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May 2, 2024

Sunny Becker
Washington Department of Ecology
Northwest Region Office
15700 Dayton Ave. N.
Shoreline, Washington 98133

SUBJECT: RESPONSE TO ECOLOGY COMMENTS ON FEASIBILITY STUDY REPORT
Troy Laundry Seattle Site
300 Boren Avenue North and 399 Fairview Avenue North, Seattle, Washington
Cleanup Site ID No. 11690
Project Number: 0731-004-08

Dear Sunny:

SoundEarth Strategies, Inc. (SoundEarth) has prepared this letter to respond to the Washington Department of Ecology (Ecology) comments on the Final Draft Feasibility Study (FS) Report, dated July 11, 2023 (SoundEarth 2023). Ecology comments were provided to Thomas Cammarata in an email from you on February 20, 2024.

SECTION 1.0: REVISE SECTION IN THE FS REPORT REGARDING CONDITIONAL POINT OF COMPLIANCE (CPOC) FOR GROUNDWATER

Ecology Comment #1: [Revise section in the FS report regarding Conditional Point of Compliance \(CPOC\) for Groundwater: The CPOC for groundwater at the Troy Laundry property shall be set as close as practicable, not to exceed Troy property boundary, according to WAC 173-340-720 \(8\)\(c\) and \(d\), since the groundwater cleanup levels for this Site are not based on protection of surface water.](#)

Response: In Section 4.2 (Point of Compliance) of the FS Report, it states: “For the Site, a CPOC is warranted because it is not practicable to meet the cleanup levels throughout the Site, as required when using a standard point of compliance, because there is an ongoing upgradient source of TCE commingling with the CVOC plume on the Property. This source of TCE will continue to impact groundwater quality beneath the Boren Avenue North and Harrison Street ROWs and the Property for the foreseeable future.”

The CPOCs for the Site were proposed at groundwater monitoring wells MW04, MW07, and MW27 in the Boren Avenue right-of-way (ROW), MW26 in the Harrison Street ROW, and MW28 in the Thomas Street ROW. Based on review of available Property maps, the identified CPOC wells are located within the Property boundary, as defined in Section 3.5.2 of Ecology’s Guidelines for Property Cleanups Under the Voluntary Cleanup Program (Ecology 2008). Furthermore, the CPOC wells have been installed as close as possible to the Property boundary given physical limitations, including an extensive network of tie backs originating from the Troy and ONNI properties and the presence of overhead and underground

utilities in the ROWs, along with associated setback requirements. These limitations make installation of new or additional wells at or closer to the Property boundary impracticable and infeasible. The CPOC groundwater monitoring wells are shown on Figure 1.

Compliance with groundwater cleanup standards for the Site will be achieved when chlorinated volatile organic compounds (CVOCs) are detected at concentrations below cleanup levels in groundwater samples collected from the CPOCs (MW04, MW07, MW27, MW26, and MW28) for four consecutive groundwater monitoring events. At that time, we will consult with Ecology regarding the necessity for ongoing compliance groundwater monitoring and sampling as part of the periodic review process.

SECTION 2.0: PERFORMANCE AND COMPLIANCE GROUNDWATER MONITORING PROGRAM

Ecology Comment #2.1: The FS report should include trend analysis through December 2023.

Response: SoundEarth will update the FS Report with a statistical trend analysis for groundwater samples collected between May 2015 and December 2023. This analysis will also be included in the 2023 Annual Groundwater Monitoring Report for this Site.

Ecology Comment #2.2: Use EPA's MNA Guidance to collect groundwater data and evaluate the trend [TECHNICAL PROTOCOL FOR EVALUATING NATURAL ATTENUATION EPA/600/R-98/128](#)

Response: We will collect groundwater data and perform the statistical trend analysis in general accordance with the US Environmental Protection Agency Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water (Wiedemeier et al. 1998).

Ecology Comment #2.3 and 2.4: Ecology asks Touchstone and Ponte Gadea to sample all monitoring wells that have solvent concentrations exceeding the groundwater cleanup levels.

