STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

Public Comment Period Draft, September 8, 2022

Brett Richer
Georgetown Crossroads, LLC
Pier 1, Bay 1
San Francisco, CA 94111
(bricher@prologis.com)

Re: No Further Action opinion for the following contaminated Site

- **Site Name:** Consolidated Freightways Seattle
- **Site Address:** 6050 E Marginal Way S, Seattle WA 98108
- **Facility/Site ID:** 54757868
- **Cleanup Site ID:** 6262
- **VCP Project No.:** NW3050

Dear Brett Richer:

The Washington State Department of Ecology (Ecology) received your request for an opinion regarding the sufficiency of your independent cleanup of the Consolidated Freightways facility (Site) under the Voluntary Cleanup Program (VCP).[1]. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.[2]

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC[3] (collectively called "MTCA").

[1] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305
[3] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340

Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons as gasoline (TPH-G), diesel (TPH-D), and oil (TPH-O) range organics, and benzene, ethylbenzene, toluene, and xylenes (BETX) in Soil.
- TPH-G, TPH-D, TPH-O, BTEX, and vinyl chloride (VC) in Groundwater.

Enclosure A includes a Site description, history, and diagrams.

Please note the West of 4th facility (Facility Site ID 47779679) also affects the parcel of real property associated with this Site. This opinion does not apply to any contamination associated with the West of 4th facility.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**. You can request these documents by filing a records request.[4] For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the Site webpage[5]

This opinion is void if any of the information contained in the documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. Enclosure A describes the Site.

An initial Site assessment conducted in 1988 originally revealed that soil and groundwater were contaminated at this former construction-trucking facility. The contaminant releases originated from petroleum products in underground storage tanks (USTs), associated piping/dispenser systems, and operations of the former trucking facility.

Between 1989 and 2015, sequential phases of the Site investigations were performed further to characterize the contamination at the Site. Based on the reports, TPH-G, TPH-D, TPH-O, BTEX, and VC in the soil and/or groundwater were defined as chemicals of concern (COCs) that were at concentrations exceeding their applicable MTCA Method A cleanup levels. In addition, the

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[5] https://apps.ecology.wa.gov/cleanupsearch/site/6262

USTs and operations of the facility were identified to be the contamination sources.

Based on the Site-specific contamination source study (October 7, 2021), VC in the groundwater existing within the northern boundary area of the Property was confirmed to originate from the neighboring MTCA cleanup Site, the West of 4th facility (FSID # 47779679). The VC and TPH plumes are not commingled.

Setting cleanup standards

Ecology has determined the cleanup levels and points of compliance you set for the Site meet the substantive requirements of MTCA.

Cleanup Levels

Soil

The Site is located in an area with limited terrestrial habitat and qualified for a Terrestrial Ecological Evaluation (TEE) exclusion, based on WAC 173-340-7491(1)(c)(i). There are less than 1.5 acres of contiguous undeveloped land on the Site or within 500 feet of any area of the Site. Land use at the Site and surrounding area makes substantial wildlife exposure unlikely. Cleanup levels protective of terrestrial species are not needed at this Site.

The Property that includes the Site is located in the City of Seattle IG2 (General Industrial 2) zone. However, MTCA Method A soil cleanup levels for unrestricted land uses were selected for the Site. MTCA Method A soil cleanup levels based on protection of groundwater are appropriate.

Groundwater

The highest beneficial use for groundwater under MTCA is considered to be as a drinking water source, unless it can be demonstrated that the groundwater is not potable. MTCA Method A groundwater cleanup levels are protective of potable use and are therefore the default.

Points of Compliance

Soil

The point of compliance for soil at the Site for protection of groundwater is soils throughout the Site.

Groundwater

The point of compliance for groundwater is throughout the Site, from the uppermost level of the saturated zone extending vertically and horizontally to the lowest depth, which could

potentially be affected.

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site. The cleanup action selected for the Property consisted of the following elements:

- Removal of underground storage tanks (USTs) containing gasoline, diesel fuel, lube oil, waste oil, and heating oil;
- Treatment and disposal of contaminated soils and groundwater; and
- Confirmational sampling of soil and groundwater to document compliance with cleanup levels.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site.

