STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6300

June 30, 2025

Jaclyn Lussier
Evergreen Treatment Services
4634 E Marginal Way S C110
Seattle, WA 98134
jhebron@evergreentreatment.org

SENT BY EMAIL ONLY

Re: Opinion on Proposed Cleanup of the following Site:

Site Name:	Evergreen Treatment Services Seattle Clinic
Site Address:	1700 Airport Way S, Seattle, King County, WA 98134
Facility/Site ID:	100004066
Cleanup Site ID:	17256
VCP Project ID:	XN0059

Dear Jaclyn Lussier:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Evergreen Treatment Services Seattle Clinic site (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70A.305 Revised Code of Washington (RCW).[2]

[1] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[2] https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305

Issue Presented and Opinion

Ecology has determined that upon completion of your proposed cleanup (limited excavation, supplemental remedial injection, and monitored natural attenuation), no further remedial action will likely be necessary at the Property to clean up contamination associated with the Site.[3]

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in chapter 70A.305 RCW and chapter 173-340[4] WAC (collectively called "MTCA").

Summary of Opinion

Remedial Investigation (RI), Feasibility Study (FS), and Cleanup Action Plan (CAP)[5] were received by Ecology on May 28, 2025. The following evaluations are based on that report. This following section summarizes the Site Background and Ecology's No Further Action (NFA) Likely opinion. More detailed discussions (Site Description, Basis of Opinion, and Analysis of the Proposed Cleanup) follow.

Background

The Property consists of one parcel owned by Evergreen Treatment Services (King County Parcel 766620-2855). Ecology created the Evergreen Treatment Services Seattle Clinic Site (CSID 17256) to address contamination on this Property, which is located at 1700 Airport Way S. This Property is also a portion of the Emerald Recycling Site (CSID 39), which is associated with the following four parcels:

Table 1. Parcels comprising the Emerald Recycling Site

King County Parcel No	Position	Current Owner	Address	Acres
766620-2855	South	Evergreen Treatment Service	1700 Airport Way S	0.75
766620-2861	Central	Safety Kleen Systems	None	0.24
377030-0160	NW	Safety Kleen Systems	1502 Airport Way S	0.20
766620-2860	NE	Safety Kleen Systems	None	0.21

[3] Note that achieving cleanup levels via the proposed remedial technologies and methods carries uncertainties. Determination of no further action by Ecology will be contingent on sampling results confirming that MTCA cleanup levels have been achieved at approved points of compliance.
[4] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340
[5] Aspect. *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, 1700 Airport Way South, Seattle*. May 23, 2025.

The Evergreen Treatment Services Seattle Clinic Site is solely within parcel 766620-2855. The four parcels that comprise the Emerald Recycling site were all part of a historical Northwest EnviroService facility which has been regulated by Ecology under the Resource Conservation and Recovery Act (RCRA). The Emerald Recycling site is currently being managed by Ecology's Hazardous Waste and Toxics Reduction (HWTR) Program.

Historical operations on the Evergreen Treatment Services (ETS) property included Western Blower (1910s to 1960s), Northwest EnviroService (1979-1995), Emerald Recycling (1997-2021), and ETS (since 2021).

On January 30, 1997, Ecology HWTR provided an opinion that No Further Action (NFA) or investigation would be required for closure of the Western Blower portion of Northwest EnviroService (now referred to as the ETS property) except for the recording of an environmental restrictive covenant (ERC), since no hazardous waste management units are present on that Property. The restrictive covenant would need to restrict land use, limit building alterations, and prohibit groundwater use. That letter also stated that "If any subsurface contamination (in either soils or groundwater) is found, additional investigations will be addressed through MTCA."

An ERC was recorded for the Western Blower (now ETS) property on December 17, 2017. That restrictive covenant was addressing concentrations of arsenic, lead, benzo(a) pyrene (BAP), and total petroleum hydrocarbons (TPH) in soil, and manganese in groundwater.

In 2021, ETS, an opioid addiction treatment and social services provider, acquired the former Western Blower property from Evergreen Recycling (aka Emerald Services). Ecology understands that ETS had planned to remodel the existing structure, but demolition and reconstruction was evidently needed following flood damage to the structure due to a water pipe break in 2024.

Soil sampling was conducted in 2024, and cleanup level exceedances were found for trichloroethene (TCE) and vinyl chloride (VC), lead, BAP, and total carcinogenic polycyclic aromatic hydrocarbons (CPAHs). Cleanup level exceedances were found in groundwater samples for dissolved arsenic, *cis*-1,2-dichloroethene (cDCE), and VC. Screening level exceedance for soil gas were found for air-phase petroleum hydrocarbons, benzene, and VC.

Ecology's Toxics Cleanup Program (TCP) discussed the creation of the Evergreen Treatment Services Seattle Clinic site (CSID 17256) with Ecology HWTR, and HWTR provided their concurrence on the creation of this new site within an email dated June 4, 2025.

Aspect Consulting prepared the RI/FS/CAP dated May 28, 2025, which screened remedial alternatives and proposed Alternative 3, Source Excavation, In-Situ Treatment, and Monitored Natural Attenuation (MNA) as the preferred alternative to address the contamination on the Property that was not covered by the 2017 ERC (including the TCE and VC in soil and the cDCE and VC in groundwater). Ecology has concluded that the cleanup actions proposed within the RI/FS/CAP coupled with the 2017 ERC appear to be an appropriate approach to address the Site contamination.

The selected alternative was presented within the FS to be the most permanent alternative with costs not disproportionate to relative benefits. Ecology concurs with the results of the disproportionate costs analysis (DCA) and the selection of the preferred alternative for the Property presented within the RI/FS/CAP dated May 29, 2025.

Deliverables needed prior to NFA Determination

Deliverables that need to be submitted to Ecology's TCP for our review and comment prior to NFA issue are listed in the below section titled "Next Steps".

Site Description

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

- Arsenic, cadmium, lead, BAP, CPAHs, TCE, and VC into the soil.
- Arsenic, manganese, cDCE and VC into groundwater.
- Petroleum (air-phase hydrocarbons), benzene, and VC into the soil gas, and potentially, indoor air.

Enclosure A includes a detailed description and diagrams of the Site, as currently known to Ecology.

As discussed above in the Summary of Opinion section of this letter, the arsenic, lead, BAP, and TPH in soil, and manganese in groundwater were part of the Emerald Recycling Site (CSID 39) and are addressed by the 2017 ERC. The other contaminants listed above

(primarily the chlorinated solvent compounds TCE, cDCE, and VC) are considered to be part of the Evergreen Treatment System Site (CSID 17256).

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites other than discussed above.

Basis for the Opinion

This opinion is based on the information in the documents listed in **Enclosure B**.

You can request these documents by filing a records request.[6] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup and Tank Search web page.[7]

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Proposed Cleanup

Ecology has concluded that, upon completion of your proposed cleanup, no further remedial action will likely be necessary to clean up contamination at the Property associated with the Site. That conclusion is based on the following analysis:

Characterizing the Site

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A.** The Site has undergone characterization work both prior to and after the NFA letter dated January 30, 1997. Data collected prior to that date were addressed through the recording of an ERC for the Property on December 27, 2017. As discussed above, the ERC addressed soil contamination by arsenic, lead, BAP, and TPH in soil, and manganese in groundwater. Since that time, additional investigations have taken place at the Property that are discussed below.

[6] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[7] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=17256

Soil Characterization

Soil characterization work performed in 1996 lead to the issue of an NFA letter dated January 30, 1997. That NFA letter formed the basis for the 2017 ERC. That restrictive covenant was addressing concentrations of arsenic, lead, BAP, and TPH in soil, and manganese in groundwater. Contaminated concrete was also mentioned in the ERC; however, concrete is not a contaminated media regulated under MTCA.

Based on a review of the 1996 sampling results and current cleanup standards, no arsenic nor TPH cleanup levels were exceeded (older cleanup standards were apparently exceeded). Maximum concentrations of contaminants detected in soil samples and numbers of cleanup level exceedances are summarized in Table 2:

Table 2. Soil Sample Cleanup Level Exceedances – 1996

Contaminant	Method A Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Cleanup Level Exceedances
Arsenic	20	7.8	0
Beryllium	63*	0.27	0
Lead	250	**315**	1
BAP	0.1	**0.33**	2
TPH	2,000	1,100	0

mg/kg = milligrams per kilogram.
* Method B cleanup level.
Bold = concentration above preliminary cleanup level.

Additional soil characterization work was conducted in 2018 and in 2024. A total of 19 soil samples were collected: six samples from four locations in 2018, and 13 samples from seven locations in 2024. Maximum concentrations of contaminants detected in soil samples and numbers of cleanup level exceedances are summarized in Table 3:

Table 3. Soil Sample Cleanup Level Exceedances – 2018-2024

Contaminant	Method A Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Cleanup Level Exceedances
Arsenic	20	**27.8**	1
Cadmium	2.0	**220**	6
Lead	250	**4,720**	3
BAP	0.1	**0.59**	6
CPAHs	0.1	**0.796**	7
TCE	0.03	**0.16**	4
VC	0.67*	**1.7**	1

* Method B cleanup level.
Bold = concentration above preliminary cleanup level.

Areas with cleanup level exceedances in soil are shown on Figure 6 in Enclosure A. The soil contamination was relatively shallow, with maximum concentrations for PCE, TCE, and VC at 1.0, 2.0, and 5.0 ft below ground surface (bgs). The deepest cleanup level exceedances were at 10 ft bgs. Soil appears to have been sufficiently characterized for identifying appropriate cleanup actions. No further soil characterization appears to be warranted at this time other than confirmation sampling to verify the results of proposed additional cleanup efforts.

Soil Vapor Characterization

Soil gas was characterized through the collection of six sub-slab soil gas samples in 2018 and 2020. Maximum concentrations of contaminants detected in sub-slab soil gas samples and numbers of screening level exceedances are summarized in Table 4:

Table 4. Soil Vapor Sample Screening Level Exceedances – 2018-2020

Contaminant	Commercial Sub-slab Screening Level* ($\mu g/m^3$)	Unrestricted Sub-slab Screening Level ($\mu g/m^3$)	Maximum Concentration ($\mu g/m^3$)	Number of Screening Level Exceedances/ Samples
Petroleum	13,000	1,500	**152,135**	1
Benzene	50	11	**170**	2
VC	44	9.5	**320**	2
Acrolein	2.6	0.30	**3.8**	1

*Commercial-based screening level. Ecology notes that application of commercial based screening levels requires recording an environmental covenant restricting land use to commercial uses in perpetuity.
$\mu g/m^3$ = micrograms per cubic meter
Bold = concentration above preliminary cleanup level.

Ecology notes that acrolein is a contaminant commonly found associated with air sampling cannisters. Ecology has concluded that the acrolein in soil gas is likely attributable to the sampling method and is not representative of Site conditions.

Screening level exceedances in soil gas samples demonstrate the need for vapor intrusion mitigation measures at the Site (unless the sources of the vapors can be demonstrated to have been removed).

Indoor Air Characterization

It is Ecology's understanding that no indoor air sampling has been conducted at the Site to date. Future indoor air sampling may be needed if all sources of volatile contamination are not removed, and vapor intrusion mitigation measures are not implemented. Ecology notes that application of commercial-based indoor air cleanup levels would require an ERC that restricts land uses to commercial uses in perpetuity.

