October 17, 2025

Jing Song, LG, LHG
Voluntary Cleanup Program
WA Department of Ecology, Northwest Region
15700 Dayton Avenue North
Shoreline, Washington 98133

Re: NW3443 - Lou Herron & Co Cleaners Cleanup
1900 East Aloha Street
Seattle, Washington 98112

Dear Jing Song:

On behalf of East Aloha LLC, the Subject Property Owner, and myself, we look forward to collaborating with you on this VCP project.

We are seeking to receive a No Further Action with Covenant for the NW3443 - Lou Herron & Co Cleaners Cleanup site.

We have prepared the enclosed Summary of Findings for the three past site environmental assessments.

Based on our understanding of the Subject Property's environmental conditions, we feel that the solvent release to the 1900 East Aloha Street building subsurface is limited to the building footprint. We request Ecology VCP, based on their review and understanding of the documented Subject Property subsurface conditions, provide their recommendations on testing to fill any data gaps Ecology VCP considers necessary to adequately characterize environmental conditions within the Subject Property.

We look forward to your recommendations.

Regards,

Miguel A. Ortega, L.G.
Principal, Geologist
GO Spectrum NW

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Summary of Three Investigations

These documents contain environmental investigation results for a property at 1900 East Aloha Street in Seattle, Washington.

The key findings are:

Primary Concern: A former dry-cleaning facility operated at 1900 East Aloha Street from 1939-1975, resulting in subsurface contamination from tetrachloroethene (PCE), a common dry-cleaning solvent.

Key Findings:

- **Soil contamination:** PCE detected below regulatory cleanup levels.
- **Soil gas contamination:** PCE detected at concentrations **exceeding** screening levels beneath the 1900 building.
- **Indoor air:** PCE detected at concentrations **below** screening levels, indicating no immediate health risk to building occupants.
- **Adjacent buildings (1902 & 1906):** Lower contamination levels; no immediate vapor intrusion risk.

Current Status: While elevated PCE is present in soil gas beneath the 1900 building, indoor air testing shows concentrations are currently below health-based screening levels for commercial workers. Additional monitoring is recommended.

Detailed Breakdown by Individual Site Assessment Reports

Phase II Subsurface Investigation Report (September 2023)

Investigator: Partner Engineering and Science, Inc.

Purpose and Background

- Investigation of historical dry-cleaning operations (1939-1975).
- Two dry cleaning businesses operated at the site: Herron Lou & Co. Cleaners and Aaron's Dry Cleaners Plant.
- Dry cleaning facilities commonly release chlorinated solvents through floor drains and cracked concrete.

Field Activities

- **Three soil (B1, B2, B3) borings** advanced to five feet below ground surface (BGS).
- Locations: North, central, and south portions of former dry-cleaning facility.
- Collected soil samples and soil gas samples.
- No groundwater encountered to five feet BGS

Results - Soil Samples

- PCE was detected in all three samples.
- **All concentrations are below MTCA cleanup levels**.
- **Highest: 0.0335 mg/kg (well below 480 mg/kg limit).**

Results - Soil Gas Samples

- **PCE detected above screening levels in all three samples:**
  - B1 (north): 8,890 µg/m³.
  - B2 (central): 4,870 µg/m³.
  - B3 (south): 3,250 µg/m³.

  Screening level: 320-610 µg/m³.
- TCE also detected in B1 at low levels.

Conclusions

- Subsurface impacted by former dry-cleaning operations.

Vapor Intrusion Assessment Report (December 2023).

Investigator: SoundEarth Strategies, Inc.

Purpose follow-up investigation to:

1. Confirm initial soil gas findings with improved sampling methods.
2. Assess indoor air quality.
3. Evaluate vapor intrusion risk to building occupants.

Sub-Slab Soil Gas Sampling (October 2023)

Improved methodology: Addressed previous data quality concerns.

- Three samples collected directly beneath concrete slab (SS01, SS02, SS03).

Results - Sub-Slab Soil Gas

- **PCE exceeds commercial worker screening level (1,500 µg/m³)**
  - SS01 (north): 1,600 µg/m³.
  - SS02 (central): 1,800 µg/m³.
  - SS03 (south): 2,600 µg/m³.
- Concentrations significantly lower than initial investigation (due to sampling directly beneath slab vs. at 5 feet BGS).

Indoor Air Sampling (November 2023)

Critical findings:

- Three indoor air samples collected.
- One outdoor ambient air sample for comparison.
- **PCE detected in only one indoor sample (IA02), and at a concentration of 11 µg/m³.**
- **This sample is below the screening level of 45 µg/m³.**
- PCE not detected in other indoor or outdoor samples.

Key Conclusions

- Elevated PCE in soil gas beneath building confirmed.
- **Indoor air quality is currently acceptable** for commercial workers.
- Attenuation occurring as vapors migrate through soil.

Investigator: SoundEarth Strategies, Inc.

Purpose: Evaluate vapor intrusion risk in adjacent buildings (1902 and 1906 East Aloha) Investigation Activities (November 2024)

1902 East Aloha Building (Owner Residence with Basement)

- Three sub-slab soil gas samples from basement (SS04, SS05, SS06).
- **Results - All below screening levels:**
    - SS04: 130 µg/m³.
    - SS05: 310 µg/m³.
    - SS06: 67 µg/m³.

  (Screening level: 1,500 µg/m³).
- **No indoor air sampling needed.**

1906 East Aloha Building (with Crawlspace)

- Two crawlspace air samples (CS01, CS02).
- One outdoor air sample (OA01).
- **Results:**
    - PCE not detected.
    - TCE: 0.13 µg/m³ (below 2.9 µg/m³ screening level).
- **No indoor air sampling needed.**

Overall Conclusions (2024)

- **No vapor intrusion risk** to buildings in 1902 and 1906 East Aloha.
- **1900 building remains acceptable** under current use.

Key Regulatory Standards Referenced

MTCA (Model Toxics Control Act) - Washington State cleanup standards

- **Method A:** Unrestricted land use standards.
- **Method B:** Risk-based standards for specific land uses.
- **Commercial Worker Standards:** Assume 9 hours/day, 5 days/week exposure.

Screening Levels Applied:

- Soil gas (commercial): 1,500 µg/m³ for PCE.
- Indoor air (commercial): 45 µg/m³ for PCE.

Site Details

Property: 0.10 acres, three buildings constructed 1911-1930s.

- **1900 East Aloha:** Seatown Pottery (slab-on-grade) - **Source of solvents.**
- **1902 East Aloha:** Vacant (with basement).
- **1906 East Aloha:** Lonely Eagle, Inc. (with crawlspace).

Geology: Medium-fine sand to 5 feet depth

Summary Recommendations

- **Continued occupancy** - Current indoor air is protective of worker health.
- **Consider long-term monitoring** if property use changes or concerns arise.
- **Risk Level:** Low to moderate for current commercial use; protective measures in place through ongoing monitoring.