



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 10, 2015

MR. ROBERT S. STOWE
CITY OF BOTHELL
18305 101ST AVENUE NE
BOTHELL, WA 98011

Re: Opinion pursuant to WAC 173-340-515(5) on Revised Remedial Investigation/Feasibility Study Work Plan for the following Hazardous Waste Site:

- **Name:** Simon & Son Fine Drycleaning
- **Address:** 18107 Bothell Way NE, Bothell, Washington
- **Facility/Site No.:** 33215922
- **VCP No.:** NW2946
- **Cleanup Site ID No.:** 427

Dear Mr. Stowe:

Thank you for submitting documents regarding your Remedial Investigation/Feasibility Study work plan for the **Simon & Son Fine Drycleaning** facility (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 a review of submitted documents/reports pursuant to 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:

- Tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE) and vinyl chloride (VC) into the Soil and Ground Water

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



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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 proposed remedial actions:

1. HWA, Inc., 2015. *Remedial Investigation/Feasibility Study Work Plan (Rev 1), Bothell Service Center Site, Bothell, Washington.* August 10.

The report listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7235 or sending an email to: nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following releases:

- PCE, TCE, cis-1,2-DCE and VC into the Soil and Ground Water

Based on a review of the supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the releases at the Site, Ecology has determined:**

- Please provide an electronic red line-strike out version of the revised work plan so the changes to the original work plan text and tables are visible.
- The use of a membrane interface probe (MIP) in the four angled and four vertical soil borings will obtain useful Site characterization information only if the borings can be advanced to the proposed depths with direct push drilling methods. The sonic drilling method specified in the original work plan has a much greater chance of reaching the depths needed. Incidentally, your response to comments cover letter says hollow stem auger drilling methods were to be used but the original work plan (page 20) indicates sonic drilling was to be performed.
- Although use of the MIP technology presumably reduces the need for extensive soil sampling, Table 3A does not specify any soil samples that will be collected from the

deep (angled and vertical) soil borings that will be logged with the MIP. Will results from soil samples collected in borings for the four proposed monitoring wells outside of the building be used to ground-truth and confirm the MIP data?

- The original work plan proposed permanent monitoring wells to be installed in the four angled borings under the building. Table 3A of the revised work plan indicates that reconnaissance ground water samples will instead be collected from the “deep” borings, presumably that includes the angled borings. Is it possible that angled monitoring wells will be installed at a later time based on the results of the reconnaissance ground water sampling or will the building be torn down soon, allowing better access?
- There appears to be a discrepancy between the comment response cover letter and the revised work plan text. The revised work plan (pages 21 and 22) states that a total of 8 MIP borings will be advanced; the letter (page 2) implies a total of 6 MIP borings will be advanced. Please correct whichever document is incorrect.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please 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 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.

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If you have any questions regarding this opinion, please contact me at (425) 649-7064 or
hvic461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Vick". The signature is written in a cursive, flowing style.

Heather Vick, LHg
NWRO Toxics Cleanup Program

cc: Norm Olsen, Bothell Service Center
Arnie Sugar, HWA Geosciences, Inc.
Sonia Fernandez, VCP Coordinator, Ecology