



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 13, 2026

Brendan Lawrence
Onni 106th /Ave Bellevue LLC
1411 4th Avenue, Suite 1501
Seattle, WA 98101

**RE: Contained-In Determination for F002 Contaminated Soils at the Onni 106th Site,
located at 606 and 620 106th Ave NE, Bellevue, Washington 98004 (CU ID # 14996;
FSID # 73977; VCP # XN0011)**

References: 1. Electronic Mail and Request for Contained-In Determination from Ruth Otteman (TRC) to Paul Bianco (Ecology), dated August 7, 2026.
2. Electronic mail for Contained-In Determination from Paul Bianco (Ecology) to Brendan Lawrence (Onni), dated August 12, 2026.
3. Electronic Mail for Contained-In Determination from Ruth Otteman (TRC) to Paul Bianco (Ecology), dated August 12, 2026.

Dear Brendan Lawrence:

The Washington State Department of Ecology (Ecology) received a contained-in determination request from your environmental consultant, TRC for specific F002 listed waste tetrachloroethylene (PCE) contaminated soils to be generated during excavation activities at the Onni 106th Site, located at 606 and 620 106th Avenue NE, Bellevue, Washington 98004 (CU ID # 14996; FSID # 73977; VCP # XN0011).

Analytical data were submitted to Ecology to determine if these soils contaminated with F002 listed dangerous waste constituents may be exempt from management as dangerous wastes per the "Contained-In Policy"¹. Ecology understands that these contaminated soils do not designate under federal characteristics (WAC 173-303-090) or State-only criteria (WAC 173-303-100).

¹ Washington State Department of Ecology Contained-in Policy, dated February 19, 1993

Based on the information received and reviewed, Ecology has determined that the **21,250 tons** of PCE contaminated soils to be generated during excavation activities are contaminated with F002 listed dangerous waste constituents (PCE) at concentrations that do not warrant management as dangerous wastes. Ecology will not require disposal of these **21,250 tons** as F002 listed dangerous wastes at a RCRA permitted dangerous waste treatment, storage, and disposal (TSD) facility, provided that all of the following conditions are implemented. This contained-in determination applies only to the contaminated soils and does not pertain to contaminated water or any mixture of contaminated soils and fluid.

You or your environmental consultant, TRC, shall:

- Ensure that no standing water is present within the containers or trucks holding the contaminated soils. All water must be removed to the maximum extent possible from each container or truck and managed as F002 dangerous wastes or as otherwise allowed under Chapter 173-303 WAC. Adding bentonite or similar materials to absorb standing F002 listed waste contaminated water in the containers is not allowed. Mixtures of bentonite or similar materials and the listed waste contaminated water must be managed as F002 listed dangerous wastes.
- Directly deliver the soils to a solid waste landfill or transfer station permitted under Chapter 173-351 WAC and/or Chapter 173-350 WAC inside Washington State. If taken directly to the solid waste landfill, no off-loading of the contaminated soils is allowed between the cleanup site and the permitted solid waste landfill; If taken to the transfer station, the intermodal containers from the cleanup site will be loaded on to rail cars, removal of the contaminated soils from the intermodal container at the transfer station is not allowed.
- If you plan to deliver the contaminated soils to a landfill outside Washington State, you must FIRST submit to Ecology written approval for the contaminated soil disposal from the State hazardous waste program and the out of state landfill, **before** the soils are delivered to the out of state landfill.
- If you load the contaminated soils directly onto the truck bed or the contaminated soils are transported in roll-off bins, the truck or the roll-off bins must be lined with plastic and properly covered to prevent leaks, spills, or dispersion due to wind.
- Dispose of the contaminated soils at the permitted solid waste landfill by April 30, 2027. This contained-in determination letter is no longer valid after April 30, 2027 and the contaminated soils shall be managed as dangerous wastes after this date.
- Provide copies of all signed solid waste landfill receipts or a certificate of disposal issued by the receiving landfill for these contaminated soils to Ecology, attention of Paul Bianco, by

May 31, 2027. This is an important verification step for you and your consultant to follow in order for this Ecology decision to be valid.

