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Date: September 21, 2023

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

Name: Metro Lake Union
Address: 1602 North Northlake Way, Seattle
Facility/Site No.: 2217
Cleanup Site No.: 1275

Dear Vance,

This letter is prepared on behalf of Chevron Environmental Management Company (Chevron) and King County in response to the July 11, 2023, letter from Tamara Welty, Washington Department of Ecology (Ecology), to John Greene, King County Metro, concerning the Periodic Review conducted at the Metro Lake Union Site (Site). We are responding to the conclusions in Ms. Welty's letter and the Periodic Review Report (Report, April 2023).

Chevron and King County have completed all remedial actions required pursuant to the Site Consent Decree, and groundwater monitoring is continuing. The conclusions in the letter suggest that certain additional actions may be necessary, but those conclusions are not supported by Site data or the Site Consent Decree terms. As discussed in more detail below, Site data confirms groundwater concentrations are below Site cleanup levels at the points of compliance, with the exception of arsenic, and there are no exposure pathways of concern. Our detailed responses to the conclusions are as follows:

- Vapor Intrusion – Remedial actions required in the North Yard are outlined in the Prospective Purchaser Consent Decree (PPCD) with Touchstone Corporation. If Ecology has any vapor intrusion (VI) concerns with respect to the North Yard, those concerns should be addressed by Touchstone. Pursuant to the PPCD Cleanup Action Plan, Touchstone was to “eliminate” the VI pathway by removing contaminated soil and some impacted groundwater from the North Yard and then “waterproof” and install a “vapor barrier” to prevent migration of vapors into the building. In addition, the Touchstone building was constructed with an underground parking garage, which if ventilated properly should address any VI concerns even without any waterproofing or a vapor barrier. Note the Touchstone PPCD expressly states that it does not modify the Contribution Protection provision in the existing Site Consent Decree. In November 2017, we were notified that Touchstone sold the property to Columbia Washington NorthEdge Office Properties, LLC (NorthEdge). We do not know if NorthEdge still owns the North Yard.
- Trend Analysis/Restoration Timeframe Estimates – The Site Consent Decree does not require a trend analysis or restoration timeframe estimates but even if it did, there is no basis for requesting such analysis at this time. The plume is fully delineated, and all eleven compliance wells have met cleanup levels for at least five consecutive sampling events for benzene, toluene, ethylbenzene, naphthalene and cPAHs. Ten compliance wells have met cleanup levels for lead for at least five consecutive quarters. In the last monitoring

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event, all wells met applicable cleanup levels with the exception of arsenic, with the highest arsenic concentration detected at 12.7 ug/L. Nearby compliance wells had arsenic concentrations of 1.9 and 0.6 ug/L, well below MTCA Method A cleanup level for arsenic. While the Site specific arsenic cleanup level is less than the MTCA Method A cleanup level for arsenic, the current cleanup level is relevant when evaluating potential exposure issues and the need for a trend analysis or an estimate of the restoration time frame. While continued groundwater monitoring may be warranted to confirm concentrations are stable or declining, there is no basis for any other analysis at this time.

- Sampling for Total Petroleum Hydrocarbons (TPH) – The Site Consent Decree does not include cleanup levels for diesel or gasoline-range constituents in groundwater, and there is no basis for reopening the Consent Decree to include them. The Consent Decree is appropriately focused on the protection of surface water and the constituents of petroleum that have the potential to impact surface water. Groundwater monitoring confirms concentrations are below cleanup levels that are protective of surface water.
- Wells MW-14 and MW-22 – MW-14 was located during the June 2023 sampling event and gauged. Sampling and gauging information will be included in the next groundwater monitoring report. The surface monument of MW-22 will be investigated and repaired as needed.
- Protection of Sediment – Ecology suggests the remedy may not be protective of sediment, but that is not the case. As Ecology confirms in the Report, April 2023, the remedy is protective of surface water, which means groundwater is not impacting sediment. Sediment adjacent to the Site may have been impacted by historical operations at Gas Works Park, and the Gas Works Park PLPs will address the adjacent sediment as part of the Gas Works Park Site – Sediment Cleanup Unit cleanup.
- Right-of-Way (ROW) Contamination – Nearby ROWs are likely impacted by Gas Works Park, and it is likely that some of the ROWs adjacent to the Site are also impacted by Gas Works Park. Any health and safety or other plans in place as a result of the Gas Works Park impacts should be more than sufficient to address petroleum contamination that may exist in the ROWs. If those plans do not already address the ROWs adjacent to the Site, we suggest the City expand those documents so they apply to all ROWs in the vicinity. We are confident the City is aware of the ongoing monitoring at the Site.

We will continue to perform groundwater monitoring as required in the Site Consent Decree. Given the recent results and the ubiquitous nature of arsenic, it may be appropriate to reduce the groundwater monitoring frequency. We are evaluating that issue and will provide our thoughts on potential changes to the groundwater monitoring program under separate cover.

We appreciate the opportunity to work cooperatively with Ecology in performing the Periodic Review and look forward to continuing to work with you.

Sincerely,
Arcadis U.S., Inc.



Samuel Miles
Arcadis Project Manager

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