



November 15, 2023

Frank Winslow
Washington State Department of Ecology
1250 West Alder Street
Union Gap, Washington 98903

**RE: COMPLIANCE MONITORING PLAN
3524 STONE WAY NORTH
SEATTLE, WASHINGTON
FARALLON PN: 2761-001**

Dear Frank Winslow:

Farallon Consulting, L.L.C. (Farallon) has prepared this Compliance Monitoring Plan on behalf of Cornerstone 35 LLC to provide procedures for compliance monitoring for the property at 3524 Stone Way North in Seattle, Washington (herein referred to as the Property) (Figures 1 and 2).

The "Site," as defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) and its implementing regulations in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), comprises the area where hazardous substances originating on or from the Property have come to be located at concentrations exceeding applicable MTCA cleanup levels. The Site is enrolled in the Washington State Department of Ecology (Ecology) expedited Voluntary Cleanup Program (VCP) as expedited VCP Project No. XN0020.

A permanent cleanup action was completed between November 2022 and March 2023 in conjunction with redevelopment of the Property, which included excavation for construction of an underground parking garage. The permanent cleanup action included removal and off-Property disposal of approximately 15,857 tons of contaminated soil containing constituents of concern (COCs) at concentrations exceeding MTCA Method A cleanup levels and or exceeding Category 1 soil screening criteria established in Ecology's *Guidance for Remediation of Petroleum Contaminated Sites* dated November 2010, revised June 2016 from within the construction excavation. Confirmation soil samples collected at the horizontal and vertical extents of the contaminated soil excavation areas confirmed that the soil was less than the MTCA cleanup levels at the standard point of compliance defined for the Property, except for an area of contaminated soil left in place in the top 3 to 6 feet of the



easement immediately south of the construction excavation. The easement along the southern portion of the Property was paved with 3 inches of asphalt, which will act as an engineered cap (Figure 2).

Periodic monitoring and maintenance of the cap will be required to confirm that the direct contact pathway for the residual contaminated soil in the easement remains incomplete. The scope of work and methodology for the periodic monitoring and maintenance of the cap are described below.

PERIODIC MONITORING OF THE CAP

A localized area of residual contaminated soil was left in place in an easement along the southern edge of the Property due to limitations on excavation outside of the shoring wall, proximity to the south-adjointing building foundation, and requirements to maintain access to the south-adjointing property through the easement (Figure 2).

To ensure the integrity of the completed remedial actions, periodic monitoring of the asphalt driveway in the easement in the southern portion of the Property will be conducted. This section summarizes the periodic monitoring activities.

MONITORING FREQUENCY

Monitoring will be conducted annually, beginning immediately after recordation of the environmental covenant, for at least 5 years, until the first 5-year periodic review by Ecology, which is anticipated to be in 2028. Five monitoring events will be conducted before the first 5-year periodic review.

REPORTING

A 5-Year Periodic Monitoring Report will be submitted to Ecology prior to the 5-year periodic review. Following the 5-year periodic review, periodic monitoring will continue annually unless written approval of a reduction in frequency is received from Ecology. Inspections will be conducted by a qualified professional.

MONITORING PROCEDURES

The monitoring will consist of an inspection conducted by a walking survey of the easement along the southern portion of the Property where COCs exceeded MTCA Method A cleanup levels in soil. The monitoring will be documented on the Periodic Monitoring Form



(Attachment A). If any of the following features are present, that feature will be noted on the Periodic Monitoring Form and in photographs:

- Cracking or ruts;
- Intersecting cracks;
- Spalling of surface;
- Buckling;
- Vegetation in cracks;
- Erosion damage; and
- Excessive or uneven settlement.

The Periodic Monitoring Form may include sketches and photographs to further document the inspection and will include a summary of repairs recommended and implemented.

Areas with numerous intersecting cracks, alligatored areas, or buckling will be regarded as deterioration requiring maintenance. Cracks will be repaired and conform to current Washington State Department of Transportation Standard Specifications 5-03.3. Alligatored areas greater than 100 square feet will be removed and replaced with 3 inches of new asphalt; areas smaller than 100 square feet may be repaired as cracks. Buckling of the asphalt cap with cracks will be regarded as requiring maintenance and that section of asphalt will be removed and replaced.

Monitoring observations will be documented on the Periodic Monitoring Form. If a breach in the integrity of the asphalt cap is identified, the Property owner will notify Ecology and promptly initiate repairs. Repairs will be implemented by personnel and/or subcontractor(s) qualified to make the repairs.



