



July 13, 2021

Jing Song
Site Manager
NWRO Toxics Cleanup Program
State of Washington Department of Ecology
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

**Subject: Selection of Preferred Alternative
Y Pay Mor Drycleaner
VCP Project No. NW3265
Federal Way Link Extension Parcel FL-358**

Dear Jing,

This letter provides an update on activities completed at the Y Pay Mor Dry Cleaner Site (Site), 2210 South 320th Street in Federal Way (King County parcel 2423200050) and pertaining to the 1995 and 1998 restrictive covenants associated with the Site. The purpose of this letter is two-fold: (1) to respond to Washington State Department of Ecology's (Ecology's) April 1, 2021 request to Sound Transit for a summary of future construction activities planned within the Space A-6 Area, and (2) to request written approval from Ecology, as required in the 1995 and 1998 restrictive covenants and subsequent Ecology letters, for Sound Transit to complete certain future construction activities in the Space A-6 Area. As background, the summary below outlines the Sound Transit construction activities previously approved by Ecology under the 1995 and 1998 restrictive covenants. Portions of the parcel identified as the "approved work area" and the "Space A-6 Area" referenced in the restrictive covenants and in Ecology correspondence are delineated on Figure 1.

- **Ecology Letter dated April 29, 2020:** The following construction activities were approved for the western 2/3 of King County parcel 2423200050 ("approved work area") as of the date of the letter:
 - Demolition of existing above-ground structures.
 - Removal of existing asphalt and concrete pavement.
 - Disconnection of existing utilities.
 - Construction of new underground and aboveground structures and utilities.
- **Ecology letters dated April 8, and June 26, 2020:** The following construction activities were approved for the eastern 1/3 of King County parcel 2423200050 ("Space A-6 Area"):
 - Demolition of aboveground structures and disconnection of utilities in order to complete remedial action.
 - Investigation for cleanup action planning.
 - Remedial excavation of contaminated soil.
 - Placement of up to 15 feet of fill to raise surface grade.
- **Additional requirements of Ecology's June 26, 2020 letter:** Written Ecology approval is required for any future construction activities within the Space A-6 Area "that may result in the contaminants release or exposure to the environment, or create a new exposure pathway. Such activities would include, but not be limited to, construction

dewatering to facilitate installation of subsurface structures, such as stormwater vaults or utility conduits. Dewatering has the potential to intercept and redistribute ground water contamination that is present beneath the Site.”

Sound Transit Construction Activities Completed To Date

Figure 2 represents Cross-section A-A’ illustrating the depths and relative elevations of the remedial excavations performed as a Model Toxics Control Act (MTCA) interim cleanup action, and subsequent embankment fill placement to raise surface grades. The footprint and features of the future Federal Way Transit Center (FWTC) subsurface, surface and above-grade features in relation to the VOC-contaminated groundwater plume with the Space A-6 Area are shown on Figure 3.

Major activities completed by Sound Transit within the Space A-6 Area since April 2020 are summarized below.

- Demolished the aboveground structures.
- Disconnected the majority of underground utilities.
- Conducted the MTCA interim cleanup action which included excavation of known dry cleaner-related VOC-contaminated soil situated above the Elevation range of 41 to 416 feet (North American Vertical Datum of 1988) (see Figure 2 cross section). The remedial excavations were backfilled upon completion. The interim action report is dated February 19, 2021 and was provided to Ecology.
- Placed approximately 10 to 12 feet of embankment fill to raise surface grades. The top of newly added fill is approximately 434 feet.
- Evaluated the extent of the VOC-contaminated groundwater plume and estimated the groundwater flow direction. The estimated extent of the VOC-contaminated groundwater plume and groundwater elevation contours are shown on Figure 3. The extent of the VOC-contaminated groundwater plume is based on Spring 2020 groundwater contaminant concentrations in permanent and temporary wells and inferred based on the estimated southeasterly groundwater flow direction. The groundwater table within the vicinity of the VOC-contaminated groundwater plume is between Elevations 417 to 419 feet (shown in Figure 2). We plan to install permanent wells to define the current extent of the VOC plume, post interim action. The Remedial Investigation Work Plan describing the planned permanent well installation will be submitted to Ecology in July 2021.
- Constructed three drilled shafts within the Space A-6 Area for Federal Way Link Extension (FWLE) light rail support columns (see Figure 3). The drilled shafts were completed in April 2021. The shaft positions are approximately 50 to 90 feet upgradient of the PCE-contaminated groundwater plume. The deepest shaft extended to Elevation 379.72 feet. The shafts were cased; dewatering was not necessary during drilling. Soil removed during shaft construction activities was stockpiled, sampled and submitted for chemical analysis of VOCs, which confirmed that VOCs were not detected. Sound Transit communicated to Ecology on April 1, 2021 that the shaft installation activities did not have a potential for “contaminants release or exposure to the environment, or create a new exposure pathway” because of the upgradient locations and distance between the shafts and the extent of the VOC-contaminated groundwater plume. As a result, drilled shaft installation activities were not subject to written approval from Ecology under the restrictive covenants and Ecology’s letters.

