

Radcliff, Eugene (ECY)

From: Radcliff, Eugene (ECY)
Sent: Wednesday, November 30, 2011 9:54 AM
To: 'Joe Morrice'
Subject: RE: Morrell's Dry Cleaners - SW1039

Joe:

Thanks for your response to the Morrells Dry Cleaning (Site) Further Action Letter dated September 26, 2011. I have reviewed the letter and have the following comments:

Ecology Comment 1:

- *Comment to Aspect's response: Vertical extent of PCE and PCE.* While Ecology can appreciate the challenges involved in delineating the contamination in such tight confines, MTCA does require that the full vertical and horizontal extent of any soil contamination be completed. And while it may be difficult to get a comprehensive vertical delineation on this Site, Ecology believes this can be done by using an angled boring from the east side of the building. From this location, the boring should be able to reach the bottom of the perched aquifer and should be able to intercept the water table surface under the presumed source. Ecology would be happy to entertain other approaches that could collect the same type of delineation data.
- *Comment to Aspect's response: BTEX compounds as COCs in soil.* Ecology concurs.
- *Comment to Aspect's response: Naphthalene and lead in soil.* Ecology concurs.

Ecology Comment 2:

- *Comment to Aspect's response: BTEX and naphthalenes as COCs in groundwater.* Ecology concurs that these compounds are not classified as COCs at the Morrells Site as long as those compounds are still part of the analytical package.
- *Comment to Aspect's response: TCE, DCE, and vinyl chloride in lower aquifer groundwater.* Ecology concurs; however, TCE, DCE, and vinyl chloride shall still be evaluated for in future analysis of both the upper and lower aquifer.

Ecology Comment 3: Ecology believes the Gore® Module data indicates the need to assess the indoor air quality and remedial measures to be taken to create increased indoor air flow in any occupied spaces within the source building. The Morrell's building will need to have an assessment conducted on indoor air quality. That being said, Ecology concurs that a Tier I Assessment is the path to take in determining if the *adjacent* buildings are also required to have a Tier II Assessment conduct.

Ecology Comment 4: Concur

Ecology Comment 5: Concur

Ecology Comment 6: Concur

Ecology appreciates you comments and feedback. If you would like to discuss any of the above comments further please contact me.

Sincerely,

Eugene Radcliff, L.G.
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From: Joe Morrice [<mailto:jmorrice@aspectconsulting.com>]
Sent: Tuesday, November 29, 2011 2:07 PM
To: Radcliff, Eugene (ECY)
Cc: Doug Hillman; 'Michael J. Bond'
Subject: Morrell's Dry Cleaners - SW1039

Eugene –

The attached letter provides our responses to Ecology's review comments for the Morrell's dry cleaner site, including our planned next steps in addressing data gaps and moving to development of a Focused Feasibility Study. A hard copy will also be mailed to your attention. As discussed in the attached letter, our planned next steps include:

- Drilling an additional deep well near former shallow well MW-6 to further characterize the deeper aquifer. A round of water quality samples will be collected from all site wells and analyzed for VOCs and, in response to one Ecology comment, lead.
- Collect soil samples to further characterize the lateral extent of naphthalene in soil near boring DP-08 and evaluate whether there is a potential soil source of lead. Samples will be analyzed for naphthalene and lead.
- Perform a Tier I Vapor Intrusion Assessment by collecting soil gas samples at the northern property boundary of the Morrell's parcel. Results will be compared to Ecology's soil gas screening levels in the Vapor Intrusion Assessment Guidance to determine if there is a potential for migration to indoor air at unacceptable concentrations and if additional sampling is warranted.

We appreciate your detailed review and comments. Please feel free to contact me if you have any questions.

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