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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
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May 8, 2025

Susan Penoyar
Sound Transit
401 South Jackson Street
Seattle, Washington 98104
(susan.penoyar@soundtransit.org)

Re: Technical assistance for the following contaminated Site

Site name: Y Pay Mor Drycleaner
Site address: 2210 South 320th Street, Federal Way, WA 98003
Facility/Site ID: 2518
Cleanup Site ID: 3180
VCP Project ID: NW3265

Dear Susan Penoyar:

On April 25, 2025, the [Washington State Department of Ecology](https://ecology.wa.gov/)¹ received your request for a written opinion regarding the sufficiency of your independent cleanup of the Y Pay Mor Drycleaner facility (Site), under the [Voluntary Cleanup Program](https://apps.ecology.wa.gov/publications/SummaryPages/9406.html) (VCP).² This letter provides our opinion and analysis. We provide this opinion under the authority of the [Model Toxics Control Act](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)³ (MTCA), chapter [70A.305](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305)⁴ RCW. This technical assistance is provided under the requirements of WAC [173-340-515](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515)⁵(5).

Issue presented and opinion

- Do the proposed measures meet the stated objectives with respect to mitigating Site contamination impacts to Transit Oriented Development (TOD) sites 1 and 2?

Yes. Ecology has determined that the proposed mitigation measures are appropriate planning measures for managing Site contamination that will likely be encountered during redevelopment of TOD sites 1 and 2.

¹ <https://ecology.wa.gov/>

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

³ <https://apps.ecology.wa.gov/publications/SummaryPages/9406.html>

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340&full=true#173-340-515>

Site description

This opinion applies to the Site described here. The Site is defined by the nature and extent of contamination associated with the following releases:

- Tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), trans-1,2-dichloroethylene (trans-1,2-DCE), and vinyl chloride (VC) to soil.
- PCE, TCE, cis-1,2-DCE, and VC to groundwater.

Enclosure A includes a Site description, history, and diagrams, as currently known to Ecology.

Please note the parcels of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume King County facility (Facility Site ID 66948686). Currently, Ecology has no information indicating that contamination from the Tacoma Smelter Plume King County affects the parcels. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume King County facility.

Basis for our opinion

Ecology bases this opinion on information in the documents listed in Enclosure B.

You can request these documents by filing a [public records request](#).⁶ For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the [Site webpage](#).⁷

This opinion is void, if anything in the documents is materially false or misleading.

Analysis of the cleanup

Based on our review of the *Agency Review Draft Environmental Summary and Mitigation Measures*, dated April 24, 2025, Ecology has determined the following about your cleanup.

1. Ecology concurs with the proposed mitigation measures for TOD sites 1 and 2 (see Enclosure A, Figure 4). The proposed mitigation measures consist of:
 - Obtaining approvals from Ecology prior to any ground disturbance activities that are prohibited by the two existing restrictive covenants (RCs) recorded in 1995 and 1998;
 - Installation of a sub-slab chemical vapor barrier and a passive venting system during building construction on TOD sites 1 and 2;
 - Development and implementation of an air monitoring program, operation and maintenance program, and institutional controls on TOD sites 1 and 2;
 - Proper management of contaminated soil and groundwater during construction;

⁶ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁷ <https://apps.ecology.wa.gov/cleanupsearch/site/3180>

- Minimizing the spread of the groundwater plume when designing dewatering activities or foundation drainage systems;
 - Implementation of appropriate health and safety training and health and safety plan during the construction; and
 - Providing for alterations to the mitigation measures after developer selection and finalization of design plans, as needed.
2. Ecology understands some of the existing monitoring wells on southwestern portion of the Site may be decommissioned during the construction. Ecology recommends the following regarding monitoring wells:
- Continuous quarterly monitoring on these monitoring wells before construction commencement;
 - Proper well decommissioning in accordance with WAC 173-160-460 if any wells need to be decommissioned; and
 - Coordination with Ecology on well re-installation to monitor the groundwater condition after construction.
3. Ecology requests documenting the amount of contaminated groundwater and soil (if any) removed during the redevelopment.
4. Please note this opinion only applies to the mitigation measures for TOD sites 1 and 2, on the western portion of the Site. Ecology understands an updated remedial investigation (RI), feasibility study (FS), and cleanup action plan (CAP) will be submitted for Ecology's review to update the Site characterization and select the final cleanup action at the Site. Ecology will issue an opinion on Site characterization and cleanup after a review of the RI, FS, and CAP.
5. Ecology appreciates your submission of the Site investigation data from 2017 to 2022 to Ecology's electronic Environmental Information Management (EIM) database. Please continue submitting data to EIM. Contact Maria Kaniewski (maria.kaniewski@ecy.wa.gov) if you have any questions regarding EIM data entry.
6. Ecology appreciates Sound Transit's consistent and timely communication during the Site cleanup to date. Ecology would like to see this proactive approach continue for this Site. Please feel free to communicate with Ecology for any requests of VCP technical assistance, opinions, or other cleanup or restrictive covenant questions.

Limitations of the opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion

doesn't resolve or alter a person's liability to the state or protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW [70A.305.040](#)(4).⁸

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts would make that determination. See RCW [70A.305.080](#)⁹ and WAC [173-340-545](#).¹⁰

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW [70A.305.170](#)(6).¹¹

Contact us for more information

Thank you for choosing to clean up your Site under the VCP. After addressing our comments, you may request another review of your cleanup activities. If you have any questions about this opinion, please contact me at (425) 229-2565 or jing.song@ecy.wa.gov. We look forward to receiving your next submittal or report.

Sincerely,



Jing Song
Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2): A – Site description, history, and diagrams
 B – Basis for the opinion: Reviewed documents list

cc: Ross Stainsby, Sound Transit, (ross.stainsby@soundtransit.org)
 Matthew Mateo, Sound Transit, (matthew.mateo@soundtransit.org)
 Tricia DeOme, GeoEngineers, Inc., (tdeome@geoengineers.com)
 Tamara Welty, NWRO Periodic Reviewer, (tamara.welty@ecy.wa.gov)
 VCP Coordinator, (vcp-nwro@ecy.wa.gov)

⁸ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

¹⁰ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

¹¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Enclosure A

Site description, history, and diagrams

Site Description

This section provides Ecology's understanding and interpretation of Site conditions and is the basis for the opinion expressed in the body of the letter.

Site

The Site is defined by the nature and extent of the following releases:

- Tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), trans-1,2-dichloroethylene (trans-1,2-DCE), and vinyl chloride (VC) to soil.
- PCE, TCE, cis-1,2-DCE, and VC to groundwater.

The Site is located north of South 320th Street and approximately 0.3 miles west of Interstate 5, with the address 2210 South 320th Street in Federal Way, Washington. Historically, the Site was confined within a former 7.52-acre King County parcel 2423200050 (**Figure 1, Figure 2**). The current owner, Sound Transit, has completed a lot line adjustment to consolidate this former parcel and adjacent small parcels into two large parcels (**Figure 3**). After the parcel boundary adjustment, the Site now spans two current King County parcels 2423200020 (3.72 acres) and 2423200050 (7.55 acres). However, due to the two restrictive covenants placed on the former parcel, Ecology still refers to the former parcel as the Property in this opinion letter.

Area and Property Description

The Property is located within a mixed-use zone known as "City Center Core" in downtown Federal Way. The Property is currently being redeveloped as part of the Federal Way Downtown (FWD) light rail station that includes elevated rail platform structures, a transit station, bus loop, new roadways, and a parking structure (**Figure 3**). The FWD station is part of the Sound Transit Federal Way Link Extension project.

The adjacent properties to the north, south, west, and east are occupied by commercial buildings including retail stores, restaurants, and office buildings. The adjacent property use to the northeast is multi-family residential. Town Square Park, a 3.9-acre public park that consists of an open field and play structures, is located approximately 800 feet northeast of the Property.

Property History and Current Use

The Property was originally developed as the SeaTac Plaza Shopping Center (formerly known as Evergreen Plaza Shopping Center) in 1979. The shopping center included a retail building on the northern half, and a paved parking lot on the south (**Figure 2**).

The retail building was occupied by multiple tenants. A former dry cleaner (Y Pay Mor Cleaners) occupied the easternmost tenant space of the retail building from approximately November 1985 to June 1992 (**Figure 2**). The dry-cleaning machine was reportedly located on the western portion of the tenant space. A loading dock was located north of the tenant space.

The majority of the Property is currently an active construction site for FWD station. Part of the former dry cleaner space is located near the bus loop on eastern portion of the FWD station complex, which is currently operational as part of a transit center. The remainder of the Property is now a construction

laydown yard. Four areas within the FWD station complex are planned for Transit Oriented Development (TOD), which will likely include mixed-use commercial and residential buildings. TOD sites 1 and 2 are the focus of this VCP technical assistance opinion. A new right-of-way (ROW), 22nd Avenue South, has been constructed between the eastern and western portions of the Property (**Figure 3, Figure 4**).

Sources of Contamination

The contaminants of concern (COCs) at the Site are chlorinated volatile organic compounds (CVOC), including PCE and its breakdown products (TCE, cis-1,2-DCE, trans-1,2-DCE, and VC). The CVOC contamination is associated with the former dry cleaner (Y Pay Mor cleaners) that operated on the Property from 1985 to 1992.

