From:
 Caddey, Eric

 To:
 Wenke, Anthony (ECY)

 Cc:
 David Ratliff; Thomas Morin

Subject: RE: [EXTERNAL] Solera Renton Initial Investigation - information requested

Date: Friday, February 16, 2024 10:25:05 AM

Attachments: image001.png

External Email

Anthony,

Thanks for reaching out regarding the status of DevCo's Solera project. TRC is providing this Status Email on behalf of the current property owner, DevCo LLC (DevCo), who acquired it in 2020 and has subsequently redeveloped it for lower and market rate housing.

TRC was contracted by DevCo in July 2020 to assist with its pre-purchase due diligence for the Solera property (subject property) located at the former Highlands Shopping Center in Renton, WA. A former dry-cleaning facility, The Cleaning Shoppe, was previously located in a suite with the street address of 2830 Northeast Sunset Boulevard, in Renton Washington. The former dry cleaner property was known to have been impacted by historical releases of dry-cleaning chemicals from the Cleaning Shoppe prior to DevCo's ownership. The former dry cleaner had previously undergone extensive assessment and initial attempts at remediation using in-situ methods such as soil vapor extraction (SVE). The SVE system was operated for 6-8 months but no detailed reports of that work were reportedly generated.

In 2020, DevCo continued the assessment of chlorinated solvent impacts in soil at concentrations exceeding the MCTA Method A Soil cleanup levels (CULs). Impacts to soil were identified vertically to 30 feet below ground surface (bgs) at concentrations exceeding the CULs.

Groundwater beneath the subject property is approximately 60-70 feet (bgs) and previous sampling of groundwater monitoring wells did not identify concentrations of dry cleaning related compounds at concentrations exceeding the MTCA Method A CULs for Groundwater. Based on the available data and a vertical separation of >40 feet between exceedance of soil CULs and groundwater, it was determined that groundwater remediation would likely not be necessary at the site. TRC recommended remediation of all soil exceeding a MTCA soil CUL using excavation and off-site disposal.

In May 2021, TRC assisted DevCo with obtaining a contained-in determination (CID) from Ecology for the low level PCE soil impacts. In July 2021, TRC oversaw the remedial mass excavation of approximately 7,140 tons of contained-in soils to a final depth of 17 feet bgs. TRC collected a total of 99 performance soil samples at the terminal sides and bottom of the excavation. None of the performance soil samples contained contaminants of concern at a concentration at a concentration greater than the laboratory detection limit. After excavation activities were completed, and using an abundance of caution, an impermeable vapor barrier was placed over the deeper remaining impacts prior to building construction. While not necessary (i.e., no soil or groundwater impacts were present) DevCo opted to install the vapor barrier to address the potential low risk tolerance of future buyers. The excavation was then backfilled with structural fill as necessary to facilitate the subsequent redevelopment. The subject property is currently nearing completion of the apartment buildings known as the Solera Project.

In August 2023, TRC oversaw installation of four compliance wells. The wells were installed with the objective of facilitating confirmation that groundwater beneath and in the immediate vicinity of the former dry cleaner is in compliance with MTCA CULs. Groundwater was encountered at a depth of about 65 feet below grade and the wells were completed to a depth of approximately 70 feet bgs with 15 feet of screened interval. Soil sampling results from the well installation did not encounter any detections of chlorinated solvents. TRC has completed two quarterly monitoring events to date with the third quarterly event scheduled for March 2024. Only one well has contained a detectable concentration of PCE, which was less than the CUL. Neither TCE, t-DCE, c-DCE nor vinyl chloride have been detected at any concentrations above the method detection limit in any other samples.

DevCo intends to continue quarterly groundwater for two more quarters (March & June 2024). It is anticipated that those results will be similar to the first two quarterly events and will establish full compliance with CULs at the site. At that point the full data set will demonstrate compliance with MTCA at the standard point of compliance and the site will qualify for an unconditional No Further Action (NFA) determination. TRC will then prepare the necessary reports and documentation, enroll the site into the Voluntary Cleanup Program (VCP) and request an NFA determination.

If you have any additional questions, please don't hesitate to contact me.

Sincerely,

Eric Caddey, L.G.

Senior Geologist



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From: Wenke, Anthony (ECY) < ANWE461@ECY.WA.GOV>

Sent: Monday, January 29, 2024 9:01 AM

To: David Ratliff <david.ratliff@devcowa.com>; Caddey, Eric <ecaddey@trccompanies.com>

Subject: [EXTERNAL] Solera Renton Initial Investigation - information requested

This is an External email. Do not click links or open attachments unless you validate the sender and know the content is safe.

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Hello David and Eric,

I work in Ecology's Toxic Cleanup Program and I am writing to you to follow up on the Solera Renton property. I am tasked with conducting an Initial Investigation (II) (WAC 173-340-310:) to determine whether past releases and actions at the property warrant further remedial action under the State cleanup law. This is following up on the 2021 Contained In Determination (CID) approval letter from the Hazardous Waste and Toxics Reduction Program (see attached), which indicated that MTCA liability will need to be investigated and potentially settled separately from the State's Dangerous Waste regulations. Apologies for the delay in our follow up, as we have been understaffed and working through a long backlog of investigations.

For the II I am requesting from you all environmental documents (investigations, assessments, reports) associated with this property—with priority to documentation that reports current extent of contamination discovered or independent remedial actions taken.

Several documents are referenced in the 2018 SEPA, but I acknowledge there is likely more recent documentation to include in the II:

Geotechnical Engineering Study by Earth Solutions NW, LLC, dated 1/29/2018 Critical Areas Assessment by Soundview Consultants, LLC, dated 2/20/2018 Subsurface Investigation Results and Preliminary CAP for Former Dry Cleaner, by Aspect Consulting, dated 10/18/2017 Property History and Phase 2 Findings, by Floyd Snider, dated 11/22/2016

Lastly, if you would like to meet and discuss the II, the types of documents Ecology is requesting, additional contacts to include as I compile documentation—please let me know and I can schedule a MS teams meeting for us.

Thank you,

Anthony Wenke

Washington State Department of Ecology Toxics Cleanup Program Aquatics Unit, Northwest Regional Office (425) 515-5993 Mon – Thurs: 6:00am – 4:30pm