- Decommissioning of 11 USTs by removal was confirmed:
    - 10,000-gallon gasoline
    - 8,000-gallon, 10,000-gallon, and three 20,000-gallon diesel
    - Two 5,000-gallon lube oil
    - Two 3,000-gallon waste oil
    - 500-gallon heating oil
- The following USTs mentioned in Site historical documents were not found during geophysical surveys and were assumed to have been decommissioned by removal:
    - 1,000-gallon heating oil
    - 500-gallon diesel
- UST removals completed in 1988 and 1998 included:
    - Excavation and on-site treatment of approximately 285 cubic yards of contaminated soil; and
    - Excavation and off-site disposal of approximately 800 tons (600 cubic yards) of contaminated soil.
- Completion of final contaminated soil excavations in 2017 consisted of:

  - Dewatering to facilitate soil excavation, onsite pretreatment, and disposal of approximately 320,000 gallons of groundwater to the King County sanitary sewer system;
  - Removal and off-site disposal of approximately 6,480 tons (4,600 cubic yards) of petroleum-contaminated soil;
  - Collection of confirmation soil samples to document compliance with soil cleanup levels; and
  - Backfilling soil excavations completed with clean structural fill mixed with oxygen-release compound, to enhance breakdown of residual petroleum contamination.

- Samples of soils from excavation sidewalls and bases, and samples or groundwater from monitoring wells, were collected to confirm compliance with cleanup levels.
- Site data has been uploaded to the Ecology Environmental Information Management (EIM) database.

The Site cleanup meets the requirement for Groundwater Model Remedy 1, in accordance with *Model Remedies for Sites with Petroleum Impacts to Groundwater, Ecology Publication No. 1-09-057, Revised December 2017*[6]. Therefore, a Feasibility Study and Disproportionate Cost Analysis are not required to document the remedy selection. The requirements of Groundwater Model Remedy 1 are:

- Petroleum hydrocarbons consisting of gasoline, middle distillates/oils, or heavy fuels/oils and their constituents are the only contaminants present in soil and groundwater.
- Emergency or interim actions are not required due to the lower risk nature of the Site.
- The Site meets the criteria for a simplified Terrestrial Ecological Evaluation (TEE).
- The primary remedy consists of source removal, including free product and contaminated soil, to the greatest extent practicable.
- The Site has not caused impacts above the practical quantitation limit (PQL) to any water supply well used for drinking water purposes.
- Soil meets Method A unrestricted cleanup levels throughout the Site.
- Groundwater meets Method A cleanup levels throughout the Site.
- A conditional point of compliance for groundwater is not applied at the Site.
- An empirical demonstration is not applied at the Site.

[6] https://apps.ecology.wa.gov/publications/SummaryPages/1609057.html

- Enough groundwater monitoring data has been collected and sufficiently analyzed to document that the contaminant plume is stable or receding.
- An environmental covenant is not needed on the Property.

Decommissioning of Site monitoring wells

You must decommission resource protection wells[7] installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.[8]

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from its lists of contaminated sites, including the:

- Hazardous Sites List
- Confirmed and Suspected Contaminated Sites List
- Leaking Underground Storage Tanks List

That process includes providing public notice and the opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or rescind this opinion.

Limitations of the Opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).[9]

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised

[7] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410
[8] https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460
[9] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040

action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080[10] and WAC 173-340-545.[11]

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).[12]

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3050.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (425) 324-1892 or email at michael.warfel@ecy.wa.gov.

Sincerely,

Michael R. Warfel, VCP Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2): A – Site Description, History, and Diagrams
B – Basis for the Opinion: List of Documents]

cc: Pete Kingston, Farallon Consulting (pkingston@farallonconsulting.com)
Kelli Barker, VCP Fiscal Analyst (kelli.barker@ecy.wa.gov)
Sonia Fernandez, VCP Coordinator (sonia.fernandez@ecy.wa.gov)

[10] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[11] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[12] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

Enclosure A

Site Description, History, and Diagrams

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.

Site: The Site is located at 6050 East Marginal Way South in Seattle, Washington (the Property, **Figure 1**) and consists of TPH-G, TPH-D, TPH-O, and BTEX in Soil, and TPH-G, TPH-D, TPH-O, BTEX, and VC in Groundwater. The Property within which the Site is located is King County tax parcel number 536720-4646.

Area and Property Description: The Property lies within an industrial area (**Figure 2**) and covers 13.67 acres. The Property and vicinity is located within the City of Seattle IG2 General Industrial zone.

Property History and Current Use: A military barracks-type facility was constructed on the Property in 1943. In 1956, the facility was transferred to a construction-trucking business center. The trucking business was operated until early 2017. A proposed land redevelopment project began in June 2017 that included building a three-floor industrial warehouse that covers most of the Property.

Sources of Contamination: Site investigations conducted from 1988 through 2018 identified 13 former USTs as potential sources of documented impacts to soil and groundwater (see **Figure 2**). These USTs are described as follows:

- USTs with unknown installation and removal dates:
    - 1,000-gallon heating oil
    - 500-gallon diesel
- USTS removed in 1988:
    - 10,000-gallon diesel
    - 10,000-gallon gasoline
    - 8,000-gallon diesel
    - Two 5,000-gallon lube oil
    - Two 3,000-gallon waste oil
- USTs removed in 1998:
    - Two 20,000-gallon diesel

- UST removed 2016 through 2017:
    - 20,000-gallon diesel
    - 500-gallon heating oil

In addition, VC in groundwater at the north edge of the Site is associated with the adjacent West of 4th MTCA cleanup site, located to the northeast in the Georgetown neighborhood of Seattle (**Figure 3**). The TPH and VC contaminant plumes are not commingled.

