

Seeds, Tena (ECY)

From: Seeds, Tena (ECY)
Sent: Tuesday, October 28, 2025 9:12 AM
To: 'Lea Kane'
Cc: John Moshy; Melissa Asher; Hannah Cohen
Subject: RE: 700 Dexter - IAWP Location Changes

Hi Lea,

Thanks for sending this information to document the necessary changes. Ecology approves of these changes. Please let me know when the permit is received from SDOT and when you anticipate starting the field work after that. Do you need a formal letter, or will this email reply suffice?

Tena

From: Lea Kane <Lea.Kane@Geosyntec.com>
Sent: Tuesday, October 28, 2025 8:51 AM
To: Seeds, Tena (ECY) <TSEE461@ECY.WA.GOV>
Cc: John Moshy <john.moshy@biomedrealty.com>; Melissa Asher <MAsher@Geosyntec.com>; Hannah Cohen <Hannah.Cohen@Geosyntec.com>
Subject: 700 Dexter - IAWP Location Changes

External Email

Hi Tena,

As we discussed on our call on October 14, 2025, we will need to make two adjustments to the IAWP Addendum #3 Phase 1 injection implemental plans to meet SDOT permitting requirements and avoid underground and overhead utilities. The Phase 1 injections were described in the IAWP Addendum #3 dated August 13, 2025 and approved by Ecology on August 15, 2025. The changes are outlined below, and overall, do not impact our ability to meet the Phase 1 objectives and target the needed areas offsite.

Planned changes:

1. Shift the transect of injection wells (or well pairs) from the western 9th Ave N sidewalk due east into the rightmost southbound drive lane of 9th Ave N (approximately 12 feet away). This change is depicted on the attached draft Permit Plans showing the new proposed locations and underground utilities in the vicinity. The wells impacted by this change are listed in the Proposed Well Construction Details table from the IAWP Addendum #3.

These wells need to be moved for the following reasons:

- The original locations in the sidewalk of 9th Ave are not feasible because there are numerous underground utilities and sidewalk features (such as trees) that prohibit installation of most of the wells in the original proposed locations.
- The property owner of Block 79E (adjacent to the 9th Ave sidewalk) requested we maintain a 5-foot clearance from the eastern B79 property boundary, limiting the area of the sidewalk where we could install wells to a narrow strip along the eastern part of the sidewalk. This is also where the majority of the underground utilities are located.

The new proposed locations in the drive lane of 9th Ave N will still allow us to achieve our treatment goals in the area. Moving the wells in the 9th Ave transect slightly east should still accomplish the goal of substantially reducing concentrations of CVOCs. Performance monitoring wells will still be within the design theoretical radius of influence of the injection points, so amendment distribution and delivery can be monitored during the injections, as well as ongoing treatment of CVOCs during subsequent sampling events.

2. Remove Intermediate B Zone injection well DIA-18 from the Alley alignment. After reviewing underground and overhead utility locations in the Alley, we could not identify a location for DIA-18 that did not conflict with one or more utilities and moving this well out of the utility area would then put it in close proximity of one of the adjacent locations, leaving a gap in the Intermediate B Zone injection transect.
 - In order to make up for the loss of this treatment location, we propose to shift the adjacent well pairs (DIA-16/17 and DIA-19/20) towards the former DIA-18 location by approximately 3-4 feet, elongate the screen of adjacent well DIA-14 by 5 feet, shift the DIA-16 well screen up approximately 5 feet as shown in the attached figure, and inject the reagent volume planned in the design for DIA-18 into adjacent Intermediate B Zone wells DIA-16 and DIA-19.
 - Treatment goals will still be met by making these adjustments near DIA-18. By moving DIA-16 and DIA-19 a few feet inward to make up the difference in the gap left by DIA-18 and increasing the injection volume in DIA-16 and DIA-19 by 50%, the radius of influence of the injections into DIA-16 and DIA-19 will increase and still provide coverage of the planned injection transect.
 - The location adjustments for DIA-16 and DIA-19 will not impact their respective collocated Deep Zone wells, DIA-17 and DIA-20. These Deep Zone wells will be sampled during the IAWP#3 implementation to collect additional data about the extent of the plume and current geochemical conditions. The data collection goals will still be achieved and will not be affected by the slight change in location.

