

Response to Public Comment

Former Precision Engineering — Remedial Investigation and Feasibility Study

Site	Former Precision Engineering Property, 1231 South Director Street, Seattle
Cleanup Site ID (CSID)	4532
Lead agency	Washington State Department of Ecology, Toxics Cleanup Program — Central Region Office
Documents commented on	Remedial Investigation, Public Review Draft (April 22, 2026); Feasibility Study, Public Review Draft (April 17, 2026)
Public comment period	June 1 – June 30, 2026
Comments received	Two — Duwamish River Community Coalition (DRCC), June 30, 2026; and one nearby resident, June 22, 2026
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Response date	10/07/26

What we heard

Two comment letters were received.

The first came from the Duwamish River Community Coalition. DRCC did not oppose the cleanup. Their letter opens by describing the health and pollution burdens carried by the Georgetown and South Park neighborhoods, then raises six sets of issues: the treatment of climate change in the two documents; whether the environmental justice finding changed any decision; how community and tribal perspectives were considered; requests concerning the Duwamish Tribe and cultural resources; the durability of the preferred cleanup option; and a challenge to how the cleanup options were scored. It closes by asking what Ecology considers success in a cleanup, and whether repeatedly capping contamination in place is a net benefit for communities already carrying this burden.

The second came from a resident living a short walk from the property on the same street. They wrote about the families, gardens, and wildlife along South Director Street, said they did not have the capacity to read several hundred pages of technical reports, and asked us not to accept a cleanup that leaves any risk of contamination remaining, spreading, or causing harm. They asked us to select a complete remedy.

I. Climate change and this cleanup

Our response in brief

DRCC raises five climate concerns: heat, air quality, rising temperatures, heavier rain, and wildfire smoke. Each names a real burden in the Duwamish Valley.

State cleanup law asks a narrower question about this property. Could a climate impact damage the cleanup badly enough to release the contamination again? Only two things could do that here — a flood, or rain eroding the ditch — and we evaluated both. The others are serious problems, but they are not ways this cleanup fails, this cleanup does not make them worse, and a cleanup order on this property cannot reach them.

DRCC comment I.A

The site may not have flooding risk, but no other climate burdens were reported — including the site's contribution to air pollution and to urban heat island effects from surface impermeability. A full climatological assessment is required, covering both the remediation period and post-cleanup industrial activity.

Our response

Heat and air quality are real burdens in the Duwamish Valley. But state cleanup law asks a narrower question at a site like this one: is climate impact likely to happen here, and likely to negatively impact the cleanup — to hinder the cleanup enough that contamination is released again?

Two things could do that at this property: a flood or rain-washing contaminated soil out of the ditch. We looked at both. The property sits outside the floodplain and is not near the shoreline. The ditch is well vegetated and drains less than six acres.

Heat and air quality cannot disrupt this cleanup, and they are largely outside what we can require through a cleanup order on this property. The cleanup also does not make them worse: no option we evaluated adds pavement or changes the building.

We will carry a fuller discussion of climate impacts to the site and the cleanup action resilience into the Draft Cleanup Action Plan and improve how we explain it on the site webpage and in future fact sheets.

DRCC comment I.B

Reference the Sustainability Remediation: Climate Change Resiliency and Green Remediation guidance. DRCC cites state-average projections of roughly 2.3°F under a low-emissions scenario (RCP 2.6) and 8.7°F under a high-emissions scenario (SSP 585) by the 2080s, and asks that the combined air-temperature increase plus urban heat island effect at this location be reported.

Our response

We have reviewed the Ecology guidance that DRCC references. At this property, the temperature projections DRCC cites do not change which cleanup option protects people best. The contamination beneath the building is treated in place, and the contamination in the ditch is removed and covered, and will not remain exposed at the surface. The ditch cleanup affects approximately 2,000 square feet of soil. No option we evaluated changes the property's pavement or heat profile. Where the guidance

bears on our work here is in how we describe climate resilience, and we will apply it more fully in the Draft Cleanup Action Plan as required by MTCA.

DRCC comment I.C

Heatwave and urban-heat-island impacts must be a consideration. If cleanup decisions intensify future climate vulnerability, those actions do more harm than good and alternatives should be reconsidered.

