

## T E C H N I C A L M E M O R A N D U M

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**TO:** Grant Yang – Washington State Department of Ecology

**cc:** Brett Richer – Georgetown Crossroads, LLC

**FROM:** Pete Kingston, L.G., Principal Geologist

**DATE:** June 7, 2022

**RE:** **REVISED TABLE FOR COMPLIANCE GROUNDWATER  
MONITORING EVENTS  
6050 EAST MARGINAL WAY SOUTH  
SEATTLE, WASHINGTON  
FARALLON PN: 1071-010  
VCP PROJECT NO.: NW3050**

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Farallon Consulting, L.L.C. (Farallon) has prepared this Technical Memorandum on behalf of Georgetown Crossroads, LLC to provide the Washington State Department of Ecology (Ecology) with a revised analytical table for compliance groundwater monitoring events for the property at 6050 East Marginal Way South in Seattle, Washington (herein referred to as the Property).

The “Site,” as defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), is confined within the boundaries of the Property where petroleum hydrocarbons have come to be located at concentrations exceeding applicable MTCA cleanup levels. Vinyl chloride in groundwater has migrated onto the Property from up-gradient off-Property contaminant sources. The Site is enrolled in the Ecology Voluntary Cleanup Program and has been assigned Project No. NW3050.

In an email from Grant Yang of Ecology to Pete Kingston of Farallon dated June 6, 2022,<sup>1</sup> Ecology concurred that the Site meets the requirements for a No Further Action determination. However, Ecology requested revisions to an analytical table. Specifically, Ecology requested that if either the DRO or ORO fraction was not detected in a sample, half the laboratory reporting limit was used for the non-detected fraction. In accordance with Ecology’s Implementation Memorandum

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<sup>1</sup> Email Regarding VCP NW3050 – Site NFA Opinion Letter dated June 6, 2022, from Grant Yang of Ecology to Pete Kingston of Farallon.



#4,<sup>2</sup> DRO and ORO concentrations were only combined if either the DRO or the ORO fraction was detected in a groundwater sample collected from a monitoring well at concentrations exceeding the laboratory practical quantitation limit. Table 2 has been revised to include this change.

## CLOSING

Farallon, on behalf of Georgetown Crossroads, LLC, requests that Ecology issue a No Further Action determination for the Site.

If you have questions or require additional information, please contact Pete Kingston at (425) 394-4146. Thank you in advance for your assistance with this project.

Attachment: Table 2, *Groundwater Analytical Results for NWTPH-Dx*

PK:cm

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<sup>2</sup> *Determining Compliance with Method A Cleanup Levels for Diesel and Heavy Oil, Implementation Memorandum #4* dated June 17, 2004, prepared by Ecology (Implementation Memorandum #4).

**TABLE**

**REVISED TABLE FOR  
COMPLIANCE GROUNDWATER MONITORING EVENTS  
6050 East Marginal Way South  
Seattle, Washington**

**Farallon PN: 1071-010**

**Table 2**  
**Groundwater Analytical Results for NWTPH-Dx**  
**6050 East Marginal Way South**  
**Seattle, Washington**  
**Farallon PN: 1071-010**

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per liter) <sup>1</sup>		
			DRO	ORO	NWTPH-Dx <sup>2</sup>
MW-15	12/18/2018	MW-15-121818	< 260	< 410	--
	3/18/2019	MW-15-031819	< 250	< 400	--
	6/13/2019	MW-15-061319	< 250	< 400	--
	9/20/2019	MW-15-092019	< 270	< 430	--
	12/20/2019	MW-15-122019	< 210	460	--
	4/30/2020	MW-15-042020	45.0 J	< 76.2	--
	11/4/2020	MW-15-110420	< 38.1	< 76.2	--
	1/25/2022	MW-15-012522	41.2 J	< 158	--
MW-16	12/18/2018	MW-16-121818	< 250	< 400	--
	3/18/2019	MW-16-031819	< 280	< 450	--
	6/13/2019	MW-16-061319	< 250	< 410	--
	9/20/2019	MW-16-092019	< 270	< 430	--
	12/19/2019	MW-16-121919	< 210	< 210	--
	5/1/2020	MW-16-052020	< 37.4	< 74.8	--
	11/4/2020	MW-16-110420	< 37.4	< 74.8	--
	1/25/2022	MW-16-012522	< 78.4	< 157	--
MW-17	12/18/2018	MW-17-121818	< 260	< 410	--
	3/18/2019	MW-17-031819	< 250	< 400	--
	6/13/2019	MW-17-061319	< 260	< 420	--
	9/20/2019	MW-17-092019	< 280	< 450	--
	12/19/2019	MW-17-121919	< 210	< 210	--
	4/30/2020	MW-17-042020	44.1 J	< 74.8	--
	11/4/2020	MW-17-110420	< 37.7	< 75.5	--
	1/25/2022	MW-17-012522	50.0 J	< 154	--
<b>MTCA Method A Cleanup Level for Groundwater<sup>3</sup></b>			<b>500</b>	<b>500</b>	<b>500</b>

