

Memorandum

To: Brett Carp, Washington State Department of Ecology

Copies: Christina Kapoi, Seattle Public Utilities

From: Kristin Anderson, Floyd|Snider

Date: April 23, 2026

Project ID: Silver Bay Logging Site, Facility/Site ID #16139, Cleanup Site ID #12300

Re: Field Investigation Plan for Upgradient Groundwater PCE

This memorandum is presented on behalf of Seattle Public Utilities (SPU), the current owner of the properties located at 816 and 836 S Kenyon Street, 803 and 811 S Chicago Street, and 7760 8th Avenue S in Seattle, Washington, which constitute the majority of the uplands of the Silver Bay Logging/Independent Metals Plant 2 Site (Site). SPU has entered into Agreed Order (AO) No. DE 21418 with the Washington State Department of Ecology (Ecology) to perform Site characterization and remediation.

The findings of remedial investigation completed by SPU in accordance with the AO in 2024 to 2025 indicated the presence of tetrachloroethylene (PCE) in groundwater attributed to a source located in the generally upgradient direction to the south-southwest. Maps showing PCE distribution in the available Site groundwater dataset during March 2025 and September 2025 (wet and dry season, respectively) sampling events are included for reference (refer to Figure 1 and Figure 2). Per Ecology email direction to SPU on February 17, 2026 (Carp 2026):

“Given the known distribution of PCE in groundwater, Ecology will require two additional reconnaissance groundwater samples be collected during pre-remedial design. That effort is not expected to delay completion of the RI, FS, or CAP. Approximate locations are shown on the attached figure. Reconnaissance groundwater samples from these locations, analyzed for VOCs by EPA Method 8260C, will both inform the remedy design for the Site and support further assessment of the up-gradient source thereby allowing Ecology to evaluate if a new Site needs to be listed.”

This memorandum presents a plan for field investigation to perform PCE delineation at the Site, for the purposes of informing remedial design and further assessing the source(s) of upgradient PCE, as directed by Ecology.

INVESTIGATION LOCATIONS

Two target investigation areas for upgradient groundwater PCE were specified in a map markup provided via email by Ecology. After further assessment by SPU of area utilities and other access constraints for subsurface drilling, boring locations were selected within the Ecology-directed areas. Groundwater sample locations are shown on the appended Ecology-provided map, which is presented as Figure 3. The two proposed locations are designated MW-24 and MW-25. Final drilled locations may be adjusted after field utility location; however, the final locations will be located within the general Ecology-directed target areas.

INVESTIGATION SCOPE

The additional investigation is intended to inform remedy design for the Site and provide further information to Ecology regarding the source and distribution of upgradient PCE. To meet these goals, borings MW-24 and MW-25 will be advanced using direct-push methodology to a depth of 20 feet below ground surface (bgs). Recovered soils will be logged and field screened for indications of contamination in accordance with the approved Site Remedial Investigation (RI)/Feasibility Study (FS) Work Plan (Floyd|Snider 2023). If field indications of contamination such as odors or elevated headspace volatiles measured using a photoionization detector (PID) are encountered at the target depth, the boring will be advanced further until PID readings are within 0.2 parts per million by volume of ambient background concentrations.

SOIL SAMPLE COLLECTION

Samples will be collected from the recovered soils for analysis of volatile organic compounds (VOCs) in accordance with the RI/FS Work Plan. Samples will be collected from the material with the greatest field indications of contamination, if observed, within each interval targeted for characterization. Samples will be collected from at least four intervals at each location, including the following:

- Vadose zone (one sample above approximately 5 feet bgs)
- Capillary fringe/water table interval (one sample, anticipated to be between 5 and 7 feet bgs)
- Saturated zone (two samples between approximately 7 and 15 feet bgs)
- Additional intervals of interest, if identified by field screening

GROUNDWATER SAMPLE COLLECTION

Groundwater samples will be collected at each location by installing a 10-foot-long by 2-inch-diameter, pre-packed polyvinyl chloride (PVC) screen within the soil boring annulus. The screened interval will be determined based on the observed occurrence of saturated soil in the field, with the screen set to intercept the shallow groundwater zone consistent with the most elevated detections of PCE in the existing Site groundwater dataset. The well will be constructed

and completed with a flush-mounted monument in accordance with Ecology regulation for resource protection wells (WAC 173-360 Part Two).