CLOSING

Farallon appreciates the opportunity to provide environmental consulting services for this project. Please contact either of the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.

Yusuf Pehlivan, L.G.
Associate Geologist

Pete Kingston, L.G.
Principal Geologist

Attachments: Figure 1, *Property Vicinity Map*
Figure 2, *Property Plan*
Attachment A, Periodic Monitoring Form

cc: Jieun Shon, Cornerstone 35 LLC

YP/PK:cm

LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- **Accuracy of Information.** Farallon reviewed certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and recommendations are based in part on such information. Farallon's services did not include verification of its accuracy. Should the information upon which Farallon relied prove to be inaccurate, Farallon may revise its conclusions, opinions, and/or recommendations.
- **Reconnaissance and/or Characterization.** Farallon performed a reconnaissance and/or characterization of the Site that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Site that were not investigated or were inaccessible. Site activities beyond Farallon's control could change at any time after the completion of this report/assessment.

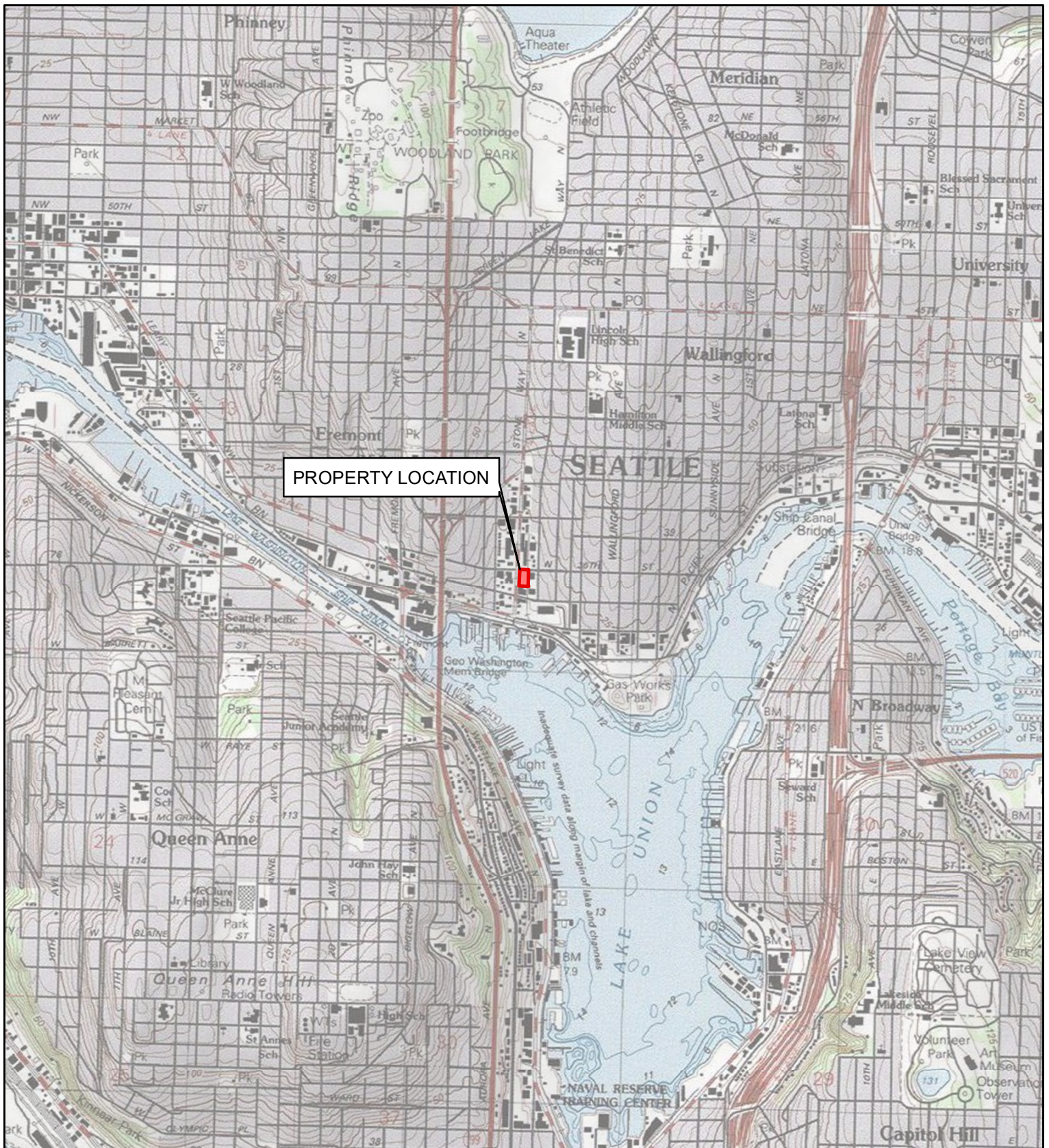
Farallon does not guarantee that the Site is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions are as of the date of the report.