- Provide an itemized table of all PCE contaminated soils disposed of under this letter on a monthly basis beginning on August 31, 2026 and ending on April 30, 2027. The table shall be submitted no later than the last day of each month to Ecology and include at a minimum the following:
 - Date each contaminated soil shipment left the Site;
 - Date the contaminated soil shipment is received by the Ecology approved solid waste landfill;
 - Weight of each shipment of contaminated soil;
 - Total of all contaminated soil shipments to the Ecology approved solid waste landfill;
 - Approximate percentage of the total contained-in soils removed from the site to date;
 - Name and location of the solid waste landfill for each soil shipment.
- Notify Ecology before disposal of the contaminated soil if the amount exceeds the approved amount or if the CID excavation limits exceed the lateral and vertical extents shown on Figures 5 through 13 attached to this approval letter. Additional soils must be approved for a CID by Ecology before disposal because they are dangerous waste until that approval is received.
- Notify Ecology via email at least five (5) days before removing the contaminated soils approved in this letter. This notice gives Ecology the option of observing the removal. If Ecology will observe the removal, we will notify you by phone or email at least 24 hours before the day the soil removal begins.
- Do not consolidate these contaminated soils with other soils that do not pertain to this CID.
- Ensure that the transporter is properly trained to handle hazardous waste so that the transporter manages the contained-in determination soils during transport in a manner that is protective of human health and the environment.
- Take measures to prevent unauthorized contact with these contaminated soils at all times.
- Provide instructions to the landfill operator that these soils are **not** to be used for daily, intermediate, or final cover.
- Provide copies of all soil analytical data to the landfill operator, upon request.

- Do not send these contaminated soils to any incinerator, thermal desorption unit or recycling facility unless that facility is a RCRA Subtitle C permitted dangerous waste TSD facility.

Ecology issued this determination based on the information provided and reviewed to date. This Ecology determination will be rescinded if Ecology finds that the information submitted by the property owner or its environmental consultant is materially false, misleading, otherwise does not accurately represent the site conditions, or if the Ecology requirements listed above are not followed.

This written decision only applies to the **21,250 tons** of soil described in your request (references 1 and 3). It does not apply to any other media. Any data used for this contained-in determination is intended for use in determining the proper disposal of the above stated PCE contaminated soil according to the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC) and Ecology Contained-in Policy. This letter is not an Ecology approval for dangerous waste designation or disposal of contaminated soils that may be generated or already excavated from other areas in this property.

This letter is not a No Further Action (NFA) letter and not written approval for any cleanup action plan you may have submitted. Instead, this letter only addresses the procedures for disposal of the contaminated soils according to the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). Regulatory decisions regarding the cleanup action, applicable soil and groundwater cleanup levels and any other cleanup issues must comply with the requirements under Ecology Model Toxics Control Act (Chapter 173-340 WAC). Local agencies may have the authority to impose additional requirements on this waste stream.

If you fail to comply with the terms of this letter, Ecology may issue an administrative order and/or penalty as provided by the Revised Code of Washington, Sections 70A.300.090 and/or .120 (Hazardous Waste Management Act).

This correspondence is being transmitted electronically only. If a hardcopy is needed, request one from the Ecology representative below. If you have any questions concerning this letter, please contact me at (425) 466-5161 or paul.bianco@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "P.V. Bianco", with a stylized flourish at the end.

Paul V. Bianco, PE
Environmental Engineer
Hazardous Waste and Toxics Reduction Program

