



May 20, 2020

Responsiveness Summary

Comment Period: March 23, 2020 through April 22, 2020

- **Site Name:** New City Cleaners
- **Site Address:** 747 Stevens Drive, Richland
- **Facility Site ID:** 327
- **Cleanup Site ID:** 4894

Document for Review and Comment:

Remedial Investigation & Feasibility Study

The Washington State Department of Ecology (Ecology) received five (5) comments during the public comment period for the New City Cleaners Site. All five comments received were from Rose Longoria with the Yakama Nation Fisheries.

Comment 1: Contingency Plan. This remedy relies extensively on MNA in the downgradient solvent plume for an estimated 15 years. Therefore, it is critical that any remedy selected include adequate performance monitoring and a contingency plan. There is no mention of a contingency plan in this report and one should be included.

Response: *The Cleanup Action Plan (CAP) will outline the performance-monitoring plan and include a contingency plan.*

Comment 2: Incomplete groundwater contaminant plume delineation. The downgradient end of the groundwater contaminant plume is not bounded (Figure 10 and 19). Residences and businesses are located adjacent to the unbounded downgradient plume end, and the Columbia River is within a ½ mile. Delineation and bounding of the downgradient end of the solvent plume is necessary in order to understand potential risk to downgradient receptors, as well as to evaluate the rate and effectiveness of MNA.

Response: *MTCA defines **Remedial Study/feasibility study** as “a remedial action that consists of activities conducted under WAC 173-340-350 to collect, develop, and evaluate sufficient information regarding a site to select a cleanup action under WAC 173-340-360 through 173-340-390.” Ecology believes sufficient information has been collected, developed, and evaluated to select and perform remedial action.*

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Comment 3: Performance Monitoring. Alternative 2 recommends this downgradient plume be addressed through passive monitored natural attenuation. Performance monitoring is a key component of MNA and Ecology's MNA guidance include sentinel wells requirements.

Although performance monitoring is mentioned as a component of Alternative 2, no mention of a sentinel well was found in this RI/FS Report. It is critical that performance monitoring plans include sentinel wells. See Ecology's "Guidance on Remediation of Petroleum-Contaminated Ground Water By Natural Attenuation", July 2005 Publication No. 05-09-091, Table 3.1 and 4.1, Section 4.1.1 and 4.2 5.2, and elsewhere, <https://fortress.wa.gov/ecy/publications/documents/0509091.pdf>.

Response: Section 1.1 of the referenced guidance states:

This guidance does not establish or modify regulatory requirements. While this guidance provides several useful evaluation methods and tools to demonstrate compliance with regulatory requirements and makes recommendations regarding the appropriate use of those methods and tools, persons do not need to use those specific methods or tools and may use alternative methods or tools to demonstrate compliance.

The performance-monitoring plan will be outlined in the CAP.

Comment 4: Adjacent, downgradient historic cleaners: U.S. Linen & Uniform, 1106 Harding St, Richland, WA 99352, Tax Parcel # 111 993 020 560 002. The unbounded downgradient plume end is adjacent to an historic facility that we understand has operated as a dry cleaners facility since the WWII era. Any efforts to comply with delineation and performance monitoring requirements will need to consider the potential for releases from this historic facility.

Response: Ecology does not require investigations due to historic use. Credible evidence of a release is required before Ecology has authority to require remedial investigation. Ecology does not have record of a release at 1106 Harding Street in Richland (U.S. Linen & Uniform).

Comment 5: Columbia River. We understand that PCE (and/or breakdown products) have been detected downgradient and within the potential flowpath of groundwater flowing from New City Cleaners towards the Columbia River. Yakama Nation Fisheries requests environmental information on this historic dry cleaning facility and any other wells or facilities within this general flowpath.

Response: Referred to the Public Records Coordinator, who responded by email on April 4, 2020.

Ecology Responses by:

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