Ecology also notes that while the existing ERC limits land uses, residential uses are not prohibited within that EC. However, we understand that vapor intrusion mitigation measures are planned for Site, therefore, no land use restrictions appear to be needed at this time. The existing ERC includes a requirement to contact Ecology prior to changes to the on-site structure, therefore we anticipate that ERC will be sufficiently protective of the planned vapor intrusion mitigation measures.

Groundwater Characterization

Groundwater is quite shallow at the Site, occurring at depth between 0.8 and 5.7 ft bgs. Groundwater flows to the west, based on a potentiometric surface map presented within the RI/FS/CAP report and consistent with surface topography. Groundwater occurs within interbedded sand, silt, and clay beds, which were historically placed fill materials in the area west of Interstate 5.

Groundwater was characterized through the collection of nine groundwater samples from five locations in 2018 and 2024. Maximum concentrations of contaminants detected in groundwater samples and are summarized in Table 5:

Table 5. Groundwater Sample Cleanup Level Exceedances – 2018-2024

Contaminant	Method A Cleanup Level (µg/L)	Maximum Concentration (µg/L)	Number of Cleanup Level Exceedances
Dissolved Arsenic	8*	**20.3**	4
Lead	15	**26**	1
cDCE	16	**22**	1
VC	0.2	**23**	3

* Puget sound regional background concentration for dissolved arsenic in groundwater.
µg/L = micrograms per liter.
Bold = concentration above preliminary cleanup level.

The dissolved arsenic concentrations exceeding the Puget Sound Regional background concentration of 8.0 µg/L are believed to be attributable to anthropogenic sources of carbon (e.g. wood waste or petroleum) causing reducing conditions in groundwater. The arsenic is believed to likely to have been mobilized from naturally occurring solid phase arsenic. Wood waste was noted in one boring log (AB-06 from 2-4 ft bgs). No petroleum was detected at concentrations above cleanup levels in 20 soil samples and 9 groundwater samples; however, one soil gas sample (SV-5, collected adjacent to monitoring well AMW-5) had elevated petroleum concentrations. Petroleum was a contaminant listed within the 2017 ERC.

The more recent soil and groundwater data appears to indicate that petroleum contamination at the Site has likely attenuated. It is anticipated that the reducing conditions that caused arsenic mobilization may also attenuate, though, the localized wood waste material could cause a continuing source of reducing conditions in groundwater.

The lead in groundwater was an exceedance for total lead in one monitoring well sample (AMW-5). No dissolved lead was detected in this sample. The cleanup level for lead in groundwater is based on drinking water pathway from a water supply well. The dissolved lead result is more representative of this pathway (total lead includes suspended solids within a monitoring well that would not be found in a water supply well). Therefore, Ecology does not consider lead in groundwater to be a contaminant of concern at this Site.

The VC cleanup level exceedances were from two locations; AMW-5 (located south of the sump in the building) and AMW-1 (within the Airport Way South right-of-way). Based on the number of exceedances and the concentrations detected, the groundwater contamination is expected to be relatively localized. Some contamination has extended under Airport Way S, as evidenced by 2.9 µg/L VC at AMW-1 and 11.4 µg/L and 20.3 µg/L dissolved arsenic at AMW-1 and AMW-3, respectively. However, the extent of contamination is believed to be limited. Risk to utility workers within Airport Way S was assessed using a risk evaluation spreadsheet provided by Ecology's TCP's lead toxicologist. A risk-based concentrations for VC in groundwater based on vapor exposure and dermal contact was 200 µg/L. Based on the maximum VC concentration of 23 µg/L in groundwater, risk to utility workers in the street appear to be low.

Groundwater appears to have been sufficiently characterized for identifying appropriate cleanup actions at the Site. No further groundwater characterization appears to be warranted at this time other than performance/compliance monitoring to verify the results of proposed further cleanup efforts.

Setting Cleanup Standards

Cleanup Standards

Ecology has determined the cleanup levels and points of compliance presented below meet the substantive requirements of MTCA. The following cleanup levels and screening levels have been selected for the Site:

Table 6. Selected Cleanup Levels and Screening Levels

Contaminant	Method A Soil Cleanup Level (mg/kg)	Method A Groundwater Cleanup Level (µg/L)	Sub-slab Screening Level* (µg/m^3)
Arsenic	20	5.0	NA
Cadmium	2.0	5.0	NA
Lead	250	16	NA
BAP	0.1	0.1	NA
Total CPAHs	0.1	0.1	NA
Petroleum†	2,000	500	1,500/13,000
Benzene	0.03	5.0	11/50
TCE	0.03	5.0	11/95
cDCE	160‡	16	610/5,200
VC	0.67‡	0.2	9.5/44
Acrolein	--	--	0.30/2.6

*Both residential (unrestricted) and commercial screening/cleanup levels are provided. Application of commercial-based screening levels would require restricting land use to commercial (non-residential) uses in perpetuity.
† Diesel- or heavy oil-range petroleum for soil or groundwater, generic cleanup level for soil gas.
‡ Method B Cleanup Level
NA = Not applicable (no risk of vapor intrusion from non-volatile contaminants).

As discussed above, Ecology has concluded that the acrolein in soil gas detection was likely attributable to the sampling methods (this compound is commonly detected in vapor cannister samples as a false positive).

Points of Compliance

The points of compliance are throughout the Site. Cleanup levels based on the direct contact pathway apply to soils to a depth of 15 ft bgs, whereas cleanup levels for the soil-to-groundwater pathway apply throughout the Site without regard to depth. Cleanup levels for groundwater apply throughout the Site.

Terrestrial Ecological Evaluation (TEE)

The Site is located within a highly urbanized area near downtown Seattle. However, there is approximately seven acres of open space within 500 feet of the Site. These open spaces consist of forested areas adjacent to Interstate 5 and on steeply sloping lands east of Interstate 5). Based on completion of MTCA Table 749-1, the simplified TEE process cannot be ended. However, risk to ecological receptors at the Site appears to be low. Interstate 5 adjacent to the Site, and the highly urbanized lands in the vicinity of the Site are anticipated to make wildlife unlikely to be found at the Site.

The contaminated soil and groundwater area is generally covered by the existing structure and will also continue to be covered by the planned replacement structure. Ecology has concluded that no further actions are warranted with respect to the TEE pathway at the Site, at this time. Should the structure on the Property be demolished, and not be replaced, and the soil contamination not be cleaned up, then Ecology could reevaluate this conclusion.

Selecting the Cleanup Action

Ecology has determined the cleanup actions you proposed for the Site meet the substantive requirements of MTCA. As discussed above, some of the contamination at the Site was previously addressed through institutional controls memorialized within the 2017 ERC. This included arsenic, lead, BAP, and TPH in soil, and manganese in groundwater.

The RI/FS/CAP submitted to Ecology dated May 23, 2025, included evaluation of the following three alternatives to address the identified contamination that was not addressed by the 2017 ERC:

Table 7. FS Alternatives

Alternative Number	Alternative Description	Estimated Cost	Benefit Score
1	Monitored Natural Attenuation (MNA) and Institutional Controls	$570 K	2.3
2	Source Excavation, MNA, and Institutional Controls	$810 K	3.8
3	Source Excavation, In-Situ Treatment, MNA, and Institutional Controls	$870 K	4.3

Alternative 3, Source Excavation, In-Situ Treatment, MNA, and Institutional Controls was proposed within the FS as the preferred remedial alternative. This alternative includes the following components:

Source Excavation Remedial Excavation

The RI/FS/CAP stated:

> *Remedial excavation is proposed to remove the unsaturated (vadose zone) soils with concentrations above MTCA cleanup levels. Source excavation, regrading, and a chemical vapor barrier beneath new structures with the buildings and hardscapes as a cap as described in Section 4.3.2.* (copied below).
>
> *Demolition of the sump and removal and off-Site disposal of shallow contaminated soil in the general vicinity of the sump and known shallow soil exceedances. The assumed extent of the excavation is approximately 25 feet by 40 feet to depth reaching approximate Elevation 18 feet (approximately 2 feet below the top of the basement slab). However, the final excavation extent may be modified in the field during excavation by field screening and soil sampling.*
>
> *Shallow soil excavation to physically remove soil by standard excavation practices and technology with off-Site disposal at a permitted disposal facility. Excavation and off-Site removal of contaminated soil would address the exposure pathways by permanently removing secondary contaminant sources from the Site. However, excavation dewatering is considered impracticable, therefore only excavation of vadose soils is retained.*
>
> *Regrading of the Site to support redevelopment with no below-grade structures. A chemical vapor barrier will be constructed at grade beneath new structures with the buildings and hardscapes acting as a hard cap.*

In-Situ Treatment

The RI/FS/CAP stated:

> *Saturated zone contamination is to be addressed by supplemental remedial In-situ treatment of groundwater and remaining contaminated soil below the vadose zone via application of chemical oxidizers, known as ISCO. ISCO is a remediation technology that involves injecting or mixing an oxidation agent with organic COCs in soil and groundwater and transforming them into nonhazardous or less toxic compounds that are more stable, less mobile, and/or inert. Oxidants will react with the organic COCs, causing the rapid and complete chemical destruction of many organic chemicals and producing carbon dioxide and water. Oxidizing agents used during ISCO at the Site may include permanganate, peroxide, persulfate, percarbonate, and ozone. Oxidants can also liberate naturally occurring metals in the subsurface and can be toxic to native bacteria. ISCO oxidants can persist in the treatment area for a period of weeks to months; however, multiple rounds of ISCO treatment can be required.*
>
> *ISCO treatment will be introduced to the subsurface through direct-push injection points in a 10-foot treatment thickness in the vadose or saturated zone. A 7-foot radius of influence (ROI) is assumed for planning purposes. The injection layout is designed to target contamination around the sump and downgradient of the sump at the Property boundary. Injections within the planned building footprint would be conducted prior to building construction.*

MNA

The RI/FS/CAP stated:

> *MNA of groundwater and ICs as described in 4.3.1 with the exceptions as described in Section 4.3.2, and the additional exception that the duration of groundwater monitoring is reduced to twice-annually for up to 5 years.*
>
> *MNA reduces contaminant concentrations in groundwater by natural processes such as biodegradation, abiotic degradation, adsorption, and dilution. MNA does*
>
> *not include significant infrastructure but does rely on appropriate conditions for effectiveness. MNA will consist of long-term groundwater and vapor intrusion monitoring. A long-term groundwater monitoring plan would be developed to track contaminant attenuation over time.*

Institutional Controls (ICs)

The RI/FS/CAP stated:

> *ICs, as an administrative mechanism to ensure long-term performance of the cleanup actions, are required for a cleanup action that involves containment of contaminated media (WAC 173-340-740(6)(f)(iv)). The ICs do not include physical actions to remediate or mitigate impacts on environmental media on the Property. ICs will be utilized in the form of administrative/legal tools to (1) provide notification regarding the presence of contaminated materials; (2) regulate the disturbance/management of these materials and the cleanup action components; and (3) provide for long-term care of cleanup actions, including long-term monitoring. The ICs may include deed restrictions which restrict land use and soil disturbance without Ecology approval.*

The selected alternative (Alternative 3) was presented within the FS to be the most permanent alternative with costs not disproportionate to relative benefits. Ecology concurs with the results of the DCA and the selection of the preferred alternative for the Property presented within the RI/FS/CAP dated May 23, 2025.