Our response

A cleanup should not leave a community worse off than it found it. On this property, heat does not play a role in choosing between the cleanup options.

Every option we evaluated leaves the building and the pavement where they are — including full excavation — because those surfaces are part of what keeps the contamination covered and contained. None of the five changes how much of the site is paved, how hot it gets, or what the property is used for afterward.

DRCC comment I.D

Total annual precipitation is projected to become more volatile and drought conditions to increase across Washington. The Duwamish Valley has a unique climate vulnerability due to its valley topography.

Our response

Heavier and less predictable rain may impact the site in one specific way: it could wash contaminated soil out of the ditch along the southern edge of the property. We looked at rainfall for this site. The ditch is heavily vegetated, it is not prone to heavy runoff, and it drains less than six acres.

The cleanup option we prefer — Alternative 4 in the feasibility study — goes further than managing that risk. It digs the contaminated soil out of the ditch and hauls it away, and replaces the contaminated soil with clean imported soil and replanted vegetation. As a result, there will be no contaminated material left for heavy and less predictable rain to carry off-site. The digging is scheduled for the dry season, so the work itself does not wash soil downstream.

DRCC comment I.E

Quotes CIG 2019 projections: Pacific Northwest annual area burned projected to triple by the 2040s; Western Washington very-high-fire-danger days rising from a historical 36 (1971–2000) to 43 in the 2020s and 48 by the 2050s. Particulate matter settles within the Valley, exacerbating wildfire smoke and health impacts.

Our response

The wildfire smoke burden in the Duwamish Valley is real. But smoke does not carry contamination from this property to people, so it is not one of the exposure pathways the remedial investigation evaluates.

Where smoke does touch this cleanup is during construction: if crews are digging while the air is bad, that affects workers and the neighbors next door.

We will address work stoppages and protective measures during wildfire smoke events in the health and safety plan and the Engineering Design Report.

II. The environmental justice finding

Our response in brief

We agree with DRCC's central factual point. This site and the area around it carry the highest environmental health disparities rank on the scale. The surrounding communities are vulnerable and overburdened. We made that finding ourselves, and it is a formal part of the cleanup record.

DRCC's real question is what the finding changed. State cleanup law includes vulnerable and overburdened communities into two of the criteria we score cleanup options against: how well an option protects people, and how well it manages risk during the work. Together those carry 45 percent of the weight, and protection carries more than anything else we measure. The option we prefer scores highest on protection. The cleanup levels we set, and the speed of the remedy, are consistent with the finding as well.

We will make these connections explicit in the Draft Cleanup Action Plan rather than leaving them implicit in the RI/FS scoring.

DRCC comment II.A

The site has an Environmental Health Disparities rank of 10, the highest possible. The assessment was correct that this area is overburdened and has vulnerable populations under Ecology Publication 24-09-044.

Our response

The remedial investigation found that this site and the area around it carry an Environmental Health Disparities rank of 10 — the highest on the scale. It concluded that the surrounding communities are vulnerable and overburdened. We made that finding ourselves, using the Department of Health's mapping tool. The finding stands as a formal part of the cleanup record.

DRCC comment II.B

The remedial investigation acknowledges the overburdened designation once and defers it to the feasibility study. FS Sections 6.1.1, 6.1.4 and 6.2.1 repeat the phrase “including likely vulnerable populations and overburdened communities,” but there is no substantive analysis of how that finding changed, or was incorporated into, any decision.

Our response

The finding is built to work through the scoring, not to sit in a section of its own. We score cleanup options against criteria set in state cleanup law. Two of them are written to expressly include vulnerable populations and overburdened communities: how well an option protects people, and how well it manages risk to people while the work is underway. Between them they carry 45 percent of the score; protection alone carries 35 percent, the heaviest weight of anything we measure.

The option we prefer scored highest of the five on protection — 9 out of 10, ahead of full excavation at 8.

We will make this connection explicit in the Draft Cleanup Action Plan rather than leaving it implicit in the scoring.

DRCC comment II.C

What additional protections, more conservative assumptions, or accelerated timelines resulted from the highest-ranking EHD analysis? Without that, this is a formal finding with no demonstrated consequence, as is statutorily required.

