



October 19, 2023

Mr. Dale Myers
Site Manager
Washington Department of Ecology
15700 Dayton Avenue North
Shoreline, WA 98133

Subject: Comment on Quarterly Progress Report: Second Quarter 2023
Carson Cleaners Site, Cleanup Site ID 14878
Washington Department of Ecology Agreed Order DE 19805

Dear Mr. Myers--

We respectfully submit this comment letter regarding the Quarterly Progress Report: Second Quarter 2023 (Q2 2023 Report), dated July 17, 2023, prepared by Anchor QEA on behalf of Than Associates, LLC, for the Carson Cleaners property located at 4701 Brooklyn Avenue NE, Seattle. This comment letter was prepared by WSP USA Environment & Infrastructure Inc. on behalf of the UDPA 4701, LLC, owner of the Bank of America building located at 4701 University Way NE, Seattle (Bank Property).

Our principal comment on the Q2 2023 Report is that the figures depicting the isoconcentration distributions of the chlorinated solvents do not adequately present the groundwater conditions and could lead to misinterpretations. Specifically, Figures 5-9 depict what could be interpreted to be a separate groundwater plume area under the Bank Property and a southward groundwater gradient (Figure 4) that is cross-gradient to the Bank Property. We believe that Figures 5-9 must be reviewed in context with the historical groundwater conditions and more recent development activities. Reviewing the current Figures 5-9 in isolation could lead to misinterpreting the source of the solvent impacts. We do not believe that Carson Cleaners should be able to deflect responsibility for their contaminant plume by presenting these figures and data out of context from the historical data. This comment letter will discuss the Q2 2023 Report in the context of the historical groundwater monitoring and cleanup in this area so that Ecology has an unbiased assessment of the full range of data available.

Groundwater concentrations of tetrachloroethene (and related breakdown products) that originated from the Carson Cleaners property were discovered during the groundwater monitoring of the former Chevron Station located due east of Carson Cleaners and adjacent to the west of 4701 University Way NE. The former Chevron Station groundwater has been monitored from 1990 and continues to the present. Up to 2018, the groundwater gradient was generally shown to be flowing from Carson Cleaners, across the Chevron property, toward the Bank Property in an easterly direction. In 2018, the former Chevron Station was developed as an apartment complex that involved the deep excavation and remediation of the entire lot. The excavation at the former Chevron Station included dewatering of 1,842,284 gallons of water based on the information from the Ecology website. Over the years of monitoring, the groundwater gradient has been modified by the development work conducted in the area, including that of the Chevron Station. The potentiometric surface map in Figure 4 of the Q2 2023 Report depicts a southerly flow direction; however, as stated on Figure 4, the "groundwater flow direction may be impacted by dewatering activities taking place at two locations south and southeast of Carson Cleaners".

Ecology should note the following when making any inferences from the Q2 2023 Report:

- Although the Q2 2023 Report indicates on Figure 4 that the groundwater flow direction is toward the south, from 1990 to 2018, the groundwater gradient was regularly reported as flowing toward the east or northeast based on over 25 years of monitoring at the former Chevron Station.



- Figures 5-9 on the Q2 2023 Report, if read in isolation, appear to depict a distinct chlorinated plume that is separate from the Carson Cleaners chlorinated plume. Prior groundwater maps showed a connection of the plume from Carson Cleaners migrating to the east towards the Bank Property. As Ecology knows, chlorinated solvent plumes can become disconnected from an ongoing source, particularly when the Chevron property in-between Carson Cleaners and the Bank Property has been extensively excavated, dewatered, and the new underground portion of the structure obstructs the upper flow of groundwater. In addition, many of the historic wells were removed during the redevelopment of the Chevron station and data are now lacking in areas that had historically much better areal distribution establishing the eastward groundwater flow direction and connection of the Carson Cleaners plume.
- There are no groundwater quality data for the area north of MW-25 (under the Bank building) or south of MW-22 to indicate that there is a widespread chlorinated solvent plume in those locations as depicted in Figures 5-9. Moreover, there are no groundwater quality data to support a plume in the area of the Christ Episcopal Church building that is south of the former Chevron and southeast of Carson Cleaners. Carson Cleaners should not be extrapolating their existing data to this extent—there is simply no supporting information.
- There is no historical support for a drycleaning operation at the Bank Property. With the numerous apartments in the University District, coin operated laundries were common. Permits and tax archives from the City of Seattle indicate that the Bank Property in 1945 was a store, reading room and sales office. In 1950 the Bank Property usage is “press shop”. In 1951 it is noted to be a self-serve laundry (laundromat) and in 1956 the building was demolished to build the Bank building.
- Similarly, the building at 4709 University Way (north of the Bank building) had permit records signed by the owner noted as Ravenna Cleaners in 1962 and 1963; however, in 1963, the city inspector made a sketch of the coin operated machines in the building indicating that this facility was another coin operated laundromat, not a dry cleaner. In 1964 this building was demolished for development of the Bank parking lot.

This area of the University District is undergoing significant redevelopment, particularly with the nearby Sound Transit Station and tunnel construction. We respectfully request that Ecology carefully review the current data in context with the prior data so that no incorrect conclusions are drawn concerning the Bank Property and the historical data that supports Carson Cleaners as the source property.

We appreciate Ecology’s attention to the issues raised in this comment letter. If you have any questions or require additional information, please feel free to contact the undersigned.

Sincerely,

WSP USA Environment & Infrastructure Inc.

Kathleen Goodman, LHg.

Principal

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C: Darin Willis, UDPA
John Houlihan, Houlihan Law