Physiographic Setting: The Site is located in the Puget Sound Lowland, which is characterized as a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains and Willapa Hills to the west. The Site is relatively level at elevation 15 feet above mean sea level, with a slight slope toward the west.

Surface/Storm Water System: The nearest surface water body is the Lower Duwamish Waterway (LDW). Slip 1 of the LDW is approximately 350 feet west of the Property, and the main river body is about 1,000 feet to the west. Surface water and storm water runoff on and in the vicinity of the Site disperse via sheet flow to King County's storm water drainage and treatment system.

Ecological Setting: The Site is surrounded by developed land occupied by industrial facilities, warehouses, office buildings, workshops, storage facilities, paved areas, and other physical barriers. Therefore, the urban environment prevents wildlife from feeding on plants, earthworms, insects, or other food sources in or on the soil affected by the Site.

Geology: The subsurface strata at the Site consist of 2 to 3 feet of fill overlying sand and silty sand, with an intermittent clayey to sand silt unit 1 to 6 feet thick. The sand and silty sand extends to a depth of 24 feet below ground surface, the maximum depth explored at the Site.

Groundwater: Groundwater was encountered at 6 to 9 feet bgs at the Site. The groundwater flow direction is generally to the south and southwest toward the Duwamish River **(Figure 4**).

Water Supply: Public water supply is currently provided to the Property by the City of Seattle. According to Ecology's well log database, there are no drinking water wells located within approximately 1,000 feet of the Property.

Releases and Cleanup of Contamination: Since 1988, various phases of investigations and cleanup actions were conducted at the Site, which included characterization of the Site contamination, removal of the USTs, over-excavation and off-site disposal of the contaminated soil, soil cleanup confirmation sampling, application of chemical agents to treat the impacted soil and groundwater, and groundwater monitoring.

Eight monitoring wells (MW-15 through MW-22) were installed at the Site in December 2018 (see **Figure 2**). Based on the monitoring data collected between December 2018 and April 2022, TPH-D and TPD-O were detected in the groundwater samples from all the monitoring wells at concentrations below the MTCA Method A cleanup levels in four consecutive quarterly sampling events (**Figure 5**).

VC concentrations exceeded the MTCA Method A cleanup level in monitoring wells MW-15 and MW-16, located in the northern portion of the Site, during multiple monitoring events in 2018 through 2020 (**Figure 6**). A study was performed in October 2021 to assess VC in the groundwater at this Site. Based on the report, the VC plume present at the Consolidated Freightways Site is associated with the West of 4th cleanup site (see **Figure 3**). The study also documents that the VC plume is not commingled with the TPH-D/TPH-O plume.

