



SoundEarth Strategies, Inc.
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Seattle, Washington 98134

May 1, 2024

Frank P. Winslow, LHG
Washington Department of Ecology – Toxics Cleanup Program
1250 W. Alder Street
Union Gap, Washington 98903

SUBJECT: RESPONSE TO ECOLOGY INITIAL COMMENTS ON REMEDIAL INVESTIGATION AND FEASIBILITY STUDY
Plantation Building
5512, 5520, & 5522 20th Avenue Northwest
Seattle, King County, Washington
Facility/Site ID: 12489
Cleanup Site ID: 11614
VCP Project ID: XN0045
Project Number: 0627-003

Dear Frank:

SoundEarth Strategies, Inc. (SoundEarth) has prepared this letter to respond to the Washington Department of Ecology (Ecology) initial comments on the Remedial Investigation and Feasibility Study, dated February 23, 2024 (SoundEarth 2024). Ecology comments were provided to Mindy Graddon via email dated March 20, 2024.

COMMENT 1.0: VAPOR INTRUSION PATHWAY AND AIR SAMPLING RESULTS

Sub-slab soil gas data from Ballard Blossom included elevated concentrations of PCE and TCE at SS-02 for PCE and TCE. Indoor air sampling results from Ballard Blossom were below detection limits. Unfortunately, one sampling round is not sufficient to close out this concern.

The need for more than one indoor air sampling round is suggested in our Vapor Intrusion Guidance since significant temporal variability of contaminant concentrations in indoor air can occur over relatively short periods of time. The following Figure is from Ecology's Implementation Memo #21 (IM-21), dated November 15, 2021. [Figure 2, Continuous TCE sampling results from the Sun Devil Manor Study Site in Layton, Utah attached to comments.]

Ecology's vapor intrusion guidance dated March 2022 includes the following on page 55:

The following table has recommendations for the number of samples that may be needed when using canisters, sorbent tubes, or passive sampler methods. These recommendations do not factor in soil gas or indoor air concentrations levels, meteorological conditions, long-term exposures to the receptors present, or whether mitigation will be implemented quickly-any of which can affect

how many sampling events will be needed. The premise is that longer sampling periods should provide better changes for capturing temporal variability associated with VI.

[Table 1: Recommended minimum number of sampling events for three sampling methods attached to comments.]

Since the Site includes elevated concentrations of sub-slab TCE (which can result in a short-term exposure concern), a minimum of three sampling rounds with a cannister are suggested when sub-slab soil gas results are elevated.

Response: SoundEarth concurs that additional indoor air sampling is required at the Ballard Blossom Property. Indoor air samples were collected at the Ballard Blossom Property in November 2023; therefore, we propose an additional indoor air sampling be performed in April/May 2024 (i.e., sampling event spaced 6 months apart). Based on the results April/May 2024 indoor air sampling event, an additional event may be required and performed in consultation with Ecology.

Sub-slab soil gas and indoor air sampling will not be performed at the Ballard Camera Property.

COMMENT 2.0: SUB-SLAB SOIL GAS SAMPLING LOCATION AND DEPTH

Sample location SV-03 from 2017 had elevated concentrations of PCE and TCE in 2017. In order for Ecology to consider whether or not the soil gas samples collected in this area in 2023 are representative of this location and depth, Ecology request an E-W schematic cross section showing the depths and locations of soil gas samples on the Property to across the East Adjoining Property. This schematic cross section showing the depths and locations of soil gas samples on the Property to across the East Adjoining Property. This schematic cross section should also show the depths of the structures, and depth to groundwater.

A N-S schematic cross section showing soil gas and indoor air sampling locations is also warranted from the Property to across the Ballard Blossom property to the south. In addition, please provide versions of Figure 17 and Figure 18 that include only soil gas and indoor air sampling locations (without soil boring and groundwater sampling locations) since is it very difficult to assess these maps currently due to the density of the data.