Implementing the Cleanup Action

The remedial excavation work can proceed at any time. Critical elements for this task include obtaining any contained-in determination (if needed) for soils containing chlorinated solvents that are not to be disposed of as hazardous waste. Ecology's TCP should be copied on any contained-in related correspondence. Based on correspondence submitted to Ecology, we understand that a case for such materials not being considered hazardous waste has been suggested, based on both characteristics and listing.

Ecology generally requests a confirmatory soil sampling plan map showing planned locations for excavation floor and sidewall samples. It appears that the proposed source excavation is largely bound by previous soil sampling data. Existing soil data at the excavation boundary can serve as confirmation soil sampling data. Ecology notes that the excavation is proposed to a depth immediately above the water table. If the excavation does not extend into the water table, excavation floor confirmation soil sampling should be conducted.

Following completion of the remedial excavation work, a Remedial Action Completion Report should be submitted to Ecology that documents the soil removal and offsite disposal, and confirmatory soil sampling results. Maps should be included that present the locations and depths of remaining soil contamination. This report should also include documentation of the installation of the vapor barrier. Ecology recommends that passive (or active) sub-slab venting also be included in the building design and construction to provide for redundancy in vapor intrusion protections.

Remedial injection work can proceed when underground injection control (UIC) authorization is received. Ecology's TCP requests to be copied with any injection basis of design documents prepared for injection remediation work as well as any UIC authorization-related correspondence. After completion of remedial injections, information including injection locations, depths, injectate volumes, and performance monitoring results should be submitted to Ecology's TCP within a Remedial Action Completion Report. Depending on the timing of the cleanup work, this could be the same report as the one presenting the excavation cleanup results.

Ecology will be requesting submittal of a draft Groundwater Monitoring Plan prior to NFA issue. This monitoring plan should include proposed monitoring locations, analytes, and sampling schedule (including post-NFA groundwater monitoring). This plan should include collection of field and laboratory biogeochemical parameters that provide evidence of conditions consistent with natural attenuation. This groundwater monitoring plan should identify contingency measures in case MNA is not found to be protective over the long term.

Ecology has concluded that the existing ERC appears to be protective for the long-term for the Property. No modification of this ERC appears to be warranted at this time. Key elements of that ERC are 1) no incompatible land uses, 2) no drinking water use of groundwater, 3) no modification of structures without prior written approval from Ecology, and 4) no activities that could result in contact with contaminated soil without prior written approval from Ecology.

Next Steps

Ecology anticipates the following next steps at the Site, not necessarily in this sequence:

1. Copy Ecology's TCP with contained-in related correspondence (if a contained-in determination is needed).

2. Copy Ecology's TCP with UIC authorization-related correspondence and any basis of design documents supporting injection design.

3. **Submit a Remedial Action Completion Report for Excavation Work** that documents the excavation cleanup work and presents receipts documenting proper disposal of excavated contaminated soils, confirmation soil sampling results, documentation of remaining vadose zone soil contamination following cleanup, and documentation of vapor barrier installation.

4. **Submit a Remedial Action Completion Report for Remedial Injection Work** that documents the injection locations and depths, volumes of injectate, and performance monitoring data. The Remedial Action Completion Reports (for Excavation and Remedial Injection Work) can be submitted as one combined report, or separately, depending on the timeframe of work completion.

5. **Submit a Draft Compliance Groundwater Monitoring Plan** providing locations, analytes, and frequencies for post-remediation MNA groundwater monitoring. The long-term groundwater compliance monitoring plan must be finalized prior to NFA issue.

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 does not:

- Resolve or alter a person's liability to the state
- 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).

Opinion does not constitute a determination of substantial equivalence.

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

Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the Voluntary Cleanup Program (VCP).

State is immune from liability.

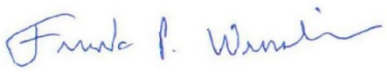
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the VCP. As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our webpage.[8] If you have any questions about this opinion, please contact me at 509-424-0543 or frank.winslow@ecy.wa.gov.

Sincerely,



Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Section

FPW/tam

Enclosure: A – Site Description and Diagrams
B – Basis for the Opinion: Documents List

cc by email: Nathan Dickey, Geosyntec, nathan.dickey@geosyntec.com
Dave Cook, Geosyntec, dave.cook@geosyntec.com
Treasure Mitchell, Ecology, treasure.mitchell@ecy.wa.gov
Ecology Site File

[8] https://www.ecy.wa.gov/vcp

Enclosure A

Site Description and Diagrams

Site Description

Site

The Site is defined by the extent of soil, soil gas, and groundwater contamination associated with the property at 1700 Airport Way South. As discussed above, a portion of this contamination was covered by an environmental restrictive covenant (ERC) recorded for the property in 2017. That work was done under the Emerald Recycling Site (CSID 39), which includes four King County Parcels discussed below.

Area and Property Description

The Evergreen Treatment Services Seattle Clinic site is solely within parcel 766620-2855 (hereinafter referred to as "the Property". However, this parcel is also part of the Emerald Recycling Site (CSID 29), which includes the following four parcels:

Table 2. Parcels comprising the Emeral Recycling Site

King County Parcel No	Position	Current Owner	Address	Acres
766620-2855	South	Evergreen Treatment Service	1700 Airport Way S	0.75
766620-2861	Central	Safety Kleen Systems	None	0.24
377030-0160	NW	Safety Kleen Systems	1502 Airport Way S	0.20
766620-2860	NE	Safety Kleen Systems	None	0.21

The Property is bound by Interstate 5 to the east and Airport Way South to the west. Beyond Interstate 5 is a forested slope, which rises from an elevation of about 25 feet above mean sea level (ft amsl) to 270 ft amsl, 730 feet to the east. To the north and adjacent to the Property is parcel 766620-2861, owned by Safety Kleen Systems, which includes an above ground tank farm, and is part of the Emerald Recycling Site. To the south and adjacent to the Property is a three-story commercial building with various commercial tenants. On the west side of Airport Way South are commercial operations, and beyond are commercial and industrial operations, railroad yards, and Port of Seattle facilities.

Site History

The following Site history discussion is from the RI/FS/CAP report:

> *Records indicate that Western Blower constructed the on-Site Building between 1914 and 1915 and that in 1937, a 350-gallon fuel tank was installed to supply an oil-burning boiler in the central portion of the Building. Building plans dated to 1942 indicate the basement of*

the north wing featured a paint spray booth, metal shop, metal plating areas, and a sump. Western Blower occupied the Property until the 1960s, and the Site was reportedly vacant in the 1970s.

Northwest EnviroService, Inc. (NWES) began operating a tank cleaning service at 1500 Airport Way South (north of the Site) in 1979 (NWES, 1995; 1996). In 1987, NWES expanded operations onto the Site as part of a 1.3-acre facility between Airport Way South and Interstate 5, spanning from South Atlantic Street to the north and South Holgate Street to the south. Operations on the Site included business administration and materials handling. Facility operations were regulated by Ecology under the Resource Conservation and Recovery Act (RCRA).

In 1995, NWES discontinued its hazardous-waste operations and started RCRA closure of the hazardous-waste handling aspect of the facility. Since their use of the Site (known as the Western Blower Property) was limited, closure of this portion of the Property was conducted separately from the remainder of the Property to the north where more hazardous-waste handling (aka oil recycling) activities were focused.

ETS moved into the south wing of the Building in 1997. In 2017, the Western Blower property was divided into two parcels: the current Property, and the current north-adjoining property (King County Parcel 7666202861), and the environmental covenant for the Property revised to allow continued use by ETS (Ecology, 2017). Meanwhile, Emerald Recycling (also known as Emerald Services) used the north wing of the Building for materials storage until 2020. ETS acquired the Site from Emerald Services in 2021. In 2024, the Building suffered significant damage from [a] *water line break, significantly reducing the usable area for ETS' operations. Since then, ETS has primarily provided treatment services on-Site from temporary structures and Mobile Medical Units located in the central courtyard and parking areas (Aspect, 2024).*

Sources of Contamination

The Site contamination is believed to be largely attributable to historical operations of the Western Blower and Northwest EnviroService operations. It is possible that metals and CPAHs in soil could be attributable to historical fill materials placed in the area (soil contamination with metals and CPAHs is common in fill soils in the area). The chlorinated solvents appeared to likely be associated with the sump on the Property (see Figure 3c in Enclosure A).

Physiographic and Topographic Setting

The Site is located in the Seattle, Washington, approximately one mile east of the Duwamish River inlet, approximately 900 feet south of Elliot Bay of Puget Sound, and one mile south of downtown Seattle. The Site is located within the gently undulating glacial terrain of the Puget Lowland Physiographic Province. More locally, the Site is located on the eastern edge of an area of reclaimed land (bay fill) with elevations ranging from 15 to 25 ft above mean sea level (amsl). The slope rises abruptly to the east, to approximately 300 ft amsl about 1,000 feet east of the Site.

Surface/Storm Water

The nearest surface water body is Duwamish River inlet, near its discharge into Elliot Bay, which is approximately one mile west of the Site. Surface elevations at the Property range from 26 to 27 ft amsl on the eastern side of the building, to 24 ft amsl along Airport Way South. Stormwater would flow to the south within Airport Way South, and in the vicinity of the Site, more generally to the west toward Puget Sound.

Ecological Setting

The Site is located within a highly urbanized area near downtown Seattle. However, there is approximately seven acres of open space within 500 feet of the Site. This open space consists of forested areas adjacent to Interstate 5 and on the steeping sloping lands east of Interstate 5. Based on completion of MTCA Table 749-1, the simplified TEE process cannot be ended. However, risk to ecological receptors at the Site appears to be low. The contaminated soil and groundwater area is generally covered by the existing structure and will also continue to be covered by the planned replacement structure. Interstate 5 adjacent to the Site, and the highly urbanized lands in the vicinity of the Site are anticipated to make it unlikely to find wildlife at the Site.

Geology and Hydrogeology

The following Site Geology and Hydrogeology discussion is from the RI/FS/CAP report:

> *Soils observed during field investigations consisted primarily of artificial fill soil overlying native estuarine sediments. The fill material was observed to generally be composed of reworked silty sand with gravel, with artificial debris including shards of glass, bricks, and wood. The observed estuarine sediments were composed of interbedded silty sand, sand with silt, sandy clay, and sand with gravel. Estuarine sediments included some seashell fragments and trace rootlets…*

