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**STATE OF WASHINGTON**  
**DEPARTMENT OF ECOLOGY**

**Northwest Region Office**

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September 29, 2023

Eli Gurian  
Phillips 66 Company  
3900 Kilroy Airport Way, Suite 210  
Long Beach, CA 90806  
([Eli.A.Gurian@p66.com](mailto:Eli.A.Gurian@p66.com))

**Re: Ecology Approval of Final Remedial Investigation Work Plan for the Block 37 Site  
Facility Site ID 46445373, Cleanup Site ID 6134, 600-630 Westlake Ave N, Seattle, WA  
Agreed Order No. DE 19430**

Dear Eli:

Thank you for submitting the final Remedial Investigation Work Plan (RIWP), dated August 23, 2023, for the Block 37 Site in accordance with Agreed Order No. DE 19430 (AO) Exhibit C – Schedule of Deliverables. Our final comments on the document have been addressed via email correspondence received from Atlas Technical Consultants on September 25, 2023 (enclosed). We have no further comments at this time. Therefore, the RIWP dated August 23, 2023 is hereby approved.

Ecology appreciates the diligence of Phillips 66 Company and City Investors XI L.L.C. and their respective consulting teams in the fulfillment of this and the upcoming requirements of the AO. Please keep me informed of any issues as they occur during performance of the remedial investigation work. We look forward to continued progress at the Block 37 Site.

Eli Gurian  
September 29, 2023  
Page 2

If you have any questions, please contact me by phone at (425) 457-3143 or by email [tena.seeds@ecy.wa.gov](mailto:tena.seeds@ecy.wa.gov).

Sincerely,



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

Enclosure: 1) Responses to final RIWP Comments

cc: Corey Wilson – City Investors XI, L.L.C., ([CoreyW@vulcan.com](mailto:CoreyW@vulcan.com))  
Jim Broadlick – City Investors IX, L.L.C., ([JimBr@vulcan.com](mailto:JimBr@vulcan.com))  
Elisabeth Silver – Atlas Technical Consultants, ([Elisabeth.Silver@oneatlas.com](mailto:Elisabeth.Silver@oneatlas.com))  
Brani Jurista – Farallon Consulting, ([bjurista@farallonconsulting.com](mailto:bjurista@farallonconsulting.com))  
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Kim Wooten – Dept. of Ecology, ([Kim.Wooten@ecy.wa.gov](mailto:Kim.Wooten@ecy.wa.gov))  
Dhroov Shivjiani – Dept. of Ecology, ([Dhroov.Shivjiani@ecy.wa.gov](mailto:Dhroov.Shivjiani@ecy.wa.gov))

## Seeds, Tena (ECY)

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**From:** Elisabeth Silver <Elisabeth.Silver@oneatlas.com>  
**Sent:** Monday, September 25, 2023 4:25 PM  
**To:** Seeds, Tena (ECY)  
**Cc:** bjurista@farallonconsulting.com; coreyw@vulcan.com; cschmitt@farallonconsulting.com; jimBr@vulcan.com; david.raubvogel@aecom.com; Eli.A.Gurian@p66.com  
**Subject:** RE: Block 37 Site - Final Remedial Investigation Work Plan - Agreed Order No. DE 19430

Hi Tena,

Thank you for reviewing the final RIWP document. Regarding the follow-up questions you had, as you noted it was acceptable to do so, I am responding via email with the requested information. The specific item you requested are below, followed by my responses.