If the 2023 soil gas sampling results cannot be considered to replace the 2017 results, then indoor air sampling (or resampling of soil gas at the same location and depth) would appear to be warranted.

Response: SoundEarth has prepared the following figures:

- ***Figure D: This figure illustrates the soil gas samples in a cross-section aligned from east to west (i.e., from the Property to the east-adjointing property).***
- ***Figure 4A: This figure illustrates the soil gas samples in a cross-section aligned from north to south (i.e., from the Property to the south).***
- ***Figure 17A (Soil Gas Analytical Results): This figure has been revised to show the shallow soil gas sample and sub-slab soil gas locations only.***

- **Figure 18A (Indoor Air Analytical Results):** *This figure has been revised to show the indoor air sampling locations only.*

We appreciate our continued progress towards finalizing the Remedial Investigation and Feasibility Study for the 20th Avenue Northwest Property/Plantation Building Property.

Respectfully,

SoundEarth Strategies, Inc.



Mindy Graddon, LG
Associate Geologist



Tom Cammarata, LHG
Principal Geochemist

cc: Frank Winslow, Ecology

Attachment: Figure D, Cross Section (D-D')
Figure 4A, Cross Section (A-A')
Figure 17A, Soil Gas Analytical Results (Revised)
Figure 18A, Indoor Air Analytical Results (Revised)

LMF:kak

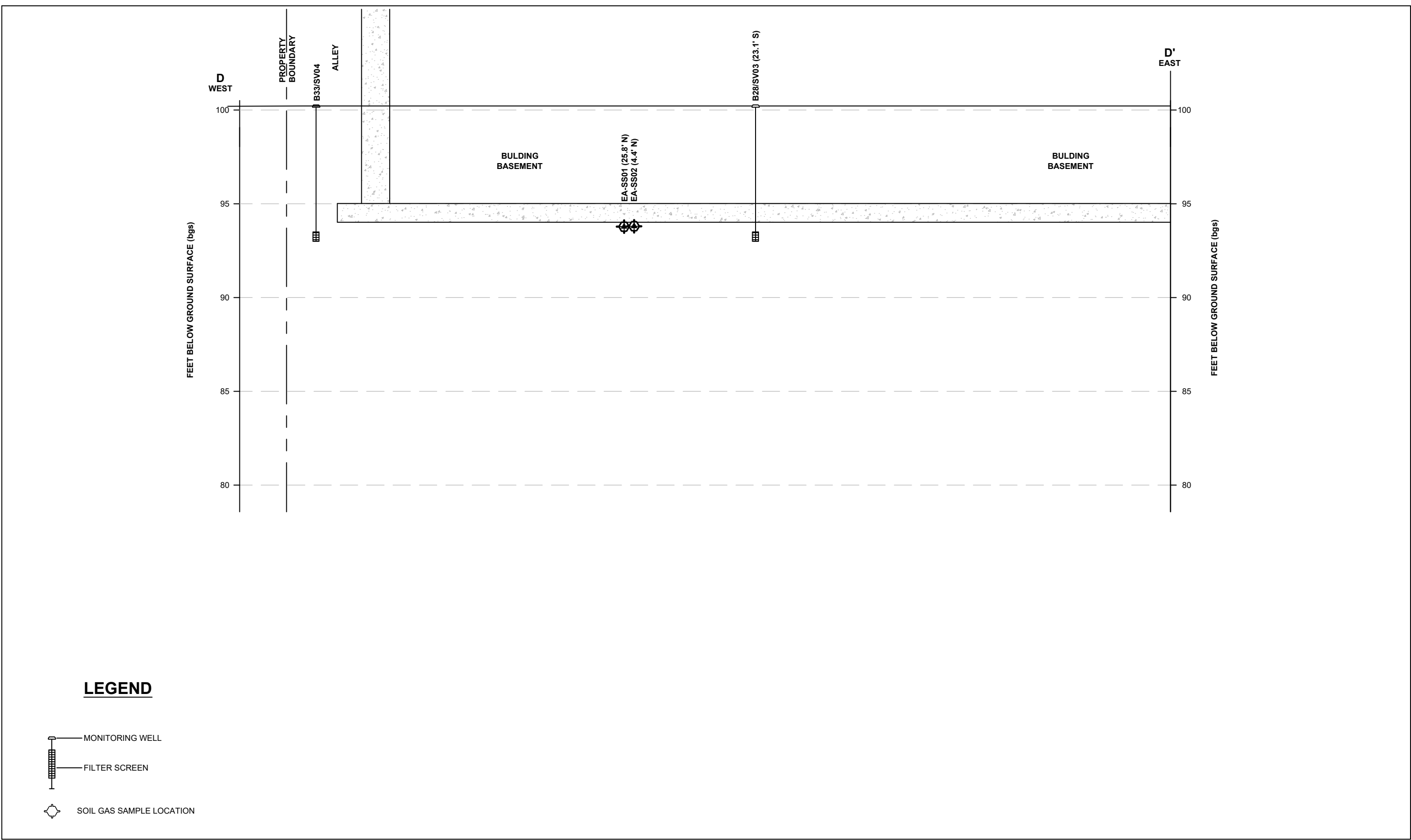
BIBLIOGRAPHY

SoundEarth Strategies, Inc. (SoundEarth). 2024. *Remedial Investigation and Feasibility Study, 20th Avenue Northwest Property/Plantation Building Property, 5512 through 5522 20th Avenue Northwest, Seattle, Washington*. Prepared for Doug Mullavey, Vicki Gruger, David Mitchell, and Diane Jacobsen. February 23.

Washington State Department of Ecology (Ecology). 2009. *Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action*. Publication No. 09-09-047. Finalized March 2022. October.

_____. 2024. Email thread regarding Plantation Building – XN00045 – Request for Intake Meeting. From Frank Winslow. To Mindy Graddon and Tom Cammarata, SoundEarth Strategies, Inc. March 20.

FIGURES



LEGEND

- MONITORING WELL
- FILTER SCREEN
- SOIL GAS SAMPLE LOCATION



DATE: 04/18/24
DRAWN BY:
CHECKED BY:
CAD FILE: 0627-003_2022_HIST

PROJECT NAME: 20TH AVENUE NORTHWEST PROPERTY
PROJECT NUMBER: 0627-003
STREET ADDRESS: 5512-5522 20TH AVENUE NORTHWEST
CITY, STATE: SEATTLE, WASHINGTON

