



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 24, 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 2: Capital Industries Plant 4 Interim Action Field Investigation Work Plan**

Dear Ms. Cannon:

On May 10, 2018, the Washington State Department of Ecology (Ecology) received an Emailed copy of the revised Site Unit 2 *Capital Industries Plant 4 Interim Action Field Investigation Work Plan* (FIWP). The revised FIWP 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 revision by its due date and addressing Ecology's comments on the draft document.

Following submittal of the FIWP Ecology also received an email from Farallon Consulting (on May 15, from Ms. Jennifer Moore), explaining the basis for the PLPs' Stage 1 oxidant-dosing proposals. The May 2018 revised FIWP, together with the May 15 Farallon email, are hereby approved as the final Stage 1 FIWP.

The revised FIWP also contains a revised SAP. On page 4-3 of the SAP it is stated that wells OBW-1, OBW-3, OBW-5, MW-6, and MW-7 will be monitored for the presence of permanganate. It goes on to say that if no permanganate is present at MW-7, samples will be collected for hexavalent chromium analysis. It does not appear to propose sampling/analysis for the other four wells. In the FIWP text (pages 5-14 and -15), however, the PLPs propose to monitor groundwater for permanganate at OBW-3, OBW-5, MW-6, and MW-7. OBW-1 does not seem to be mentioned here. If permanganate is not observed/detected at OBW-3, OBW-5, and MW-6, the FIWP states that samples will be collected from these wells for the same analyses performed during baseline sampling (which are shown on the SAP's page 5-2 table). Like the SAP, the FIWP says that if no permanganate is present at MW-7, samples will be collected for Cr+6 analysis.



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Today's approval of the FIWP assumes the following, with respect to Stage 1 groundwater monitoring:

- wells OBW-1, OBW-3, OBW-5, MW-6, and MW-7 will be monitored for the presence of permanganate;
- if permanganate is not observed/detected at OBW-1, OBW-3, OBW-5, and MW-6, groundwater samples will be collected from these wells for the same analyses performed during baseline sampling; and,
- if no permanganate is present at MW-7, samples will be collected and analyzed for hexavalent chromium.

If this is not what the PLPs had planned to do, and you would prefer to monitor post-injection groundwater differently than assumed above, please contact Ecology prior to initiation of Stage 1 mobilization.

The PLPs should now proceed to implement Stage 1 of the interim action in accordance with the approved FIWP and its schedule/timeline. If you have any questions about 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 7336 79

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