- The added boring/well in the Westlake ROW (AB-44/AMW-18) is shown on top of the 'EV' structure on Figure 7-2. Is drilling at that location possible? What is the plan for drilling, sampling, and well installation for that location if that EV structure is in the way?
  - Utility locations will be verified for this and all locations prior to drilling. If necessary, drilling locations will be adjusted as needed to avoid the utility(ies) while still achieving the data gap objective, as specified in Table 7-1 of the RI WP. Any significant adjustments will be communicated to Ecology prior to proceeding.
- The MDL and Reporting Limit values for EDB and Naphthalene in SAP/QAPP Table 4 (soil gas DQOs) are shown higher than their respective Reporting Limits, which seems to be opposite of what they should be (i.e., MDL should be lower than RL). Did those get swapped inadvertently? Please confirm the MDL and Reporting limit values for these two compounds.
  - Correct, the MDL and Reporting Limit values for EDB and Naphthalene in SAP/QAPP Table 4 (soil gas DQOs) were swapped inadvertently.
- The values for MDL, Reporting Limit, and LCS/LCSD Accuracy and Precision are missing from SAP/QAPP Table 4 for the APH analysis. Please confirm what these values are.
  - The values for MDL, Reporting Limit, and LCS/LCSD Accuracy and Precision for the APH analysis are shown in this table:

Analyte	Method	Matrix	Units	MDL	PQL/RL	LCS/LCSD Accuracy	Precision RPD	Surrogate
Aliphatic EC5-8	MA APH (EPA TO-15)	Soil Gas	ug/m3	54.4	114	±30%	<25%	±30%
Aliphatic EC9-12	MA APH (EPA TO-15)	Soil Gas	ug/m3	47	118	±30%	<25%	±30%
Aromatic EC9-10	MA APH (EPA TO-15)	Soil Gas	ug/m3	6.93	25.2	±30%	<25%	±30%

Please let me know if these sufficiently answer your questions, or if you need any more information from me. Thank you,



Elisabeth Silver (she/her)

Senior Project Manager

C: 206.491.9754

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**From:** Seeds, Tena (ECY) <[TSEE461@ECY.WA.GOV](mailto:TSEE461@ECY.WA.GOV)>  
**Sent:** Tuesday, September 5, 2023 5:53 PM  
**To:** Elisabeth Silver <[Elisabeth.Silver@oneatlas.com](mailto:Elisabeth.Silver@oneatlas.com)>  
**Cc:** Branislav Jurista <[bjurista@farallonconsulting.com](mailto:bjurista@farallonconsulting.com)>; Corey Wilson <[coreyw@vulcan.com](mailto:coreyw@vulcan.com)>; Cliff Schmitt <[cschmitt@farallonconsulting.com](mailto:cschmitt@farallonconsulting.com)>; Jim Broadlick <[JimBr@vulcan.com](mailto:JimBr@vulcan.com)>; Raubvogel, David <[david.raubvogel@aecom.com](mailto:david.raubvogel@aecom.com)>; 'Gurian, Eli A' <[Eli.A.Gurian@p66.com](mailto:Eli.A.Gurian@p66.com)>  
**Subject:** [EXTERNAL] RE: Block 37 Site - Final Remedial Investigation Work Plan - Agreed Order No. DE 19430

**[External Email]** This email originated from outside of the Atlas mail system. Please use caution when opening attachments.

Hi Elisabeth and Block 37 team,

I have finished reviewing the final RIWP document received from the link provided in your August 23<sup>rd</sup> email (below). I have a few questions, but nothing that requires revision to the document:

- The added boring/well in the Westlake ROW (AB-44/AMW-18) is shown on top of the 'EV' structure on Figure 7-2. Is drilling at that location possible? What is the plan for drilling, sampling, and well installation for that location if that EV structure is in the way?
- The MDL and Reporting Limit values for EDB and Naphthalene in SAP/QAPP Table 4 (soil gas DQOs) are shown higher than their respective Reporting Limits, which seems to be opposite of what they should be (i.e., MDL should be lower than RL). Did those get swapped inadvertently? Please confirm the MDL and Reporting limit values for these two compounds.
- The values for MDL, Reporting Limit, and LCS/LCSD Accuracy and Precision are missing from SAP/QAPP Table 4 for the APH analysis. Please confirm what these values are.

There are a few other minor items, but nothing significant enough to warrant any changes to the RIWP document. They may be brought up later during review of the RI Report.

Regarding the above bullets, I am fine with you responding via email with the requested information. Again, no need to revise or resubmit the document.

I'll issue the work plan approval letter following receipt of the information requested above.

**Tena Seeds, PE** (she/her)  
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Northwest Region Toxics Cleanup Program  
Washington State Department of Ecology  
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