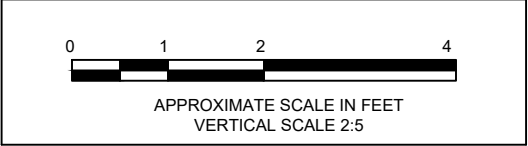
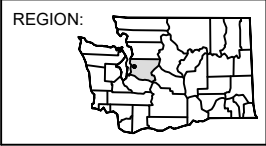
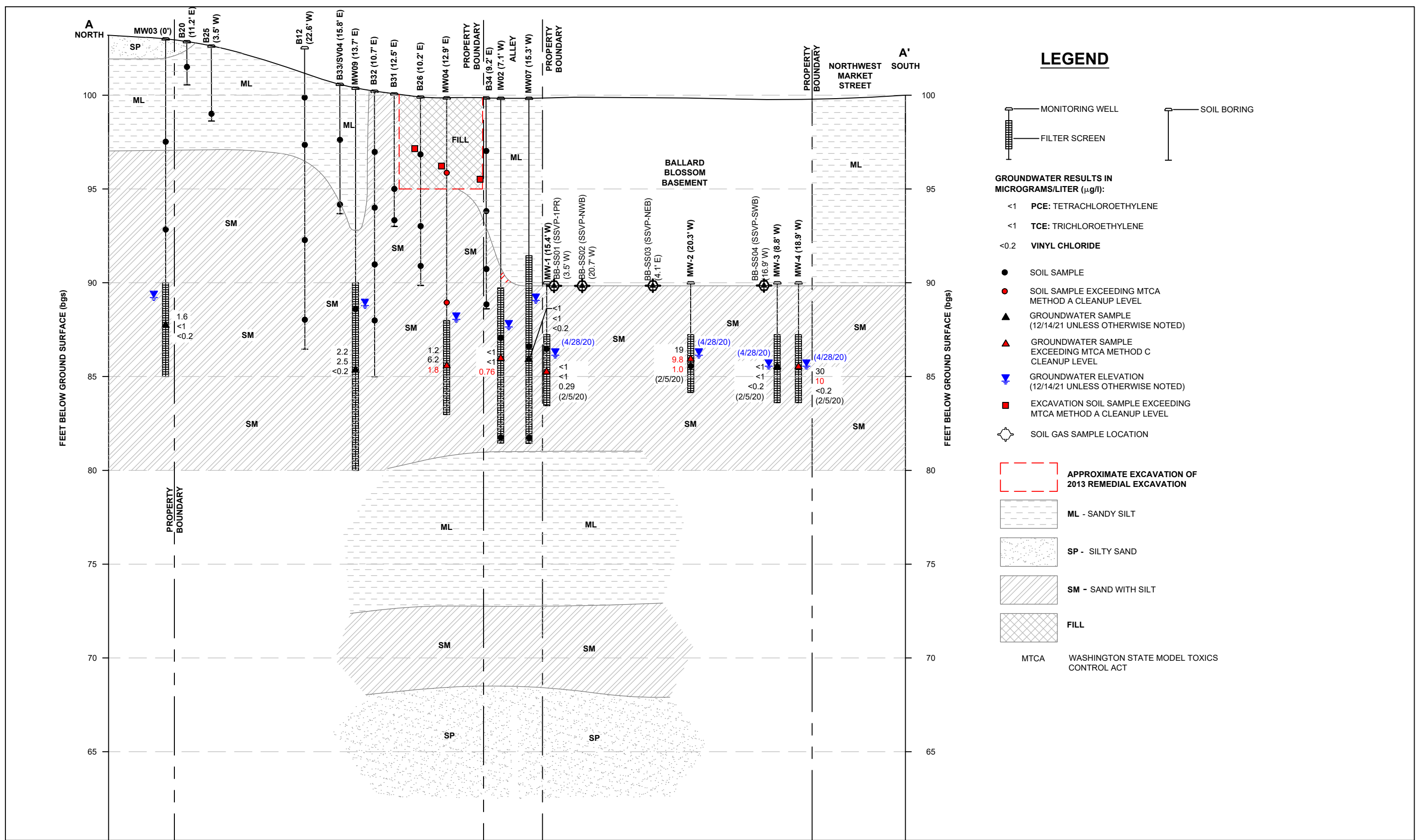


FIGURE D
CROSS SECTION D-D'



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CHECKED BY: SKD
CAD FILE: 0627-003_2022_HIST

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PROJECT NUMBER: 0627-003
STREET ADDRESS: 5512-5522 20TH AVENUE NORTHWEST
CITY, STATE: SEATTLE, WASHINGTON

