STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL

November 19, 2007

Mr. Wilbur Allison
dba Allison's Norge Village Dry Cleaners
C/o Mr. David D. Cullen
West Hills Office Park
Building 11, 1800 Cooper Point Road SW
Olympia, WA 98502

Re: Opinion under WAC 173-340-515(5) on Remedial Action(s) for the following Hazardous Waste Site:

- Name: Allison's Norge Village (a.k.a. Eastside Laundry)
- Address: 120 NE Turner Street (a.k.a. 116 or 122 NE Turner Street)
- Facility/Site No.: 14214153
- VCP No.: SW0804

Dear Mr. Allison:

Thank you for submitting your independent remedial action report(s) for the Allison's Norge Village (Site) for review by the Washington State 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 the groundwater monitoring network is sufficient to meet the specific substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Halogenated Volatile Organic Compounds in Groundwater.

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 your remedial action(s):

1. October 19, 2007, Farallon Consulting, LLC. Cleanup Action Progress Report, August 2006 to August 2007, Allison's Norge Village (a.k.a. Eastside Laundry), 120 NE Turner Street, Olympia, Washington.

The reports listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact, Debbie Nelson, at (360) 407-6365.

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

- Halogenated Volatile Organic Compounds in Soil.
- Halogenated Volatile Organic Compounds in Groundwater.

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 Cleanup Action Progress Report and supporting documentation listed above, **Ecology has determined that the groundwater monitoring network described in the report <u>is not</u> sufficient to meet the specific substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:**

- Halogenated Volatile Organic Compounds in Groundwater.

Based on a review of the above-listed document, Ecology has the following comments:

1. The groundwater contour maps from July and September 2007 show that the direction of groundwater flow is generally southwest. No deep monitoring wells are present south or southwest of the area of soil contamination. **Therefore, additional deep groundwater monitoring wells are needed near the southwest and south extent of soil contamination to further define groundwater concentrations and flow direction.**

2. **Since the Soil Vapor Extraction (SVE) Interim Action at the site is still in progress, this Opinion Letter is not commenting on the sufficiency of it at this time.** When the Interim Action has been completed and the Interim Action Report has been submitted, an Opinion Letter will be prepared. However, we encourage you to continue to update us on the status of the SVE system operation at the site.

3. In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted in both a written and electronic format. Additional information regarding electronic format requirements, see the website http://www.ecy.wa.gov/eim. All laboratory analyses shall be performed by the State of Washington Certified Laboratory for each analytical method used.

Please note that this letter does not provide an opinion on the sufficiency of any other remedial actions conducted at the Site or whether further remedial action is necessary to characterize and address all contamination at the Site. To obtain such an opinion, you must submit an independent remedial action report to Ecology upon completion of the cleanup action for the Site and request such an opinion under the VCP.

Please also 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.

Again, Ecology appreciates your initiative in conducting an 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 conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-6247 or via e-mail at stee461@ecy.wa.gov.

Sincerely,

SSTeel

Steve Teel, LHG
Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

ST/ksc:SW0804 Allisons Opinion on Completed RA

Enclosure

Cc: Mr. Riley Conkin, Farallon Consulting, LLC
Ms. Carla Brock, Farallon Consulting, LLC
Stormans Inc., Mr. Kevin Stormans, c/o Mr. Paul Carey, Betts Patterson & Mines
Gerald Tousley,Thurston County Health Department, Environmental Health
Scott Rose – Ecology

ENCLOSURE A

The site is located on the southeast corner of the intersection of Turner Street and State Street in Olympia, Thurston County, Washington. The 0.37-acre parcel includes a single-story masonry building in the northwest corner; this building was built in the early 1960s. The remainder of the site is covered with asphalt. The building is divided into four suites that are currently occupied by (from north to south): Eastside Laundry (dry cleaning operations), a barbershop, an insurance broker, and Eastside Laundry (pick-up and drop-off only).

The site has been operated as a dry-cleaning business since the early 1960s. The building formerly contained eight coin-operated dry-cleaning machines along the southern wall of the northern suited that were supplied with tetrachloroethene (PCE) from an above-ground storage tank (AST) located inside the building. The coin-operated machines were removed in late 1990 and a single, dry-to-dry type commercial dry-cleaning machine was installed in its place. The AST was pumped-out in late 1990 and remains in place.