This report/assessment has been prepared in accordance with the contract for services between Farallon and Cornerstone 35 LLC. No other warranties, representations, or certifications are made.

FIGURES

COMPLIANCE MONITORING PLAN
3524 STONE WAY NORTH
SEATTLE, WASHINGTON

FARALLON PN: 2761-001



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



0 2,000
SCALE IN FEET



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FIGURE 1

PROPERTY VICINITY MAP
3524 STONE WAY NORTH
SEATTLE, WASHINGTON

FARALLON PN: 2761-001

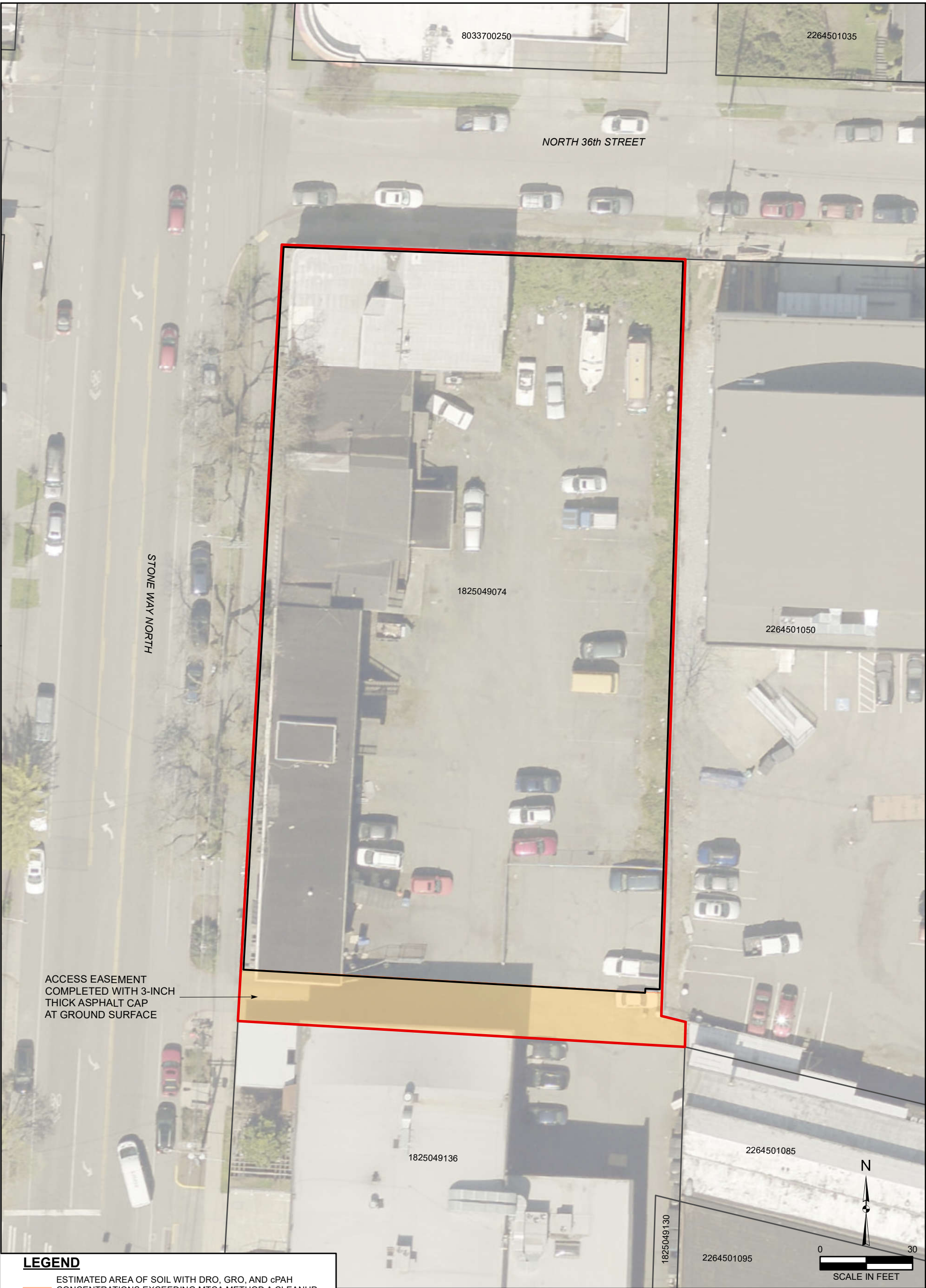
Drawn By: vpehlivan

Checked By: PK

Date: 1/13/2022

Disc Reference:

Path: Q:\Projects\2761 Evolution Projects\001 Living Stone\Mapfiles\003\Figure-01 PropertyVicinity.mxd



LEGEND

- ESTIMATED AREA OF SOIL WITH DRO, GRO, AND cPAH CONCENTRATIONS EXCEEDING MTCA METHOD A CLEANUP LEVELS REQUIRING ENVIRONMENTAL COVENANT AND ASPHALT CAP
- ESTIMATED AREA OF SOIL WITH DRO, GRO, AND cPAH CONCENTRATIONS EXCEEDING MTCA METHOD A CLEANUP LEVELS REQUIRING ENVIRONMENTAL COVENANT AND ASPHALT CAP
- BUILDING EXTENT
- PROPERTY BOUNDARY
- KING COUNTY PARCEL BOUNDARY
- 1825049074 KING COUNTY PARCEL NUMBER
- NOTES:
- DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
 - GRO = TPH AS GASOLINE-RANGE ORGANICS
 - cPAH = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBON
 - TEC = TOXIC EQUIVALENT CONCENTRATION
 - MTCA = WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION

DRAFT

1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.



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Portland | Baker City

California
Oakland | Irvine

Drawn By: Imurock

Checked By: YP

Date: 10/17/2023

Disc Reference:
Path: Q:\Projects\2761 Evolution Projects\001 Living Stone\Mapfiles\004\Figure-02_PropertyPlan.mxd

FIGURE 2

PROPERTY PLAN
3524 STONE WAY NORTH
SEATTLE, WASHINGTON

FARALLON PN: 2761-001

**ATTACHMENT A
PERIODIC MONITORING FORM**

COMPLIANCE MONITORING PLAN
3524 Stone Way North
Seattle, Washington

Farallon PN: 2761-001



