup> Site - Agreed Order #DE 10402**  
**Site Unit 1, In Situ Metals Immobilization Pilot Testing Work Plan**

Dear Ms. Cannon:

On December 21, 2017, the Washington State Department of Ecology (Ecology) received an Emailed copy of the revised Site Unit 1 *In Situ Metals Immobilization Pilot Testing Work Plan*. The revised Work Plan was submitted by the West of 4<sup>th</sup> PLPs in accordance with Agreed Order (AO) 10402, amended on November 21, 2017.

Thank you for submitting the revised Work Plan by its due date. The document is hereby approved. However, it appears that the revised Work Plan contains several artifacts of the draft document that were missed during revision. These include:

- (1) a reference to PSW-4 on page 12 (Section 4.3), and
- (2) outdated schedule proposals at the bottom of page 14 (Section 6).

According to Figure 12, PSW-6 and -7 are now proposed for locations corresponding to the anticipated treatment ROI. PSW-4 is no longer being proposed.

Figure 13 contains the revised project schedule, and contains different proposals than those in Section 6. Phase I field data collection is proposed for Q1 2018 in the figure, not Q3 2017, as stated in the text. Phase II bench-scale testing is scheduled for March through May 2018 (in the figure), while Q4 2017 is proposed in the text. In addition,

- the Field Investigation Work plan (FIWP), estimated in the text to be finalized during the first quarter of this year, is unlikely to be approved until the early summer of 2018 (as indicated in Figure 13);
- Phase III fieldwork, proposed in the text for initiation by the end of Q1 2018, is unlikely to be started until late summer this year (as shown in the figure); and,



Ms. Dana Cannon  
January 11, 2018  
Page 2

- as Figure 13 depicts, a year of project groundwater monitoring will probably not be completed until the second quarter of 2019. The text's proposal is Q1 2019.

The PLPs should now proceed to implement the revised Work Plan in accordance with the project schedule contained in Figure 13.<sup>1</sup> If you have any questions, or would like to schedule a meeting or conference call to discuss today's letter, please contact me at (425) 649-4449 or [ejon461@ecy.wa.gov](mailto:ejon461@ecy.wa.gov).

Sincerely,



Ed Jones  
Environmental Engineer  
Hazardous Waste and Toxics Reduction Program

By certified mail: 9171 9690 0935 0169 7332 35

cc: William Joyce, SJZ  
William Carroll, PCE  
Janet Knox, PGG  
Jeff Kaspar/Peter Jewett, Farallon  
Ronald Taylor, CI  
Donald Verfurth, G&R  
Marlys Palumbo, VNF  
William Beck, Stericycle/PSC  
Central Files  
PLPs' W4 repository

ecc: Tong Li, GWS  
Peter Hapke, ALG  
Nels Johnson, AAG  
Patty Foley/Sherell Ehlers, GTCC

---

<sup>1</sup> Figure 13 anticipated approval of the revised Work Plan by the end of 2017. The document's approval, however, occurred in January 2018 (today's date).