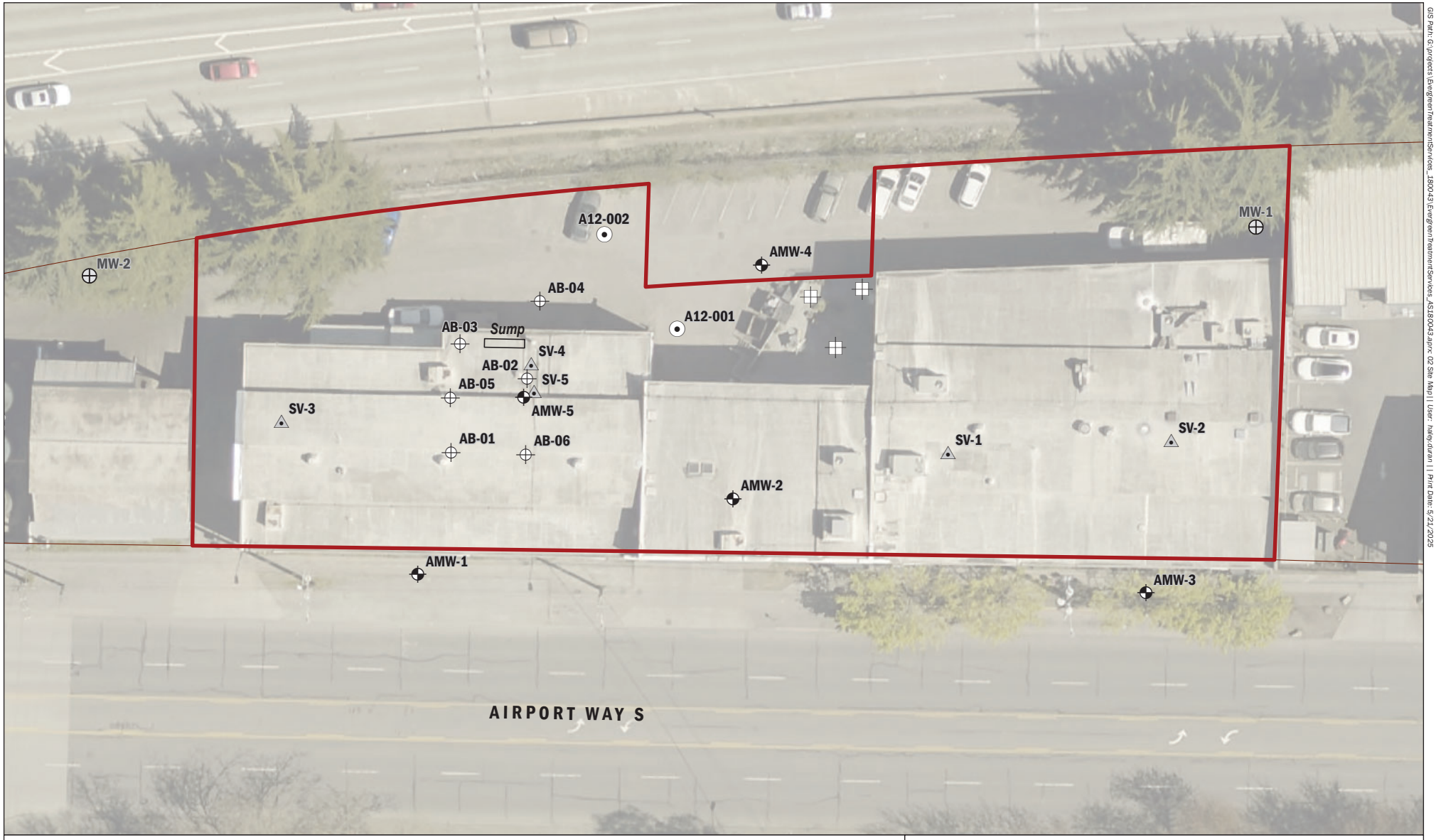
The depth to groundwater at the Site ranged from 0.8 ft bgs to 5.7 bgs (18.1 to 19.7 ft amsl), with most depth to water measurements around 5.0 ft bgs. Based on potentiometric surface maps and surface topography, groundwater flows to the west, towards Puget Sound.

Water Supply

Potable water is provided to the Property by the City of Seatle. No Group A/B wells or wellhead protection zones are found in the vicinity of the Site. Risk to existing water supply wells from the Site appears to be low.

Site Diagrams

Figures from Geosyntec's Remedial Investigation, *Feasibility Study, and Cleanup Action Plan,* dated May 23, 2025.



Remedial Investigation

- Soil Gas Sample Location (Aspect, 2018-2020)
- Groundwater Monitoring Well Location (Aspect, 2018-2024)
- Soil Boring (Aspect, 2024)

Historical Site Closure Sampling

- Concrete Sample Location (NWES, 1995)
- Shallow Soil Sample Location (NWES, 1995)
- Decommissioned Well (NWES, 1995)

Site Feature

- Sump
- Subject Property
- King County Tax Parcel

N

0 20 40 Feet

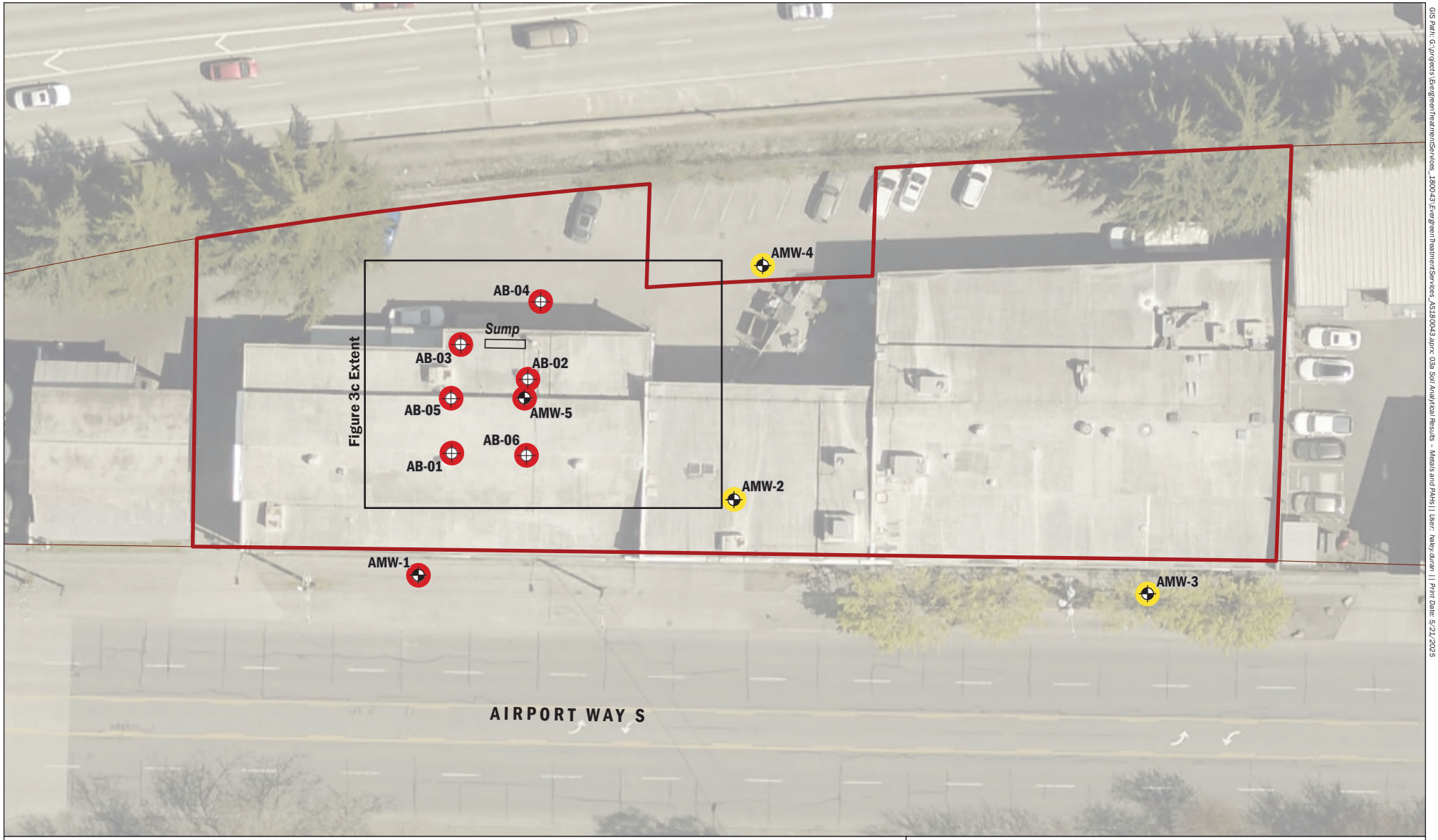
Site Map

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect CONSULTING	MAY-2025	BY: ND / HMD	FIGURE NO. 2
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.

GIS Path: G:\projects\EvergreenTreatmentServices_180043\EvergreenTreatmentServices_AS180043.aprx: 02 Site Map || User: haley.duran || Print Date: 5/21/2025



Remedial Investigation

- Groundwater Monitoring Well Location (Aspect, 2018-2024)
- Soil Boring (Aspect, 2024)

Analytical Results

- One or More Analytes Exceed Screening Level
- One or More Analytes Detected, No Screening Level Exceedance

Site Features

- Sump
- Subject Property
- King County Tax Parcel

N

0 20 40 Feet

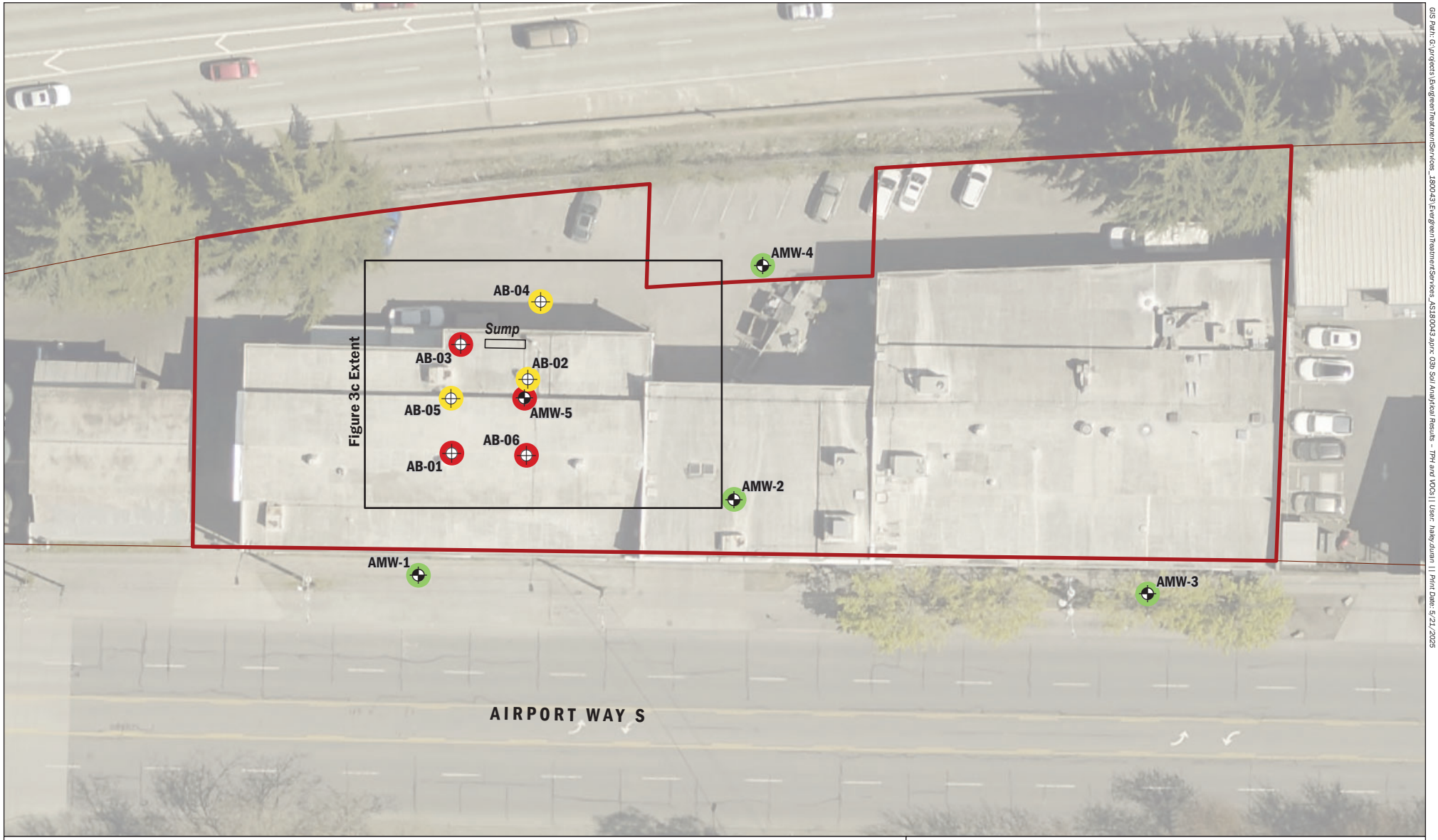
Note:
- Metals = arsenic, cadmium, chromium, lead, and mercury
- PAHs = Polycyclic Aromatic Hydrocarbons
- See Report for details regarding analytes and chosen screening levels.