A Site Hazard Assessment (SHA) was completed for the site and the ranking was determined to be a **3**.

Soil Contamination from Dry Cleaning Past Practices: Environmental investigations conducted to date have shown that PCE soil concentrations exceed the MTCA Method A Cleanup Level for Unrestricted Uses of 0.05 milligrams per kilogram (mg/kg). The maximum depth of contamination above the Cleanup Level ranges from approximately 35 feet below ground surface (bgs) in the eastern portion of the property to approximately 82 feet bgs below the dry-cleaning machines. The lateral extent and depth of soil contamination has been defined to the east, southeast, and south. ***However, the lateral extent and depth of soil contamination to the southwest, west, northwest, and north has not been determined.*** The maximum observed PCE soil concentration is 39.9 mg/kg from sample IB-2 (5 foot depth).

Groundwater: The hydrogeology of the site has been described as consisting of three zones: shallow, intermediate, and deep. The shallow zone consists of silts, silty sands, and sands to a depth of between 20 to 35 feet bgs. The intermediate zone is composed of dense silty gravels and silty sands from the bottom of the shallow zone to between 85 to 90 feet bgs. The deep zone is composed of gravel from 85 to 90 feet bgs to a total depth between 112 to 116.5 feet. The base of the deep zone is defined by a silt that may contain various amounts of sand and gravel.

A total of six wells ("deep zone wells") monitor the regional groundwater table beneath the site (MW-2, -5, -7, -9, -10, and -11). Depth to water ranges from 76 to 88 feet bgs. Local perched water was observed in several borings at depths of 5 to 22 feet bgs at insufficient quantities to collect groundwater samples. A deeper perched groundwater zone was encountered in well MW-1 at a depth of approximately 55 feet bgs. Well MW-1 has been converted to use as a soil vapor extraction (SVE) well and has been re-named as SVE-1I.

Groundwater concentrations of PCE above the MTCA Method A Cleanup Level of 5 micrograms per liter (µg/L) have been observed in three deep zone wells (MW-2, -5, and -7) and the perched zone ("intermediate zone") monitoring well (MW-1). PCE is the only constituent that has been observed at concentrations above the Cleanup Level. Observed deep zone concentrations above the Cleanup Level range from 7 µg/L (MW-7, December 2004) to 920 µg/L (MW-2, July 2007). The closest water supply well is greater than 0.5 miles from the site.

During the July and September 2007 sampling events, information on groundwater flow gradient and direction were collected for the deep zone. Prior to the installation of wells MW-9 through MW-11 in August 2006, the direction of groundwater flow was presumed to be west-northwest toward Capital Lake and Budd Inlet. However, the water table maps from July and September 2007 show that the direction of groundwater flow is southwest. **Therefore, additional deep groundwater monitoring wells are needed near the southwest and south extent of soil contamination to further define groundwater concentrations and flow direction.**

Ecology previously reviewed and approved the used of SVE as an Interim Remedial Action. The SVE system started operation on April 4, 2007. The system had to be shut down on June 11, 2007 due to breakthrough of one of the carbon canisters. The system began operating again in September 2007.