SITE DIAGRAMS

REFERENCE: 7.5 MINUTE USGS QUADRANGLE SEATTLE SOUTH, WASHINGTON, DATED 2013

Enclosure A, Figure 1

0 5,000
SCALE IN FEET

N

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FIGURE 1

SITE VICINITY MAP
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Drawn By: vpehlivan Checked By: PK Date: 5/4/2022 Disc Reference:
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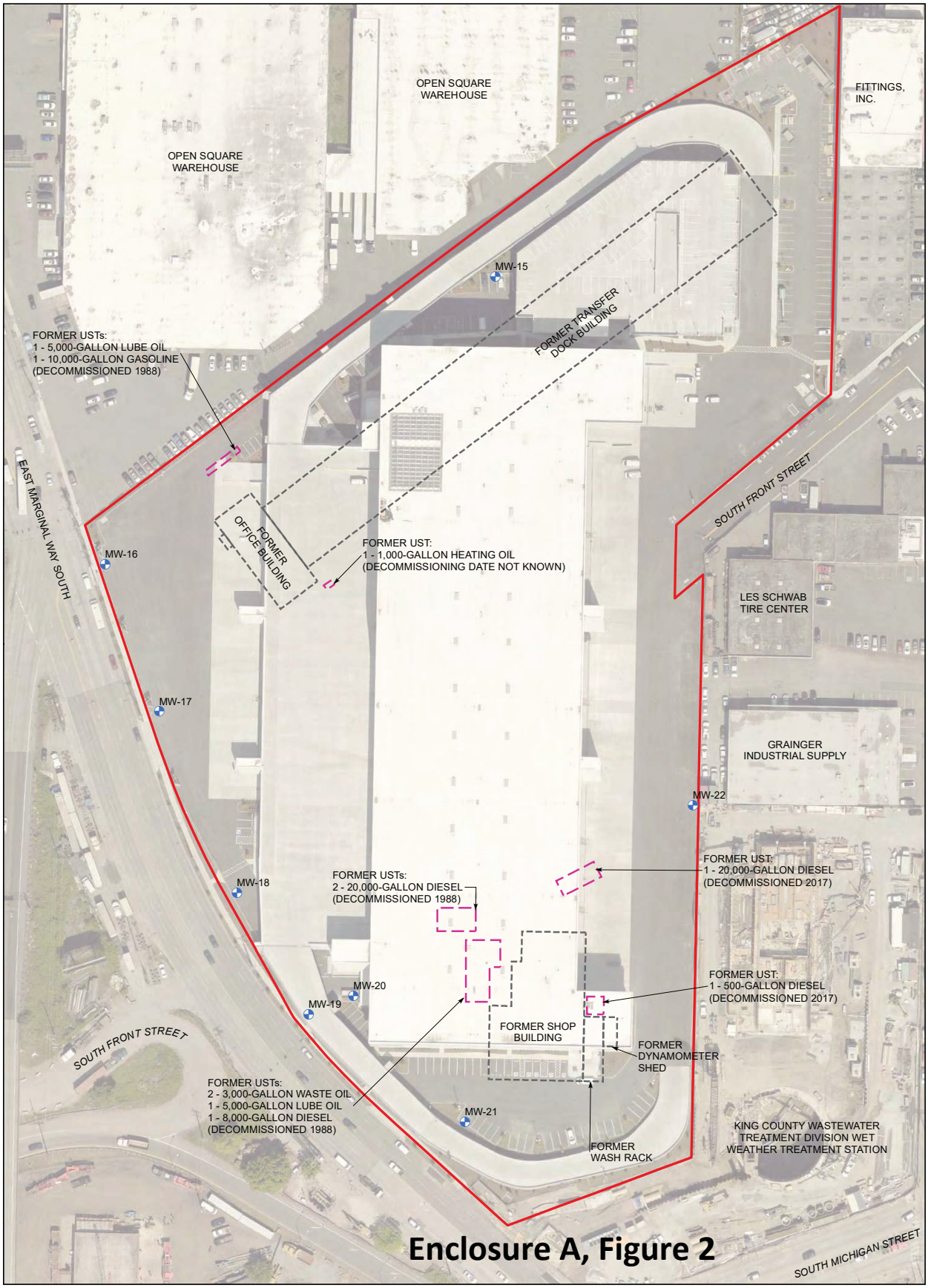

Enclosure A, Figure 2

LEGEND

- MONITORING WELL (FARALLON, 2018)
- FORMER BUILDING
- FORMER UST(s)
- SITE BOUNDARY

UST = UNDERGROUND STORAGE TANK

0 100
SCALE IN FEET

N

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
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FIGURE 2

SITE PLAN
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Drawn By: jjones | Checked By: PK | Date: 4/1/2021 | Disc Reference:

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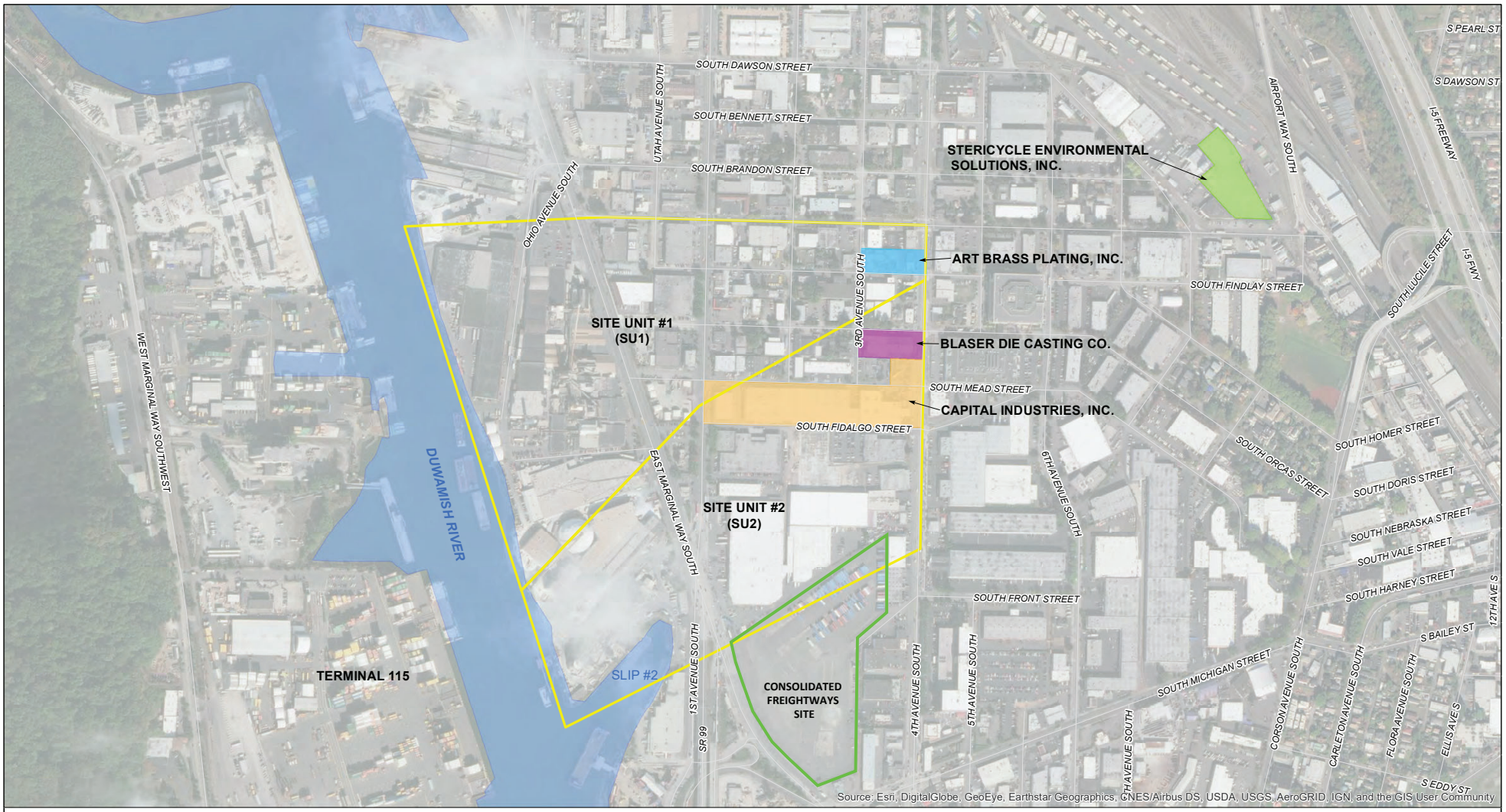

LEGEND

- ART BRASS PLATING, INC.
- BLASER DIE CASTING CO.
- CAPITAL INDUSTRIES, INC.
- STERICYCLE ENVIRONMENTAL SOLUTIONS, INC.
- SITE UNIT BOUNDARY

N

0 250 500