Soil Analytical Results: Metals and PAHs

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: ND / NLK	FIGURE NO. 3a
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



Remedial Investigation

- Groundwater Monitoring Well Location (Aspect, 2018-2024)
- Soil Boring (Aspect, 2024)

Analytical Results

- One or More Analytes Exceed Screening Level
- One or More Analytes Detected, No Screening Level Exceedance
- No Analytes Detected

Site Features

- Sump
- Subject Property
- King County Tax Parcel

N

0 20 40 Feet

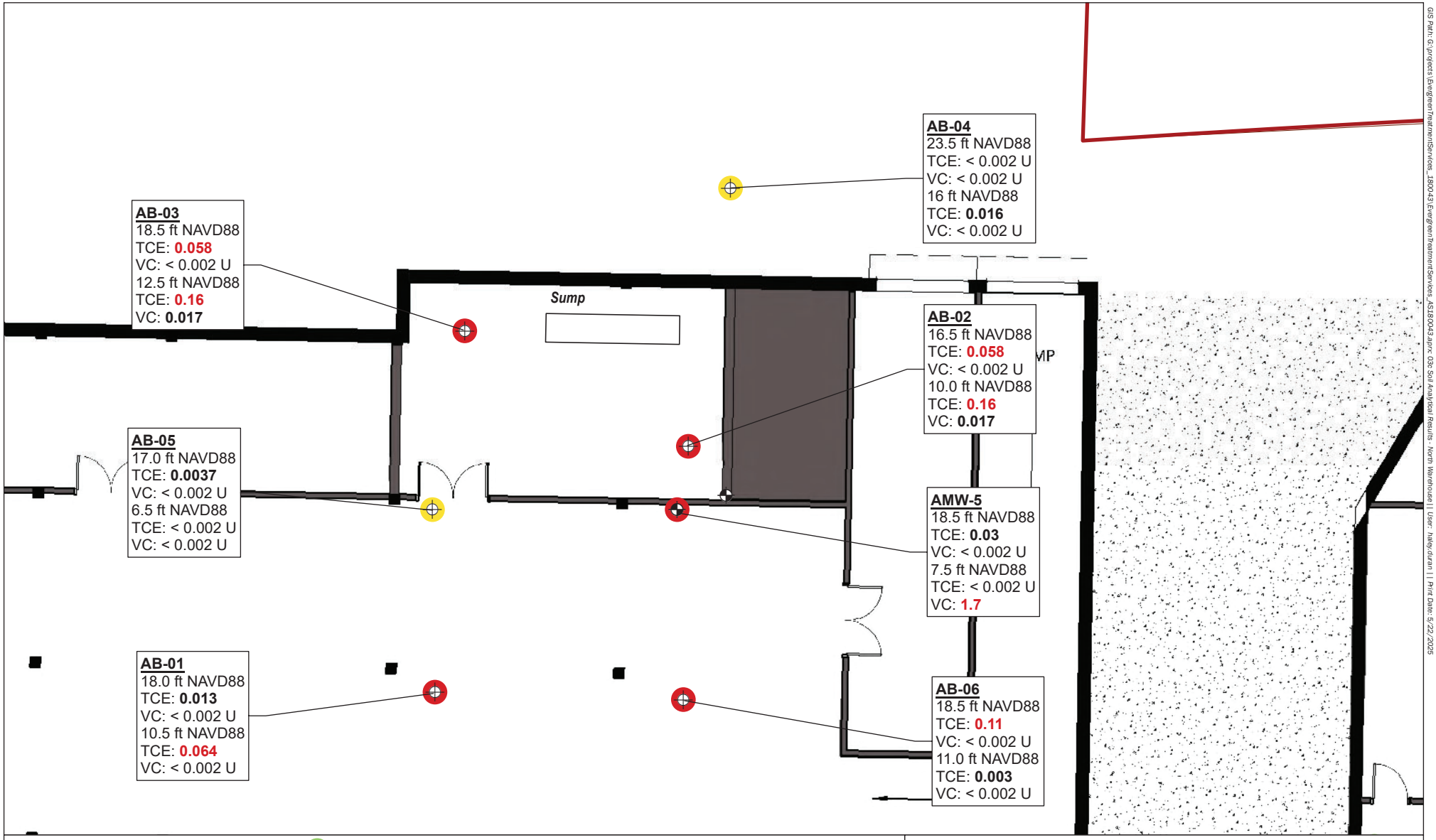
Note:
- TPH = Total Petroleum Hydrocarbons
- VOCs = Volatile Organic Compounds
- See Report for details regarding analytes and chosen screening levels.

Soil Analytical Results: TPH and VOCs

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: ND / NLK	FIGURE NO. 3b
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



Remedial Investigation

- Groundwater Monitoring Well (Aspect, 2018 - 2024)
- Soil Boring (Aspect, 2024)

Analytical Results

- One or More Analytes Exceed Screening Level
- One or More Analytes Detected, No Screening Level Exceedance
- No Analytes Detected

Site Features

- Sump
- Subject Property
- King County Tax Parcel

0 6 12 Feet

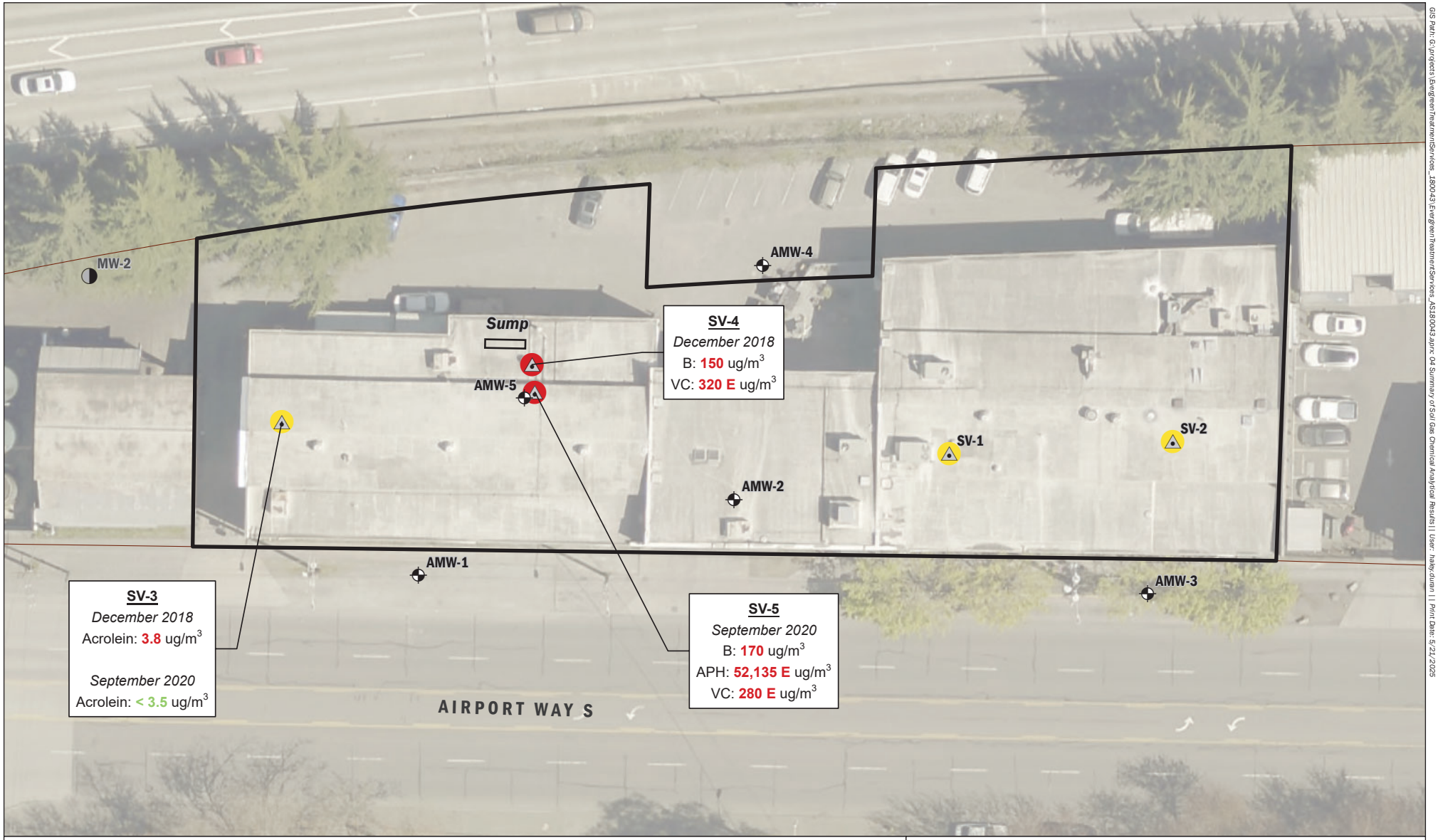
Note:
- VOCs = Volatile Organic Compounds"
- NAVD88 = North American Vertical Datum of 1988. See Report for Elevation details.
- TCE = Trichloroethylene
- VC = Vinyl Chloride
- See Report for details regarding detected analytes and applicable screening levels.
- Basement plan provided by Evergreen Treatment Services, dated January 13, 2023.

