From: Vik, Kim (ECY)
To: "mbreeson@geoengineers.com"
Cc: "susan.penoyar@soundtransit.org"
Subject: Sound Transit South Bellevue Station (VCP NW3420) Technical Assistance
Date: Thursday, February 20, 2025 10:25:46 AM

Good morning Marsi,

I appreciate the opportunity to work with you on the Sound Transit South Bellevue Station Site (VCP NW3420). The purpose of this email is to provide Technical Assistance on the status of the Site cleanup based on the documents that have been made available to Ecology to date. This Site was initially reviewed by Ecology in February 2024 (Initial Investigation) upon receipt of the letter: *MTCA Notification of Discovery of Historic Hazardous Substance Release, Sound Transit – East Link E320 South Bellevue Station (EL111) Property*, dated September 19, 2023, by GeoEngineers, Inc. The 2023 GeoEngineers letter included the following attachments:

- *Environmental Site Assessment Data Report, Sound Transit East Link E320, WSDOT South Bellevue Park and Ride, EL111, East Link Bellevue Station, Bellevue, Washington*, July 15, 2015, by GeoEngineers, dated July 15, 2015; and

- *Independent Remedial Action and Drilled Shaft Observation Report, South Bellevue Station (EL111),* by INNOVEX Environmental Management, Inc., dated June 18, 2019.

Due to the reported presence of contaminated soil above the MTCA Method A cleanup levels left on the Property, the Site was listed as a contaminated Site (Ecology Early Notice Letter dated February 14, 2024). The Site was entered into the VCP in December 2024 (Ecology VCP Application Acceptance Letter dated December 31, 2024).

Cleanup Status

The 2023 GeoEngineers letter requested a no further action (NFA) with an environmental covenant since it was reported that contamination was still present on the Property underneath the parking garage. After reviewing the available Site documents, it seems possible that the soil contamination documented prior to the completion of the construction activities (in the areas of the new parking garage and detention pond), may have been removed during construction.

The 2015 report by GeoEngineers documented that the construction was to include the following:

- Substantial dewatering in the area of the storm water pond,
- Construction of drilled shafts up to 90 feet below the ground surface (bgs) in the areas of the elevated rail structure and the parking garage,
- Mass excavation for the construction of the parking garage (documented to be 16.5 to

25 feet bgs),
- Expansion of the existing storm water pond to include excavation to deepen the pond from 3 to 10 feet bgs.

The following contamination above the MTCA Method A cleanup levels were reported in previous investigations and excavation activities:

- Soil: Total petroleum hydrocarbons in the heavy oil range (TPH-O) in soil at 8 and 15 feet bgs (boring DP10), polycyclic aromatic hydrocarbons (PAHs) and/or semivolatile organic compounds (SVOCs) in test pits sampled by O'Neill Service Group (test pit samples PR-TP-3.6 Plug and PR-TP-3-8) and in INNOVEX excavation samples (SO1 and SO2). The sample depths for the O'Neill samples are unknown, but test pits were reported to be up to 16 feet bgs. INNOVEX samples were reported as elevations (26.5 and 27 feet above mean sea level).
- Sediment: TPH-O and PAHs up to 2 feet bgs (hand auger borings HA2 and HA3).
- Groundwater: total arsenic (wells B-B-BPR-8p and DWR2-MW1).

Data Gaps

There is limited information regarding the construction of the transit station. It would seem possible that the mass excavation for the parking garage and the extension of the storm water pond for the construction of the new detection pond may have removed the areas of contamination reported prior to the completion of construction. Currently, Ecology has no information regarding the construction of the transit facility (including mass excavation and dewatering) and there has been no assessment to conclude whether the areas of contamination previously reported are still present on the Site. If the areas of contamination are no longer present on the Site, an environmental covenant would not be needed.

Next Steps

- Submit a Cleanup Action Report that summarizes the previous investigations, construction activities (mass excavations and dewatering), and an evaluation whether contaminated soil, sediment and groundwater are still present on the Property. The report must be stamped and signed by a Washington State licensed geologist, hydrogeologist, or engineer. The report should include the following to address the data gaps:
    - Summarize construction activities, including mass excavation areas (locations and depth), total amount of soil excavated, and dewatering activities (volume of water extracted).
    - Evaluate whether any of the contaminated soil and sediment samples were excavated during construction or drilled shaft excavations. If samples were not excavated, identify the areas of contamination left in place.
    - Provide estimated volumes of contamination left in place (if determined to still be present after the completion of construction activities).
    - Provide a figure showing the current Property configuration (parking garage, paved areas, detention pond, and storm water drain lines) along with the location of soil

samples from previous investigations. Show which samples are above the MTCA Method A cleanup levels and indicate whether they have been removed (within the areas of excavation).
    - Provide a cross-section showing areas of excavation and contamination left in place (if applicable).
    - Provide information on the construction of the detention pond (how much soil was excavation during the expansion and were any of the contaminated sediment samples removed during construction).
    - Provide information on the storm water drain system on the Property and provide a figure showing the storm drain lines and how they are conveyed to the detention pond. According to the City of Bellevue, there is a an oil/water separator connected to the outlet of the detention pond. Describe how the storm water is conveyed from the detention pond.
    - Update the total amount of soil excavated during construction activities. According to the INNOVEX report, the total amount of contaminated soil removed was 1,523 tons from drill cuttings (drilled shafts) and the two small remedial excavation areas (Debris Area and Test Pit Area); however, there is no information regarding the total amount of soil and sediment removed during the mass excavation and the expansion of the detention pond.
    - Provide conclusions regarding the present condition of the Site after construction activities and whether the areas of contamination previously identified in pre-construction investigations have been removed during construction activities. The determination of whether there is contamination still present on the Property will determine the need for an environmental covenant. Specifically request an opinion in the conclusions section of the report or complete and attach a VCP Request for Opinion Form.
- Complete and submit a VCP Terrestrial Ecological Evaluation Form. This may be attached to your report.
- Submit all data for all media to the Environmental Information Management database (EIM).

Let me know if you have any questions regarding this Technical Assistance email. Call me anytime or I can set up a Teams meeting if you prefer. I appreciate your continued effort on the Sound Transit South Bellevue Station Site (NW3420) and collaboration with Ecology as we move this Site towards closure.

Have a great day,

Kim Vik, LG (*she/her*)
Site Manager, Voluntary Cleanup Program
Washington State Department of Ecology | Toxics Cleanup Program | Northwest Region
Mailing Address: PO Box 330316, Shoreline, WA 98133-9716
Physical Address: 15700 Dayton Ave N, Shoreline, WA 98133
24-hour reception line: 206-594-0000
Direct Phone: (206) 556-5258 | Email: kim.vik@ecy.wa.gov
Ecology Website: www.ecy.wa.gov

DEPARTMENT OF ECOLOGY
State of Washington