Upcoming Sound Transit Construction Activities within the Space A-6 Area

During the April 1, 2021 telephone call, Ecology asked Sound Transit to provide a summary of future construction activities planned within the Space A-6 Area. Future construction activities in the Space A-6 Area will continue intermittently from August 2021 through December 2024. Future construction activities are generally described below, based on the 90%/100% civil plans dated May 6, 2021 and the 60% FWTC plans dated December 14, 2020. Specific design and construction elements are shown on Figure 3 and described below. Sound Transit will notify Ecology if design refinements are made that are significantly different from what is described below.

When FWTC construction is complete, the eastern portion of the Space A-6 Area will be developed with the FWTC station structure and associated hardscape (sidewalk and street). The western portion of the Space A-6 Area is anticipated to be a future transit-oriented development (TOD) area and will be left unpaved but graded to drain to a perimeter drainage ditch that will flow into the tightlined stormwater system. No details regarding the future TOD are known at this time.

Sound Transit's future construction will include:

- General surface regrading for installation of parking lot, station, sidewalk and bus loop areas. Future surface grades in Space A-6 range between Elevation 437 and 433 feet.
- Foundation for Garbage Enclosure: A shallow foundation for a garbage enclosure will be located approximately 70 feet upgradient of the PCE-groundwater plume. The base of excavation for the foundation is designed to be above Elevation 427 feet.
- Utilities, Shelters, and Lights: Underground stormwater, power, communication and water utilities, foundations for bus shelters and street lights will be constructed within the bus loop area overlying a portion of the anticipated PCE-groundwater plume. No stormwater utility vaults are planned in this area. The base of excavations for utilities is designed to be above Elevation 423 feet and therefore several feet above the groundwater table which is anticipated to be between Elevation 417 and 419 feet.
- Existing sanitary sewer: The existing sanitary sewer is beyond the estimated extent of the contaminated groundwater plume and extends across both City of Federal Way right-of-way (ROW) and Sound Transit ROW, approximately as shown in Figure 3. The northeast portion of the existing sanitary sewer alignment is situated in the City of Federal Way ROW and will be removed by excavation. Excavation activities will occur above Elevation 425 feet. The remaining portion of the existing sanitary sewer is situated within Sound Transit ROW and is planned to be decommissioned in place. However, there is possibility that the entire sanitary sewer will need to be removed, which would extend as deep as Elevation 414 feet (a few feet into the groundwater table). If the full extent of the existing sanitary sewer line within the Sound Transit ROW needs to be removed, the following are planned for soil and water management before backfilling to grade:
 - Soil excavated below the anticipated groundwater table will be stockpiled on plastic and covered. Free liquids will be contained if saturated soil is encountered.
 - If groundwater is encountered, water will be pumped into temporary storage tanks.
 - The soil removed below the groundwater table and any groundwater removed will be sampled and tested for VOCs by EPA method 8260D. Material will be disposed in accordance with local, state and federal regulations.

The majority of planned future Sound Transit construction excavation activities within the Space A-6 Area will extend from Elevation 437 feet down to Elevation 423 feet; these depths are several feet or more above both the groundwater table and the remaining VOC-contaminated soil at Elevations 417 to 419 feet (Figure 2). Therefore, dewatering is not planned and VOC-contaminated soil and groundwater

will not be encountered. No contaminant release or exposure to the environment is anticipated in connection with the construction excavation within the Space A-6 Area, nor are these activities likely to create a new exposure pathway.

However, if the deeper sanitary sewer in the Sound Transit ROW does need to be removed by excavation, there is potential for contaminant release or exposure to the environment due to the proximity of the contaminated groundwater plume. In this case, the soil and groundwater will be managed as described above to limit the potential contaminant release or exposure to the environment. We appreciate Ecology's review of the attached information. This letter serves as Sound Transit's request for written approval, per the 1995 and 1998 restrictive covenants and subsequent Ecology letters, to complete the construction activities in the Space A-6 Area as explained above. GeoEngineers and Sound Transit are available to discuss this further and answer any questions you may have. I can be reached at (206) 370-5531.