Based on the most recent groundwater sampling results in Quarter 2, 2022, the monitoring wells that show exceedances of the groundwater cleanup levels are:

1. MW31 and MW26 at Harrison Street and Boren Avenue
2. MW04, MW07, MW27, and MW13 at Boren Avenue
3. MW28 and MW29R at Thomas Street and Seattle Times
4. IW04, IW06, MW24, MW19, MW25, IW50, MW21, MW22, IW61, and MW23 underneath the Troy building

Response: We concur with the groundwater monitoring and sampling well network, except for the following:

- *Groundwater monitoring wells IW06 located on the Property and MW31 located in the Boren Avenue North ROW should be removed because CVOC concentrations have been below applicable Washington State Model Toxics Control Act (MTCA) groundwater cleanup level for last four sampling events (two each in 2022 and 2023).*

- **Groundwater monitoring well MW18 located on the Property should be included because vinyl chloride concentrations have exceeded the applicable groundwater cleanup level in 2022 and 2023.**
- **Groundwater monitoring well MW35 located on the former Seattle Times property should be included.**

Please refer to Table 2A (Summary of Groundwater Analytical Results for CVOCs) of the 2023 Groundwater Monitoring Report, dated April 2, 2024 (SoundEarth 2024).

We also request to discontinue analyzing groundwater samples for petroleum hydrocarbons collected at monitoring wells MW13, MW21, MW22, and MW28, because gasoline-, diesel-, and oil-range petroleum hydrocarbons detected in groundwater samples collected from these wells are attributed to the presence of the injected emulsified oil and its polar breakdown products in groundwater.

Ecology Comment #2.5: Ecology, with the input from TRC (the consultant for Onni --former Seattle Times Property located at 1120 John St., Seattle, WA.) is requiring that Touchstone monitor groundwater elevations and concentrations of chlorinated volatile organic compounds (CVOCs) on a semi-annual basis for two years. At the end of the two years, if the existing CVOCs groundwater plume under the Troy Laundry building, ROW, and Onni's new building to the south is stable or decreasing, the monitoring frequency can be reduced to once a year.

Response: We concur with semiannual groundwater monitoring and sampling for two years (i.e., collection of groundwater samples from monitoring wells MW29R and MW35) at the former Seattle Times property. We acknowledge that the groundwater monitoring and frequency may be reduced to annual following further statistical trend analysis.

Ecology Comment #2.6: During the third, fourth, fifth, sixth, and seventh year, groundwater samples will be taken once a year, alternating between the wet and dry season. One year in June, the next year in December. At the end of the seventh year, if the existing CVOCs groundwater plume under the Troy building, ROW, and Onni's new building is stable or decreasing, the monitoring frequency can be reduced further. Ecology will determine the frequency and duration of further groundwater monitoring at that time.

Response: We concur with annual groundwater monitoring and sampling (alternating between wet and dry season) during the third through seven years (2026 to 2030). We acknowledge that groundwater monitoring frequency and duration may be reduced based on further statistical analysis.

Ecology Comment #2.7: If any of the wells show CVOCs concentration results below CULS for four consecutive monitoring events, the monitoring well(s) can be dropped from the monitoring program.

Response: We concur with reducing the groundwater monitoring well network based on attainment of applicable MTCA groundwater cleanup levels for four consecutive events (i.e., well by well basis).

SECTION 3.0: SOIL GAS AND INDOOR AIR

Ecology Comment #3: Touchstone must conduct a semi-annual indoor air monitoring once Onni's new building is completed and its air handling units are operational. The semi-annual indoor air monitoring events must continue for a minimum of two years. If CVOCs 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 will be required.

Response: We concur with semiannual indoor air monitoring for a minimum of 2 years at the former Seattle Times property.