Two PCE spills were reported to Ecology in 1991: approximately 6 gallons of PCE on August 8, 1991, and an unknown amount of 99.9% PCE “waste product” on October 4, 1991. Both spills reportedly occurred near the dry-cleaning equipment on the western portion of former dry cleaner tenant space (**Figure 5**).

Site assessments have identified two major source areas (**Figure 5**):

- *Southern source area*: near the former dry-cleaning equipment and a former floor drain, located on the western portion of the former dry cleaner space, where two PCE spills occurred in 1991. This source area extends to the west into a portion of the west-adjacent tenant space.
- *Northern source area*: near the former catch basin and loading dock located north of the former dry cleaner space. This source area extends to the south into the northern portion of the former dry cleaner space.

Physiographic Setting

The ground surface elevation at the Site during the shopping center operation ranged from approximately 396 to 427 feet above mean sea level (amsl). Between late 2020 and 2024, Sound Transit placed up to 15 feet of embankment fill across the Site, raising the ground surface elevation to approximately 420 to 435 feet amsl. The current ground surface at the Site is relatively flat with a gentle slope to the southwest. The Site will be regraded to final elevations before completion of the redevelopment.

Surface/Storm Water System

The nearest surface water are tributaries of Hylebos Creek, located approximately 2,500 feet west and 2,700 feet south of the Site. These tributaries flow southerly to join Hylebos Creek. Hylebos Creek flows to the south and empties into Commencement Bay, which is a part of the Puget Sound. Multiple small lakes are also located nearby, including Steel Lake approximately 0.65 miles to the north, Easter Lake approximately 0.8 miles to the northwest, Lake Dolloff approximately 1 mile to the northeast, and North Lake approximately 1 mile to the southeast.

Former drainage structures connected to stormwater utilities within and near the former dry cleaner space included former floor drains, catch basins and stormwater lines (**Figure 5**). These utilities have been removed or closed in place by 2023. A former stormwater pond was constructed around 1979 southwest of the Site in area of the current South 319th Street (**Figure 4**). The base of the stormwater pond was

approximately 397 feet amsl. The former stormwater pond was removed around 2007 based on the historical aerial photos.¹

New underground utilities were installed above the groundwater table in area of the former dry cleaner and extend southward (**Figure 6**). A new stormwater vault was also installed at approximately 408 to 423 feet amsl east of the former stormwater pond (**Figure 4**). Stormwater at the Site is currently directed to the stormwater vault.

Ecological Setting

Before redevelopment, the Site was occupied by a building and paved parking lot. Currently the Site is part of an active construction site; most of the Site is not paved. After redevelopment, the Site is anticipated to be occupied by buildings, streets, parking lots with concrete or asphalt pavements, with small landscaped areas.

Geology

The Site is situated in the southern portion of the Puget Sound Lowland, which is bounded by the Green River Valley and the Cascade Mountains to the east, the Puyallup River Valley to the south, and Puget Sound and the Olympic Mountains to the west. The Puget Sound Lowland is underlain by Tertiary volcanic and sedimentary bedrock, and has been filled to the present day land surface with Pleistocene-aged glacial and non-glacial sediments.

According to the [geologic map for the area](#),² native soils at the Site include glacial till (Qvt). The till was deposited by the advancing Vashon-age glacier as it moved south through the area. The deposit typically consists of a dense mixture of silt, silty sand, and sand with silt and gravel.

Subsurface investigations indicate that the uppermost soil at the Site consists of sand and gravel, interpreted as fill. The fill unit extends to approximately 18 to 31 feet below the current ground surface, or elevations from approximately 395 to 420 feet amsl. The fill was placed during the development of the shopping center in the late 1970s and by Sound Transit between 2020 and 2025. A 2- to 3-foot-thick seam of organic soil (silt and sand with varying amounts of peat and woody material) is present below the fill in a portion of the Site, including beneath the former dry cleaner space (**Figure 7**).

The fill and organic soil are underlain by a layer consisting of silty sand, sandy silt, and sand/silt with gravel, interpreted as glacial till. The glacial till unit extends to elevations from approximately 390 to 400 feet amsl. An approximately 5- to 10-foot-thick hard silt layer (potential glacial lacustrine) was observed beneath the glacial till. A sand and silt layer with gravels (potential glacial advance outwash) was encountered below the hard silt layer at an elevation of 386 feet amsl to an elevation of 376 feet amsl, the lowest elevation explored (**Figure 7**). The dense glacial till and hard silt layers are not observed on the southwestern portion of the Site near TOD Site 2 and the former stormwater pond.

Groundwater

Groundwater appears to be present in two water-bearing zones (**Figure 7**). The shallow water-bearing zone is present above the hard silt layer at elevations ranging from approximately 403 to 426 feet amsl, or

¹ <https://gismaps.kingcounty.gov/iMap/>

² https://pubs.usgs.gov/sim/2004/2854/PovertyBay_map.pdf

approximately 9 to 30 feet below ground surface (bgs). Shallow groundwater generally flows to the southwest (**Figure 4**). On the southwestern portion of the Site where the glacial till and hard silt layers are absent, the deeper groundwater may combine with the shallow groundwater (**Figure 7**). The regional water-supply aquifer is present within the advance glacial outwash at elevations of 300 to 350 feet amsl in the Site area.³

Six monitoring wells were present at the Site before redevelopment: B5/MW-2 (Y Pay Mor-MW2), B11/MW-3 (Y Pay Mor-MW3), FL358-MW1 through FL358-MW4 (**Figure 5**, **Figure 8**). All six wells were decommissioned in 2020.

Twenty-seven monitoring wells (FL358-MW5A, FL358-MW5B, FL358-MW6 through FL358-MW30) were installed at the Site from 2022 to 2025 (**Figure 4**). These monitoring wells were completed with 5- to 20-foot-long screens between depths of 14 and 46 feet bgs. Among them, wells FL358-MW5A and FL358-MW5B are paired wells with screen intervals at 21 to 26, and 32 to 37 feet bgs, respectively.

Based on the measurements from monitoring wells, groundwater elevations at the Site were observed to rise approximately 2 to 7 feet after the fill placement.

Water Supply

Drinking water for the area is supplied by the Lakehaven Water and Sewer District, sourced from the Green River Watershed and 25 water supply wells. One of the water supply wells (#18) is located approximately 7,200 feet southwest of the Site. Its 10-year wellhead protection zone is approximately 500 feet west of the Site.⁴ The well is approximately 140 feet deep.

Release and Extent of Contamination

Site investigation and interim actions were conducted at the Site since 1992 and are summarized below.

Pre-interim action conditions (1992-1993)

In June 1992, twelve soil borings (BW-1 through BW-4, and B5 through B12) were completed to total depths ranging from 7.5 to 20 feet bgs in the southern source area (**Figure 5**). Boring BW-2 was replaced with vapor extraction well B1/VP-6; borings B5 and B11 were completed as monitoring wells MW-2 and MW-3; and borings B6 through B10 were completed as vapor extraction wells VP-1 through VP-5.

Soil samples from the following soil borings contained one or more CVOC concentrations above the MTCA soil cleanup levels:

- BW-2 at 5, 10, 15, and 20 feet bgs;
- B6/VP-1, B7/VP-2, and B10/VP-5 at 5 feet bgs; and
- B12 at 2.5, 5, and 10 feet bgs.

In addition, PCE exceeded the MTCA Method A cleanup level in groundwater at boring B12.

³ <https://www.usgs.gov/publications/occurrence-and-quality-ground-water-southwestern-king-county-washington>

⁴ <https://experience.arcgis.com/experience/9dc3fd45206d450f828ebd7ed9cdf7be>

Soil Vapor Extraction (SVE) System Operation (1993-1994)

A SVE system consisting of seven SVE wells (VP-1 through VP-7) was installed at the Site in 1993 (**Figure 5**). The SVE system operated for 15 months from June 1993 to September 1994. The system was shut down because the PCE recovery concentrations in the extracted soil vapor stream had decreased by more than 70 percent (from 130 parts per million [ppm] to 36 ppm) and extracted vapor levels had reached asymptotic conditions.

In November 1994, seven soil samples (CB-1 through CB-7) were collected from 5 to 8 feet bgs in the SVE treatment area (**Figure 5**). One or more CVOCs exceeded the MTCA soil cleanup levels in CB-3, CB-4, and CB-7 at 5 to 6.5 feet bgs, and in CB-5 at 6.5 to 8 feet bgs.

Additional Site Assessment (2017-2020)

In 2017 and 2020, a total of 17 soil borings (FL358-B1, FL358-B3, 358-B1 through 358-B15), four monitoring wells (FL358-MW1 through FL358-MW4), and eight test pits (358-PH1 through 358-PH8) were completed to total depths ranging from 5 to 50 feet bgs (**Figure 8**). The table below lists the soil samples with CVOC concentrations above the MTCA soil cleanup levels.