Brendan Lawrence

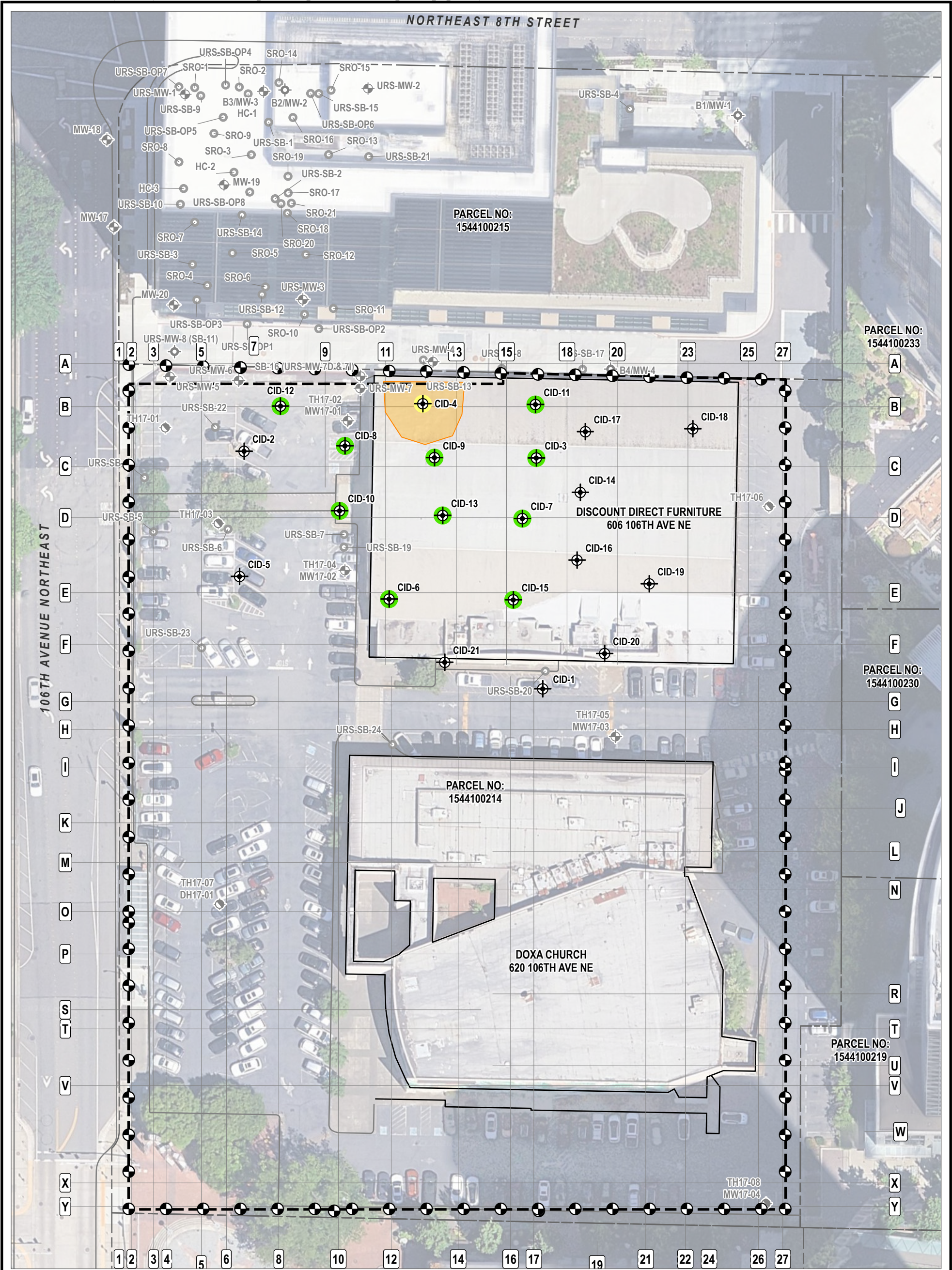
August 13, 2026

Page 5

Enclosure: Figures 5 through 13

ecc: Ruth Otteman, TRC
Joshua Bernthal, TRC
Frank Winslow, Ecology
Christa Colouzis, Ecology
Ron Kauffman, Ecology
Donna Kirkman, Ecology
Michelle Myers, Ecology
Elaine Snouwaert, Ecology
Michelle Underwood, Ecology
Kurt Walker, Ecology

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.