ATTACHMENTS (from consultant reports)
Figures 1, 3, 4, and 5

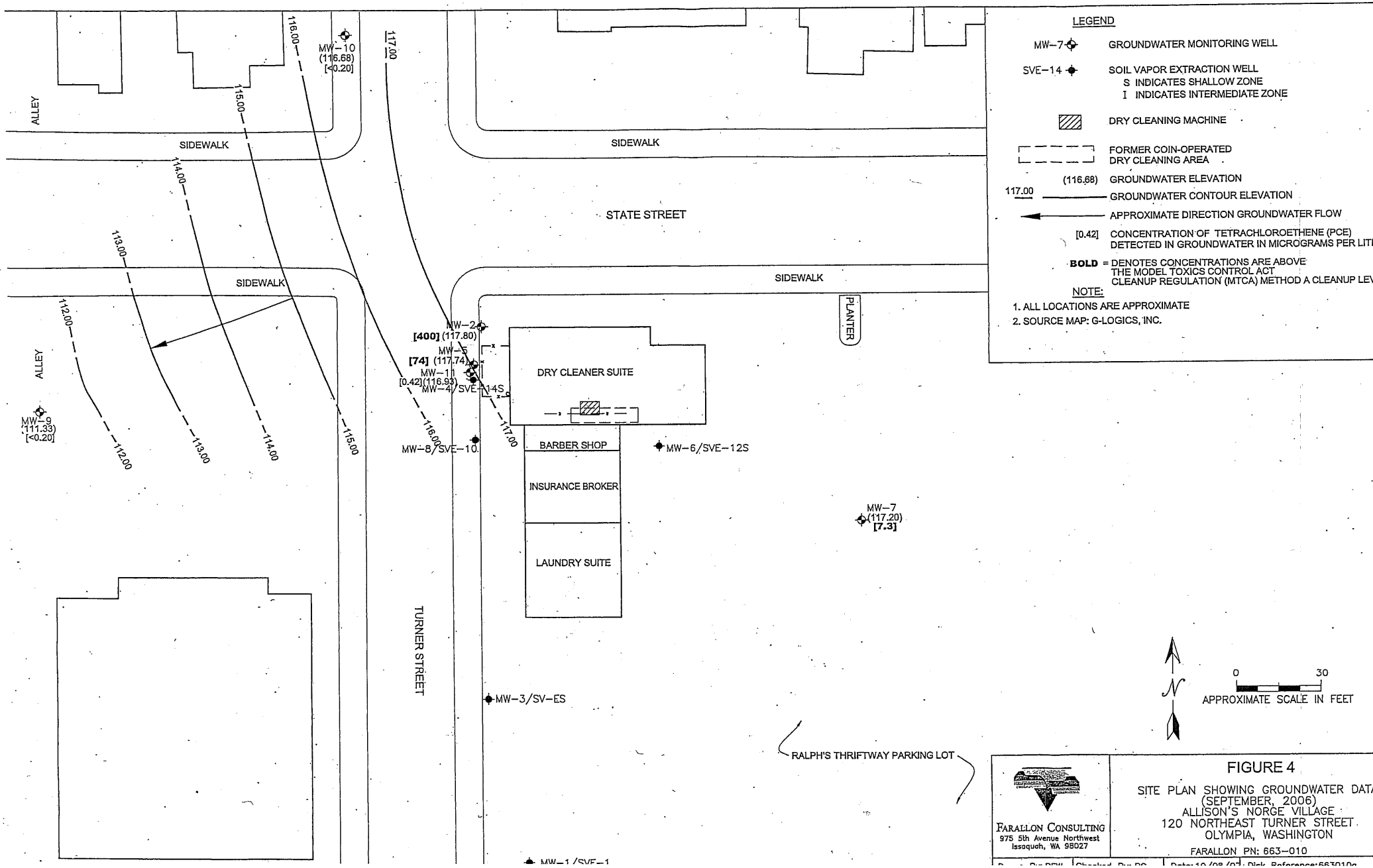
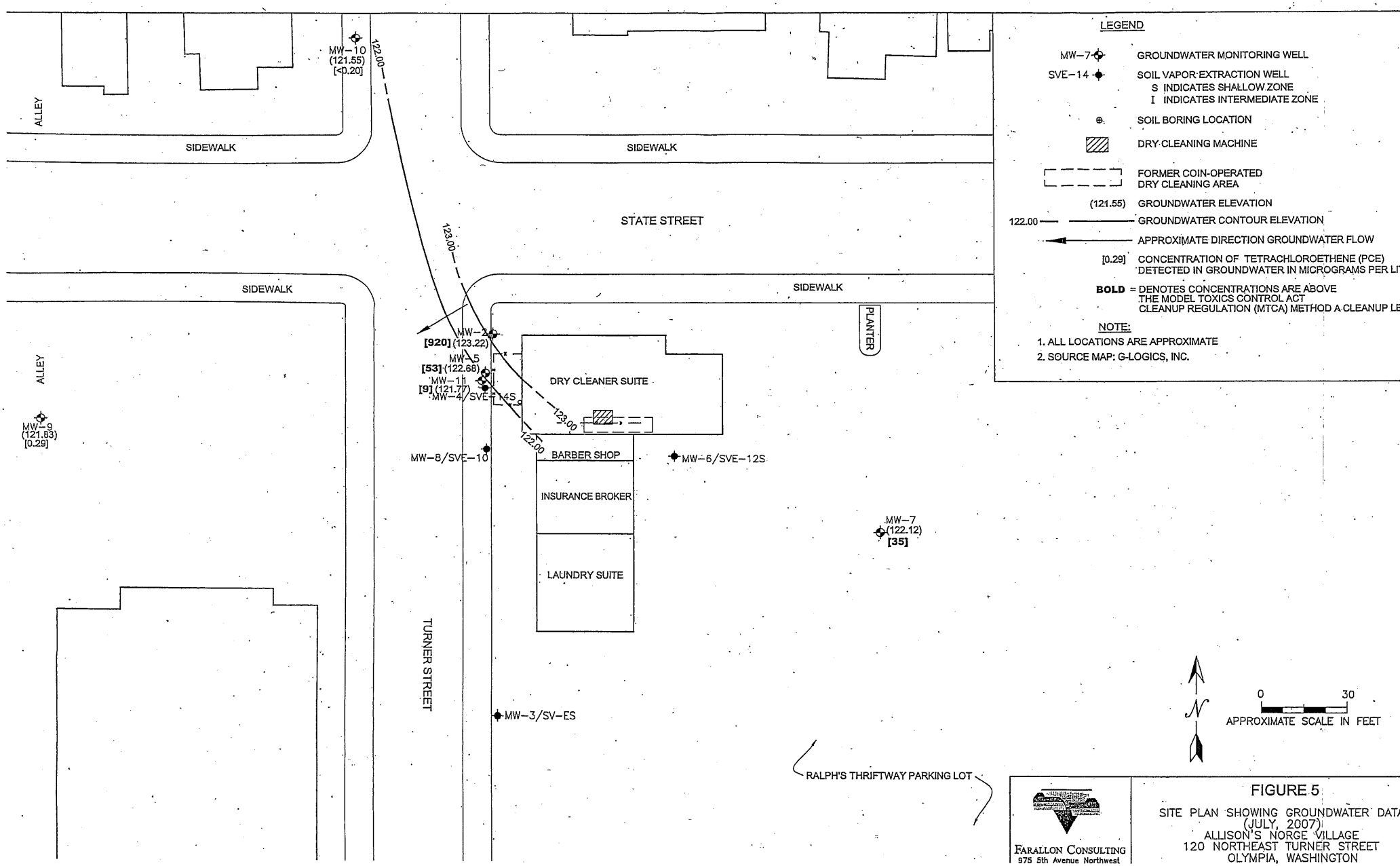


