



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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November 9, 2021

Mark Dagel Hart Crowser, a division of Haley & Aldrich 3131 Elliott Avenue, Suite 600 Seattle, WA 98121 (<u>Mark.Dagel@hartcrowser.com</u>)

Re: Opinion on Feasibility Study for the Seattle DOT Dexter Parcel Site, 615 Dexter Avenue N, Seattle, Washington (FSID 81735; CSID 14785)

Dear Mark Dagel:

The Washington State Department of Ecology (Ecology) received your request for an opinion on the Feasibility Study report, prepared for SLP 615 Dexter, LLC, for the **Seattle DOT Dexter Parcel** facility (Site). This letter provides our opinion.

Pursuant to completion of the feasibility study and disproportionate cost analysis described in the *Public Review Draft Feasibility Study, Seattle DOT Dexter Parcel* report, dated November 2, 2021 (herein referred to as the FS), Ecology has determined that Alternative 1 in the FS is a permanent action to the maximum extent practicable and is the preferred action for addressing contamination at the Site.

The preferred action includes the following elements:

- Excavation and off-site disposal of contaminated soil and groundwater from the source area on the 615 Dexter Avenue North parcel (Property);
- *In situ* enhanced bioremediation and monitored natural attenuation of contaminated soil and groundwater in the adjacent alley;
- Installation and maintenance of engineering controls, including a passive vapor barrier on the planned building on the Property and a cap in the alley;
- Implementation of institutional controls, including an environmental covenant and other administrative measures for the Property and adjacent alley; and
- Performance of compliance monitoring.

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The FS provides sufficient evaluation of all of the remedial alternatives and demonstrates that the preferred action meets the MTCA threshold requirements and other applicable requirements for cleanup actions in accordance with WAC 173-340-360.

This opinion is based on an analysis of whether the described evaluation meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). This opinion applies only to the Site, which is defined by the nature and extent of contamination associated with the following releases:

- Gasoline-range petroleum hydrocarbons into the soil
- Gasoline-range petroleum hydrocarbons, diesel-range petroleum hydrocarbons, and benzene into the groundwater.

Please note that the FS will be subject to public review and comment along with the Prospective Purchaser Consent Decree (PPCD) that is currently being negotiated for this Site between SLP 615 Dexter, LLC and Ecology. Ecology will post the FS to the Site web page for public review during the public comment period. If the FS receives any specific comments, the document may need revision to address those public comments.

Ecology appreciates the effort that your team has put into completing the characterization of the Site, evaluating cleanup alternatives, and preparing the FS report. We look forward to continuing to work with you on this project. If you have any questions, please contact me by phone at (425) 457-3143 or by email at tena.seeds@ecy.wa.gov.

Sincerely,

Jena Seeds

Tena Seeds, PE Cleanup Project Manager Toxics Cleanup Program, NWRO

 cc: Christian Gunter, 800 Mercer, LLC (<u>cgunter@are.com</u>) Ken Lederman, McCullough Hill Leary (<u>ken@mhseattle.com</u>) Steven Shain, Seattle DOT (<u>Steven.Shain@seattle.gov</u>) Gina Plantz, Haley & Aldrich (<u>GPlantz@haleyaldrich.com</u>) Julie Wukelic, Hart Crowser (<u>Julie.Wukelic@hartcrowser.com</u>) Bob Warren, Ecology (<u>bob.warren@ecy.wa.gov</u>) Allyson Bazan, Attorney General's Office (<u>Allyson.Bazan@atg.wa.gov</u>)