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December 4, 2023

Ms. Sunny Becker
Washington Department of Ecology
Northwest Region Office
15700 Dayton Avenue North
Shoreline, Washington 98133

Re: Comments on dCAP
Troy Laundry Seattle Site
399 Fairview Avenue North
Seattle, Washington 98109

TRC Project Number: 483101

Dear Ms. Becker:

In response to your request, TRC Environmental Corporation (TRC) is providing comments on the Troy Laundry Seattle Site (Troy Laundry) draft Cleanup Action Plan (dCAP). As you know, TRC works with Onni John Street (Land) LLC (Onni) which owns the 1120 John Street property which is downgradient from the Troy Laundry Site. Groundwater impacts from the Troy Laundry Site extend onto the Onni property. We appreciate the opportunity to submit these comments on Onni's behalf as an impacted property owner.

Onni's redevelopment of 1120 John Street included demolition of Seattle Times facilities and excavation of the entire property to an elevation of approximately 50 feet above Mean Sea Level (AMSL). Upon reaching final excavation depth, Onni allowed Troy Laundry to construct two groundwater monitoring wells at the 1120 John Street property. These wells are known as MW-29R and MW-35. MW-29R is located in the northwestern portion and MW-35 is located farther southeast.

Analytical results for the groundwater samples collected from MW-29R indicate that HVOCs including tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cDCE), and vinyl chloride (VC) are present in groundwater. Reported PCE, TCE, and cDCE concentrations are greater than their respective Cleanup Levels (CULs). None of these compounds were detected at well MW-35.

Based on review of this information, the Troy Laundry HVOC plume in groundwater continues to occur beneath the northwestern portion of the 1120 John Street property at an approximate elevation of 0 to 10 feet AMSL. Troy Laundry's dCAP indicates that no additional groundwater remediation is planned other than monitored attenuation. It is TRC's understanding that Onni accepts that an Environmental Covenant

(EC) will be necessary for the Troy Laundry contamination extending beneath the 1120 John Street property.

Groundwater

Based upon our review, TRC recommends that Troy Laundry monitor groundwater elevations and concentrations of HVOCs on a semi-annual basis for two years. If groundwater HVOCs concentrations remain steady or decrease, TRC does not recommend any additional remedial effort other than monitored attenuation. However, if any of the HVOCs concentrations increase over two consecutive events, additional groundwater remediation should be considered.

Soil Gas and Indoor Air

At a minimum, Troy Laundry should undertake indoor air sampling and potential vapor intrusion assessment in accordance with Model Toxics Control Act (MTCA) guidance. However, due to the limited data TRC recommends Troy Laundry commence semi-annual indoor air monitoring once Onni's new building is completed and air handling units are operational. It is recommended that the semi-annual indoor air monitoring events continue for a minimum of two years, which is more frequent than the MTCA guidance. If HVOCs concentrations are not detectable or detectable at concentrations less than half of the MTCA Indoor Air Method B values for unrestricted uses (non-cancer or cancer, whichever is less), no additional air monitoring is recommended.

However, if indoor air monitoring indicate any of the following conditions, additional remedial actions or indoor air abatement measures should be evaluated:

- Groundwater HVOCs concentrations increase or show an upward trend,
- Indoor air concentrations are more than half of their respective MTCA Method B values at any point during the recommended two-year evaluation period, and/or
- Indoor air concentrations are equal to or greater than their respective MTCA Method B values.

This phased approach allows a pragmatic approach to address potential impacts to the 1120 John Street property. Additional remedial actions will only need to be evaluated and commenced under specific conditions.

Ms. Sunny Becker, Washington Department of Ecology
Comments on dCAP, Troy Laundry Seattle Site
399 Firview Avenue North, Seattle WA
December 4, 2023

Please feel free to reach out to me regarding these recommendations.

Sincerely,

(Electronically Submitted)

Prepared by:
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John Houlihan, Houlihan Law