Per Section 4.13 of Ecology's Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action (Ecology 2009), "In those cases where indoor air concentrations are below the applicable cleanup levels, no immediate actions are necessary to reduce indoor air exposures." We interpret this to also mean that no additional indoor air sampling is required if all CVOC concentrations are below their applicable indoor air cleanup levels. We therefore propose that semiannual indoor air monitoring be stopped when CVOC concentrations are not detected at concentration above the MTCA Indoor Air Method B value for unrestricted uses (non-cancer or cancer, whichever is less).

SECTION 4.0: CONTINGENCY PLANS

Ecology Comment #4: Provide detailed contingency plans when:

1. Any of the groundwater CVOCs concentrations increase over two consecutive events.
2. Indoor air concentrations are more than half of their respective MTCA Method B values at any point during the recommended two-year evaluation period.

Response: We recommend contingency plans be prepared as follows:

1. **For groundwater, when the statistical trend analysis indicates that more than 50 percent of all target monitoring wells over two consecutive groundwater sampling events show an increasing statistical trend in concentrations.**
2. **For indoor air, when CVOC concentrations in indoor air exceed the MTCA Indoor Air Method B value for unrestricted uses (non-cancer or cancer, whichever is less).**

SECTION 5.0: ENVIRONMENTAL COVENANTS

Ecology Comment #5: Touchstone will record an environmental covenant for the Troy Laundry property and work with Onni (former Seattle Times) property to record an environment covenant on that property.

Response: Touchstone will record an environmental covenant (EC) for the Troy Laundry property. Touchstone will also coordinate with ONNI to record an EC for the former Seattle Times property.

SECTION 6.0: DCAP

Ecology Comment #6: As we discussed during the meeting, recent updates to the MTCA Rule were adopted in August and will become effective as of January 1, 2024. Some of the updates will affect the information

that will need to be presented in the FS and DCAP/final CAP. You can find the updates on Ecology's website at <https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-340>.

SoundEarth Response: SoundEarth will revise the FS to reflect updates to the MTCA Rulemaking Chapter 173-340 WAC Proposed Rule, dated February 15, 2023.

We appreciate our continued progress towards finalizing the FS and dCAP for the Troy Block Site. We respectfully request that all future correspondence regarding the FS and dCAP for the Troy Block Site be signed and provided in letter format on Ecology letterhead. Those letters can be distributed directly by electronic mail rather than by certified mail or U.S. mail.

Respectfully,

SoundEarth Strategies, Inc.



Levi Fernandes, PE
Environmental Engineer



Tom Cammarata
Principal

cc: Kim Wooten, Ecology
John Level, Ecology
Dhroov Shivjiani P.E., Ecology
Dirk Moses, Corsair Interests LLC
Barry Ziker, Hillis Clark Martin & Peterson P.S.
Jim O'Hanlon, Touchstone Corporation
Clint Jacob, Landau Associates, Inc.
Ken Lederman, McCullough Hill PLLC

Attachment: Figure 1, Conditional Point of Compliance Groundwater Monitoring Well Locations

LMF:kak

REFERENCES

SoundEarth Strategies, Inc. (SoundEarth). 2023. *Final Draft Feasibility Study Report, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington*. Prepared for Touchstone SLU LLC. July 11.

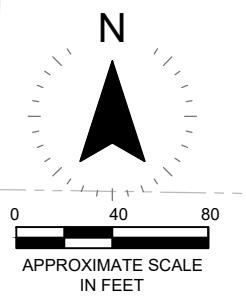
_____. 2024. Letter regarding 2023 Groundwater Monitoring Report, Troy Laundry Seattle Site, 300 Boren Avenue North and 399 Fairview Avenue North, Seattle, Washington. From Levi Fernandes and Thomas Cammarata. To Dirk P.D. Mosis III, USAA Real Estate Company, and Frank Jakus, Ponte Gadea Seattle LLC. April 2.

Wiedemeier, T.H., M.A. Swanson, D.E. Moutoux, E.K. Gordon, J.T. Wilson, B.H. Wilson, D.H. Kampbell, P.E. Haas, R.N. Miller, J.E. Hansen, and F.H. Chapelle (Wiedemeier et al.). 1998. "Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water." US Environmental Protection Agency Publication No. EPA/600/R-90/128. Revised August 2008. September.