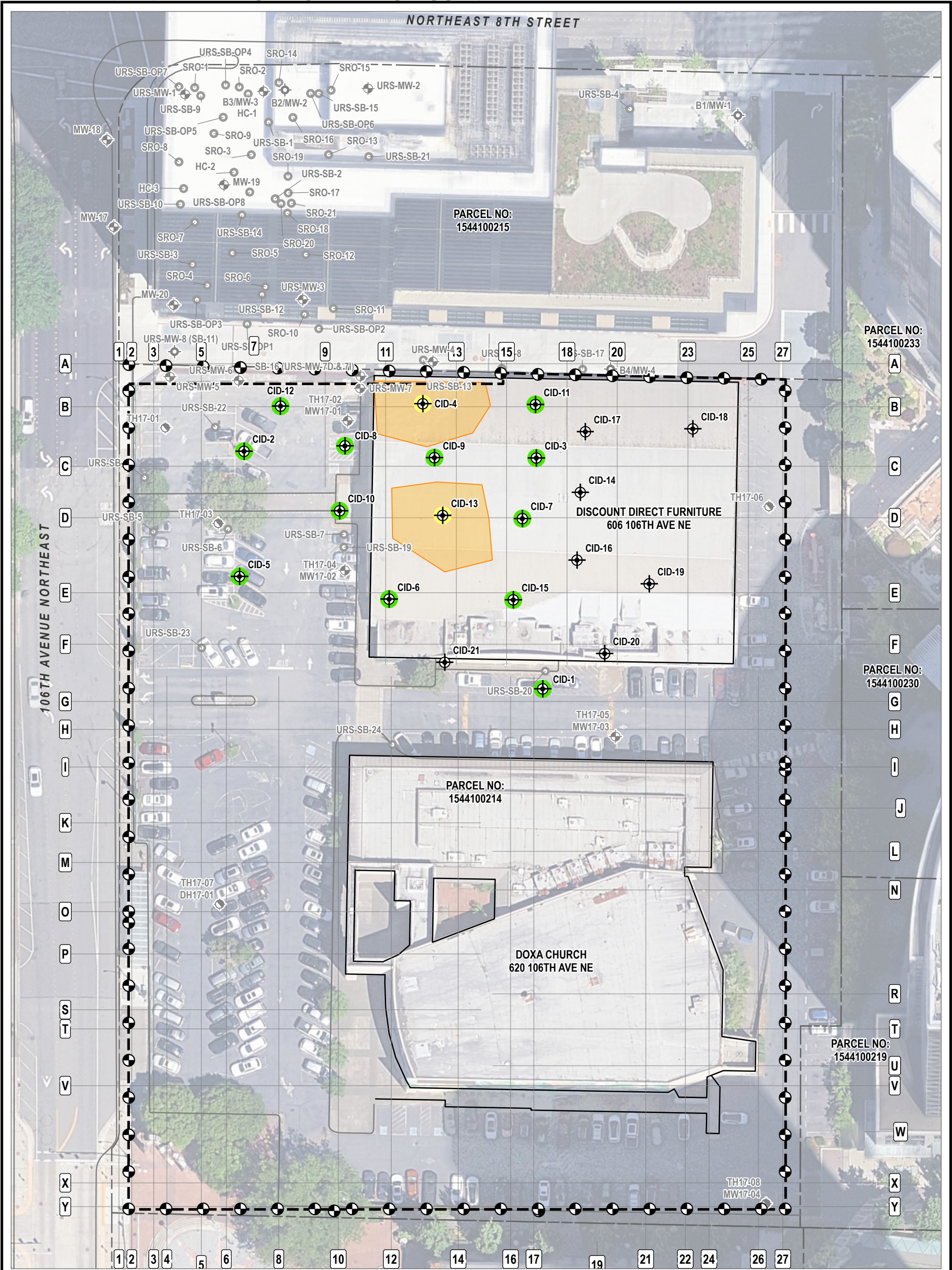


- CID INVESTIGATION BORING LOCATION - MONITORING WELL LOCATION (DECOMMISSIONED) - DEEP MONITORING WELL LOCATION (DECOMMISSIONED) - EXPLORATION LOCATION (2017) (DECOMMISSIONED) - TH = TEST HOLE, MW = MONITORING WELL, DH = DOWNHOLE SHEARWAVE VELOCITY - SOIL BORING LOCATION	- SHORING EXTENT - SURVEY MONITORING POINT - APPROXIMATE PARCEL BOUNDARY - PCE CONCENTRATION IS LESS THAN THE MTCA CLEANUP LEVEL - PCE NOT DETECTED - CONTAINED-IN SOIL AREA (PCE CONCENTRATIONS EXCEED THE LABORATORY REPORTING LIMITS)		ONNI 106TH AVE BELLEVUE LLC 606 AND 620 106TH AVE NE BELLEVUE, WASHINGTON
CONTAINED-IN SOIL 148 TO 143 FEET AMSL REQUEST FOR CONTAINED-IN DETERMINATION			PROJ. NO.: 000462297.0000.0000
DRAWN BY: R. COLLINS			FIGURE 5
CHECKED BY: J. WINDSOR			
APPROVED BY: R. OTTEMAN			
DATE: AUGUST 2026			13810 SE EASTGATE WAY SUITE 440 BELLEVUE, WA 98005 PHONE: 425.395.0010