Our response

We set the cleanup levels for this site in accordance with applicable laws including, but not limited to, the Model Toxics Control Act, and including protection of the Lower Duwamish Waterway. We are treating the groundwater as though people might drink it. That is a deliberately cautious choice: the investigation found the water is not drinkable now and unlikely to be in the future. We set the soil standard against a realistic scenario in which soil from as deep as fifteen feet is dug up and spread at the surface.

The option we prefer cleans up the site in a reasonable restoration timeframe.

We will state the connection between the vulnerable-population finding and these choices explicitly in the Draft Cleanup Action Plan.

DRCC comment II.D

Given that it is an EJ community, how can the cleanup process enhance the community aside from just cleanup? For example, the cleanup can commit to some type of greening of the site or restoration of any existing native plants on the property.

Our response

The option we prefer already puts plants back in the disturbed area. After we dig the contaminated soil out of the ditch, we place clean backfill and re-seed. What the feasibility study does not say is which plants — that choice gets made in the engineering design, the detailed construction plan prepared before work begins. Native replanting will be required, consistent with state and local codes.

III. Community process and engagement

Our response in brief

The duty DRCC cites applies here in full. This is an Ecology-supervised cleanup. When we evaluate cleanup options we must consider public concerns, including those of vulnerable populations and overburdened communities, and tribal rights and interests.

DRCC is also right that the feasibility study records that duty as a bare “Yes” in a table, with no narrative behind it. That row is a threshold determination about the cleanup as a whole: it is either met or not met, and it does not vary from one option to another. That is why it looks the same across all five. Where the options differ on their effect on this community is in the scored criteria.

Our outreach record on this site is set out below.

DRCC comment III.A

As part of state law, “Ecology supervised cleanups must consider public concerns, including the concerns of likely vulnerable populations and overburdened communities, and tribal rights and interests when evaluating the cleanup alternatives.” (Citing Ecology’s guidance for Making Cleanups Permanent to the Maximum Extent Practicable.)

Our response

The requirement is as DRCC states it. This cleanup runs under an order Ecology issued and supervises, so the duty applies in full.

The guidance DRCC quotes is the same guidance we ran the cleanup-option scoring under, and we used Ecology’s tool built from that guidance to check the result.

DRCC comment III.B

The “Consideration for Public Concerns and Tribal Rights and Interests” row in Table 7-1 is marked “Yes” for every alternative with no supporting narrative, and deserves further explanation to represent a documented finding.

Our response

DRCC is reading the table correctly. That row records a yes-or-no determination about the cleanup as a whole, not a comparison between the options. The duty to consider public concerns and tribal rights attaches to how we run the cleanup. It is either met or not met — not met differently by one option than another. That is why the row looks the same all the way across.

Where the options genuinely differ is in the scored criteria, which are defined in rule to include vulnerable and overburdened communities — see our responses to Comments II.B and VI.A.

DRCC comment III.B.1

Describe further how the cleanup to this point has considered and incorporated the perspectives of likely vulnerable populations and overburdened communities, as well as tribal rights and interests. Present an affirmative outreach record.

Our response

During this comment period we:

- Held office hours in the neighborhood — at South Park Playground on June 3 — rather than asking residents to travel to us.
- Put the review documents at the South Park branch of the Seattle Public Library.
- Wrote a plain-language summary of the technical documents, so people could follow what the investigation found without reading several hundred pages.
- Took comments online, by email, and by mail for the full thirty days.
- Carried information in the fact sheet, in Spanish, Chinese, Vietnamese, and Khmer, about how to get help in those languages.

That plain-language summary answers a request this community made previously in the last comment period on this site (in 2020), which drew two comments. Both asked for clearer explanations of the cleanup process and to be kept informed in plain language.

IV. Duwamish Tribe considerations

Our response in brief

DRCC sets out the Tribe's connection to this ground and makes seven specific requests. They ask us to check the site's cultural sensitivity, to put an archaeologist and a Tribal monitor on site during digging, to plan native replanting with the Tribe, to let the Tribe assess any trees before removal, to shield the lighting, and to manage construction noise.

Cultural resources are protected by making plans before any investigation or excavation. Cultural resources are protected in consultation with the state historic preservation office and the affected Tribes. The laws behind it are already named in the feasibility study as rules this cleanup has to meet.

DRCC's requests arrive at a useful moment: the engineering design has not been written yet, so the choices they are asking about are still open.

DRCC comment IV.A

Describes the pre-contact village at too-KWHEHL-teed in what is now south Georgetown, and ancestral places across the river in South Park. Argues the site's alluvial geology — RI Section 3.3 describes Quaternary alluvium, peat lenses and shell fragments — is exactly the depositional context where pre-contact cultural material survives, and that WISAARD's predictive model for alluvial bottomland near a major salmon river is consistently high to very high sensitivity.

Our response

DRCC's description of the land in the area of this site is accurate — our own investigation describes the same alluvium, peat, and shell fragments they cite. Continued cultural resources planning (surveys and inadvertent discovery plan, etc.) will be part of the cleanup documents prior to and during any excavation.

DRCC comment IV.B

Conduct a WISAARD lookup and report the sensitivity level. Commit to having a qualified archaeologist, as well as a Duwamish Tribal monitor, present during all ground-disturbing activities.

Our response

Before any field work begins, we will review this project for potential impacts to cultural resources, in consultation with the Department of Archaeology and Historic Preservation and the affected Tribes. That review will include, at minimum, an inadvertent discovery plan — the procedure for what happens if something is found once digging starts.

That review and consultation will lead to a cultural resources work plan, such as a survey or a monitoring plan, to find cultural resources and avoid or reduce harm to them. If that work plan calls for

an archaeologist on site, we will contact the Duwamish Tribe at that point to discuss having a Tribal representative present as well.

DRCC comment IV.C

If excavation of AOC3 occurs, require a native restoration plan developed in coordination with the Duwamish Tribe. Commit to replanting native species that benefit water quality, ecological function, and traditional use. This is low-cost relative to the remediation budget.

Our response

Approximately 2,000 square feet of excavation is planned at AOC3. Replanting is already part of the option we prefer. Once the contaminated soil comes out of the ditch, clean soil goes back in. The ground is re-seeded and tended until the vegetation is re-established. Specific plant choices are made in the engineering design, which has not been written yet.

Native species will be required, consistent with state and local codes.

DRCC comment IV.D

Before any tree removal occurs during remediation, provide the Duwamish Tribe with the opportunity to assess whether any mature trees at the site qualify as Culturally Modified Trees, especially near AOC1.

Our response

No tree removal is planned for this cleanup.

DRCC comments IV.E and IV.F

Any perimeter fencing, equipment security lights during active remediation, or other lighting should align with International Dark-Sky Association standards, to protect salmon migration behavior and nocturnal wildlife. In the Engineering Design Report, require lighting to be downward-directed, shielded, LED with warm color temperature (3000K or lower), and motion-activated where possible.

Our response

This cleanup does not install any permanent lighting. Active work outside at AOC3 is expected to take about one to two weeks during daylight hours only. If lighting is needed (unlikely), it would be temporary construction lighting, which gets addressed in the engineering design and has to follow local codes.

We will provide DRCC's specific recommendations — downward-directed, shielded, warm-temperature LED, motion-activated — to the design team for consideration in the Engineering Design Report.

DRCC comment IV.G

The CAP and Engineering Design Report should include a construction noise management plan addressing work-hour restrictions (Seattle noise code at minimum, with consideration of tighter limits given residential proximity and VP/OC status); baseline noise monitoring before and during remediation; a community notification protocol so neighbors can plan around high-noise activity periods; and a complaint response mechanism.

Our response

There are homes directly north of this property, across South Director Street. Construction noise gets handled at the design stage, not in a feasibility study. The work will have to comply with the local noise ordinance.

The option we prefer is also the quieter one: about one to two weeks of active work outside at AOC3. Other AOCs are inside buildings.

We will require a protocol for notifying neighbors ahead of construction in the Engineering Design Report.

V. The preferred cleanup option (Alternative 4)

Our response in brief

DRCC's three comments here ask one underlying question: does this remedy hold over time?