The well screen will be developed in accordance with the procedures in the RI/FS Work Plan. After development and an equilibration period of at least 1 week, groundwater samples will be collected from MW-24 and MW-25 using low-flow methodology for analysis of VOCs in accordance with the RI/FS Work Plan.

DATA VALIDATION AND REPORTING

Laboratory analytical data will be validated in accordance with the RI/FS Work Plan. Resulting validated data will be tabulated and provided to Ecology via email for review. Additionally, in accordance with the AO, all data will be uploaded to Ecology's Environmental Information Management database, and raw data packages received will be attached to the applicable Quarterly Progress Report.

SCHEDULE AND REPORTING

The drilling field work will be conducted in mid-May 2026, pending Ecology concurrence with this investigation plan. SPU anticipates that the resulting soil and groundwater data and interpretation of the investigation findings will be incorporated in a Public Review Draft RI Report, which will be prepared between June and September 2026.

REFERENCES

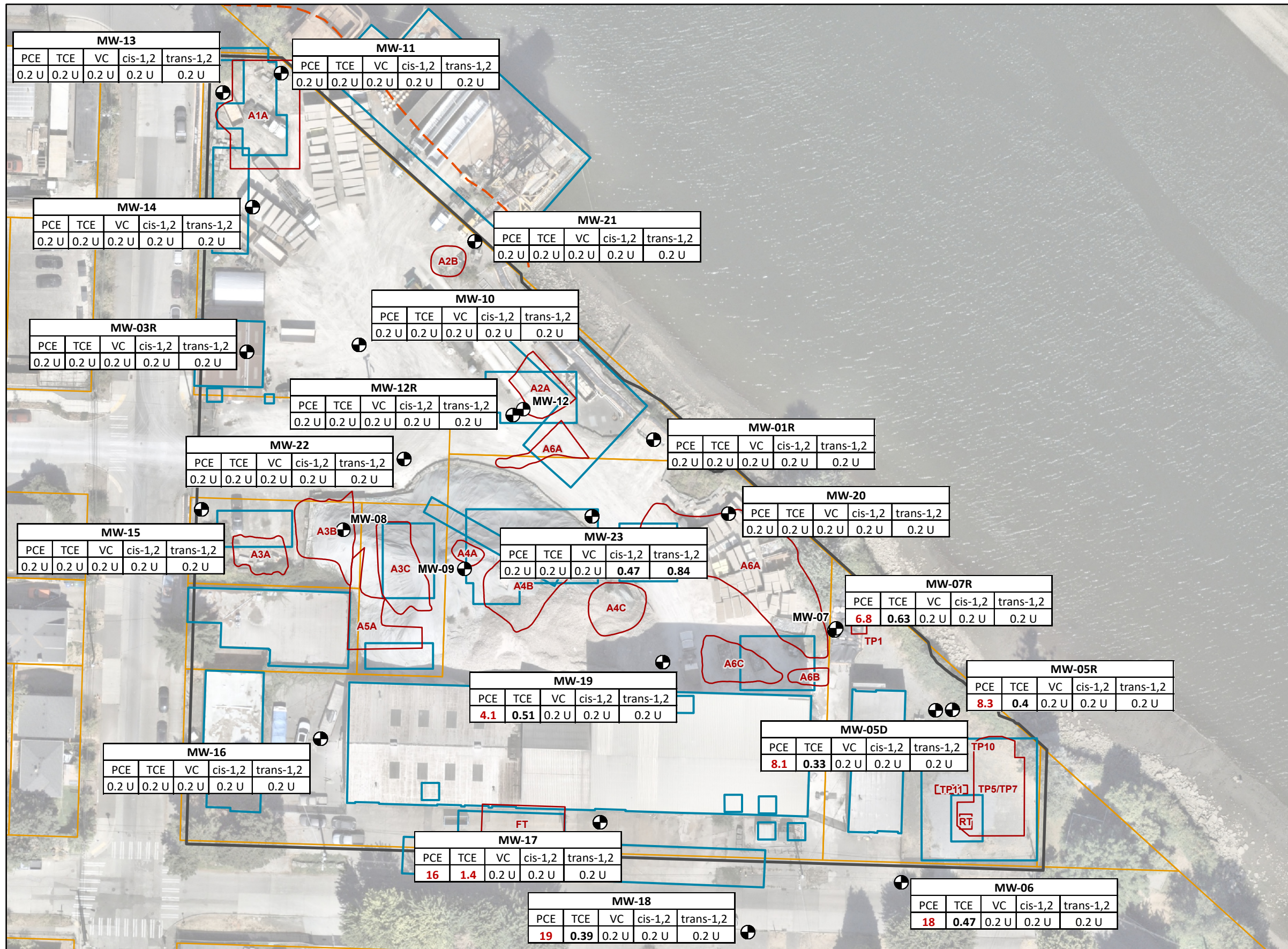
- Carp, B. 2026. Email message "RE: Chlorinated Solvents Discussion, Independent Metals Plant 2 | 12300" to Kristin Anderson. 17 February.
- Floyd|Snider. 2023. *Silver Bay Logging Site Remedial Investigation/Feasibility Study Work Plan*. Prepared for Seattle Public Utilities. May.
- HDR, Inc. (HDR). 2022. *Condition Assessment Report, Seattle Public Utilities, South Park Water Quality Facility Site Investigation*. 27 June.¹
- The Riley Group, Inc. (RGI). 2017. *Underground Storage Tank Closure & Site Assessment Report*. Prepared for Silver Bay Logging. 8 August.¹
- _____. 2018. *Remedial Action Report, Silver Bay Logging – East Yard Property*. Letter from Megan E. Poysnick and Paul D. Riley, The Riley Group, Inc., to Betty Buhler, Silver Bay Logging, Inc. 19 October.¹
- _____. 2019. *Interim Soil Cleanup Action Report, Silver Bay Logging Property*. Letter from Megan E. Poysnick and Paul D. Riley, The Riley Group, Inc., to Betty Buhler, Silver Bay Logging, Inc. 12 March.¹

¹ Source of GIS layers used on Figures 1 and 2.

LIST OF ATTACHMENTS

- Figure 1 Groundwater CVOCs Results, Wet Season (March 2025)
- Figure 2 Groundwater CVOCs Results, Dry Season (September 2025)
- Figure 3 Groundwater Sample Locations

Figures

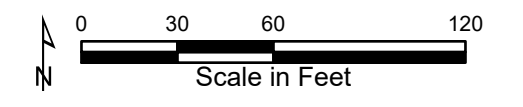


- Sample Locations**
- Groundwater Monitoring Well
- Other Features**
- Approximate Shoreline Below Dock⁽¹⁾
 - Remedial Excavation Limit and Designation⁽²⁾
 - Historical Operational Areas
 - Property Boundary
 - King County Tax Parcel

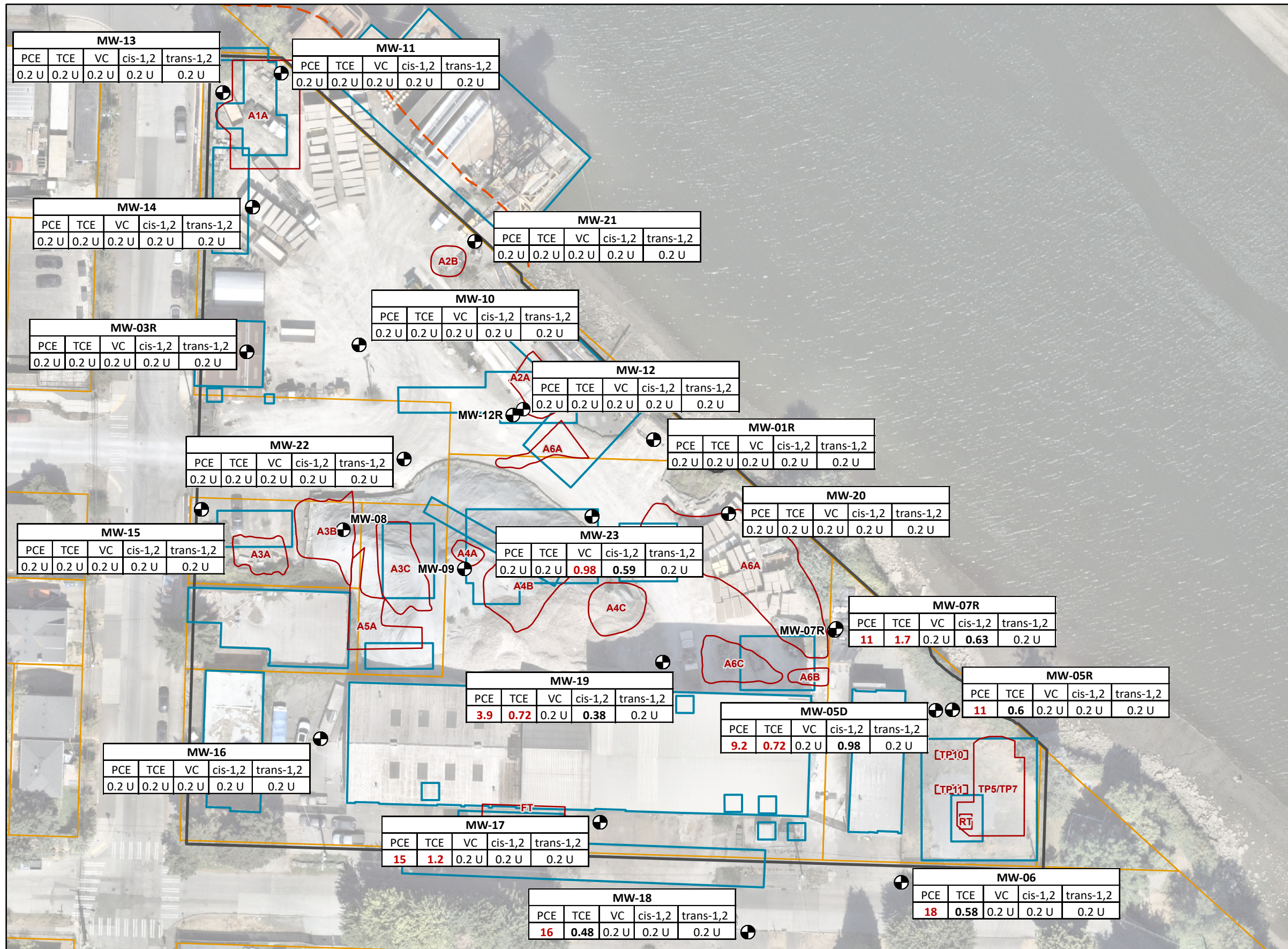
PSLs:
PCE = 2.9 µg/L
TCE = 0.70 µg/L
VC = 0.18 µg/L
cis-1,2 = 16 µg/L
trans-1,2 = 77 µg/L

- Notes:
- Approximate shoreline based on Condition Assessment Report (HDR 2022).
 - Details regarding previous remedial excavations are provided in construction completion reports prepared by The Riley Group, Inc. (RGI 2017, RGI 2018, RGI 2019).
- Results shown in **BOLD** are detects, results shown in **RED** are exceedances.
 - Parcel boundaries obtained from King County, 2024.
 - Orthoimagery obtained from Nearmap, 2024.

Abbreviations:
cis-1,2 = cis-1,2-Dichloroethylene
CVOC = Chlorinated volatile organic compound
µg/L = micrograms per liter
PSL = Preliminary Screening Level
PCE = Tetrachloroethylene
trans-1,2 = trans-1,2-Dichloroethylene
TCE = Trichloroethylene
VC = Vinyl chloride



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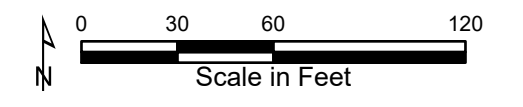


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