Soil Analytical Results: North Warehouse – VOCs

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: ND / NLK	FIGURE NO. 3c
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



Remedial Investigation

- Soil Gas Sample Location (Aspect, 2018-2020)
- Groundwater Monitoring Well Location (Aspect, 2018 - 2024)
- Damaged Monitoring Well

Analytical Results

- One or More Analytes Exceed Screening Level
- One or More Analytes Detected, No Screening Level Exceedance

Site Features

- Sump
- Subject Property
- King County Tax Parcel

N

0 25 50 Feet

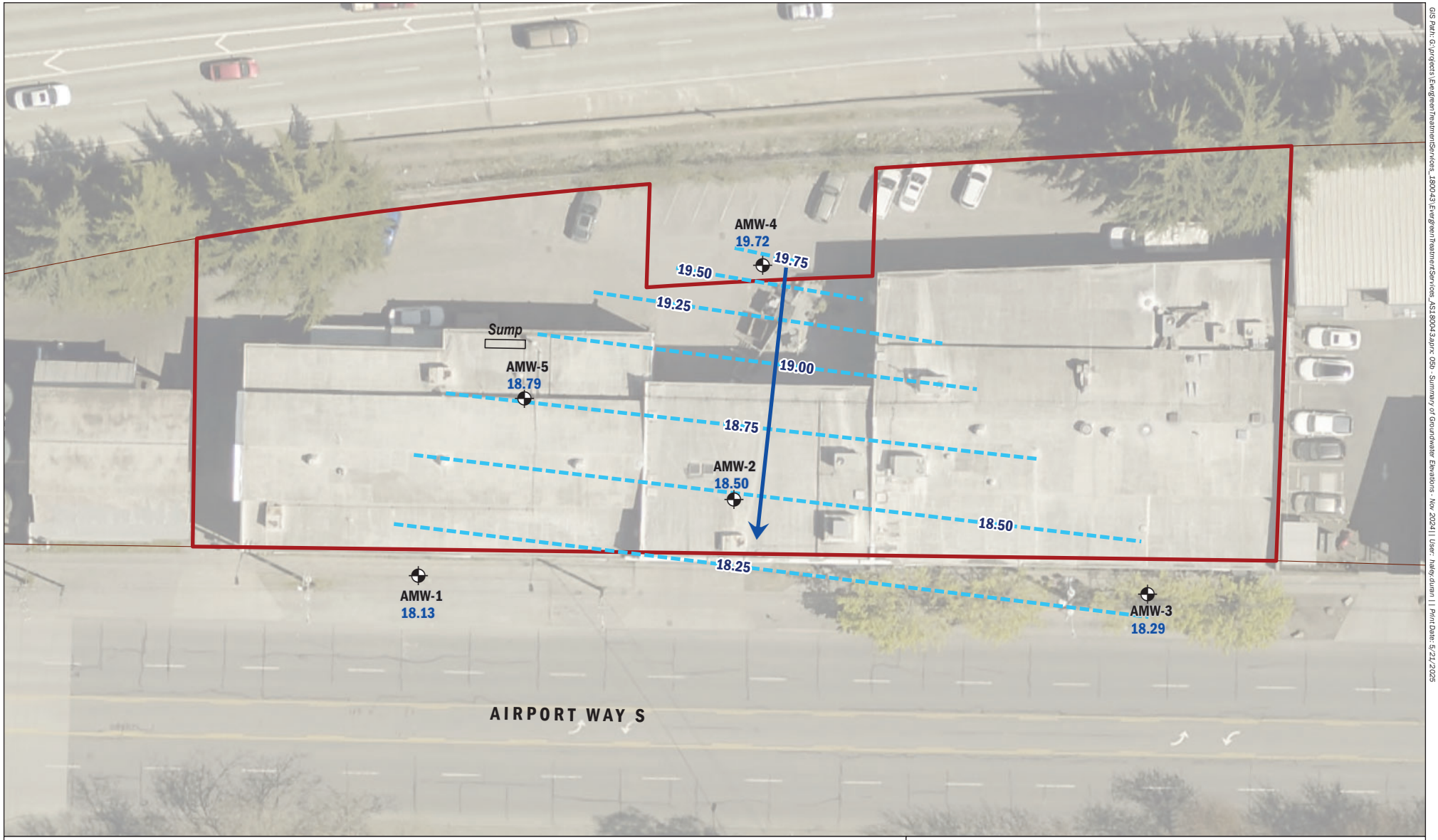
Notes:
- *B: Benzene*
- *APH: Total Petroleum Hydrocarbons*
- *VC: Vinyl Chloride*

Summary of Soil Gas Chemical Analytical Results

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: ND / NLK	FIGURE NO. 4
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: DLC / EAC / SCC || Basemap Service Layer Credits: EagleView Technologies, Inc.



Groundwater Monitoring Well Location (Aspect, 2018 - 2024)

GW Contour

GW Flow Direction

Sump

Subject Property

King County Tax Parcel

AMW-2 (Exploration Number)
18.50 (Groundwater Elevation (ft))

N

0 20 40 Feet

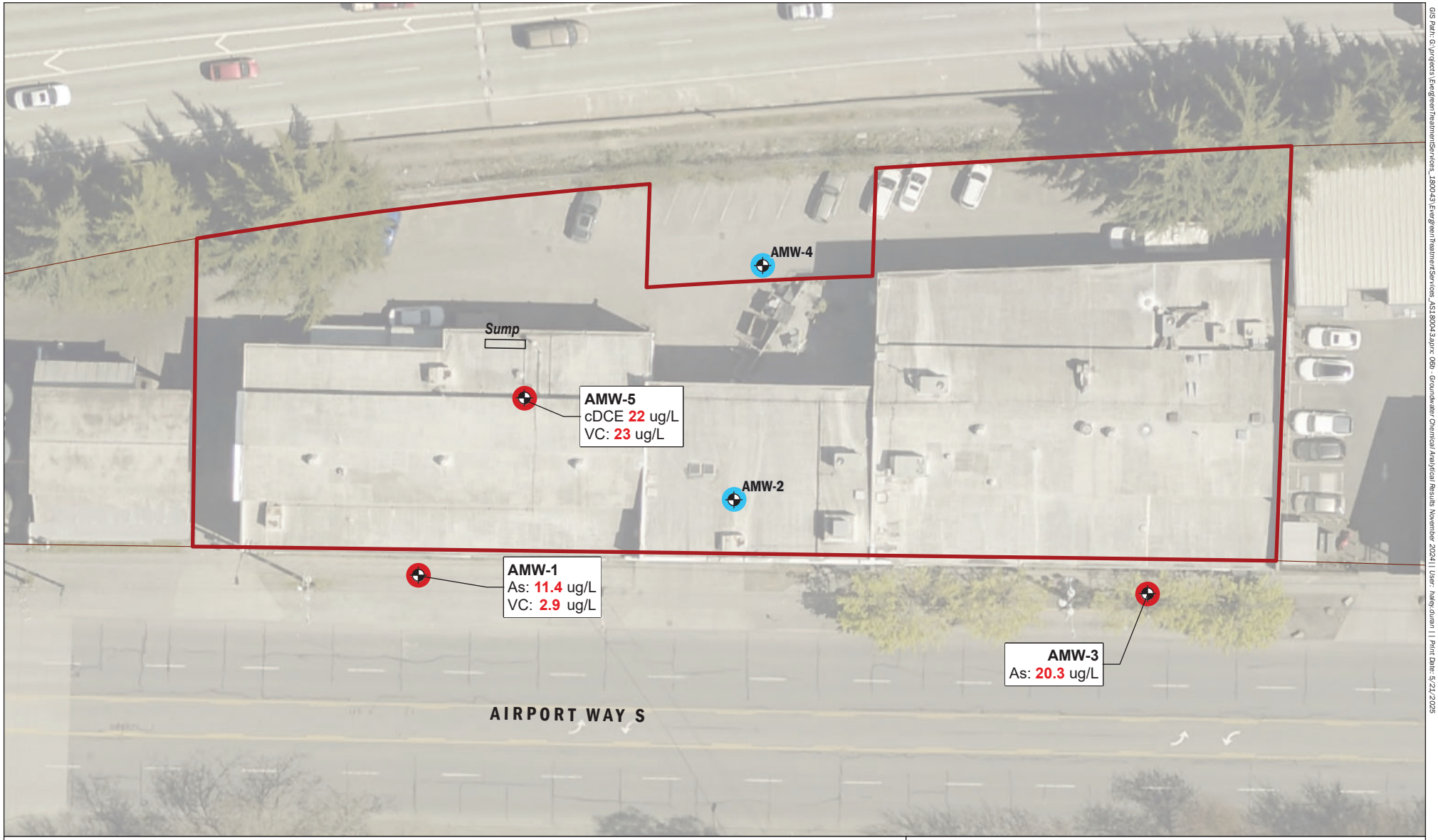
Note: AMW-5 installed in November 2024

Groundwater Elevations November 2024

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect CONSULTING	MAY-2025	BY: ND / NLK	FIGURE NO. 5b
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



Groundwater Monitoring Well Location (Aspect, 2018 - 2024)

One or More Analytes Exceed Screening Level

One or More Analytes Detected, No Screening Level Exceedance

No Analytes Detected

Sump

Subject Property

King County Tax Parcel

N

0 20 40 Feet

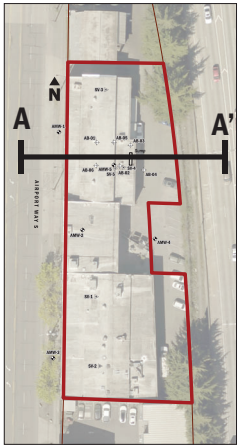
Notes:
Only analytical results which exceed the screening level are displayed.
- As = Dissolved Arsenic
- cDCE = cis-1,2-Dichloroethene
- VC = Vinyl Chloride

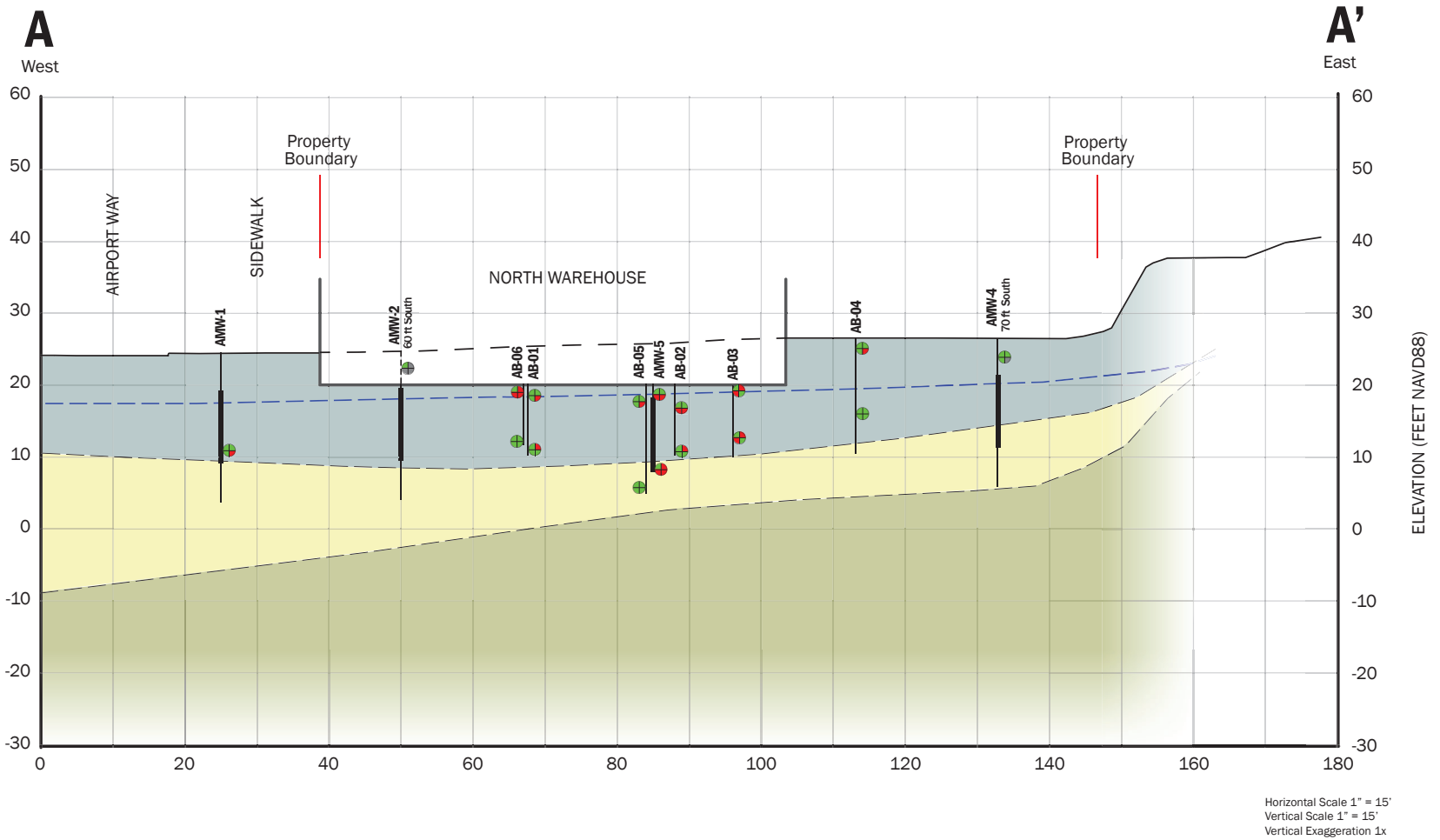
Groundwater Analytical November 2024

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: ND / NLK	FIGURE NO. 6b
	PROJECT NO. AS180043	REVISED BY: WBL	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.