In the ditch, the remedy does not simply cover the contamination. It digs the soil out, hauls it away, and confirms by sampling that it is gone. Then, clean soil is replaced and the area is replanted.

Regarding the three petroleum spots in AOC4, DRCC is right that the original soil data is old. However, the RI included more recent soil and groundwater sampling for the locations and broader site.

Regarding the treated soil in AOC1, it should be noted that excavation would leave more contamination in the ground here, not less.

The specific controls, and what gets monitored where and for how long, are set in the Cleanup Action Plan and the compliance monitoring plan.

DRCC comment V.A and V.A.1.a

Excavation for AOC3 (the ditch) — is it enough? We request continued monitoring of the sediments and water in the ditch as part of the institutional controls. Report on the level of risk that climate change could affect contaminants of concern during continuous rain events.

Our response

The feasibility study already provides for part of what DRCC asks. The contaminated ditch soil gets dug out and hauled away rather than covered over. After the digging, we take confirmation samples to verify the contamination is below the cleanup levels. Then the ditch is backfilled with clean soil and re-seeded. We monitor and maintain the ditch until the vegetation is re-established. Compliance monitoring is required in every option.

Regarding heavy rain, see our response to Comment I.D: the ditch is the only place on the property where soil could erode. Digging the soil out removes the material a long rain event could carry off in the first place, and the work will be scheduled for the dry season.

What we monitor in the ditch after the cleanup — which media, where, how often, and for how long — is set in the compliance monitoring plan developed in accordance with the Cleanup Action Plan. We will consider DRCC's request for continued sediment and water monitoring at that point.

DRCC comment V.B and V.B.1

AOC4 — MNA plus institutional controls in three TPH hotspots, one with concentrations up to 25,000 mg/kg — relies heavily on the durability of caps and deed restrictions. Long-term effectiveness depends on long-term enforcement, future redevelopment compliance, and periodic review. Additionally, the soils were last sampled more than ten years ago. We request confirmation sampling at those three sites during cleanup to evaluate that MNA is effective.

Our response

DRCC is right that the three petroleum spots in AOC4 were discovered long ago, which is true of many cleanup sites. However, as part of the RI, soil and groundwater were sampled in the vicinity of the hotspots in 2022–2023, and the sampling confirms that TPH is localized in soil, and TPH is not moving offsite in the groundwater.

Monitored natural attenuation means relying on natural processes to break contamination down over time. That only works if we check that it is actually happening. Confirmation sampling is not an add-on to this remedy — it is part of what the remedy means.

We will require confirmation sampling for the site as part of the compliance monitoring plan developed in accordance with the Cleanup Action Plan.

For context: the 2022–2023 investigation put eighteen new borings and twelve new monitoring wells across the property and the streets beside it. Sampling immediately around the two larger spots found no petroleum above cleanup levels. That is why we describe them as isolated pockets rather than a spreading release. The groundwater downgradient is unaffected.

DRCC comment V.C

AOC1 — “If the site were redeveloped...the presence of solidified/stabilized soil in AOC1 may need to be reevaluated,” meaning the alternative's long-term protectiveness is dependent on a property owner's future decisions, leading to a vulnerability that any alternative except full excavation leaves present.

Our response

DRCC reads this as a weakness that only full excavation removes. At this site, our analysis found the opposite. The option we prefer treats the contamination in AOC1 down to about fifteen feet — roughly as deep as the contamination goes. Excavation would only be achievable to about five feet without destabilizing the building. Excavation would leave more untreated contamination in the ground than our preferred option, not less. That is why the feasibility study scores excavation lower on long-term effectiveness.

Every option leaves some contamination in place, so every option comes with controls on the property, compliance monitoring, and periodic review by Ecology.

The specific controls — including whether an environmental covenant is recorded against the property — are defined in later steps as discussed in the Cleanup Action Plan.

VI. How the cleanup options were scored

Our response in brief

DRCC makes two arguments here. The first is structural: that the way we weight the scoring criteria works against overburdened communities. The second is the question their letter closes on — what does Ecology consider success in a cleanup, and is capping contamination in place a net benefit for a community already carrying this burden?