Sincerely,

Susan Penoyar

Susan Penoyar, PE, LEG
Environmental Manager
Planning, Environment and Project Development
Sound Transit

cc:

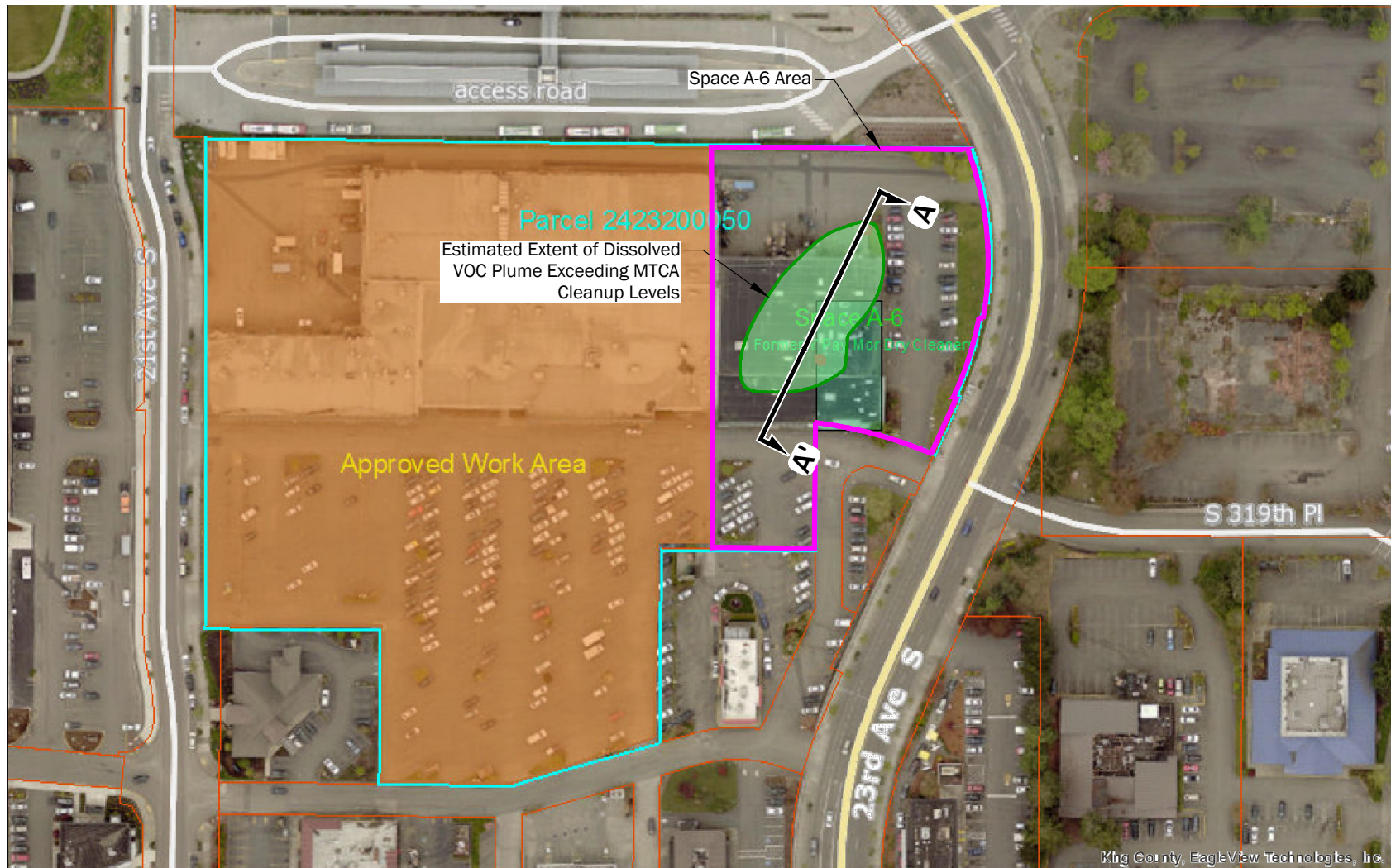
Tricia DeOme, GeoEngineers

Attachments:

Figure 1. Restrictive Covenant Areas

Figure 2. Cross Section A - A'

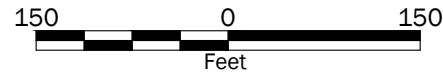
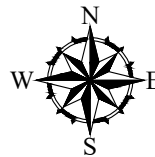
Figure 3. Proposed Remedial Investigation Sampling Locations



Notes:

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Data Source: Base map was part of April 29, 2020 Ecology Letter