PERIODIC MONITORING FORM

Preparer's Name: _____ Date/Time Prepared: _____
Site Name: _____ Farallon PN: _____

Site Information

Tenant/Facility _____

Manager: _____ Interviewed: ☐ Yes ☐ No

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Phone No.: _____ Email: _____

Current Land Use (Check appropriate boxes)

☐ Residential ☒ Commercial (office) ☐ Commercial (warehouse) ☐ Strip Mall ☐ Industrial

☐ Other, Describe: _____

Cap Material (Check all appropriate boxes that apply)

☐ Earthen/Soil ☒ Asphalt ☐ Concrete ☐ Other, Describe:

Inspection Scope:

To ensure the integrity of the completed remedial actions, periodic monitoring of the asphalt-paved parking lot outside the footprints of the newly constructed building will be conducted for the foreseeable future. The inspection will consist of a walking survey of the exterior portion of the Property in areas where constituents of concern exceeded the preliminary screening levels for direct contact.

Visual Inspection

Using the attached checklist, inspect the paved parking lot areas outside the footprints of the newly constructed building. Summarize the results of the visual inspection below:



Site Inspection Sketch

In the area below, provide an appropriate sketch(s) indicating areas inspected and locations of problem areas with recommended repairs. Include additional pages and photographs of areas as appropriate.

General Comments

Provide any other information that may be of importance in understanding the recommendations for annual cap maintenance activities for the Site.



VISUAL INSPECTION CHECKLIST

ASPHALTIC OR CONCRETE CAPPED AREAS

Open cracks and/or ruts	None _____	Repair Needed _____
Differential settlement	None _____	Repair Needed _____
Spalling of surface	None _____	Repair Needed _____
Buckling	None _____	Repair Needed _____
Vegetation in cracks	None _____	Repair Needed _____
Erosion damage	None _____	Repair Needed _____
Excessive or uneven settlement	None _____	Repair Needed _____

Recommended Repair Type/Location: