



April 30, 2024

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

**RE: COMPLIANCE SAMPLING PLAN  
THOMPSON FIELD  
KING COUNTY PARCEL NO. 0825069104  
REDMOND, WASHINGTON  
FARALLON PN: 650-031**

Dear Frank Winslow:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter on behalf of the Estate of Barbara J. Nelson and WCN GST Non-Exempt Marital Trust No. 2 (Estate) to present the Compliance Sampling Plan (CSP) for the cleanup action at King County Parcel No. 0825069104 in Redmond, Washington, known as Thompson Field. The area on the western portion of Thompson Field where total naphthalenes and carcinogenic polycyclic aromatic hydrocarbon (cPAH) toxic equivalent concentrations (TECs) in soil exceed Washington State Model Toxics Control Act Cleanup Regulation (MTCA) cleanup levels, as established in Chapter 173-340 of the Washington Administrative Code, is herein referred to as the Thompson Field Site (Figures 1 and 2). The overall objectives of the cleanup action are to remediate concentrations of cPAHs and total naphthalenes exceeding MTCA cleanup levels on the Thompson Field Site; to obtain sufficient data to meet the requirements of MTCA for the cleanup action; and to obtain an unrestricted No Further Action determination for the Thompson Field Site from the Washington State Department of Ecology (Ecology).

## **BACKGROUND**

Thompson Field comprises the western portion of King County Parcel No. 0825069104 and is part of the greater property comprising King County Parcel Nos. 0825069067, 0825069012, 0825069013, 0825069102, 0825069103, 0825069104, and 0825069105 (Property). Thompson Field is part of a preliminary plat related to proposed development at the Property. Following plat approval, Thompson Field will remain as undeveloped open space. The Estate has been working with King County and Ecology since 2019 to integrate plans for redevelopment of the Property with the appropriate level of



cleanup to restore beneficial use of the Thompson Field Site. Wetland creation and restoration activities will be conducted in coordination among the Estate and the U.S. Army Corps of Engineers, Ecology, and King County, as appropriate. The Thompson Field Site was entered into the Expedited Voluntary Cleanup Program, as required by King County, to obtain concurrence that the collective environmental investigation work conducted by Farallon, and by Ecology and Environment, Inc. on behalf of the U. S. Environmental Protection Agency (EPA), and proposed cleanup action work will meet the requirements for completing a cleanup action under MTCA.

### CLEANUP ACTION SUMMARY

A permanent cleanup action was selected for the Thompson Field Site and is described in detail in the Cleanup Action Plan.<sup>1</sup> The permanent cleanup action will consist primarily of the excavation and off-site disposal of soil containing total naphthalenes and cPAHs at concentrations exceeding MTCA Method A cleanup levels and the creation and restoration of wetland following excavation activities.

The specific elements of the cleanup action will consist of the following activities:

- Remedial excavation of approximately 10,842 cubic yards (18,431 tons) of contaminated soil to a maximum depth of approximately 7 feet below ground surface using a horizontal grid system as guidance during excavation activities;
- Disposal of the contaminated soil in accordance with the acceptance criteria of a licensed disposal facility and applicable hazardous waste regulations and associated guidance;
- Compliance performance and confirmation soil sampling and laboratory analysis to confirm that the cleanup levels for soil were attained at the final limits of the remedial excavation, and that the remedial excavation meets the cleanup levels defined at the standard point of compliance; and
- Wetland creation and restoration activities that include hydroseeding the area with wetland and upland grasses, sedges, and rushes.

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<sup>1</sup> Farallon. 2022. *Cleanup Action Plan, Thompson Field, Portion of King County Parcel No. 0825069104, Redmond, Washington*. Prepared for Estate of Barbara J. Nelson and WCN GST Non-Exempt Marital Trust No. 2, c/o Nelson Legacy Group, LLC. October 31.



## COMPLIANCE SAMPLING PLAN

The purpose of this compliance sampling plan is to describe the sampling methodology, sample locations, sample quantities, laboratory analyses, and documentation protocols that will be implemented during the cleanup action at the Thompson Field Site.

### SOIL SAMPLING

Performance and confirmation soil samples will be collected during cleanup action excavation activities to identify and segregate contaminated soil from uncontaminated soil, and to ensure that cleanup standards are met at the points of compliance. Soil samples will be collected using either hand tools or an excavator bucket. To prevent potential cross-contamination, soil samples collected from an excavator bucket will be collected from soil that is not in contact with the sides of the excavator bucket. Soil samples will be observed for the potential presence of fill material and will be evaluated for indications of contamination such as the presence of stains, odors, or elevated photoionization detector readings. Soil samples will then be transferred to laboratory-supplied containers for laboratory analysis. Sample locations will be measured in the field either by measuring locations from static reference points (e.g., distance from excavation sidewalls), or by using a handheld global positioning system unit.

#### Performance Soil Sampling

Performance samples were collected during the remedial investigation and supplemental subsurface investigation performed by Farallon from 2020 through July 2021 to assist with defining the lateral and vertical extent of contaminated soil and classifying the soil for disposal. Soil analytical results for samples collected during the previous investigations were presented in the Remedial Investigation Report (RI Report)<sup>2</sup> and Addendum to Remedial Investigation Report (RI Addendum Letter),<sup>3</sup> and are summarized on Figure 2.

Additional performance soil sampling will involve collecting and analyzing an estimated minimum of 17 performance soil samples, as needed to support identifying, classifying, and segregating impacted soil in the excavation area. Discrete soil samples will be collected

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<sup>2</sup> Farallon. 2021. *Remedial Investigation Report, Thompson Field, Portion of King County Parcel No. 0825069104 Redmond, Washington*. Prepared for Estate of Barbara J. Nelson and WCN GST Non-Exempt Marital Trust No. 2 c/o Nelson Legacy Group, LLC. April 6 (RI Report).

<sup>3</sup> Farallon. 2022. Letter Regarding Addendum to Remedial Investigation Report, Thompson Field, Portion of King County Parcel No. 0825069104 Redmond, Washington. From Stuart Brown and Clifford T. Schmitt. To Frank Winslow, Ecology. February 24 (RI Addendum Letter).



from excavation grids as needed to guide the excavation, and to serve as confirmation samples where cleanup levels are attained. The performance soil sample locations will be based on the grid excavation areas, prior soil sampling results, and field-screened observations of soil conditions (Figure 3).

### **Confirmation Soil Sampling**

Confirmation soil samples were collected during previous investigations to confirm the final limits of the soil excavation area at the Thompson Field Site. These soil sampling locations, where cleanup levels were attained at the limits of the excavation area, will be used as confirmation sampling points. Soil analytical results for samples collected during previous investigations were summarized in the RI Report and the RI Addendum Letter. Farallon will collect additional confirmation soil samples during the excavation activities as needed to demonstrate that contaminated soil identified during previous investigations and contaminated soil discovered during excavation activities is removed at the lateral and vertical limits of the excavation to the maximum extent practicable. At a minimum, Farallon will collect confirmation soil samples from the floor and sidewalls of the excavation beneath and proximate to the locations of performance soil samples containing total naphthalenes or cPAHs at concentrations exceeding MTCA Method A cleanup levels that were collected during previous investigations or performance soil samples collected during the course of the cleanup action (Figure 3).

Confirmation samples will be collected generally as follows:

- Excavation sidewall samples will be collected along the sidewalls of the remedial excavation in areas where there is a gap of over 100 feet between existing soil samples that currently define the limits of contaminated soil.
- Excavation floor samples will be collected at the base of the excavation at a rate of approximately one sample per each 50- by 50-foot sampling grid, with the exception of sampling grid cells where sufficient confirmation soil samples were collected during previous investigations.

### **Laboratory Analyses**

Soil samples collected during excavation activities will be transported to OnSite Environmental, Inc. of Redmond, Washington under standard chain-of-custody protocols for analysis on an expedited turnaround time to prevent delays in the excavation schedule. Soil



samples collected for performance and confirmation monitoring will be analyzed for cPAHs and total naphthalenes by EPA Method 8270E/SIM.

### **Field Documentation**

Documentation of field activities will be provided on field report forms, soil sample data logs, sample and waste material labels, waste inventory tracking sheets, and chain-of-custody forms.

