



Electronic Copy

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • PO Box 330316 • Shoreline, Washington 98133-9716 • (206) 594-0000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

July 13, 2021

Coleen Spratt
Union Station Associates
159 South Jackson Street, Suite 300
Seattle, WA 98104
(coleens@nsco.com)

RE: Notice of Periodic Review Conducted at the following Cleanup Site:

- Name: Union Station
- Address: 411 South Jackson Street, Seattle, Washington
- Facility/Site No.: 2060
- Cleanup Site No.: 3858

Dear Coleen Spratt:

The Model Toxics Control Act (MTCA), Chapter 70.105D Revised Code of Washington, which governs the cleanup of hazardous waste sites in Washington State, requires the Department of Ecology (Ecology) to conduct a periodic review every five years for sites with cleanup actions under a consent decree that include institutional controls (an environmental covenant). This letter serves to inform you that a periodic review has been conducted at the Union Station (Site).

The periodic review process includes the following steps:

1. Review cleanup information, including any recent monitoring data.
2. Confirm that the covenant is active and recorded with the title to the property.
3. Visit the Site to confirm the institutional controls and conditions of the covenant are effective. (However, due to Washington State's Stay Home order related to the COVID-19 pandemic, a Site visit was not conducted for this periodic review.)

A copy of the periodic review document is attached. Below is a brief summary of the periodic review's conclusions:

- Groundwater concentrations of acenaphthene, benzene, arsenic, benzo(a)anthracene, chrysene, diesel-range total petroleum hydrocarbons (TPH), and gasoline-range TPH exceed cleanup levels at the conditional point of compliance (the western property boundary) and this contaminated groundwater appears to be migrating off-property.

Therefore, the remedy is not protective of groundwater and marine surface water located downgradient of the property. Based on this, the Site failed the periodic review.

- Required contingency actions are outlined in the Cleanup Action Plan (CAP). Groundwater monitoring is currently being performed every 5 years. According to the CAP, if any sample exceeds cleanup levels, another sample is to be collected one quarter later. If the second sample exceeds cleanup levels, quarterly monitoring for one year is to commence. Further contingency actions based on those findings (such as monitoring frequency changes or groundwater treatment), as well as the appropriate methods of analyzing the monitoring data, are described in the CAP. However, it should be noted that groundwater treatment may be the most likely result, based on historical monitoring data. Therefore, another option is to focus resources on groundwater treatment rather than additional quarterly monitoring at this time.
- Vapor intrusion does not appear to have been evaluated at the Site. For example, groundwater concentrations of benzene and naphthalene exceed the groundwater screening levels for vapor intrusion. A vapor intrusion assessment should be completed for the Site to determine if vapor intrusion from any of the contaminants of concern is a risk to building occupants.
- The attached periodic review report contains additional detailed information.

Periodic reviews will continue to be performed for as long as contamination remains at the Site and institutional controls (an environmental covenant) are required to protect human health and the environment. Institutional controls for the Site were recorded in the form of an environmental covenant in 1997. The covenant remains active and is discoverable through the King County Auditor's Office. The covenant prohibits activities that could result in the release of contaminants contained as part of the remedy, and prohibits any use of the property that is inconsistent with the covenant (unless Ecology's approval is obtained in advance). It is recommended that you periodically review your covenant in order to understand the specific restrictions at your Site, as well as the notification and approval requirements for ground disturbing activities performed at your Site (such as digging, drilling, building demolition, etc.).

If you have any questions regarding this letter or the periodic review, please contact the periodic reviewer Tamara Welty by email at tamara.welty@ecy.wa.gov or by phone (206) 594-0090.

Sincerely,



Tamara Welty, LG, LHG
Toxics Cleanup Program, NWRO

Enclosures: Periodic Review Document