Horizontal Scale 1" = 15'
Vertical Scale 1" = 15'
Vertical Exaggeration 1x

Legend

Lithology Graphics

- Artificial Fill
- Lacustrine Deposits
- Glacial Till

Contacts and Groundwater

- Contact - Known
- Contact - Inferred
- Groundwater - Inferred

Soil Boring and Monitoring Well Key

AMW-1 *Location Name*

Screened Interval (Monitoring Wells)

Select Chemical Analytical Results

Petroleum Hydrocarbons
Chlorinated VOCs
Metals
Polycyclic Aromatic Hydrocarbons

- *Analyte(s) detected in soil at a concentration greater than the MTCA Method A cleanup level*
- *Analyte(s) not detected or detected less than the MTCA Method A cleanup level*
- *Analyte result(s) not reported by laboratory*

Note: Some sample locations omitted for clarity. See Report for detailed results and explanations.

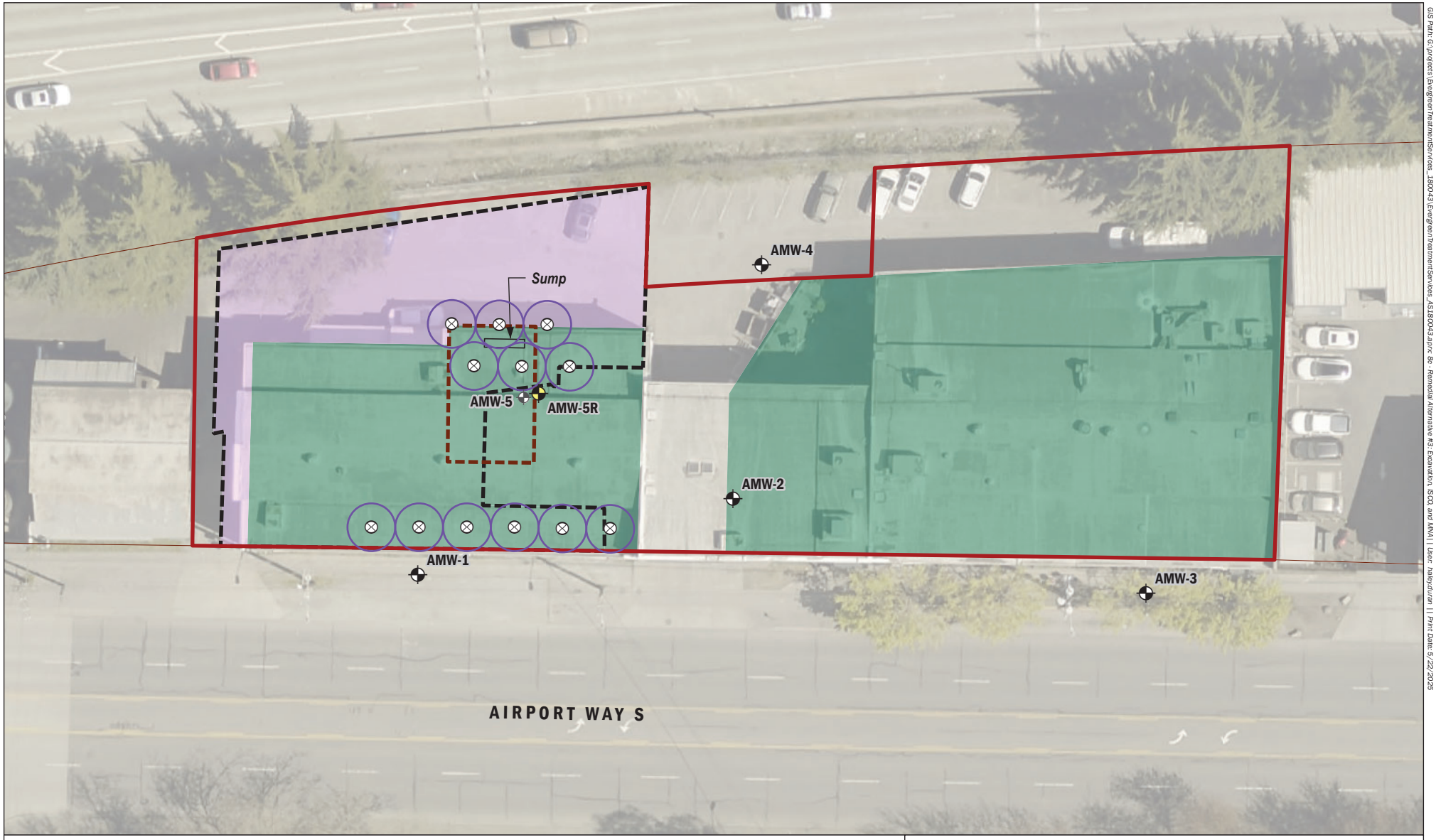
DISCLAIMER: The subsurface conditions presented in this geologic cross section are conceptual. Variations may exist between the soil and groundwater conditions depicted on this figure and those actually underlying the site. Refer to the contents of this report for further context.

Notes:
- Cross section profile based on GeoEngineers (2023), and geologic observations during investigations. See Report for details.
- Site features are approximate.

Cross Section

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
Seattle, Washington

Aspect Consulting	MAY-2025	BY: NWD	FIGURE NO. 7
	PROJECT NO. AS180043	REVISED BY: --	



Groundwater Monitoring Well Location
Replacement Groundwater Monitoring Well
Groundwater Monitoring Well to be Decommissioned
Injection Point
Injection ROI
Subgrade Demolition and Backfill

Extent of Construction Excavation
Extent of New Building
Extent of Remedial Excavation (2 ft bgs)
Sump
Subject Property
King County Tax Parcel

N

0 20 40 Feet

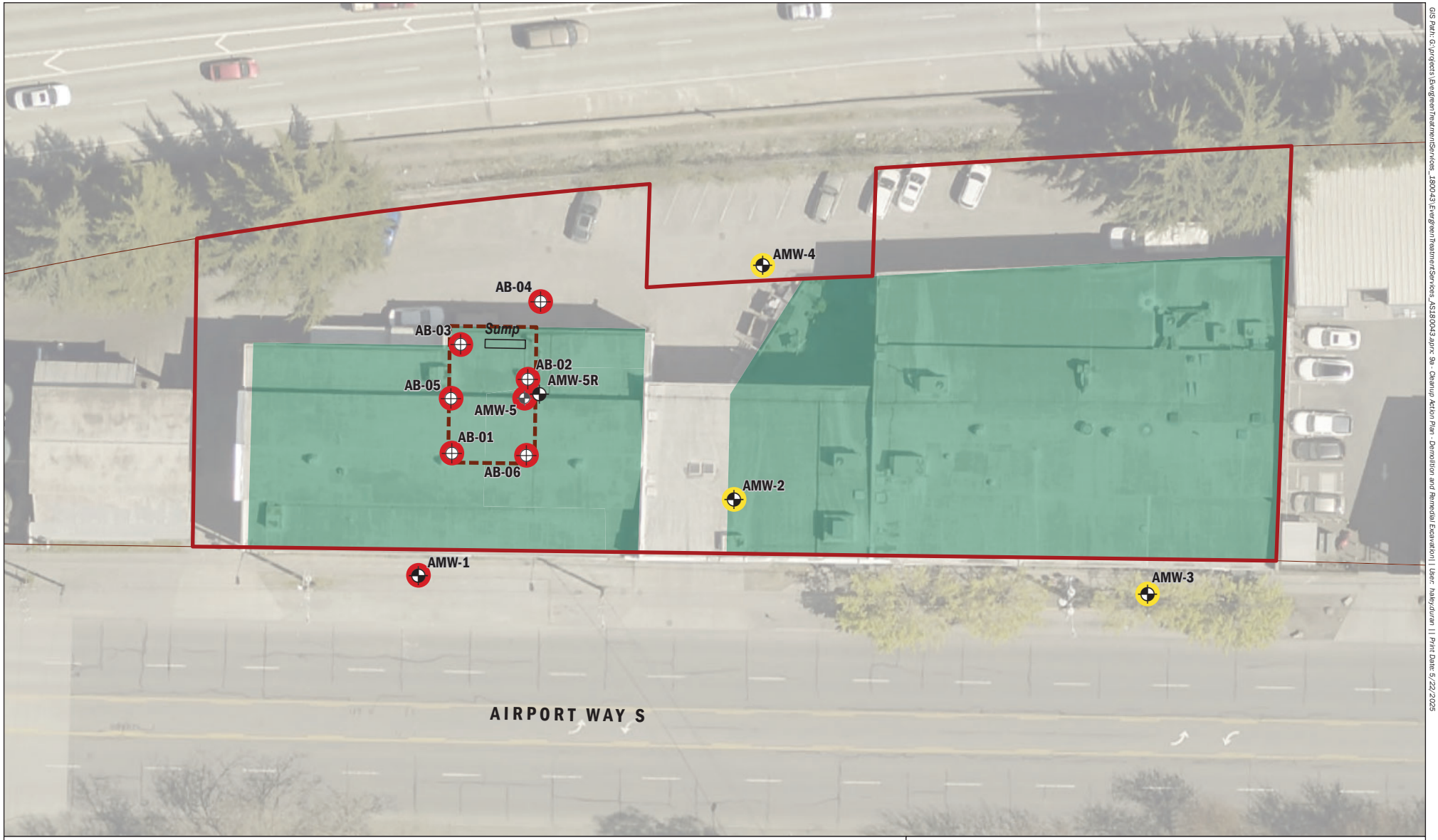
Notes:
- Injection ROI point spacing is 14-feet center to center

Remedial Alternative #3: Excavation, ISCO, and MNA

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: JT / HMD	FIGURE NO. 8c
	PROJECT NO. AS180043	REVISED BY: ---/---	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



- Soil Boring
- Groundwater Monitoring Well Location
- Groundwater Monitoring Well to be Decomissioned
- One or More Analytes Exceed Screening Level
- One or More Analytes Detected, No Screening Level Exceedance
- Subgrade Demolition Area
- Extent of Remedial Excavation (2 ft bgs)
- Sump
- King County Tax Parcel
- Subject Property

N

0 20 40 Feet

Notes:
Screened analytes include arsenic, cadmium, chromium, lead, mercury, polycyclic aromatic hydrocarbons, total petroleum hydrocarbons, and volatile organic compounds - See Report for details regarding analytes and chosen screening levels.