### **UNFORESEEN CONDITIONS**

Unforeseen conditions that may be encountered during implementation of the cleanup action include discovery of contaminated soil outside the area of known contamination shown on Figures 2 and 3. In the event of an unforeseen condition, Farallon will observe the condition, and will implement the following procedures:

- Estimating the boundaries of potentially contaminated soil using field-screening methods (e.g., presence of stains or odors, photoionization detector readings);
- Further marking the area as necessary, possibly using white paint and/or wooden stakes;
- Photographing and maintaining notes documenting the preliminary nature and extent of potentially contaminated soil in-situ;
- Collecting performance samples in accordance with this Compliance Sampling Plan to assess the nature and extent of potential additional contamination, and to plan accordingly for profiling, manifesting, removing, and disposing of additional soil;
- Coordinating analytical testing and managing analytical data pertaining to the encountered contaminated soil, including expedited laboratory analysis as needed, in coordination with the excavation contractor to minimize disruption to the excavation schedule;
- Consulting with the Estate and the excavation contractor to develop and implement a contaminated soil removal and disposal plan, as needed;
- Collecting confirmation samples in accordance with this Compliance Sampling Plan and applicable regulations and guidance to confirm complete removal of contaminated soil; and
- Incorporating the performance and confirmation soil sampling results in the Cleanup Action Report following completion of the cleanup action.



## CLOSING


Please contact either of the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

**Farallon Consulting, L.L.C.**



Greg Peters  
Associate Scientist



Brani Jurista, P.G.  
Principal Geologist

Attachments: Figure 1, *Site Vicinity Map*  
Figure 2, *Soil Analytical Results for cPAH TEC and Total Naphthalenes*  
Figure 3, *Proposed Soil Sample Locations and Soil Analytical Data*

cc: Amy Webber, Nelson Legacy Group, LLC

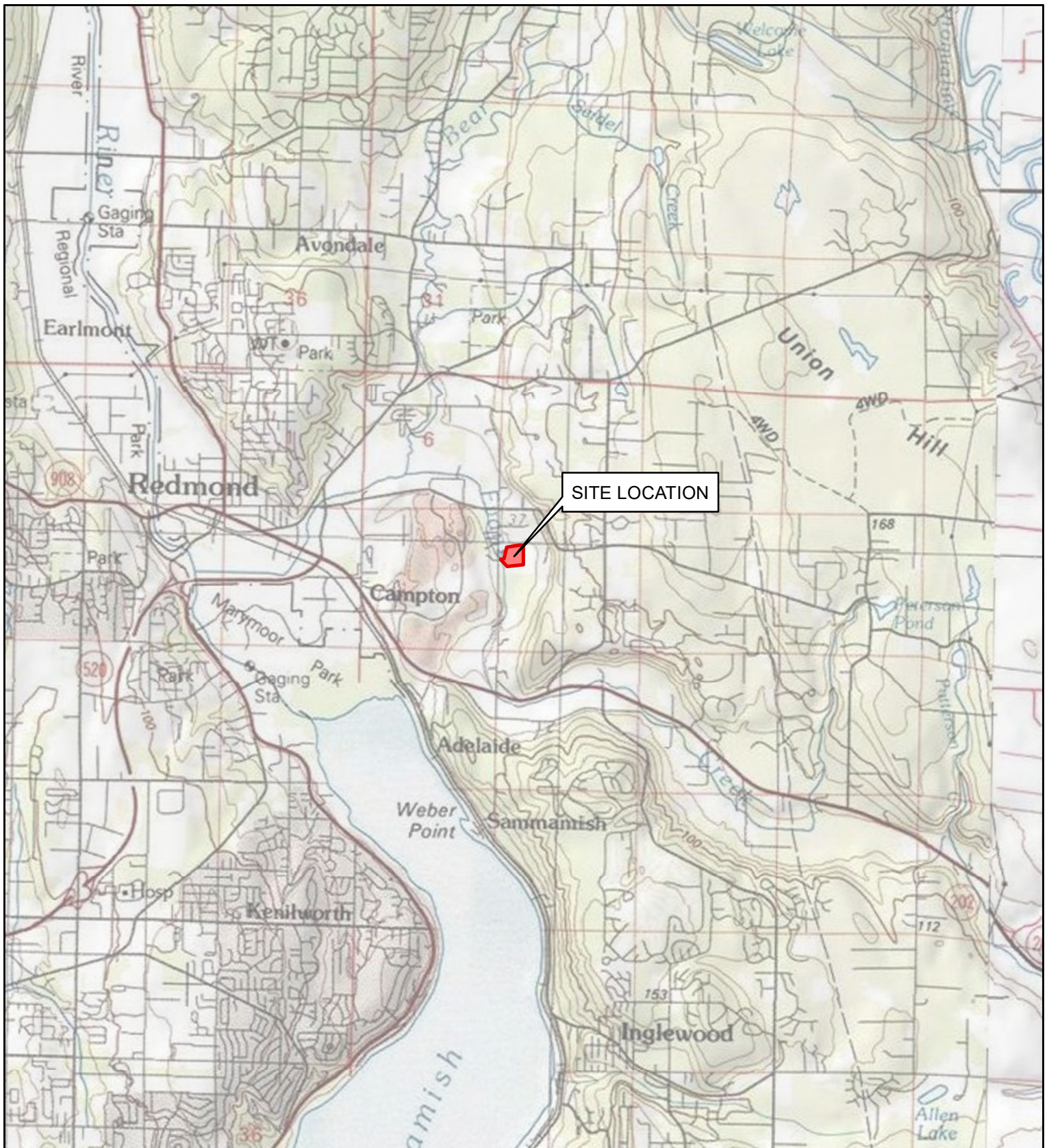
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## **FIGURES**

