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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

June 22, 2026

Robert Code
Fox Avenue Building, LLC
6900 Fox Ave S
Seattle, WA 98108
(bobc@cascadecolumbia.com)

Re: Direction to Investigate Sources, Nature, and Extent of Per- and Polyfluoroalkyl Substances (PFAS)

- **Site Name:** Fox Ave Building
- **Address:** 6900 Fox Ave S, Seattle, WA 98108
- **Facility/Site No.:** 2282
- **Cleanup Site ID:** 5082
- **Agreed Order No.:** DE 8985

Dear Robert Code:

The Washington State Department of Ecology (Ecology) has determined that PFAS compounds are hazardous substances and are regulated under the Model Toxics Control Act (MTCA). See Ecology's [website](#)¹ for additional information.

Due to historical site uses, including chemical manufacturing and storage, PFAS compounds are suspected to have been used at the Fox Ave Building site. Known chemical storage which has contributed to contamination at the Site includes chlorinated volatile organic compounds, petroleum hydrocarbons, and pentachlorophenol.

Based on the potential historical use of PFAS-containing materials at the Site, Ecology hereby requests that the PLP conduct an initial presence/absence investigation for PFAS compounds in

¹ <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Addressing-priority-toxic-chemicals/PFAS/Cleanup-sites>

groundwater. This may be done as part of the groundwater sampling conducted during your Site's next compliance monitoring event conducted under Agreed Order No. DE 8985.

Ecology requests that the PLP develop and implement a basic Ecology-approved work plan to assess the presence or absence of PFAS in site groundwater. The selected wells should include upgradient wells, to help evaluate if PFAS detected in other samples is related to releases on the Site. Please refer to Ecology's [Guidance for Investigating and Remediating PFAS Contamination in Washington State](#),² revised June 2023 for further information regarding sampling procedures and recommended analyses.

Ecology expects you to submit a PFAS groundwater sampling plan by August 30, 2026. Once approved by Ecology, this sampling event should take place during the next scheduled compliance monitoring event. The results should be shared with Ecology as part of the next groundwater monitoring report. Groundwater sampling events required by the existing CAP are conducted annually in January.

Ecology recognizes that the PLP is currently implementing a Cleanup Action Plan under AO DE 8985. It is not Ecology's intention to delay further implementation of the remedy; instead, Ecology is requesting that you confirm via groundwater sampling that PFAS is not a concern in groundwater at your property. If PFAS are detected in groundwater, Ecology may require additional assessment to characterize the nature and extent of PFAS in groundwater and to determine if PFAS is present in other site media. Please contact me to schedule a time to discuss how the PFAS investigation will be integrated into your existing cleanup work.

Please contact me via phone (206-459-6287) or email (david.unruh@ecy.wa.gov) with any questions.

Sincerely,



David Unruh, LHG
Site Manager
Toxics Cleanup Program, NWRO

cc: Alexandra Kleeman, HCMP, P.S. (alexandra.kleeman@hcmp.com)
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² <https://apps.ecology.wa.gov/publications/summarypages/2209058.html>