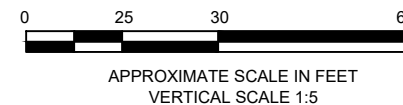
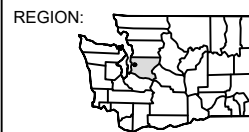
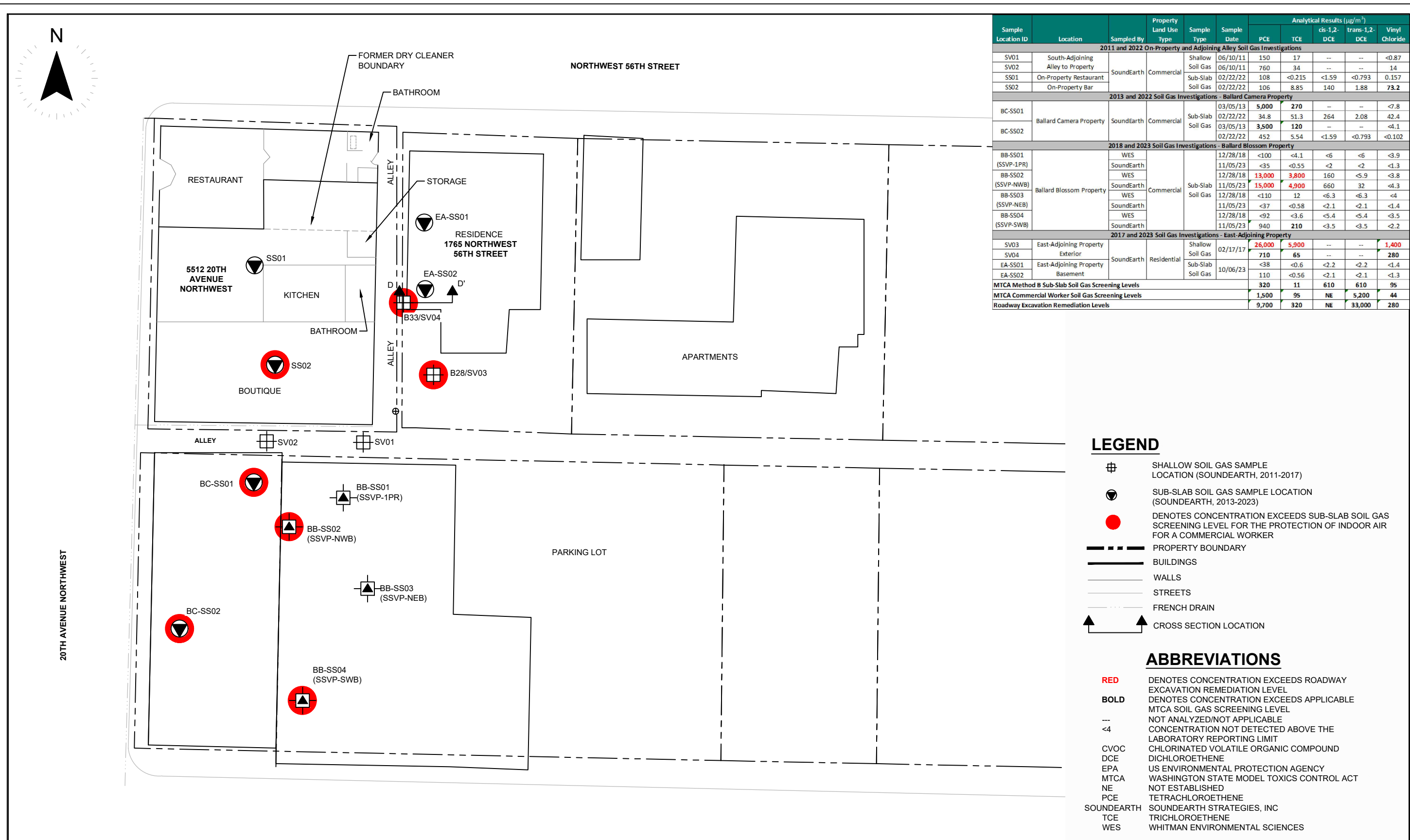
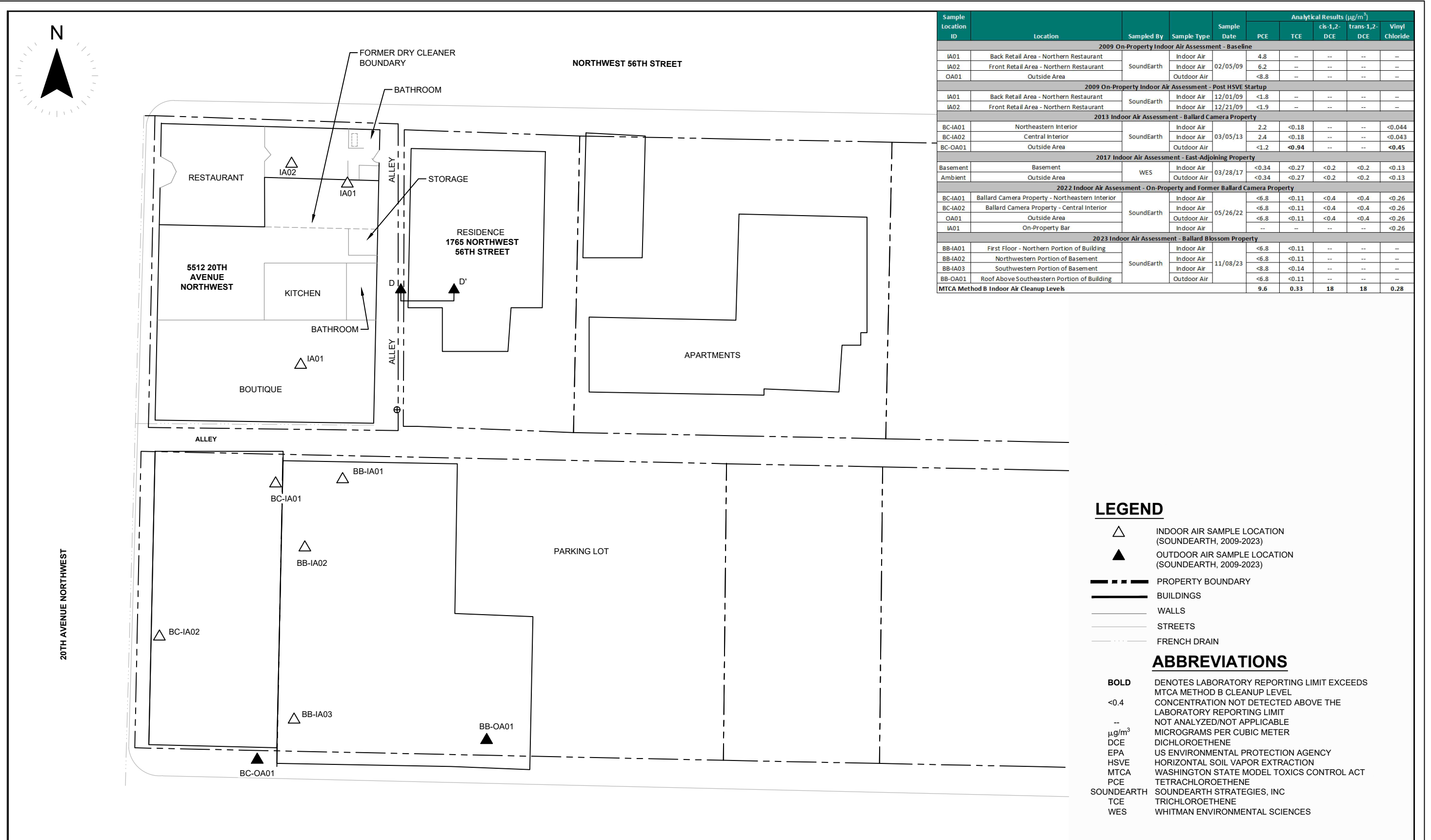



FIGURE 4A
CROSS SECTION A-A'





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PROJECT NUMBER: _____ 0627-003
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CITY, STATE: _____ SEATTLE, WASHINGTON

REGION: 

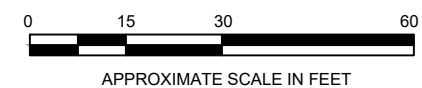


FIGURE 18A
INDOOR AIR ANALYTICAL RESULTS