COMPLIANCE SAMPLING PLAN  
THOMPSON FIELD SITE  
PORTION OF KING COUNTY PARCEL NO. 0825069104  
REDMOND, WASHINGTON

FARALLON PN: 650-031





REFERENCE: 7.5 MINUTE USGS QUADRANGLE REDMOND, WASHINGTON, DATED 2013



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Disc Reference:

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## FIGURE 1

SITE VICINITY MAP  
THOMPSON FIELD  
PORTION OF KING COUNTY  
PARCEL NUMBER 0825069104  
REDMOND, WASHINGTON  
FARALLON PN: 650-031





NOTES:  
SOIL RESULTS SHOWN AS  
DEPTH IN FEET BGS | cPAH TEC | TOTAL NAPHTHALENES  
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM  
**BOLD** = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL  
TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) CLEANUP LEVEL  
< = ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED  
BGS = BELOW GROUND SURFACE  
cPAH TEC = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBON  
TOXIC EQUIVALENT CONCENTRATION  
TOTAL NAPHTHALENES = SUM OF NAPHTHALENE, 1-METHYLNAPHTHALENE, AND  
2-METHYLNAPHTHALENE

LEGEND

- MONITORING WELL (FARALLON, 2020)
- BORING (FARALLON)
- BORING (ECOLOGY & ENVIRONMENT, INC, 2019)
- EXCAVATION CONTOUR (DEPTH IN FEET BGS)
- ESTIMATED SITE BOUNDARY
- SOIL WITH cPAH TECs ABOVE MTCA METHOD A  
CLEANUP LEVEL
- WETLAND
- THOMPSON FIELD BOUNDARY
- PROPERTY BOUNDARY

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



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Checked By: SB

Date: 2/23/2022

FARALLON PN: 650-031

Disc Reference:

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FIGURE 2

SOIL ANALYTICAL RESULTS FOR cPAH TEC  
AND TOTAL NAPHTHALENES  
THOMPSON FIELD  
PORTION OF KING COUNTY  
PARCEL NUMBER 0825069104  
REDMOND, WASHINGTON



NOTES:  
SOIL RESULTS SHOWN AS  
DEPTH IN FEET BGS | cPAH TEC | TOTAL NAPHTHALENES  
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM

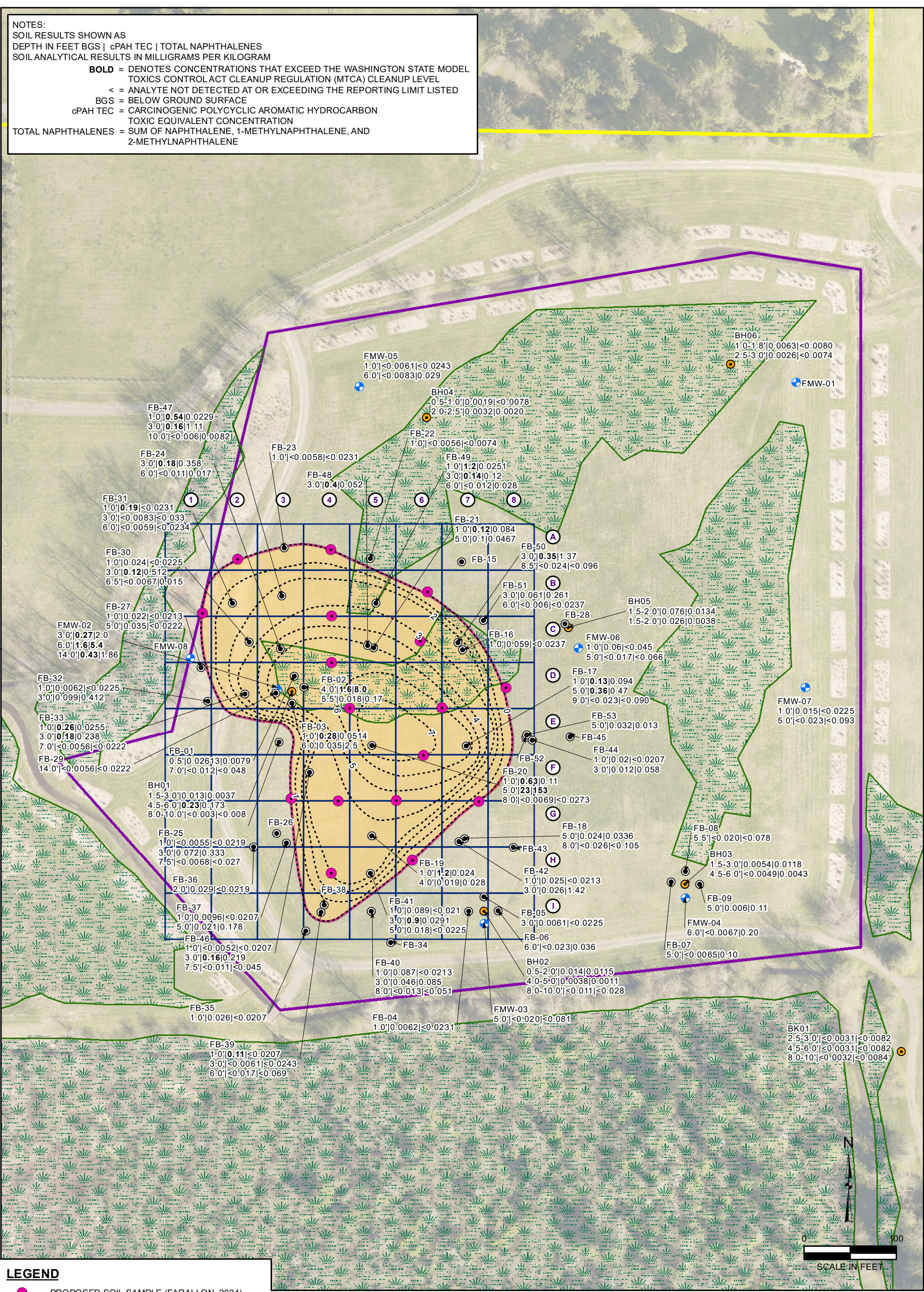
**BOLD** = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL  
TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) CLEANUP LEVEL

< = ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED

BGS = BELOW GROUND SURFACE

cPAH TEC = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBON  
TOXIC EQUIVALENT CONCENTRATION

TOTAL NAPHTHALENES = SUM OF NAPHTHALENE, 1-METHYLNAPHTHALENE, AND  
2-METHYLNAPHTHALENE



LEGEND

- PROPOSED SOIL SAMPLE (FARALLON, 2024)
- SAMPLING GRID (50'X50')
- MONITORING WELL (FARALLON, 2020)
- BORING (FARALLON)
- BORING (ECOLOGY & ENVIRONMENT, INC, 2019)
- EXCAVATION CONTOUR (DEPTH IN FEET BGS)
- ESTIMATED SITE BOUNDARY
- SOIL WITH cPAH TECs ABOVE MTCA METHOD A CLEANUP LEVEL
- WETLAND
- THOMPSON FIELD BOUNDARY
- PROPERTY BOUNDARY

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



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FIGURE 3  
PROPOSED SOIL SAMPLE LOCATIONS  
AND SOIL ANALYTICAL DATA  
THOMPSON FIELD  
PORTION OF KING COUNTY  
PARCEL NUMBER 0825069104  
REDMOND, WASHINGTON

FARALLON PN: 650-031

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