FIGURE 4

SITE PLAN SHOWING GROUNDWATER DATA
(SEPTEMBER, 2006)
ALLISON'S NORGE VILLAGE
120 NORTHEAST TURNER STREET
OLYMPIA, WASHINGTON

FARALLON PN: 663-010

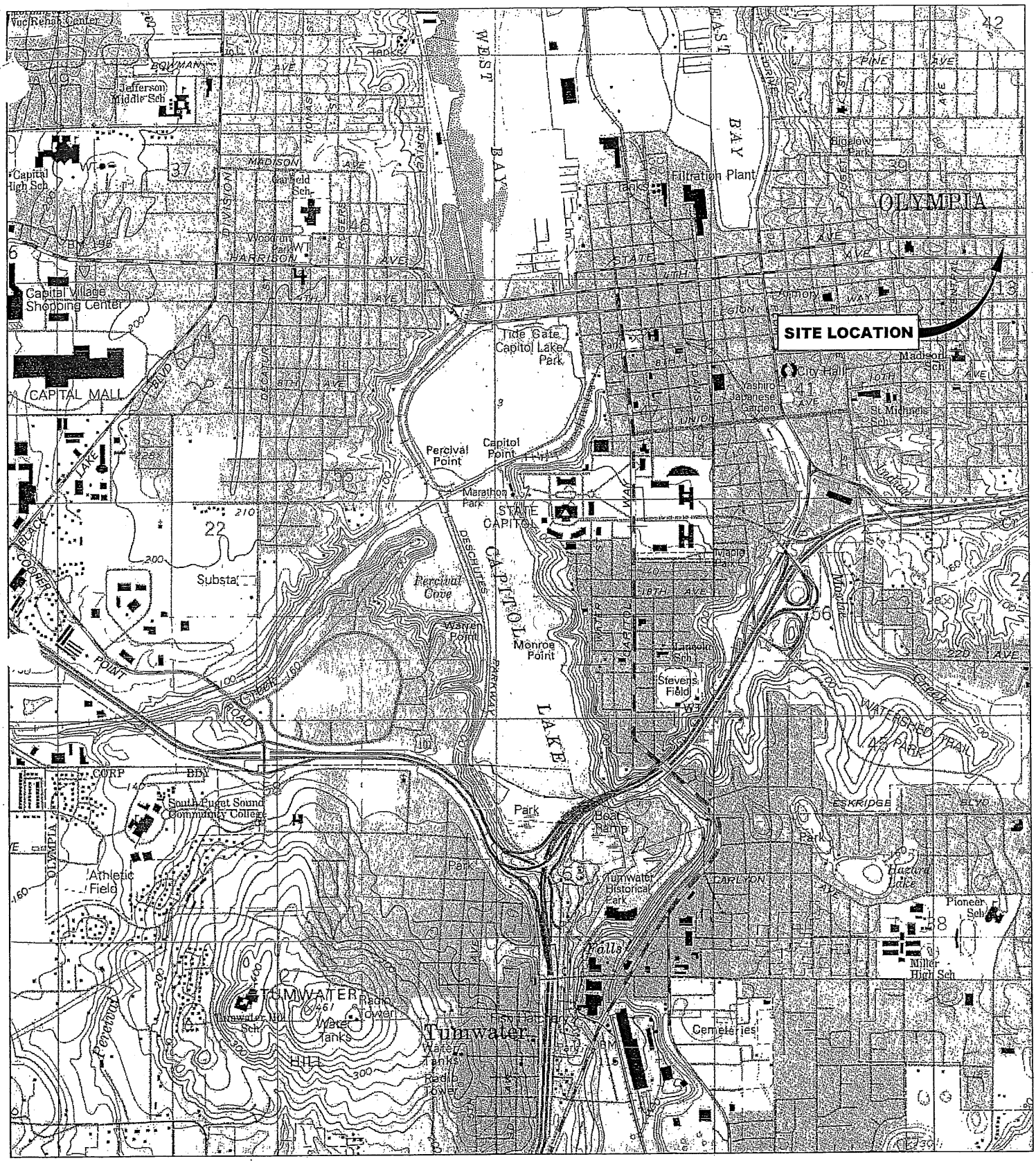
FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027



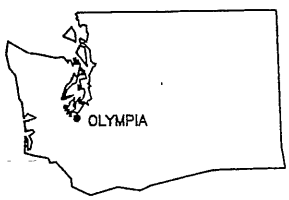
FARALLON CONSULTING
975 5th Avenue Northwest

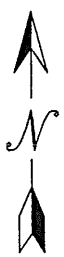
FIGURE 5

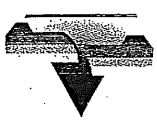
SITE PLAN SHOWING GROUNDWATER DATA
(JULY, 2007)
ALLISON'S NORGE VILLAGE
120 NORTHEAST TURNER STREET
OLYMPIA, WASHINGTON



REFERENCE: 7.5 MINUTE USGS QUADRANGLE TUMWATER, WASHINGTON. DATED 1997







FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

FIGURE 1

SITE LOCATION
ALLISON'S NORGE VILLAGE
120 NORTHEAST TURNER STREET
OLYMPIA, WASHINGTON

FARALLON PN: 663-010

Drawn By: DEW	Checked By: RC	Date: 10/08/07	Disk Reference: 663010a

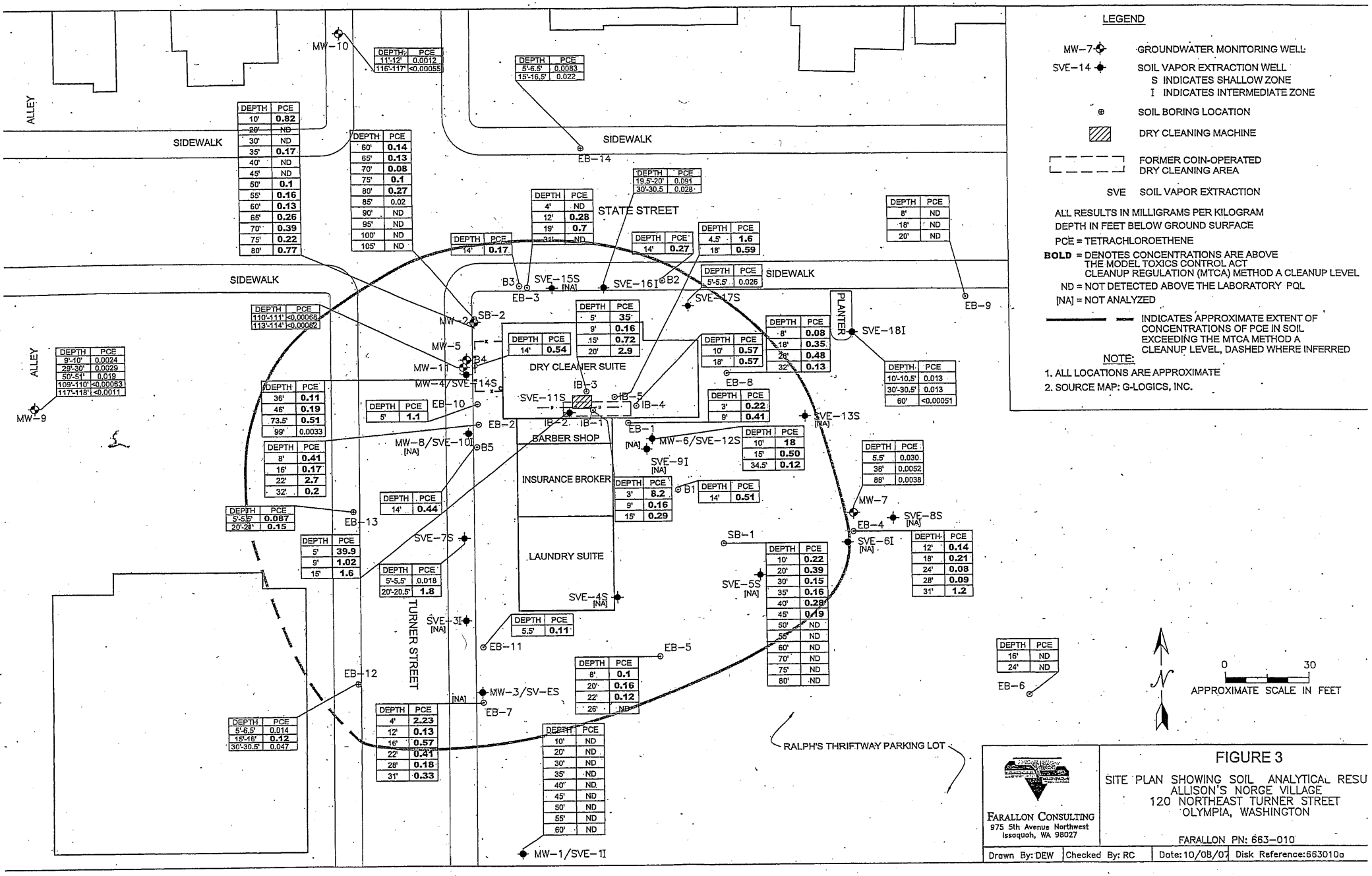


FIGURE 3

SITE PLAN SHOWING SOIL ANALYTICAL RESU
ALLISON'S NORGE VILLAGE
120 NORTHEAST TURNER STREET
OLYMPIA, WASHINGTON

FARALLON PN: 663-010

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