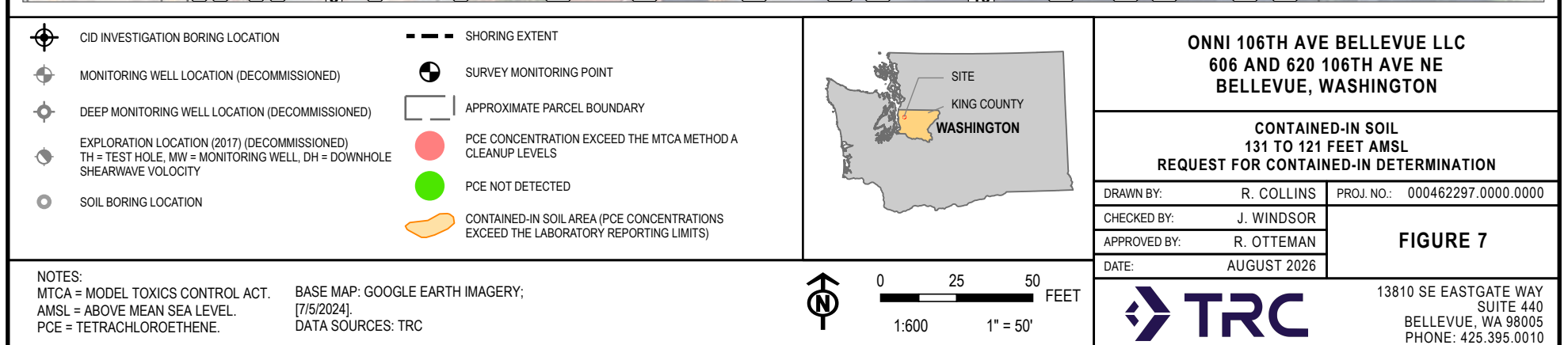
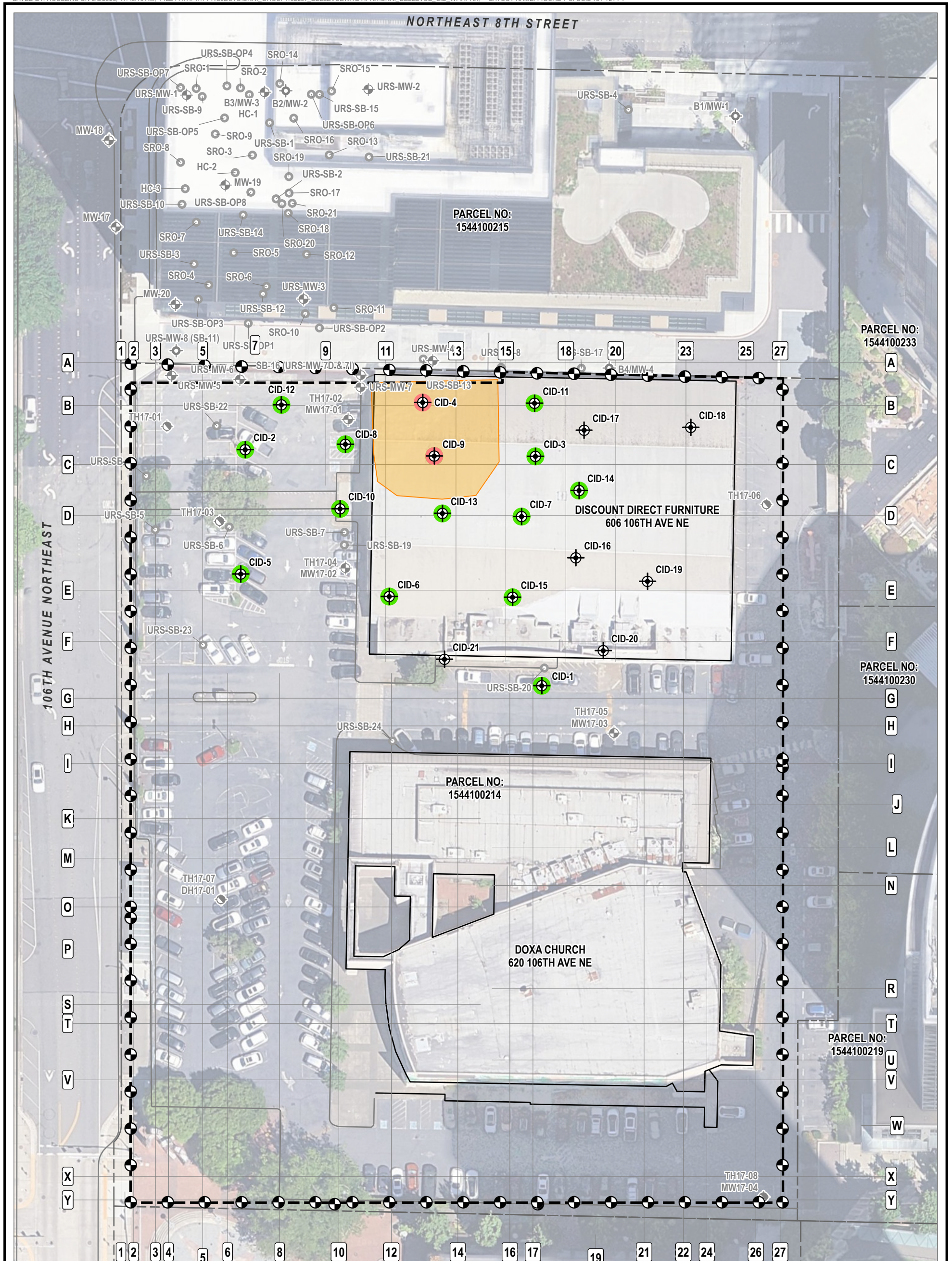
NOTES:
MTCA = MODEL TOXICS CONTROL ACT.
AMSL = ABOVE MEAN SEA LEVEL.
PCE = TETRACHLOROETHENE.

