



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 19, 2019

Adam Griffin
Aspect Consulting, LLC
350 Madison Avenue North
Bainbridge Island, WA 98110

**RE: Ecology Comments on the Draft Remedial Investigation and Feasibility Study,
Request for a Draft Cleanup Action Plan**

- **Site Name:** New City Cleaners Site
- **Site Address:** 747 Stevens Drive, Richland
- **Facility Site ID No.:** 327
- **Cleanup Site ID No.:** 4894

Dear Adam Griffin:

Washington State Department of Ecology (Ecology) has reviewed the Agency Review Draft of the Remedial Investigation/Feasibility Study Report (RI/FS) for the New Site Cleaners Site (Site). This letter provides Ecology's comments on the RI/FS and establishes a deadline for addressing Ecology's comments.

Ecology requests the following comments be addressed:

- In Section 1 Introduction – remove the last sentence of paragraph two. Written notice from Ecology is required for Enforcement Order No. DE 96TC-C180 (EO) to be deemed satisfied, and Agreed Order No. DE6558 (AO) does not state that it supersedes previous orders or decrees. The AO also does not specifically mention the EO.
 - Ecology will review EO DE 96TC-C180 and determine if work performed as part of AO DE 6558 satisfies the conditions of the EO, and issue a letter accordingly.
- In Section 2.3 Surrounding Properties – in the paragraph titled “East of Subject Property” remove the d after the final period.
- In Section 3.3 Hydrogeology – in the second paragraph there is a hydraulic gradient reported as feet per feet that should be feet per foot.



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- In Section 5.2 Constituents of Concern – consider adding soil vapor and indoor air as a bullet, both were sampled as part of the RI. They are also included in Table 7 (Proposed Cleanup Levels for Site COCs) and are discussed in Section 5.6.
- In Section 5.6 Soil Vapor and Indoor Air – in the fourth paragraph the 3 in ug/m³ should be superscripted (there are two instances).
- In Section 8 Remedial Technologies – consider discussing Institutional Controls in this section, as cleanup alternatives 1 & 2 discuss implementation.
 - Add an Institutional Control bullet to Section 8.10 if discussed above and renumber the sections accordingly.
- In section 9.3.1 Mann Kendall Trend Test – consider including the well name for the exception, at the end of paragraph 2.

Please address these comments or incorporate the changes and prepare the public comment review draft by **December 20, 2019**. Since the hard copies will become final, if no changes are required from public comment, please remove all the draft language and watermarks prior to printing.

Ecology agrees that remedial Alternative 2 with implementation of a Soil Vapor Extraction (SVE) pilot test is the preferred remedial action for this site. VII.F of the AO states that “upon receipt of Ecology’s comments on the draft Feasibility Study Report, the PLPs shall submit to Ecology for review a draft Cleanup Action Plan...” Please provide ecology with a draft Cleanup Action Plan (dCAP) for review by **January 22, 2020**. The dCAP shall meet the requirements of WAC 173-340-380 and reflect Alternative 2 of the RI/FS; it should also include an outline of the SVE pilot test.

Please provide the public comment draft RI/FS by December 20, 2019 and the dCAP by January 22, 2020.

Sincerely,



Kyle Parker
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office