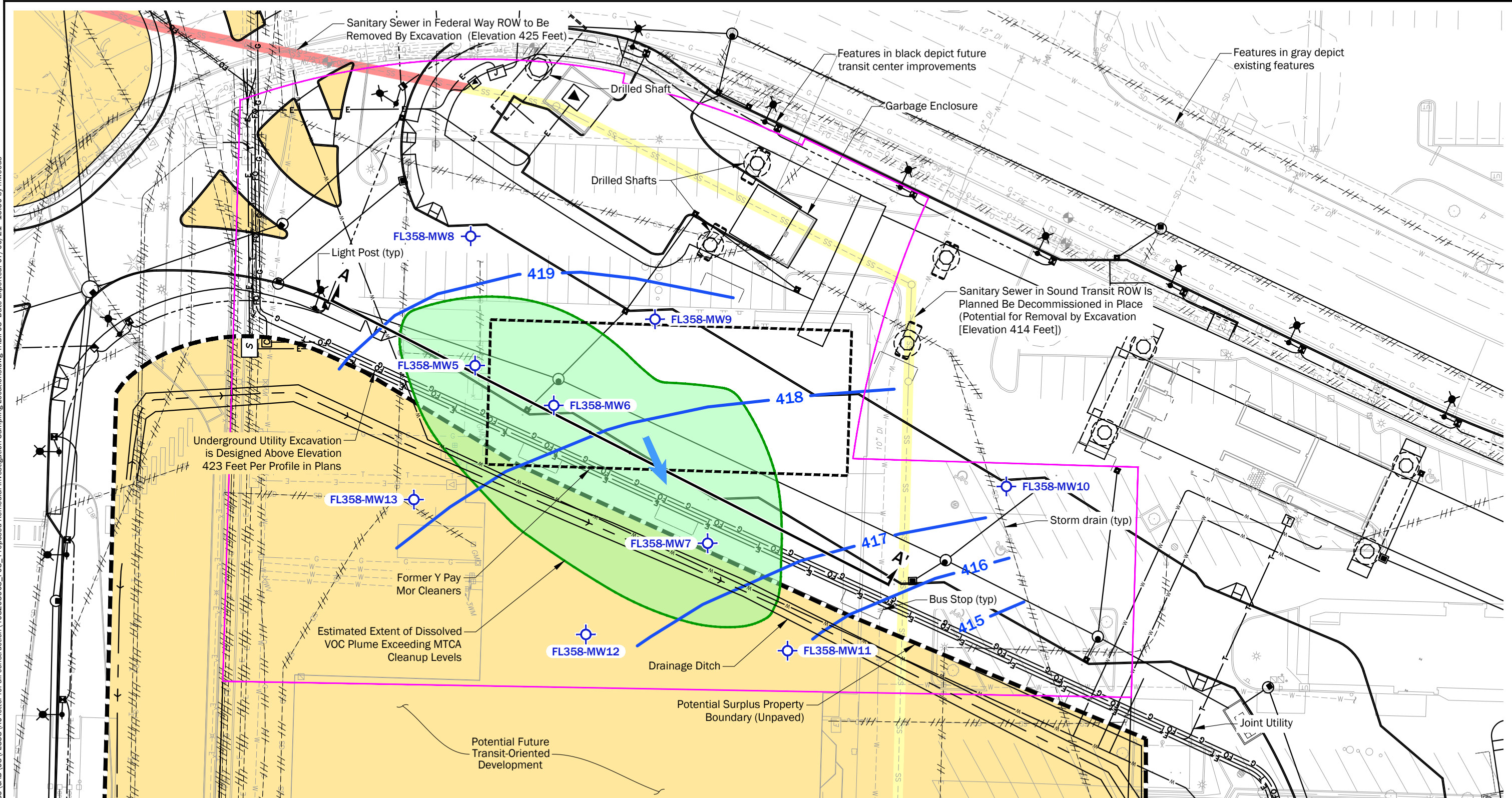
Restrictive Covenant Areas

Y Pay Mor Dry Cleaners Site
Sound Transit Federal Way Link Extension
Federal Way, Washington



Figure 1

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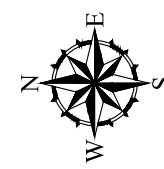
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3. Monitoring well monuments will be installed inside concrete manholes to protect the wells during FWLE construction activities and to provide access to the wells after construction is completed and final grade elevations are achieved.

Data Source: Design drawings provided by Kiewit on March 17, 2021.
Projection: Project Datum Washington State Planes, North Zone, US Foot.

Legend

- Proposed Monitoring Well To be Protected and Maintained
- Space A-6 Area
- Groundwater Elevation Contour (feet NAVD88; based on groundwater levels measured April-June 2020)
- Inferred Groundwater Flow Direction
- Approximate Extent of Unpaved Area Following Construction
- Existing Features in Gray
- Design Features in Black



Proposed Remedial Investigation Sampling Locations	
Y Pay Mor Dry Cleaners Site Sound Transit Federal Way Link Extension Federal Way, Washington	
	Figure 3