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**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

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September 23, 2024

Tom Camarata
SoundEarth Strategies, Inc.
1011 SW Klickitat Way, Suite 212
Seattle, Washington 98134
(TCamarata@soundearthinc.com)

RE: ECOLOGY COMMENTS ON THE FEASIBILITY STUDY REPORT

- **Troy Laundry Seattle Site**
- **300 Boren Avenue North and 399 Fairview Avenue North, Seattle, Washington**
- **Cleanup Site ID No. 11690**

Dear Tom Camarata:

The Washington State Department of Ecology (Ecology) agrees with SoundEarth Strategies, Inc.'s (SoundEarth) responses, dated May 2, 2024, to Ecology's comments on the Final Draft Feasibility Study (FS) Report, dated July 11, 2023 (SoundEarth 2023), except for its responses on the conditional point of compliance (CPOC), contingency plan trigger(s), and contingency plans/actions.

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

Sound Earth: "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."

MW29R and MW35, located at Onni John Street LLC's (Onni) property, will be part of the groundwater wells that make up the CPOC monitoring wells. Touchstone SLU LLC (Touchstone) must monitor these wells along the other CPOC monitoring wells, and the results of this monitoring must meet the same compliance criteria as the CPOC monitoring wells for groundwater cleanup standards.

SECTION 2.0: PERFORMANCE AND COMPLIANCE GROUNDWATER MONITORING PROGRAM

Ecology agrees with SoundEarth's proposal that Touchstone will monitor the following eighteen groundwater monitoring wells:

1. MW26 at Harrison Street and Boren Avenue (1 well)

2. MW04, MW07, MW27, and MW13 at Boren Avenue (4 wells)
3. MW28, MW29R and MW35 at Thomas Street and Seattle Times (3 wells)
4. MW18, MW19, MW21, MW22, MW23, MW24, MW25, IW04, IW50, and IW61 underneath the Troy building. (10 wells).

The agreed upon groundwater monitoring frequency is semi-annually for the first two years. If the plume under the Troy Laundry building, the right-of-way, and Onni's new building is stable or decreasing, the frequency of monitoring may be reduced to annual for the third, fourth, fifth and seventh year.

SECTION 3.0: SOIL GAS AND INDOOR AIR

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.

Ecology agrees that if CVOCs concentrations are not detectable or detectable at concentrations less than the MTCA Indoor Air Method B values for unrestricted uses (non-cancer or cancer) whichever is less, no additional air monitoring will be required.

SECTION 4.0: CONTINGENCY PLANS

Within 30 days of receiving this letter, Touchstone must provide a detailed draft contingency plan(s) to Ecology for review and approval.

Contingency Plan(s) Triggers

Contingency plans should be triggered when the groundwater conditions at the site (including groundwater conditions at the Troy building property, ROW, and former Seattle Times property with Onni's buildings) deteriorated and become worse than the groundwater conditions in 2018 and 2019.

Two indoor air sampling events occurred in March 2018 and February 2019 inside the Troy Laundry building. The indoor air sampling results from these two sampling events showed that the indoor air quality was in compliance with MTCA indoor air cleanup standards.

If the groundwater conditions do not deteriorate and become worse than the conditions in 2018 and 2019, the indoor air quality inside Troy Laundry building presumably would remain in compliance with MTCA cleanup standards.

For example, vinyl chloride concentration in IW50 was detected at 7.4ppb in 2019. If vinyl chloride concentrations in IW50 is detected exceeding 7.4ppb, the contingency plan(s) will be triggered, and Touchstone must implement contingency actions such as additional indoor air sampling to determine if the indoor air quality is still in compliance with MTCA indoor air cleanup standards, and if additional cleanup actions should be taken to reduce or eliminate contaminants in the air and groundwater.

Ecology does not accept SoundEarth's proposed contingency plan trigger:

SoundEarth: "We recommend contingency plans be prepared as follows:

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.

Troy Laundry site is a solvent site, the concentrations of PCE and TCE are expected to decrease, while the concentrations of DCE and VC are expected to increase. As a matter of fact, the groundwater monitoring data from the annual groundwater reports have shown an increasing statistical trend in vinyl chloride concentrations (see below).

SoundEarth: "The trend analyses for VC concentrations in the groundwater at on-Property monitoring wells MW18, MW19, MW21, MW22, MW24, and MW25 and injection wells IW04 and IW61 are increasing with time." (SoundEarth 2023)

"While the overall statistical trend in VC concentrations on the Property is increasing with time, engineering controls on the Property protect the inhalation pathway, which is documented in the two vapor intrusion studies performed at the Property (SoundEarth 2019)."

"VC was detected at concentrations exceeding the commercial worker groundwater remediation level at the Property in groundwater samples collected from on-Property monitoring wells MW19, MW21, and MW23 through MW25 and injection wells IW50 and IW61."

Further, Ecology is concerned that sampling results from one particular well could be well above cleanup levels by an extreme magnitude over multiple sampling events, but not at more than 50 percent of all target monitoring wells. Under SoundEarth's position, this would not result in the triggering of the contingency plan. However, the extreme exceedance would be cause for concern.

You may contact me at 425-457-3842 or hlin461@ecy.wa.gov if you have questions or require clarification of any items in this letter.

Sincerely,



Sunny Becker
Cleanup Project Manager
Toxics Cleanup Program, NWRO

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