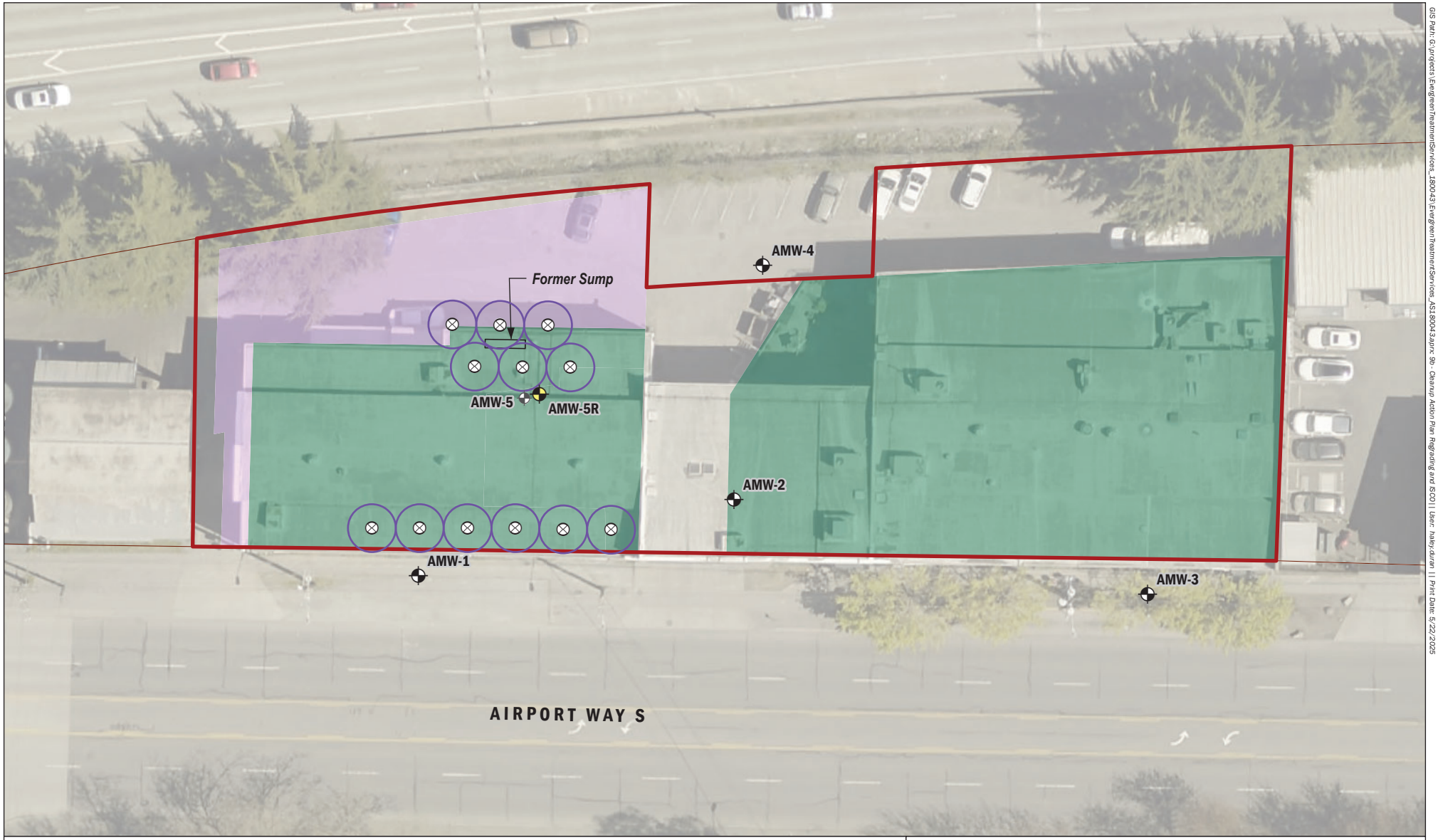
Cleanup Action Plan
Demolition and Remedial Excavation

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: JT / HMD	FIGURE NO. 9a
	PROJECT NO. AS180043	REVISED BY: ---/---	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.

GIS Path: G:\projects\EvergreenTreatmentServices_180043\EvergreenTreatmentServices_AS180043.aprx: 9a - Cleanup Action Plan - Demolition and Remedial Excavation|| User: haleyduran || Print Date: 5/22/2025



- Groundwater Monitoring Well Location
- Replacement Groundwater Monitoring Well
- Groundwater Monitoring Well to be Decommissioned
- ISCO Injection Point
- Injection ROI
- Sump
- Subject Property
- King County Tax Parcel

Regrading Areas

- Fill
- Excavation

N

0 20 40 Feet

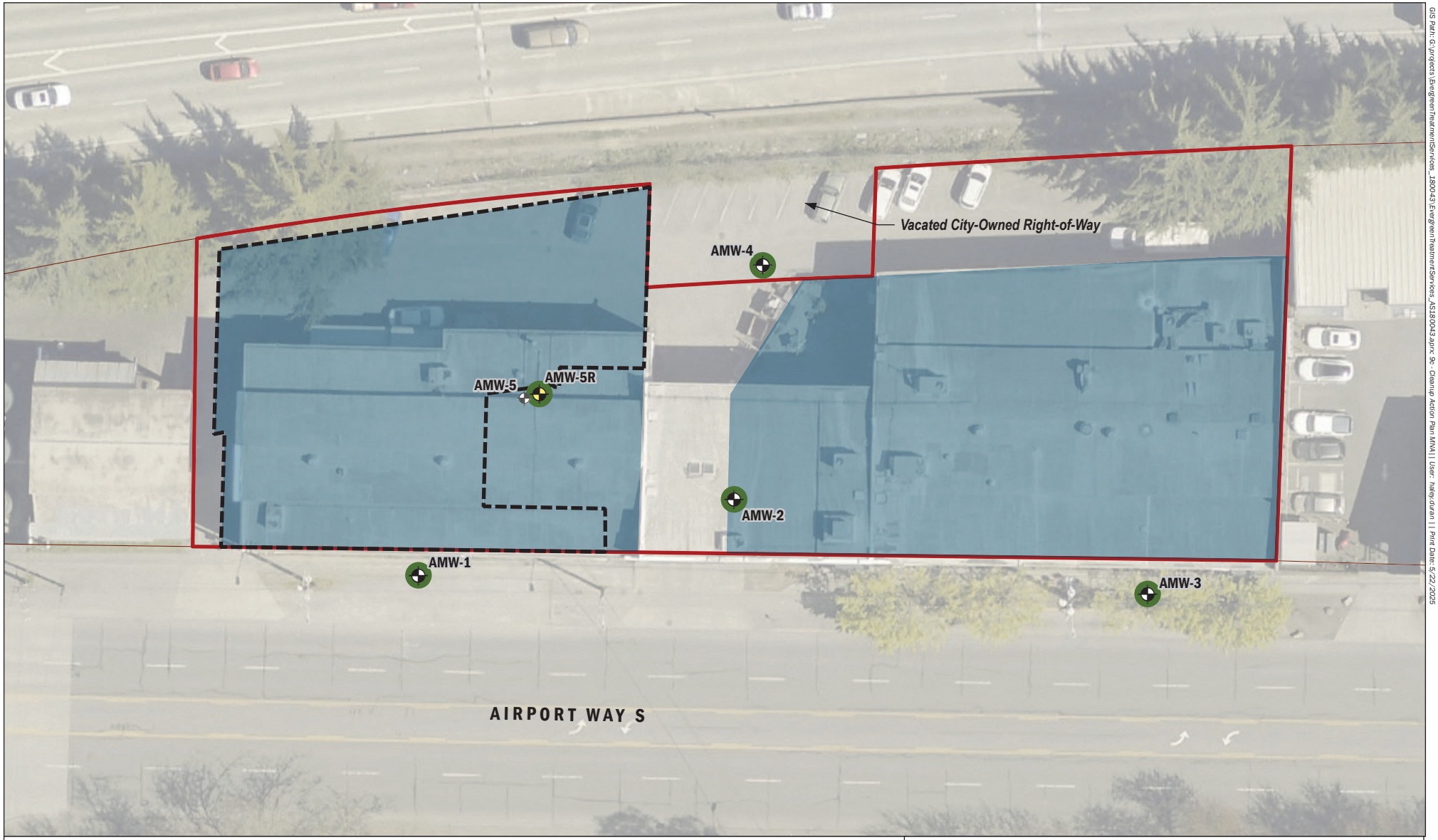
Notes:
- ISCO = In Situ Chemical Oxidation
- Injection ROI point spacing is 14-feet center to center

Cleanup Action Plan: Regrading and ISCO

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: JT / HMD	FIGURE NO. 9b
	PROJECT NO. AS180043	REVISED BY: ---/---	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.



- Groundwater Monitoring Well Location
- Replacement Groundwater Monitoring Well
- Groundwater Monitoring Well to be Decommissioned
- Groundwater MNA Wells
- Extent of New Building
- Extent of New Hardscape
- Subject Property
- King County Tax Parcel

N

0 20 40 Feet

Notes:
- AMW-5 to be replaced during construction of New Building
- Quarterly groundwater monitoring for years 1-2
- Semiannual groundwater monitoring for years 3-5

Cleanup Action Plan: MNA

Remedial Investigation, Feasibility Study, and Cleanup Action Plan
Evergreen Treatment Services
1700 Airport Way South
Seattle, Washington

Aspect Consulting	MAY-2025	BY: JT / HMD	FIGURE NO. 9c
	PROJECT NO. AS180043	REVISED BY: ---/---	

Data source credits: None || Basemap Service Layer Credits: EagleView Technologies, Inc.

Enclosure B

Basis for the Opinion: Documents List

Documents List

1. Aspect. Contaminated Media Management Plan, 1700 Airport Way South, Seattle, Washington. May 30, 2025.
2. Aspect. *Remedial Investigation, Feasibility Study, and Cleanup Action Plan, 1700 Airport Way South,* Seattle, Washington. May 23, 2025.
3. Aspect. *Subsurface Investigation Report, 1700 Airport Way South,* Seattle, Washington. April 18, 2025.
4. Aspect. Phase I Environmental Site Assessment, 1700 Airport Way South, Seattle, Washington. November 25, 2024.
5. Emerald Treatment Services. Letter to Washington Department of Ecology re Change of Use Notification – 1700 Airport Way South. August 1, 2024.
6. GeoEngineers. *Geotechnical Mater Use Permit (MUP) Report, Seattle Clinic Renovation*. August 16, 2023.
7. Aspect. Phase I Environmental Site Assessment, 1700 Airport Way South, Seattle, Washington. April 6, 2021.
8. Aspect. Phase II Environmental Site Assessment, 1700 Airport Way South, Seattle, Washington. February 21, 2019.
9. Department of Ecology. *Environmental Restrictive Covenant, Western Blower Associates, LLC, Tax Parcel 766620-2855-08*. Recorded December 27, 2017.
10. CH2MHill. *RCRA Interim Status Closure Plan, 1500 Airport Way South Facility*. Revised May 2016.
11. CH2MHill. *Technical Memorandum - Emerald Services Airport Way South Facility May 17, 2012, Diesel Release Summary*. July 19, 2012.
12. Ecology. *Review of Soil Data dated August 5, 1996, for the Northwest EnviroService Inc. Western Blower Property Area*. January 30, 1997.
13. U.S.EPA. *Northwest EnviroService Inc., Western Blower Property, RCRA Closure Sampling Results*. August 5, 1996.
14. U.S.EPA. *Interim Status Closure Plan, Western Blower Property, Northwest EnviroService Inc., 1700 Airport Way South*. July 1995.