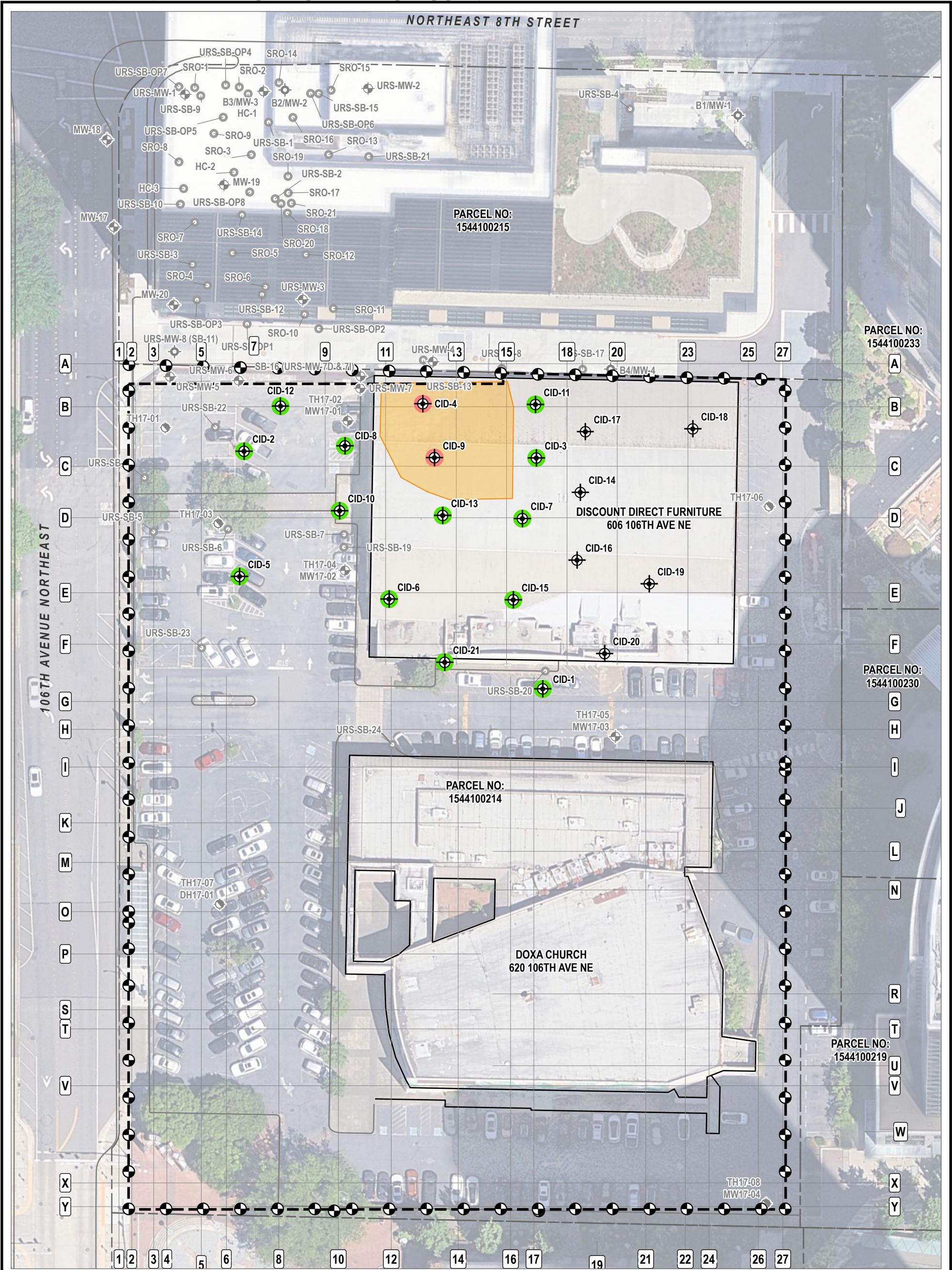
BASE MAP: GOOGLE EARTH IMAGERY;
[7/5/2024].
DATA SOURCES: TRC

0 25 50 FEET
1:600 1" = 50'