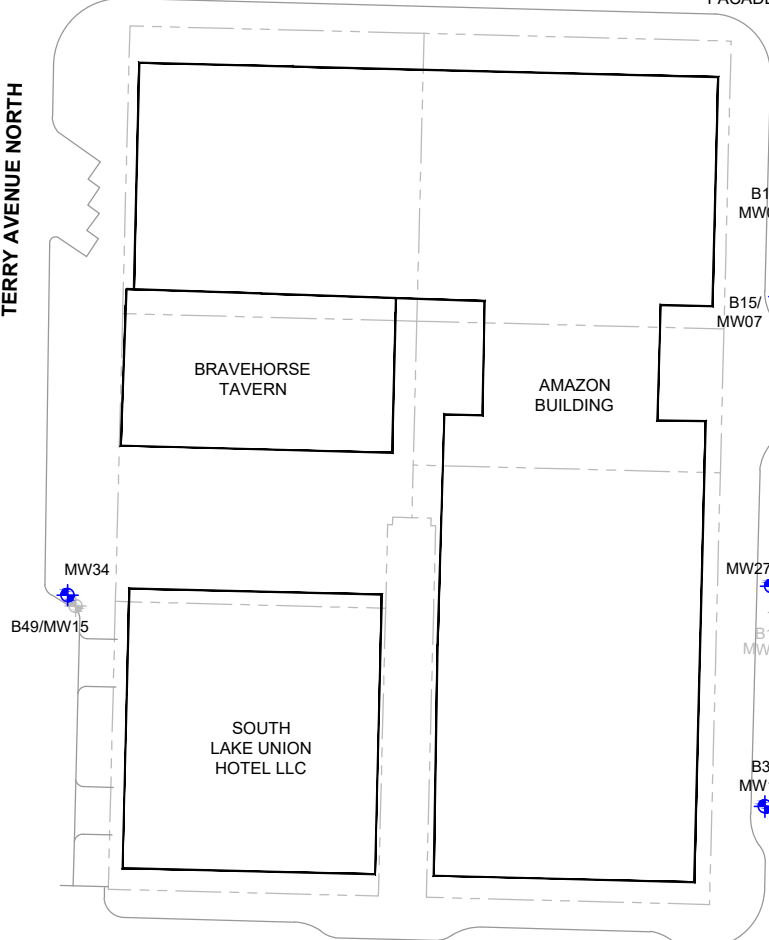
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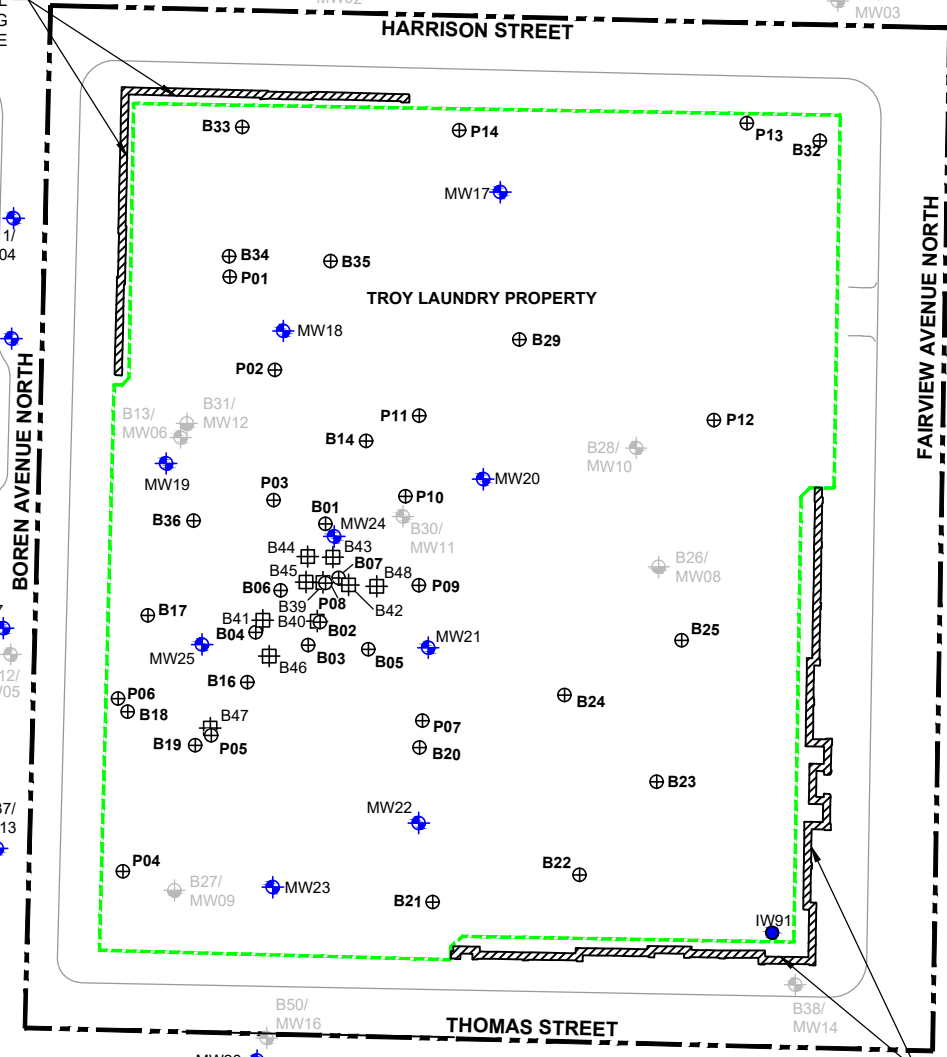
FIGURE