Please let us know by Tuesday, November 4th if these adjustments are acceptable or if you have any additional questions. To stay on schedule to begin field implementation in December, we submitted our final changes to SDOT last week, and would appreciate Ecology's written concurrence on the injection locations while the final permit package is under review. In addition to this email, these changes will be documented in the Phase I Technical Memorandum following the completion of the Phase I scope.

Thank you!

Lea Kane, PG, LG (CA,WA)

(she/her)

Principal Geologist

Geosyntec Consultants, Inc.

801 5th Ave, Suite 2200

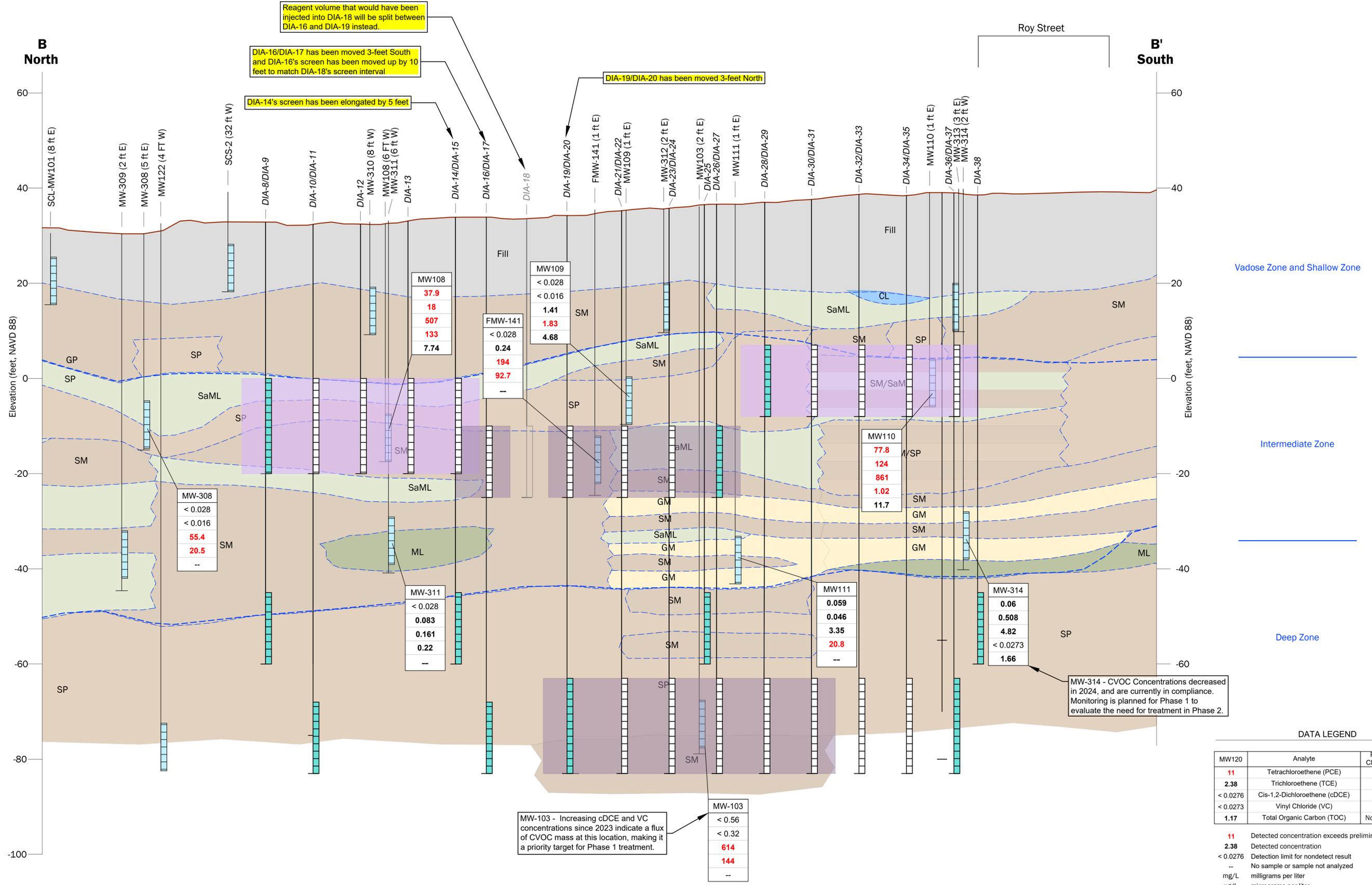
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Reagent volume that would have been injected into DIA-18 will be split between DIA-16 and DIA-19 instead.