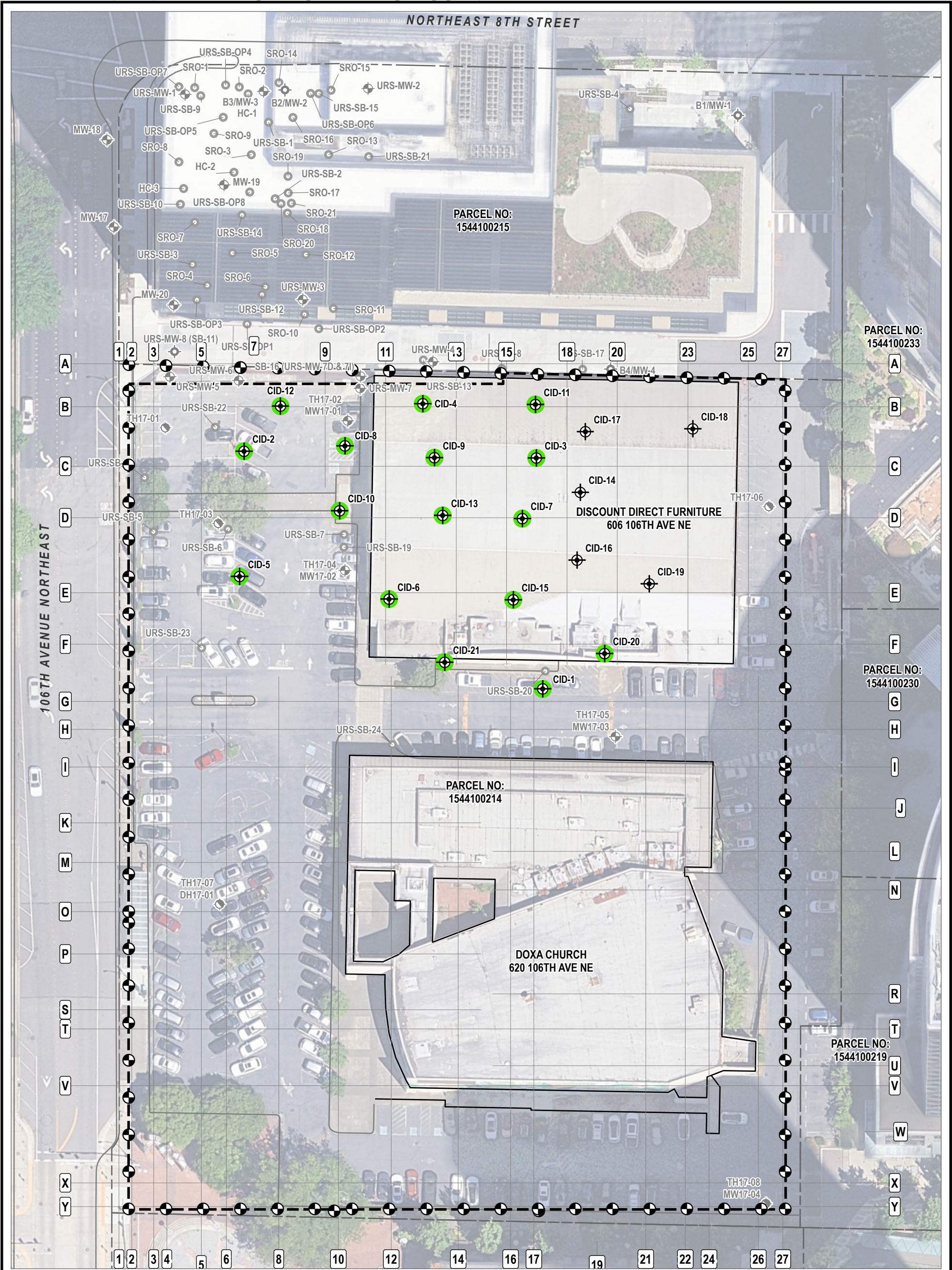


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NOTES: MTCA = MODEL TOXICS CONTROL ACT. AMSL = ABOVE MEAN SEA LEVEL. PCE = TETRACHLOROETHENE. BASE MAP: GOOGLE EARTH IMAGERY; [7/5/2024]. DATA SOURCES: TRC 0 25 50 FEET 1:600 1" = 50' 13810 SE EASTGATE WAY SUITE 440 BELLEVUE, WA 98005 PHONE: 425.395.0010		