SCALE IN FEET

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FIGURE 1

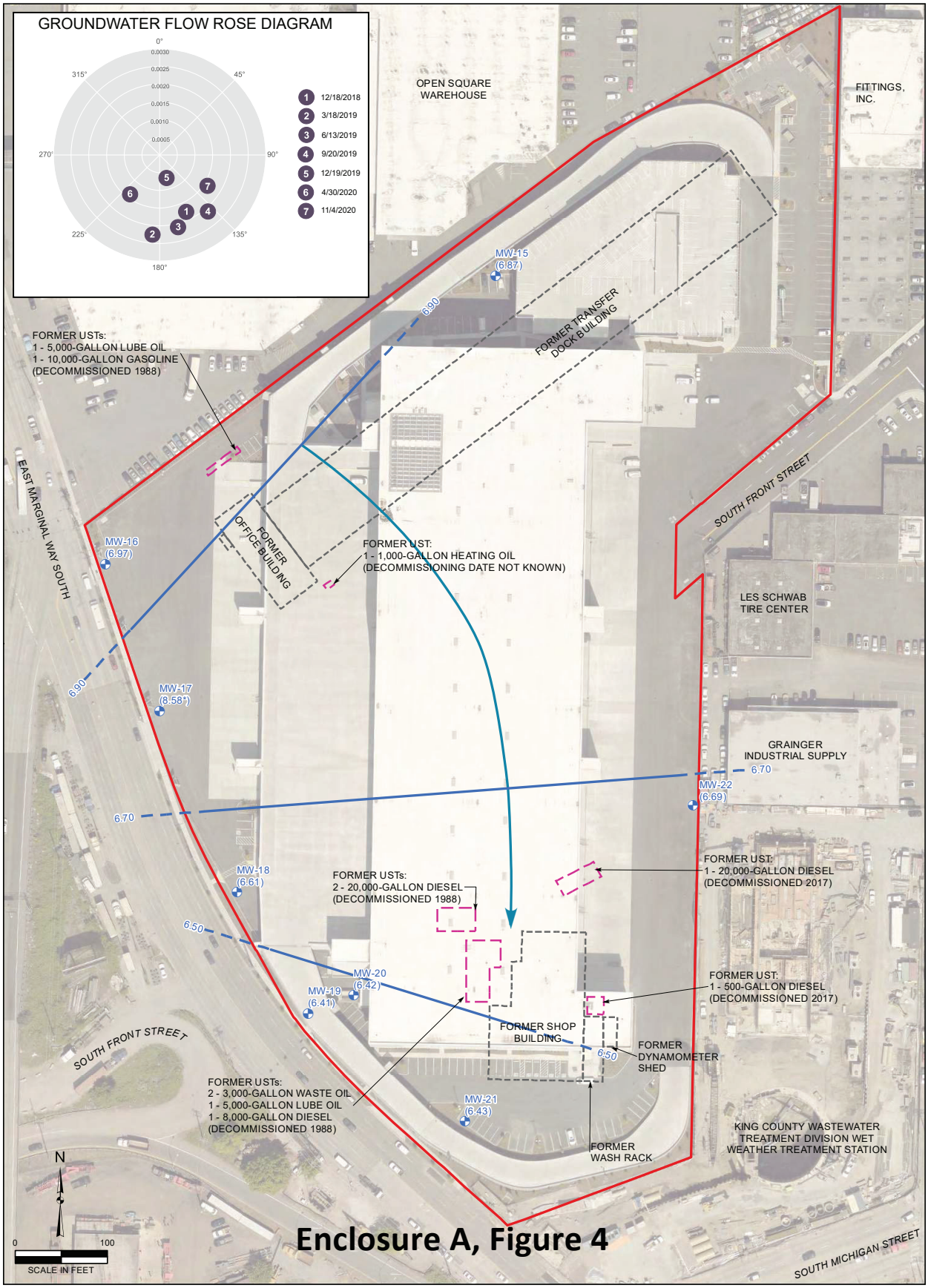
SITE DIAGRAM
WEST OF 4TH GROUP SITE
CAPITAL INDUSTRIES, INC.
5815 4TH AVENUE SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 457-008