Sample Location	Sample ID	Sample Depth (feet bgs) ^a	CVOC that Exceeded Soil Cleanup Level	Left in Place after Remedial Excavation (Y/N)	Vadose zone or Saturated Zone ^b
Northern source area	FL358-B1	13-14	PCE	Y	saturated
	358-B3	12-13.5	PCE	Y	saturated
	358-B3	15-16.5	PCE, TCE, cis-1,2-DCE	Y	saturated
	358-B12	7.5-9	PCE, TCE	N (removed)	vadose
	358-B12	15-16.5	PCE, TCE	Y	saturated
	358-B12	25-26	PCE	Y	saturated
	358-PH7	3-4, 6-7, 9-10	PCE, TCE, cis-1,2-DCE	N (removed)	vadose
	358-PH7	11-12, 14-15	PCE, TCE, cis-1,2-DCE	Y	saturated
Between northern and southern source areas	358-B5	5-6.5	Cis-1,2-DCE	Y	Vadose ^c
	358-B5	20-21, 25-25.5	PCE	Y	saturated
	358-B6	5-6.5	Cis-1,2-DCE	Y	Vadose ^c
	358-B15	25-26.5	Cis-1,2-DCE	Y	saturated
Southern source area	358-B7	20-21	Cis-1,2-DCE	Y	saturated
	358-B8	2.5-4	PCE	N (removed)	vadose
	358-B8	5-6.5	Cis-1,2-DCE	N (removed)	vadose
	358-PH2	0-1	PCE	N (removed)	vadose
	358-PH2	3-4, 6-7	Cis-1,2-DCE	N (removed)	vadose

Sample Location	Sample ID	Sample Depth (feet bgs) ^a	CVOC that Exceeded Soil Cleanup Level	Left in Place after Remedial Excavation (Y/N)	Vadose zone or Saturated Zone ^b
	358-PH3	3-4	PCE, TCE, cis-1,2-DCE, trans-1,2-DCE, VC	N (removed)	vadose
	358-PH3	6-7	cis-1,2-DCE, trans-1,2-DCE, VC	N (removed)	vadose
	358-PH3	9-10	Cis-1,2-DCE	Y	saturated
	358-PH4	1-2	PCE	N (removed)	vadose
	358-PH4	3-4	Cis-1,2-DCE	N (removed)	vadose
	358-PH8	4-5	PCE, TCE, cis-1,2-DCE, VC	N (removed)	vadose

Note:

a – The sample depth is relative to the ground surface at the time of sample collection (i.e. former ground surface before fill placement).

b – This is relative to the current groundwater elevations (after 2022).

c – The sample is located above the pre-2022 groundwater elevations. After groundwater elevations rose, the sample appeared to have been located in the groundwater fluctuation contaminant smear zone.

Remedial Excavation (2020)

In July and August 2020, remedial excavations were completed to a maximum depth of 10 feet bgs (416 feet amsl) in the southern source area and 11 feet bgs (412 feet amsl) in the northern source area (**Figure 9**). A total of 4,202 tons of CVOC-contaminated soil were excavated and disposed off-Site, following the requirements of a contained-in determination from the Ecology Hazardous Waste and Toxics Reduction Program. Approximately 39,634 gallons of excavation water and ponded water were also disposed off-Site. The remedial excavations were backfilled with clean fill. A total of 113 soil samples were collected from the remedial excavations.

- In the northern source area, a total of 12 excavation bottom or sidewall samples collected at 10 to 11 feet bgs, contained one or more CVOC concentrations above the MTCA soil cleanup levels. These soil samples are all located below the current groundwater elevation.
- In the southern source area, all soil samples from the final excavation limits contained PCE and TCE concentrations below the MTCA Method A soil cleanup levels. Four sidewall samples collected at 5 to 6 feet bgs contained cis-1,2-DCE concentrations ranging from 0.037 to 0.062 milligrams per kilogram (mg/kg). These concentrations were above the MTCA Method B soil cleanup level protective of leaching pathway for saturated zone (0.0052 mg/kg) but below the cleanup level for vadose zone (0.079 mg/kg). These samples appear to be located within the groundwater fluctuation contaminant smear zone (after groundwater elevations rose).

The residual soil concentrations that are above the MTCA soil cleanup levels are depicted on **Figure 10** for PCE, and on **Figure 11** for PCE breakdown products. After the remedial excavation, vadose zone soils at the Site do not contain CVOC concentrations above the MTCA soil cleanup levels. The residual soil

concentrations that are above the MTCA cleanup levels are all located below the groundwater elevation, or in the groundwater contaminant fluctuation smear zone (cis-1,2-DCE only).

Post-Excavation Monitoring (2022-2025)

A total of 27 monitoring wells were installed after the remedial excavation. Soil samples from wells FL358-MW5A, FL358-MW5B, and FL358-MW6 (in northern source area) and well FL358-MW9 (between the two source areas) contained CVOC concentrations above the MTCA soil cleanup levels (**Figure 10, Figure 11**). All these soil samples are collected from 23 to 31 feet bgs, below the groundwater elevation.

Based on groundwater monitoring data to date, PCE, TCE, and/or cis-1,2-DCE exceeded their respective MTCA Method A or Method B groundwater cleanup levels in the following wells:

- FL358-MW5A, FL358-MW6, and FL358-MW16.

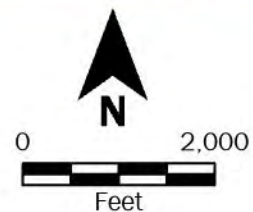
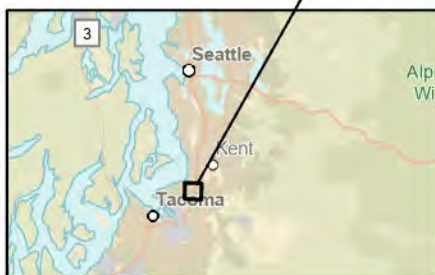
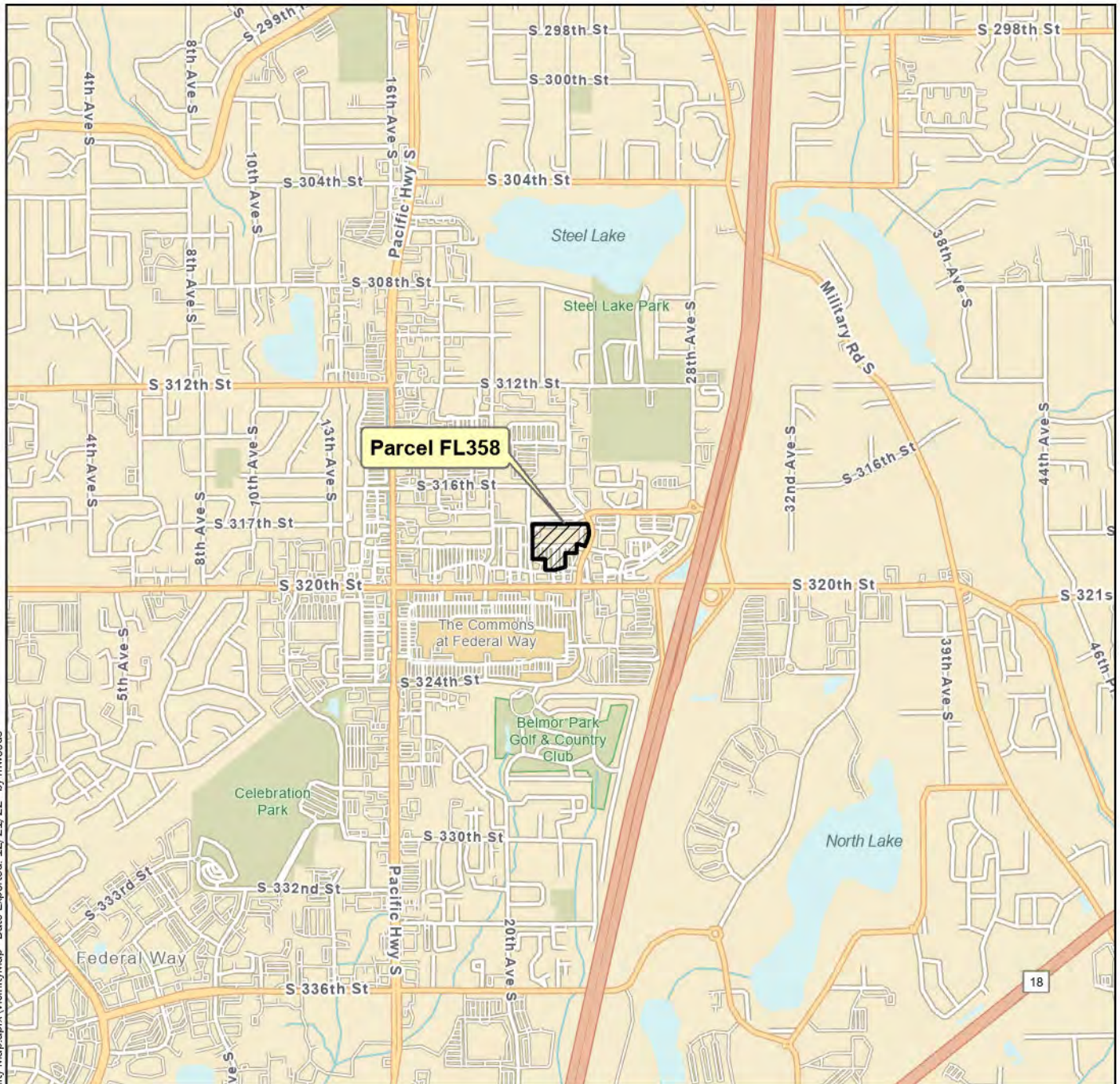
VC exceeded the MTCA Method A groundwater cleanup level in the following wells:

- FL358-MW5A, FL358-MW6, FL358-MW7, FL358-MW9, FL358-MW10, FL358-MW11, FL358-MW14, FL358-MW16, FL358-MW17, FL358-MW20, and FL358-MW26.