TERRY AVENUE NORTH



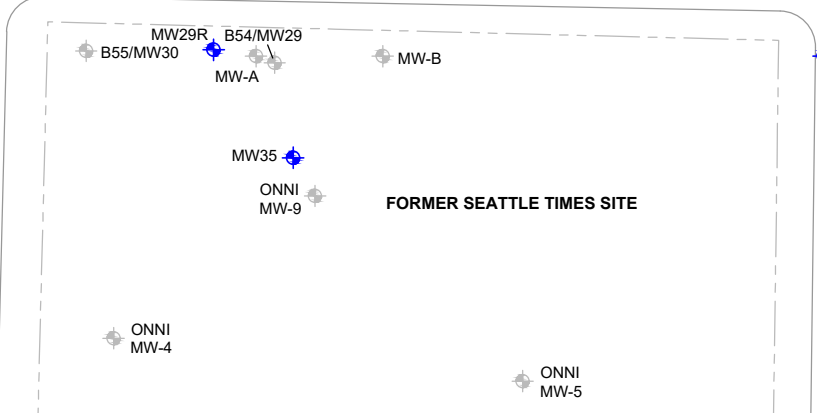
HISTORICAL BUILDING FACADE



FAIRVIEW AVENUE NORTH

THOMAS STREET

HISTORICAL BUILDING FACADE



LEGEND

- PROPERTY BOUNDARY
- PARCEL BOUNDARY
- REDEVELOPMENT EXCAVATION AREA
- MW20 MONITORING WELL
- MW-5 MONITORING WELL (ENVIRONMENTAL PARTNERS INC)
- IW91 INJECTION WELL CONVERTED TO MONITORING WELL
- DECOMMISSIONED/DESTROYED MONITORING WELL
- B25 SOIL BORING
- B46 POST-SVE CONFIRMATIONAL SOIL BORING
- SVE SOIL VAPOR EXTRACTION



TROY LAUNDRY SEATTLE SITE
 300 BOREN AVENUE NORTH AND
 399 FAIRVIEW AVENUE NORTH
 SEATTLE, WASHINGTON
 SOUNDEARTH PROJECT #0731-004

FIGURE 1
 CONDITIONAL POINT OF
 COMPLIANCE GROUNDWATER
 MONITORING WELL LOCATIONS