**Table 2**  
**Groundwater Analytical Results for NWTPH-Dx**  
**6050 East Marginal Way South**  
**Seattle, Washington**  
**Farallon PN: 1071-010**

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per liter) <sup>1</sup>		
			DRO	ORO	NWTPH-Dx <sup>2</sup>
MW-18	12/18/2018	MW-18-121818	< 260	< 410	< 335
	3/18/2019	MW-18-031819	330	< 430	<b>545</b>
	6/13/2019	MW-18-061319	< 250	490	<b>615</b>
	9/20/2019	MW-18-092019	< 270	< 430	< 350
	12/19/2019	MW-18-121919	< 200	< 260	< 230
	4/30/2020	MW-18-042020	74.4 J	< 75.5	112.2 J
	11/4/2020	MW-18-110420	< 37.7	170	189
	1/26/2022	MW-18-012622	289	< 157	368
MW-19	12/18/2018	MW-19-121818	<b>510</b>	< 400	<b>710</b>
	3/18/2019	MW-19-031819	360	< 400	<b>560</b>
	6/13/2019	MW-19-061319	< 260	<b>520</b>	<b>650</b>
	9/20/2019	MW-19-092019	300	< 420	<b>510</b>
	12/20/2019	MW-19-122019	280	450	<b>730</b>
	4/30/2020	MW-19-042020	134	< 75.5	172
	11/4/2020	MW19-110420	170	< 75.5	208
	1/26/2022	MW-19-012622	212	< 154	289
	4/11/2022	MW-19-041122	174	< 348	348
MW-20	12/18/2018	MW-20-121818	370	< 400	<b>570</b>
	3/18/2019	MW-20-031819	< 280	< 440	< 360
	6/13/2019	MW-20-061319	< 260	< 410	< 335
	9/20/2019	MW-20-092019	< 260	< 410	< 335
	12/20/2019	MW-20-122019	320	420	<b>740</b>
	5/1/2020	MW-20-052020	130	< 75.5	168
	11/4/2020	MW20-110420	121	< 75.5	159
	1/26/2022	MW-20-012622	106	< 155	184
	4/11/2022	MW-20-041122	109 J	< 340	279 J
<b>MTCA Method A Cleanup Level for Groundwater<sup>3</sup></b>			<b>500</b>	<b>500</b>	<b>500</b>

**Table 2**  
**Groundwater Analytical Results for NWTPH-Dx**  
**6050 East Marginal Way South**  
**Seattle, Washington**  
**Farallon PN: 1071-010**

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per liter) <sup>1</sup>		
			DRO	ORO	NWTPH-Dx <sup>2</sup>
MW-21	12/18/2018	MW-21-121818	< 250	< 410	< 330
	3/18/2019	MW-21-031819	470	< 400	<b>670</b>
	6/13/2019	MW-21-061319	< 250	< 400	< 325
	9/20/2019	MW-21-092019	< 260	< 410	< 335
	12/19/2019	MW-21-121919	260	360	<b>620</b>
	4/30/2020	MW-21-042020	85.7	< 75.5	123.5
	11/4/2020	MW21-110420	< 37.4	< 74.8	< 56.1
	1/25/2022	MW-21-012522	86.9	< 157	165.4
	4/11/2022	MW-21-041122	100 J	< 348	274 J
MW-22	12/18/2018	MW-22-121818	< 250	< 400	--
	3/18/2019	MW-22-031819	< 290	< 470	--
	6/13/2019	MW-22-061319	< 250	< 400	--
	9/20/2019	MW-22-092019	< 260	< 420	--
	12/20/2019	MW-22-122019	< 210	< 220	--
	5/1/2020	MW-22-052020	48.3 J	< 74.8	--
	11/4/2020	MW22-110420	< 37.4	< 74.8	--
	1/25/2022	MW-22-012522	47.3 J	< 158	--
<b>MTCA Method A Cleanup Level for Groundwater<sup>3</sup></b>			<b>500</b>	<b>500</b>	<b>500</b>

**NOTES:**

Results in **bold** denote concentrations exceeding applicable cleanup levels.  
 < denotes analyte not detected at or exceeding the reporting limit listed.

<sup>1</sup>Analyzed by Northwest Method NWTPH-Dx.

<sup>2</sup>Sum of DRO and ORO. Only calculated if both DRO and ORO fractions were detected in a monitoring well. For concentrations reported at less than the laboratory

<sup>3</sup>Washington State Model Toxics Control Act Cleanup Regulation Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended 2013.

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

J = result is an estimate

ORO = TPH as oil-range organics