The extents of the PCE plume and VC plume are depicted in **Figure 4**. The VC plume spreads farther downgradient than the PCE plume. The extents of both plumes are fully delineated horizontally and vertically.

Site Diagrams

Enclosure A: Figure 1



Source(s):
• ESRI

Coordinate System: NAD 1983 UTM Zone 10N

Disclaimer: This figure was created for a specific purpose and project. Any use of this figure for any other project or purpose shall be at the user's sole risk and without liability to GeoEngineers. The locations of features shown may be approximate. GeoEngineers makes no warranty or representation as to the accuracy, completeness, or suitability of the figure, or data contained therein. The file containing this figure is a copy of a master document, the original of which is retained by GeoEngineers and is the official document of record.

Vicinity Map

Remedial Investigation and Feasibility Study
Y Pay Mor Site
Federal Way, Washington



Figure 1

Enclosure A: Figure 2



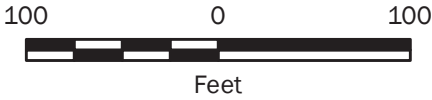
Legend

-  Former Monitoring Well
Associated with Y Pay Mor Drycleaner Site
-  FWLE Parcel FL358
-  Potential Surplus Property
-  Approximate Extent of New Light Rail Station

Notes:

- Based on current design information for the FWLE project (Kiewit/Parsons 60 Percent Submittal, December 14, 2020).
- Areas between potential surplus property and new light rail station will be roadways.
- The locations of all features shown are approximate.
- This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

Data Source: Aerial and road names from King County 2015.



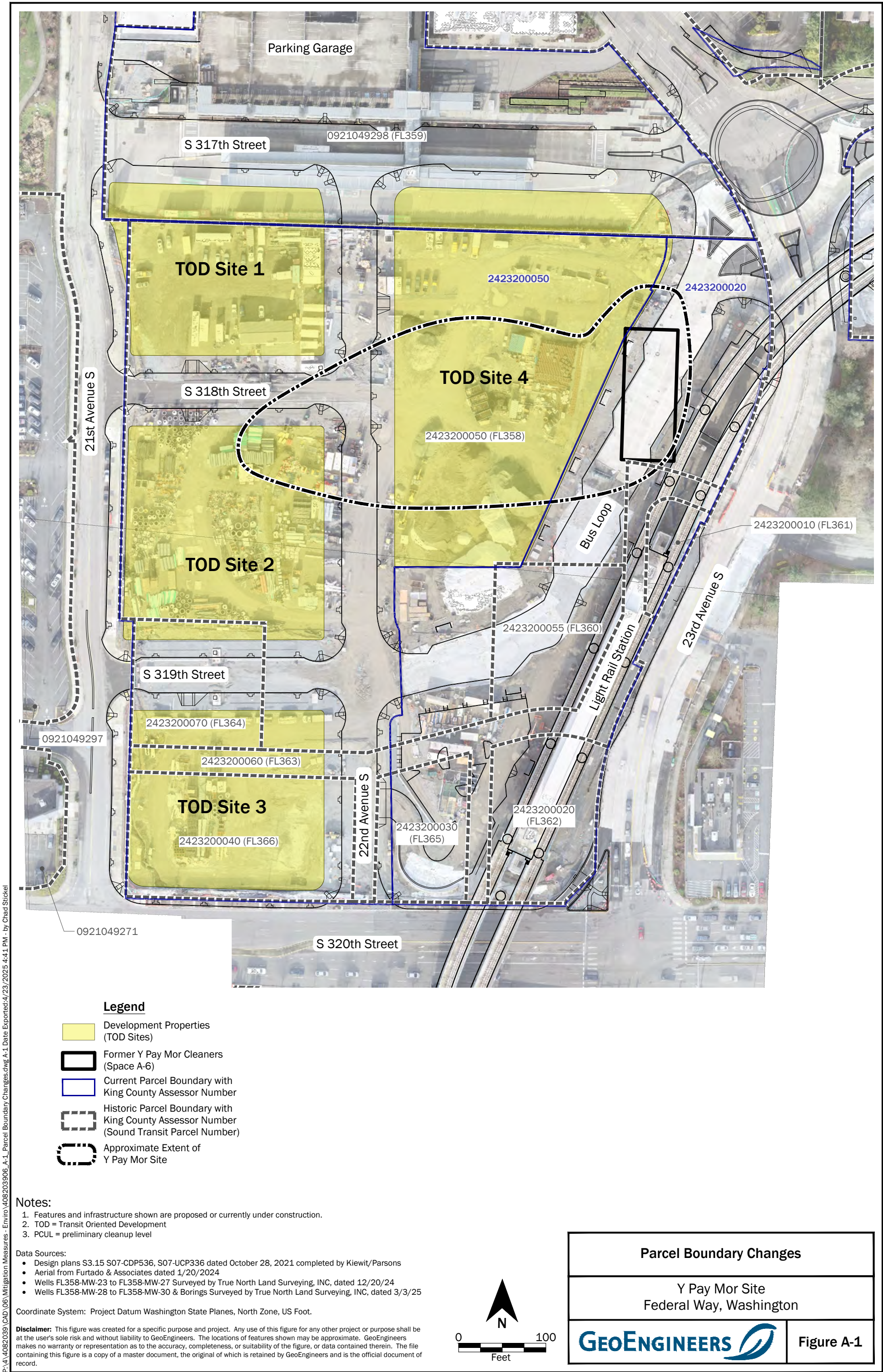
Historical Site Plan and Future Use
FWLE Parcel FL358

Remedial Investigation Work Plan, Y Pay Mor Drycleaner Site
Sound Transit Federal Way Link Extension
Federal Way, Washington

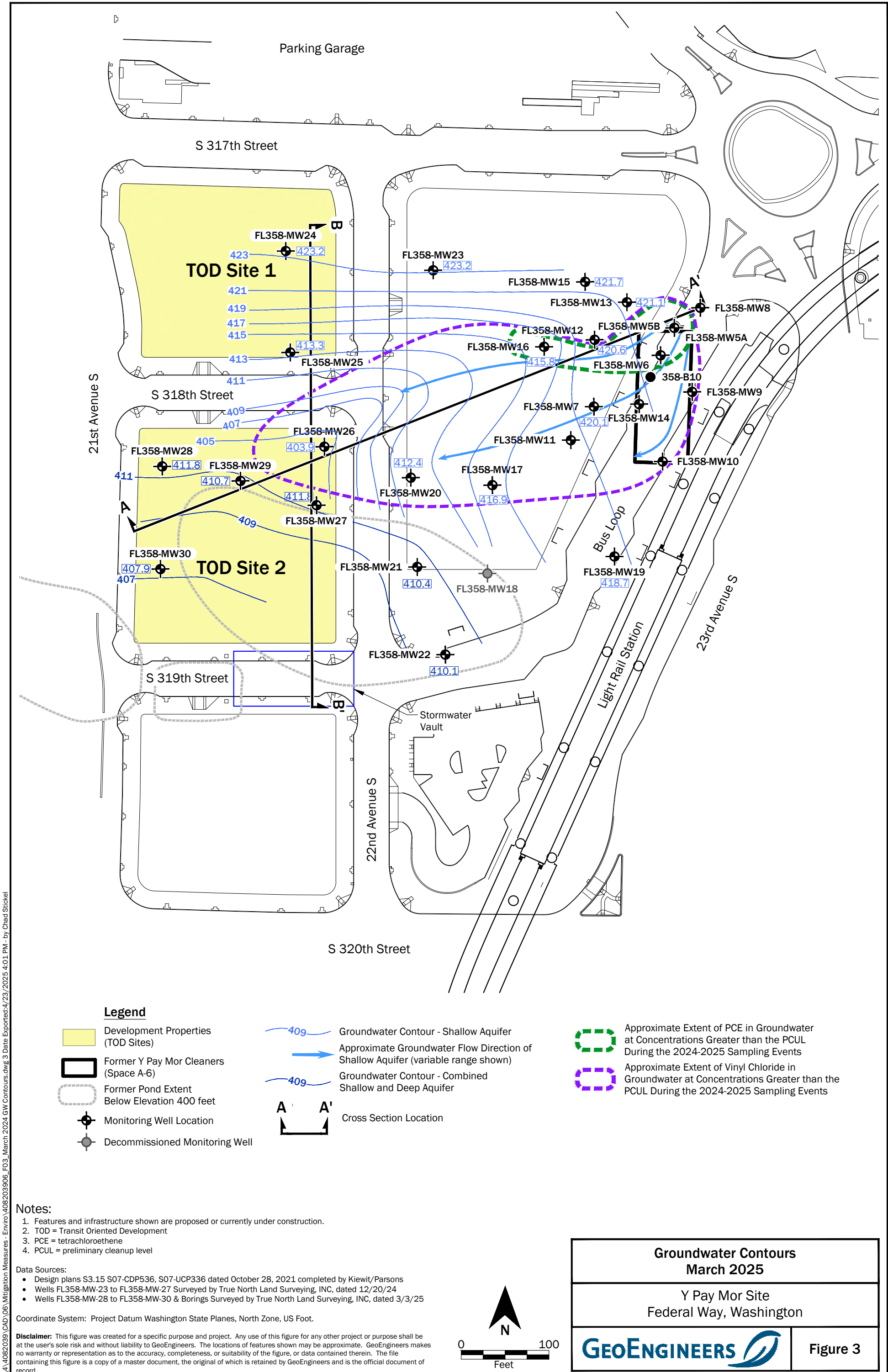


Figure 2

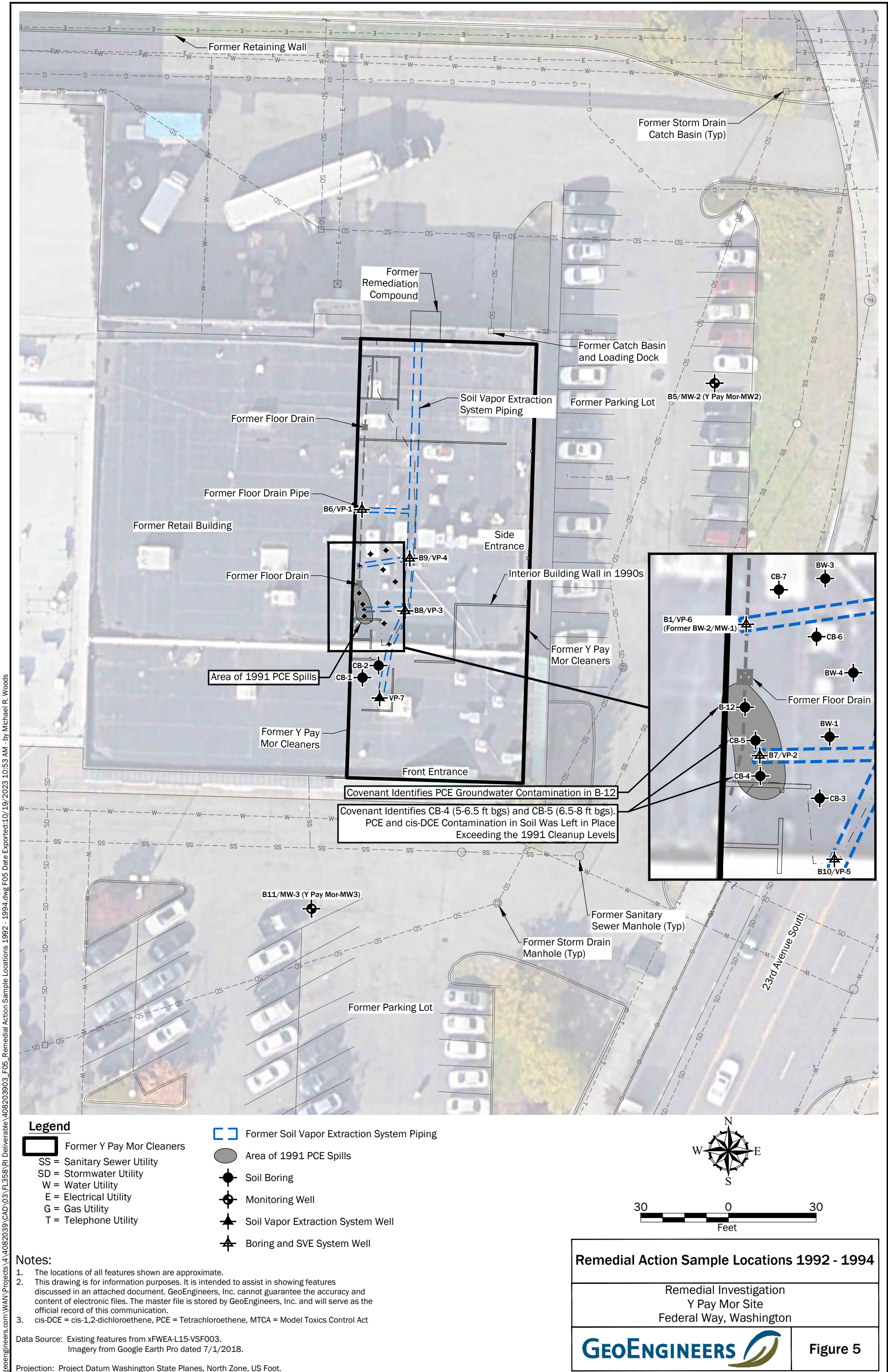
Enclosure A: Figure 3



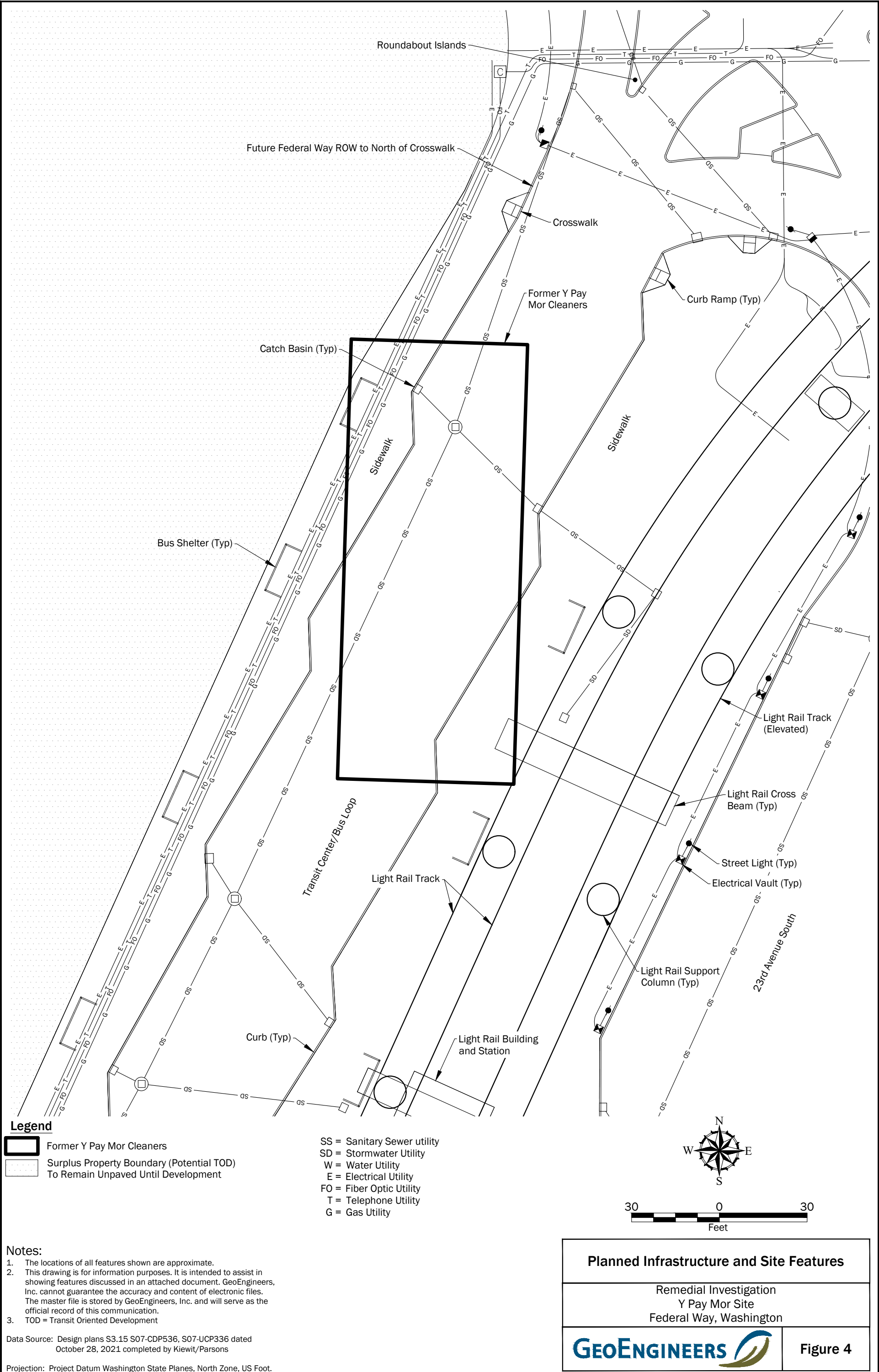
Enclosure A: Figure 4



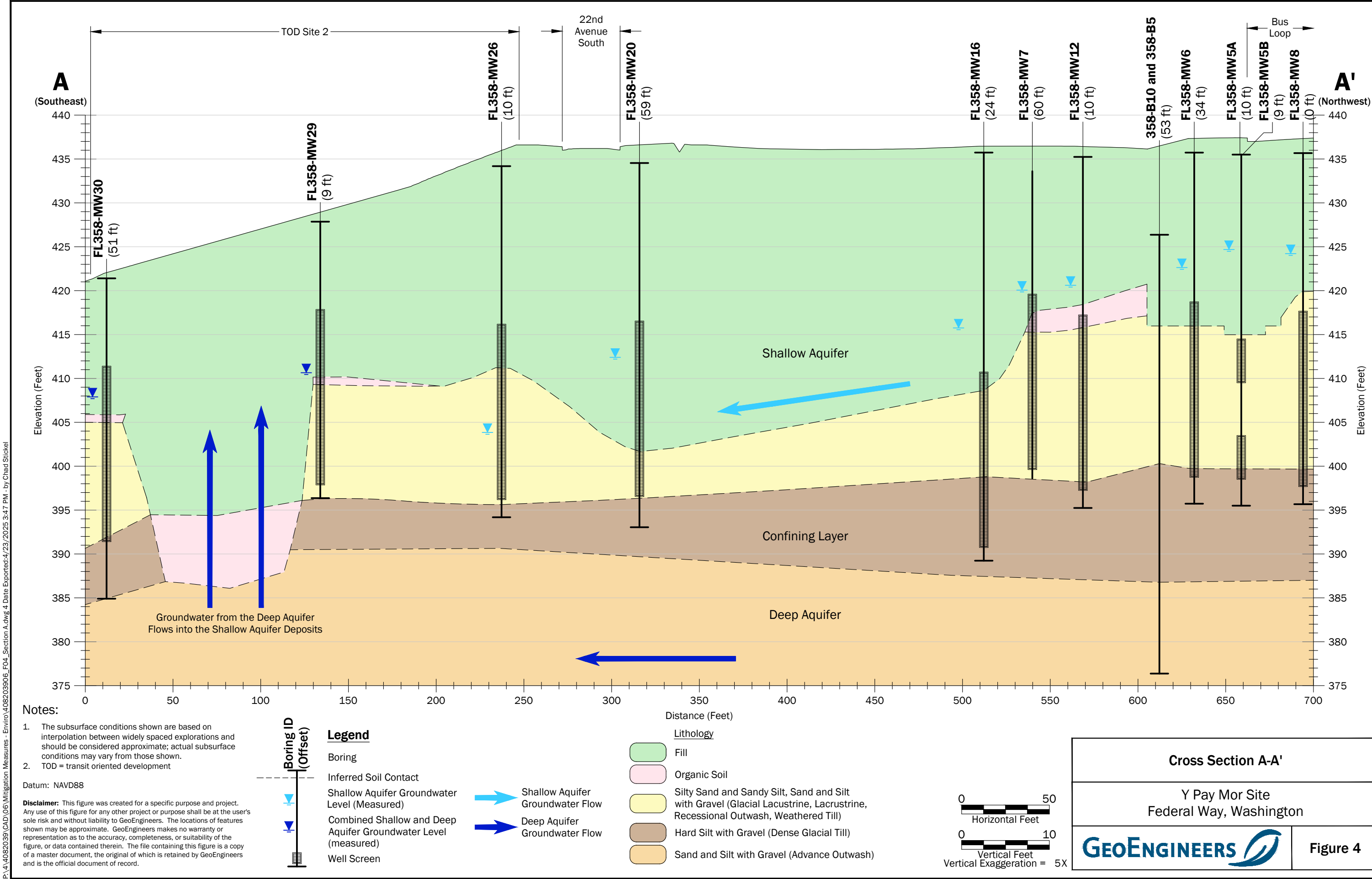
Enclosure A: Figure 5



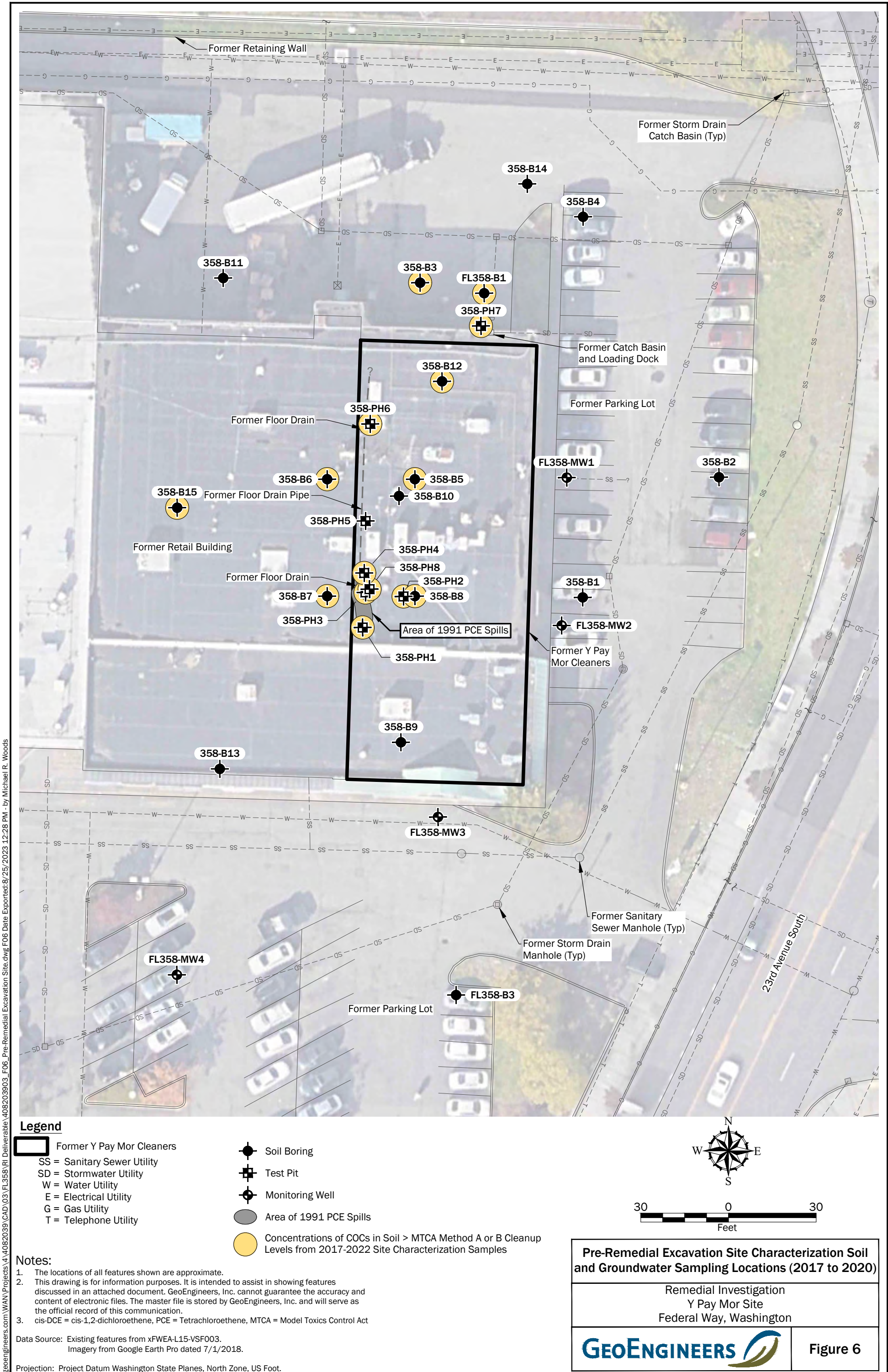
Enclosure A: Figure 6



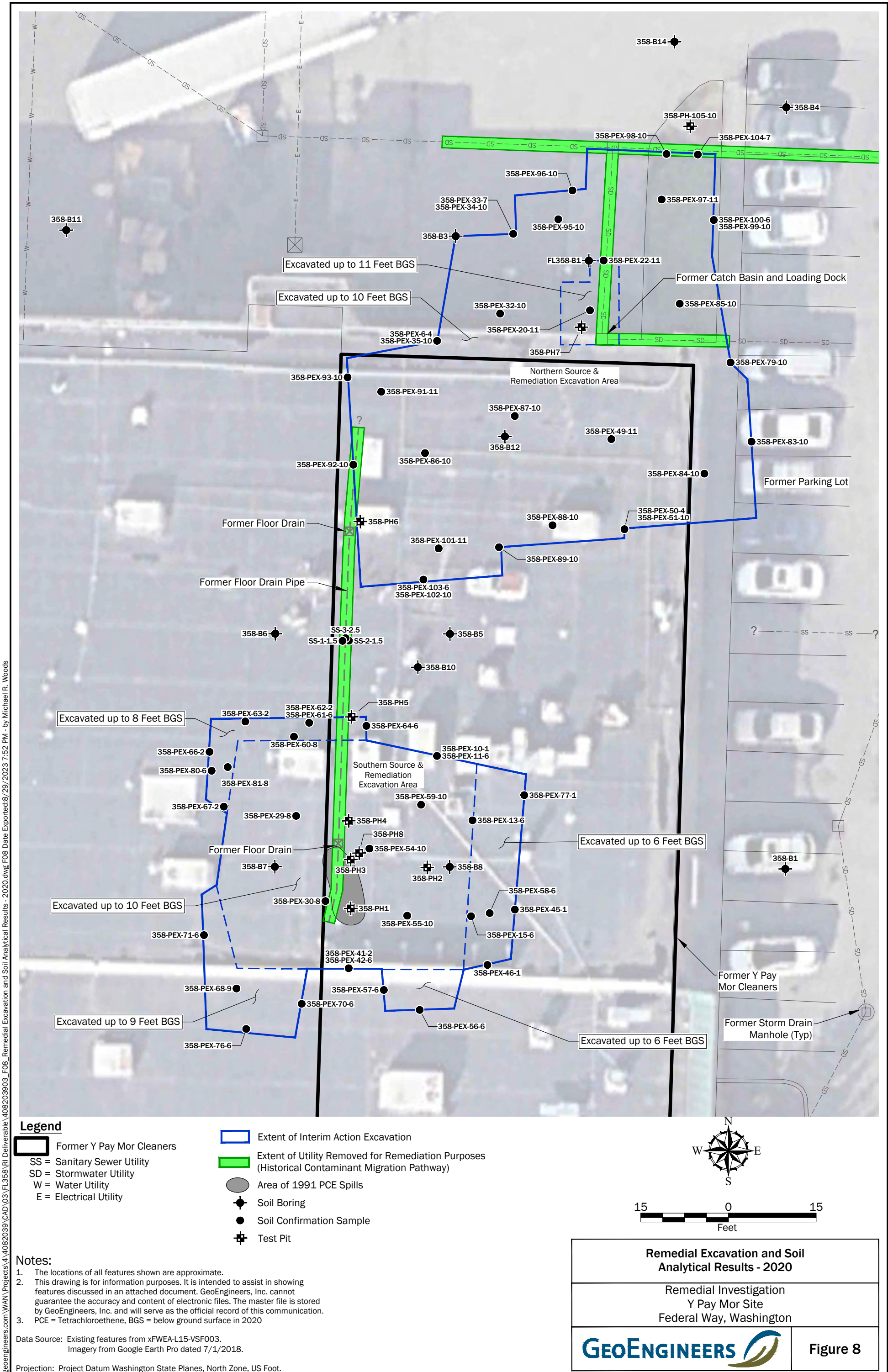
Enclosure A: Figure 7



Enclosure A: Figure 8

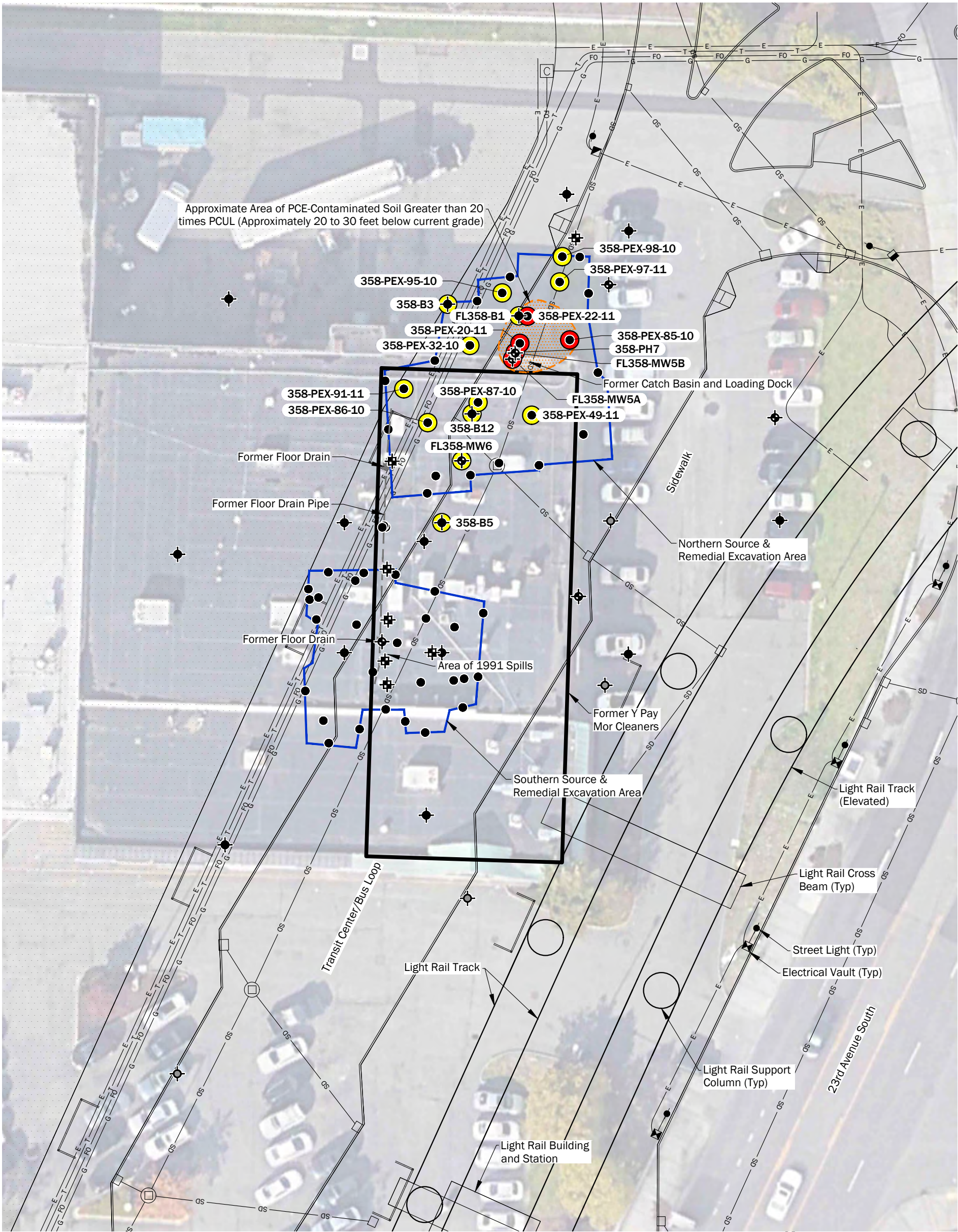


Enclosure A: Figure 9



\\geoengineers.com\\WAN\\Projects\\4\\4082039\\CAD\\03\\FL358\\RI Deliverable\\408203903_F08_Remedial Excavation and Soil Analytical Results - 2020.dwg F08 Date Exported:8/29/2023 7:52 PM - by Michael R. Woods

Enclosure A: Figure 10



Legend

Former Y Pay Mor Cleaners

SS = Sanitary Sewer Utility

SD = Stormwater Utility

W = Water Utility

E = Electrical Utility

FO = Fiber Optic Utility

T = Telephone Utility

G = Gas Utility

● Soil Confirmation Sample

⊕ Monitoring Well

⬮ Soil Boring

⊕ Test Pit

⬮ Decommissioned Monitoring Well

Extent of Interim Action Excavation

PCE Detected Greater than 20 times the PCUL

PCE Detected Less than 20 times the PCUL But Greater than the PCUL

PCE Contaminated Soil Greater than 20 times the PCUL

30

0

30

Feet

Notes:

1. The locations of all features shown are approximate.

2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.

3. PCUL = Preliminary Cleanup Level, CVOC = Chlorinated Volatile Organic Compound, TOD = Transit Oriented Development, PCE = Tetrachloroethene

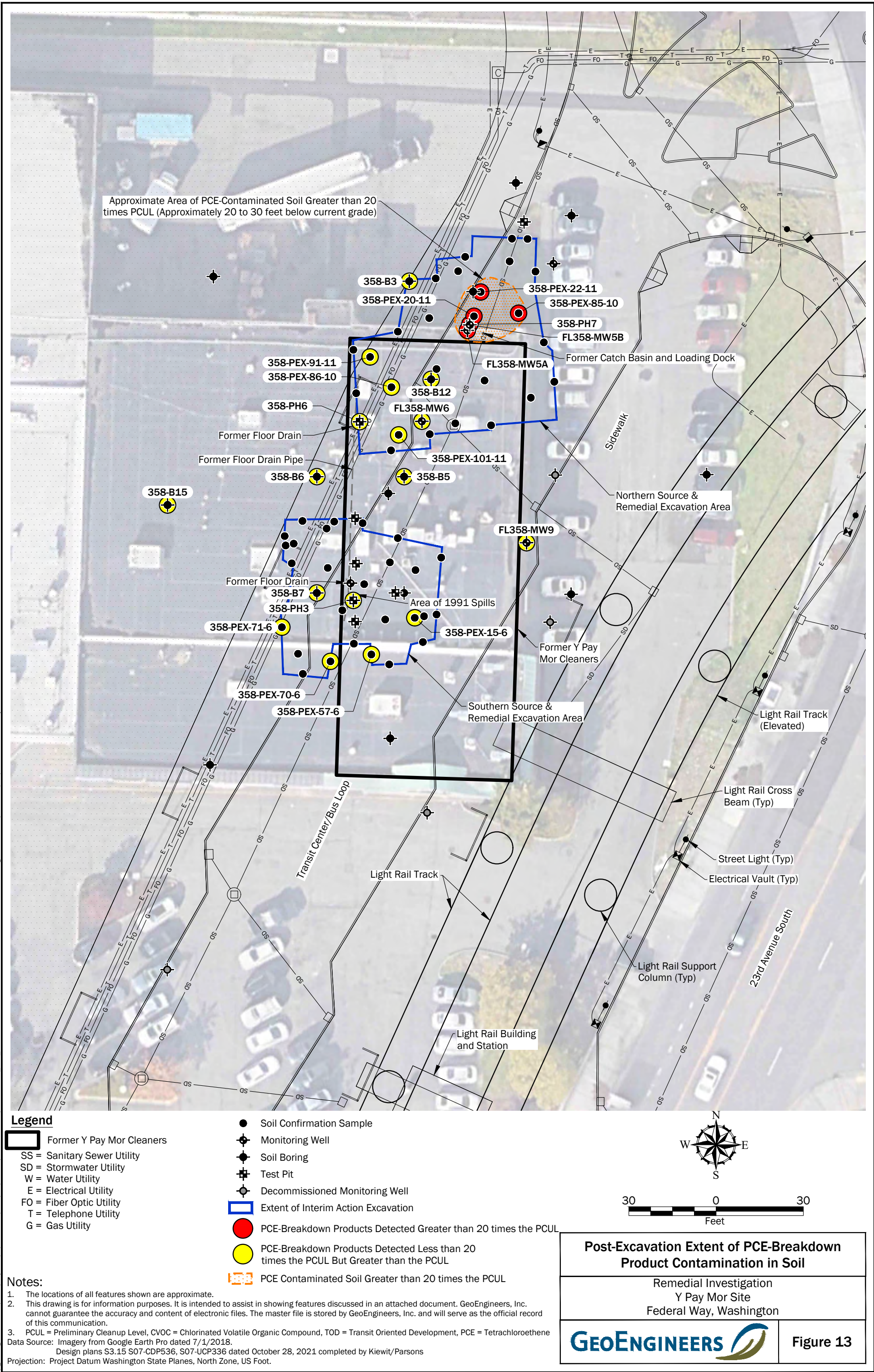
Data Source: Imagery from Google Earth Pro dated 7/1/2018.
Design plans S3.15 S07-CDP536, S07-UCP336 dated October 28, 2021 completed by Kiewit/Parsons
Projection: Project Datum Washington State Planes, North Zone, US Foot.