DIA-16/DIA-17 has been moved 3-feet South and DIA-16's screen has been moved up by 10 feet to match DIA-18's screen interval.

DIA-19/DIA-20 has been moved 3-feet North

DIA-14's screen has been elongated by 5 feet

Roy Street

B
North

B'
South

Elevation (feet, NAVD 88)

Elevation (feet, NAVD 88)

Vadose Zone and Shallow Zone

Intermediate Zone

Deep Zone

MW-308

< 0.028
< 0.016
55.4
20.5
--

MW-311

< 0.028
0.083
0.161
0.22
--

MW108

37.9
18
507
133
7.74

FMW-141

< 0.028
0.24
194
92.7
--

MW109

< 0.028
< 0.016
1.41
1.83
4.68

MW110

77.8
124
861
1.02
11.7

MW111

0.059
0.046
3.35
20.8
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MW-314

0.06
0.508
4.82
< 0.0273
1.66

MW-103 - Increasing cDCE and VC concentrations since 2023 indicate a flux of CVOC mass at this location, making it a priority target for Phase 1 treatment.

MW-314 - CVOC Concentrations decreased in 2024, and are currently in compliance. Monitoring is planned for Phase 1 to evaluate the need for treatment in Phase 2.

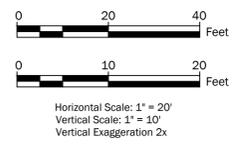
DATA LEGEND

MW120	Analyte	Preliminary Cleanup Level	Units
11	Tetrachloroethene (PCE)	5	µg/L
2.38	Trichloroethene (TCE)	4	µg/L
< 0.0276	Cis-1,2-Dichloroethene (cDCE)	16	µg/L
< 0.0273	Vinyl Chloride (VC)	0.29	µg/L
1.17	Total Organic Carbon (TOC)	Not Applicable	mg/L

- 11 Detected concentration exceeds preliminary cleanup level
- 2.38 Detected concentration
- < 0.0276 Detection limit for nondetect result
- No sample or sample not analyzed
- mg/L milligrams per liter
- µg/L micrograms per liter

LEGEND

<ul style="list-style-type: none"> Fill (GP) Poorly Graded Gravel (SP) Poorly Graded Sand (GM) Silty Gravel (SM) Silty Sand (SL) Sandy Silt (ML) Silt with or without sand and gravel (SC) Sandy Clay (CL) Clay with or without sand and gravel (PT) Peat 	<ul style="list-style-type: none"> ○ Approximate Sewer Pipe Location — Approximate Ground Surface Elevation --- Water Bearing Zone Boundary — Boring ID and Offset ▼ Depth to Groundwater (6/7/2021) Estimated Soil Lithology Change Screened Interval 	<ul style="list-style-type: none"> — Proposed DIA Injection Well to be Installed — Proposed DIA Injection Well to be Installed and Sampled — Injection Well NOT to be Installed 	<p>RADIUS OF INJECTION</p> <ul style="list-style-type: none"> — Lactate Injection — EVO Injection — EVO/ZVI Injection
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DRAFT

IA Expansion Phase 1 Layout B-B' (Alley)

Interim Action Work Plan Addendum #3
American Linen Site
Seattle, Washington

	Oct-2025 ALC/CMV 240461	FIGURE NO. 15
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Source: P&S Environmental, Inc. Geologic Cross Section Showing Soil and Groundwater VOCs Along the Alley, Drawing Number 14130010605_JAA_10-12, Dated 9/24.

CAD FILE: \\ASPECT\ASPECT\Users\BIBAR\Projects\IA Expansion Phase 1 Layout B-B' (Alley)\14130010605_JAA_10-12.dwg
 PLOT DATE: 10/15/2025 3:35:58 PM
 USER: bibar@aspect.com