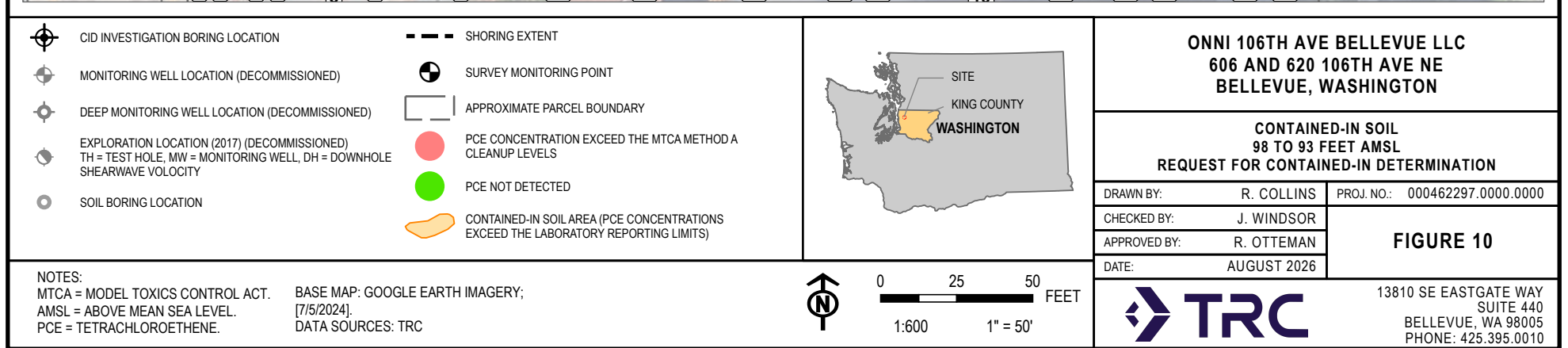




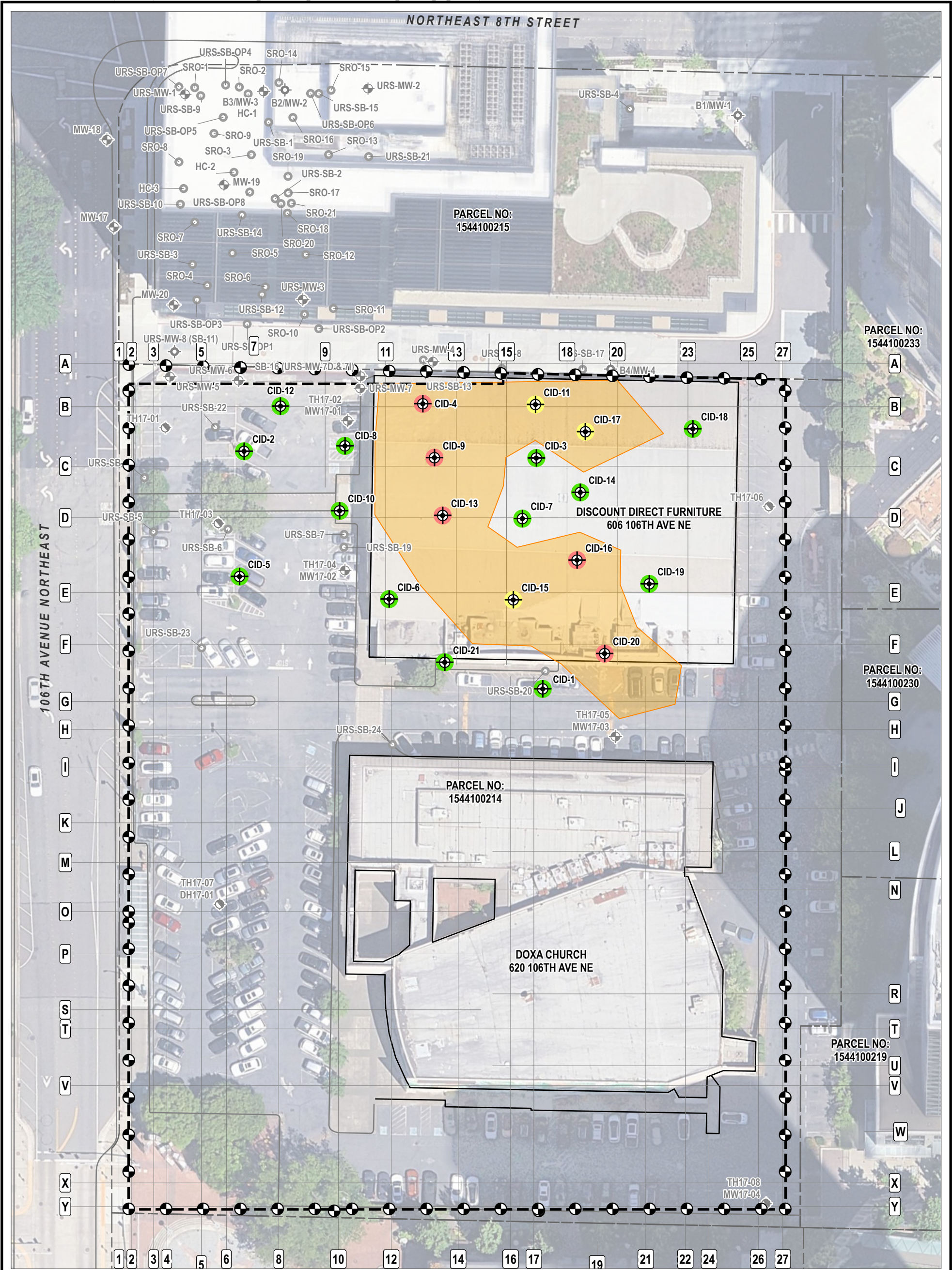
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DRAWN BY:	R. COLLINS	PROJ. NO.:	000462297.0000.0000												
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DRAWN BY:	R. COLLINS	PROJ. NO.:	000462297.0000.0000											
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CONTAINED-IN SOIL 92 TO 87 FEET AMSL REQUEST FOR CONTAINED-IN DETERMINATION			PROJ. NO.: 000462297.0000.0000
DRAWN BY: R. COLLINS CHECKED BY: J. WINDSOR APPROVED BY: R. OTTEMAN DATE: AUGUST 2026			FIGURE 11
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