Post-Excavation Extent of PCE-Contaminated Soil

Remedial Investigation
Y Pay Mor Site
Federal Way, Washington

Figure 12

Enclosure A: Figure 11



Enclosure B

Basis for the opinion: Reviewed documents list

The following documents were reviewed for this opinion.

1. GeoEngineers, Inc. (GeoEngineers), *Agency Review Draft Environmental Summary and Mitigation Measures, Y Pay Mor Site, Transit Oriented Development Sites 1 and 2, Federal Way Downtown Station, Federal Way Link Extension, Federal Way, Washington*, April 24, 2025.
2. Department of Ecology (Ecology), *Re: Environmental Covenant – Ecology Approval for Additional Remedial Investigation Field Activities at King County parcel 2423200050*, December 3, 2024.
3. GeoEngineers, *Revised Remedial Investigation Work Plan – Addendum No. 2, Y Pay Mor Cleaners Site, Federal Way, Washington, King County Parcel No. 2423200050, VCP Number: NW3265*, November 21, 2024.
4. Ecology, *Re: Environmental Covenant – Ecology Approval for Additional Remedial Investigation Field Activities at King County parcel 2423200050*, August 20, 2024.
5. GeoEngineers, *Revised Remedial Investigation Work Plan – Addendum No. 1, Y Pay Mor Cleaners Site, Federal Way, Washington, VCP Number: NW3265*, July 29, 2024.
6. GeoEngineers, *Remedial Investigation Work Plan – Addendum No. 1, Y Pay Mor Cleaners Site, Federal Way, Washington, VCP Number: NW3265*, July 16, 2024.
7. GeoEngineers, *2023 Groundwater Monitoring Report, FL358 - Y Pay Mor Dry Cleaners, 2210 South 320th Street, Federal Way, Washington, VCP No. NW3265*, May 21, 2024.
8. Ecology, *Re: Response to Sound Transit’s Request on Land Use Under Restrictive Covenant at the Following Cleanup Site: Y Pay Mor Drycleaner, 2210 South 320th Street, Federal Way, WA 98003, King County Parcel 2423200050*, April 19, 2024.
9. GeoEngineers, *Updated Remedial Investigation, Federal Way Link Extension Parcel FL358, Y Pay Mor Drycleaner Site, 2210 South 320th Street, Federal Way, Washington*, October 20, 2023.
10. Sound Transit, *Email on F200 VCP NW3265 Y Pay Mor Dry Cleaner - Schedule and Approach Update*, March 22, 2023.
11. Ecology, *Re: Environmental Covenant – Ecology Approval for Remedial Investigation Field Activities at King County parcel 2423200050*, January 20, 2022.
12. GeoEngineers, *Remedial Investigation Revised Work Plan, Federal Way Link Extension Parcel FL358, Y Pay Mor Drycleaner Site, 2210 South 320th Street, Federal Way, Washington*, December 22, 2021.

13. Ecology, *Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site: Y Pay Mor Drycleaner, 2210 S 210th Street, Federal Way, Washington 98003, VCP Project No.: NW3265*, November 10, 2021.
14. Ecology, *Re: Environmental Covenant – Ecology Approval for Certain Future Construction, Activities at King County parcel 2423200050*, July 21, 2021.
15. GeoEngineers, *Remedial Investigation Work Plan, Federal Way Link Extension Parcel FL358, Y Pay Mor Drycleaner Site, 2210 South 320th Street, Federal Way, Washington*, July 21, 2021.
16. Sound Transit, *Selection of Preferred Alternative, Y Pay Mor Drycleaner, VCP Project No. NW3265, Federal Way Link Extension Parcel FL-358*, July 13, 2021.
17. O’Neill Service Group (OSG), *Soil Characterization and Interim Action Remediation Report, Parcel FL-358, Former Y Pay Mor Dry Cleaner, VCP Project No. NW3265, Federal Way Link Extension Project, 2210 South 320th Street, Federal Way, Washington*, February 19, 2021.
18. Ecology, *Contained-In Determination for F002 Contaminated Soils at the Parcel FL-358 Sound Transit Federal Way Link Extension Project, 2200 South 320th Street, Federal Way, Washington*, July 9, 2020.
19. Ecology, *Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site, Y Pay Mor Drycleaner, 2210 S 320th Street, Federal Way, Washington 98003, VCP Project No.: NW3265*, June 26, 2020.
20. Ecology, *Re: Environmental Covenant – Ecology Approval for Activities at King County Parcel 2423200050*, June 26, 2020.
21. Sound Transit, *Selection of Preferred Alternative, Y Pay Mor Drycleaner, VCP Project No. NW3265, Federal Way Link Extension Parcel FL-358*, June 19, 2020.
22. OSG, *Technical Memorandum, FL358 – Supplemental Investigation, Sound Transit Federal Way Link Extension*, May 22, 2020.
23. OSG, *Contained-In Determination Request, Supplemental Investigation, Parcel FL-358, Sound Transit Federal Way Link Extension Project, 2200 South 320th Street, Federal Way, Washington*, May 21, 2020.
24. Ecology, *Re: Response to Additional Information at the Following Cleanup Site, Y Pay Mor Drycleaner, 2210 S 320th Street, Federal Way, Washington, 98003, Facility No. 2518, Cleanup Site ID 3180, VCP Project No NW3265*, April 29, 2020.
25. Sound Transit, *Additional Information, Y Pay Mor Drycleaner, VCP Project No. NW3265*, April 13, 2020.

26. Ecology, *Approval for Supplemental Characterization at the Following Cleanup Site, Y Pay Mor Drycleaner, 2210 S 320th Street, Federal Way, Washington, 98003, Facility No. 2518, Cleanup Site ID 3180, VCP Project No NW3265, April 8, 2020.*
27. OSG, *Cleanup Action Plan, Parcels FL-358, FL-361, Federal Way Link Extension Project, 2200 South 320th Street, Federal Way, Washington, March 11, 2020.*
28. Sound Transit, *Phase II Environmental Site Assessment Addendum, Sound Transit – Federal Way Link Extension, Parcel FL-358, 2200 South 320th Street, Federal Way, Washington, February 18, 2019.*
29. Ecology, *Periodic Review, Y Pay Mor Drycleaner, 2210 South 320th, Federal Way, Washington 98003, Facility Site ID 2518, Cleanup Site ID 3180, September 2018.*
30. Sound Transit, *Phase II Environmental Site Assessment Report, Sound Transit – Federal Way Link Extension, Parcels FL358, FL361 and FL363, Sea-tac Plaza Shopping center, 2200 South 320th Street, Federal Way, Washington, December 19, 2017.*
31. Ecology, *Re: Independent Remedial Action, Sea-Tac Plaza/Former Y-Pay-Mor Drycleaner, Space A-6, 2210 S. 320th Street, Federal Way, Washington, October 22, 1998.*
32. Restrictive Covenant, King County Recording No. 9808101434, Seatac Plaza Corporation, 2210 S 320th Street, Space A-6, Former Y-Pay-Mor Dry Cleaners, Parcel Number 242320-0050-00, July 24, 1998.
33. AGRA Earth & Environmental, Inc. (AGRA), *Sea-Tac Plaza, Biannual Sampling of Monitoring Well MW-3, Former Y-Pay-Mor Dry Cleaners, Federal Way, Washington, August 20, 1997.*
34. AGRA, *Sea-Tac Plaza, Biannual Sampling of Monitoring Well MW-3, Former Y-Pay-Mor Dry Cleaners, Federal Way, Washington, February 28, 1997.*
35. Restrictive Covenant, King County Recording No. 9510121424, September 21, 1995.
36. AGRA, *Independent remedial Action Report (IRAP), Former Y-Pay-Mor Drycleaners, 2210 S 320th Street, Federal Way, Washington, December 22, 1994.*
37. AGRA, *Remediation System Installation, Former Y-Pay More Dry Cleaners, Federal Way, Washington, October 1993.*
38. AGRA, *Preliminary Remedial Investigation, Former Y-Pay-Mor Drycleaners, Best Shopping Plaza, 2210 320th Street South, Federal Way, Washington, November 23, 1992.*