Drawn By: jjones Checked By: JK Date: 7/12/2017 Disc Reference:

Document Path: Q:\Projects\457 CapitalIndust\008 PilotStudy\InterimWorkPlan\Figure1_Sitemap.mxd

Enclosure A, Figure 3



Enclosure A, Figure 4

LEGEND

- MONITORING WELL (FARALLON, 2018)
- FORMER BUILDING
- FORMER UNDERGROUND STORAGE TANK(s) (UST)
- SITE BOUNDARY
- INFERRED GROUNDWATER FLOW DIRECTION
- 6.50 GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
- (6.41) GROUNDWATER ELEVATION IN FEET RELATIVE TO NORTH AMERICAN VERTICAL DATUM OF 1988
- (8.58*) ELEVATION NOT USED IN CONTOURING

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FIGURE 3

GROUNDWATER FLOW DIRECTION
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Drawn By: jjones | Checked By: PK | Date: 4/1/2021 | Disc Reference:

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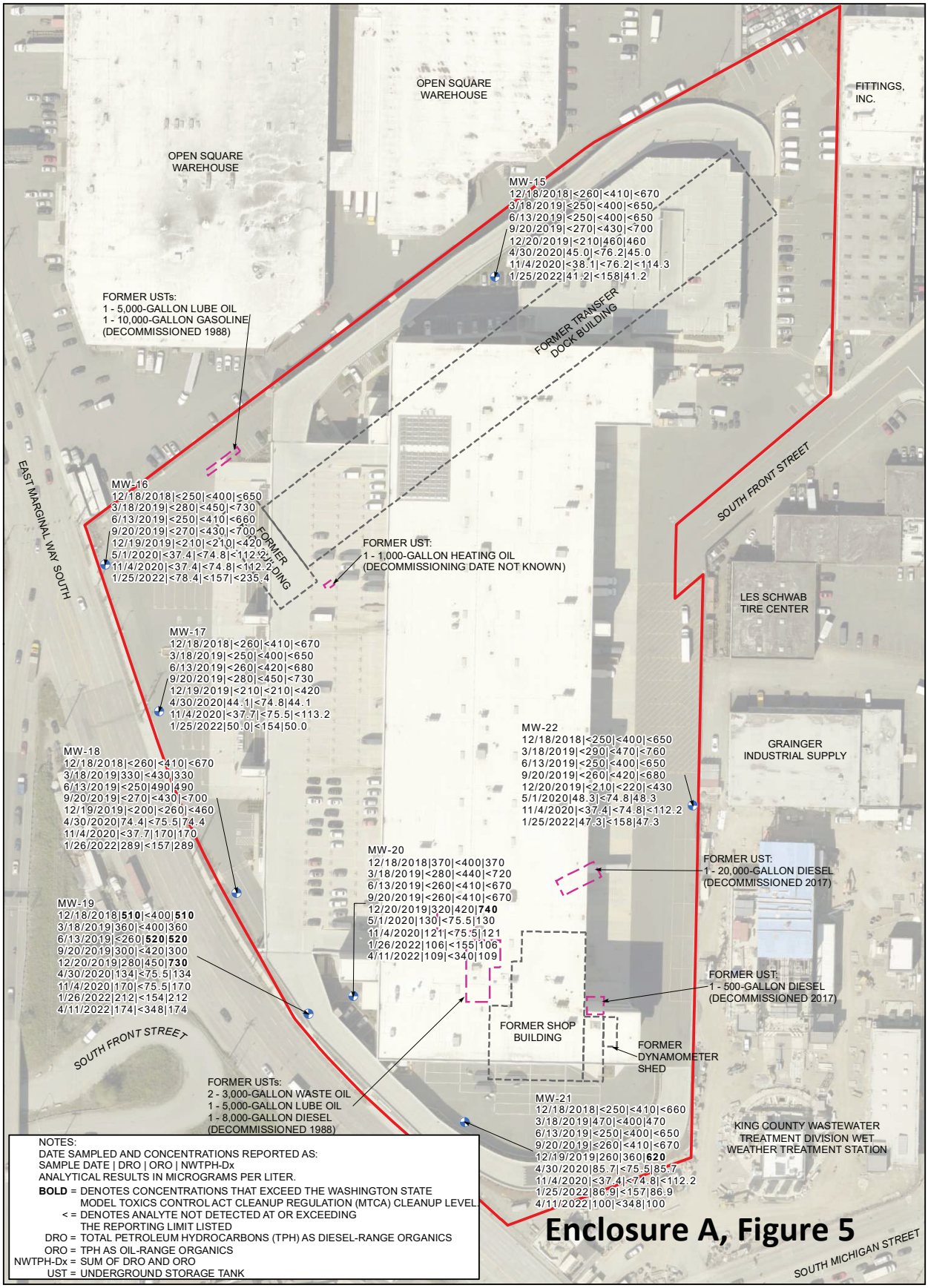

NOTES:
DATE SAMPLED AND CONCENTRATIONS REPORTED AS:
SAMPLE DATE | DRO | ORO | NWTPH-Dx
ANALYTICAL RESULTS IN MICROGRAMS PER LITER.
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) CLEANUP LEVEL.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
ORO = TPH AS OIL-RANGE ORGANICS
NWTPH-Dx = SUM OF DRO AND ORO
UST = UNDERGROUND STORAGE TANK

Enclosure A, Figure 5

LEGEND

- MONITORING WELL (FARALLON, 2018)
- FORMER BUILDING
- FORMER UST(s)
- PROPERTY BOUNDARY

N

0 100
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FIGURE 3

GROUNDWATER ANALYTICAL RESULTS
FOR NWTPH-DX
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Drawn By: vpehlivan | Checked By: PK | Date: 5/18/2022 | Disc Reference:

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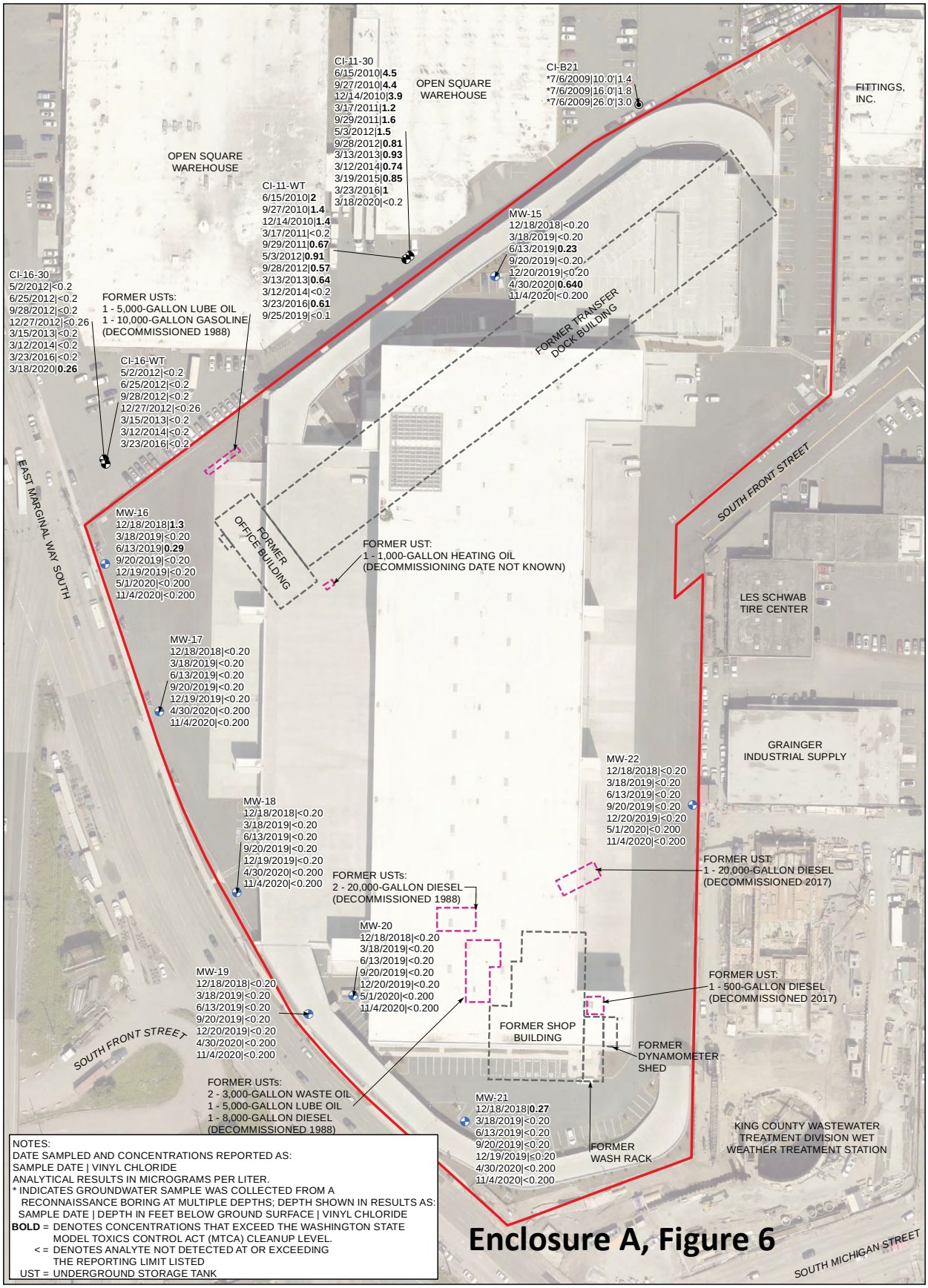

NOTES:
DATE SAMPLED AND CONCENTRATIONS REPORTED AS:
SAMPLE DATE | VINYL CHLORIDE
ANALYTICAL RESULTS IN MICROGRAMS PER LITER.
* INDICATES GROUNDWATER SAMPLE WAS COLLECTED FROM A RECONNAISSANCE BORING AT MULTIPLE DEPTHS; DEPTH SHOWN IN RESULTS AS:
SAMPLE DATE | DEPTH IN FEET BELOW GROUND SURFACE | VINYL CHLORIDE
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) CLEANUP LEVEL.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
UST = UNDERGROUND STORAGE TANK

Enclosure A, Figure 6

LEGEND

- MONITORING WELL (FARALLON, 2018)
- MONITORING WELL (WEST OF 4th SITE)
- BORING (WEST OF 4th SITE)
- FORMER BUILDING
- FORMER UST(s)
- SITE BOUNDARY

0 100
SCALE IN FEET

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FIGURE 5

GROUNDWATER ANALYTICAL RESULTS
FOR VINYL CHLORIDE
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Drawn By: jjones | Checked By: PK | Date: 9/23/2021 | Disc Reference:

Path: Q:\Projects\1071 Prologis\010 EMarginalWay\Mapfiles\004C_GW-Compliance_202109\Figure-05_GW-VOCs.mxd

Enclosure B

Basis for the Opinion: List of Documents

1. Farallon Consulting (Farallon), June 7, 2022, *Revised Table for Compliance Groundwater Monitoring Events*.

2. Farallon, May 23, 2022, *Summary of January and April 2022 Compliance Groundwater Monitoring Events*.

3. Farallon, October 7, 2021, *Response to Ecology Opinion Letter dated July 15, 2021*.

4. Department of Ecology (Ecology), July 15, 2021, *Opinion Letter on Remedial Action*.

5. Farallon, April 6, 2021, *Summary of Compliance Monitoring Well Installation and Groundwater Compliance Monitoring Results*.

6. Ecology, October 9, 2018, *No Further Action Likely Opinion on Proposed Cleanup*.

7. Farallon, July 25, 2018, *Cleanup Action Closure Report*.

8. Ecology, March 10, 2017, *Opinion Letter on Proposed Remedial Action*.

9. Farallon, February 11, 2016, *Remedial Investigation, Focused Feasibility Study, and Cleanup Action Plan*.

10. Ecology, June 3, 2015, *Site Hazard Assessment*.