



November 25, 2022

Ms. Jeanne Tran, P.E.
Water Quality Program
Department of Ecology, NWRO
15700 Dayton Ave N
Shoreline, WA 98133

**Re: Treatment System Operating Plan, Status of System
Waste Discharge Permit WA0991040
Overlake Retail Shops (Former Sears Auto #6119)
2200 148th Avenue NE
Redmond, WA 98052**

Dear Ms. Tran:

Apex Companies, LLC (Apex), has prepared this letter to update Ecology regarding Wastewater Discharge Permit WA0991040 at the Former Overlake Sears Auto Center (now Overlake Retail Shops), located at 2200 148th Avenue NE, Redmond, Washington. This letter updates Ecology on the status of the treatment system operations and required Treatment System Operating Plan.

The permitted discharge is for a Dual-Phase Extraction (DPE) soil and groundwater remediation system. System construction and final electrical connections were completed in August 2021. The system intermittently operated for pilot testing in August, September, October and December 2021. During all operations, treated water was contained in a batch tank and discharged with approval from the City of Redmond, or transported from the site to a treatment facility. Sampling, results, and Discharge Monitoring Report (DMR) submittal have all been in compliance with Wastewater Discharge Permit WA0991040.

During pilot testing of the system in August 2021, the system was recovering groundwater and vapor as planned. However, Separate Phase Hydrocarbon (SPH) removal was higher than expected. Because the treatment system was not designed for significant SPH removal, it had difficulty achieving the limitations of Wastewater Discharge Permit WA0991040 on a sustained basis, therefore water was only treated in batches. The system has not operated since December 2021 because FW WA-Overlake Fashion Plaza II, LLC and the responsible party are in a dispute regarding management of the site. During the interim, Apex has been inspecting the site on a monthly basis. In August 2022, fluids within the system were drained and taken to a permitted facility for treatment.

We are happy to report that the dispute was recently resolved and work at the site will resume. We are developing a schedule of required activities to resume the system startup. This includes the required Treatment System Operation Plan, system modification and groundwater monitoring. We will communicate this schedule in the coming weeks. Because of the continued operations hiatus, we are requesting a final 120 day extension until March 15, 2023 for submittal of the Treatment System Operation Plan.

Please contact John at jfoxwell@apexcos.com or (503) 312-0676 with any questions or comments.

Sincerely,

Apex Companies, LLC



John Foxwell, LHg
Principal

cc. Eric Silvers (FW WA-Overlake Fashion Plaza II, LLC)