DRCC comment VI.A

The DCA scoring structure and criteria weighting works against overburdened communities.

Our response

We score each cleanup option on five weighted criteria: how well it protects people, how permanent it is, how well it holds up over time, how well it manages risk while the work happens, and how practical it is to build. We then weigh the total benefit against cost.

Two of those five are written in state cleanup law to include vulnerable and overburdened communities by name — protection, and managing risk during construction. Together they carry 45 percent of the weight, and protection carries more than anything else. The option we prefer scored highest on protection.

We also tested DRCC's underlying point directly, by re-running the scoring under different weightings to see whether full excavation would ever deliver more benefit for its cost. It does not — under any weighting we can construct, including one that counts permanence and nothing else. Full excavation costs about \$501,000 more without delivering more benefit. Its permanence score is higher, but its protection and long-term effectiveness scores are lower, because digging to five feet leaves contamination that our preferred option treats all the way to fifteen.

The weighting is not what stands between this community and a full excavation. At this site, full excavation would leave more contamination in the ground and cost more.

DRCC's closing question and statement

We request an answer to this question: what really is success, as defined by the Department of Ecology, for cleanups? If you are looking at these cleanups through a lens of environmental repair, are the repeated fallback decisions to cap over contaminated surfaces really net-positive for communities bearing this burden, or even net-neutral?

Thank you for your consideration of our comments. We hope to continue these conversations.

Our response

At this site, success means a cleanup that meets the cleanup standards at the point of compliance and earns a determination that no further action is needed. Controls recorded on the property keep the remedy protective over time.

Regarding the characterization of the remedy as capping over contamination: that is not what the preferred option does here. The former plating area is treated in place by mixing in a binder that locks

the contamination up. The northern area is treated by injecting chemicals that break the solvent down to harmless constituents. The ditch soil is dug out, hauled away, and clean soil is replaced. Only the three isolated petroleum pockets — where the groundwater below is unaffected — rely on natural breakdown beneath the existing pavement.

This option also reaches cleanup levels faster than any other we evaluated.

We also hope to continue these conversations. Ecology remains available to discuss questions about the Duwamish area more generally at the program level.

VII. Comment from a nearby resident

Our response in brief

This commenter lives a few doors down from the property, on the same street. They describe a block of families, older neighbors, pets, gardens that feed people, and herons overhead. They were straightforward that they had not read the technical reports, and asked us not to settle for a cleanup that is merely good enough.

That is a fair thing to ask and it deserves a direct answer rather than a technical one.

The short version is this. The contamination at this property sits beneath a building and its pavement. We have mapped how far it reaches in every direction, and it stops at or near the property lines. The groundwater beneath the site moves east, toward the river — away from the homes on the north side of Director Street. And the cleanup we prefer is not the lighter option. At this property, digging everything out would actually leave more contamination in the ground than the option we chose.

The comment

Writes as a resident living a short walk from the property, describing homes along South Director Street occupied by babies, young people, adults, older adults and pets; gardens grown to feed the household and neighbors; walking, jogging and biking on the street; and herons and birds of prey in the area. States they do not have the capacity to read the technical documents, but holds significant concern that contamination currently described as mostly contained could still cause harm if not fully remediated. Asks Ecology not to proceed in a way that allows even the slightest risk that contamination will remain, spread, or cause harm, and to select a complete remedy rather than a “good enough” job.

Our response — where the contamination is, and which way it moves

You do not need to read the technical reports to get an answer to this. Here is what the investigation found.

The contamination is beneath the Precision building and the paved ground around it. We drilled across the property and in the streets and rights-of-way beside it, and installed monitoring wells to track the groundwater. For the main contaminants — chromium, the solvent TCE, 1,4-dioxane, and petroleum — the contaminated soil stops within the property boundaries, and for some of them within Warehouse 1 itself.

Groundwater beneath the site moves east, toward the Duwamish. The homes on the north side of South Director Street are not downstream of it. The contaminated groundwater reaches the neighboring property to the east and stops there; the wells beyond that point come back clean.

Two substances — mercury and a group of compounds called cPAHs — do show up in soil at and just past the property line. We want to be straight about that rather than leave it out. The cPAH concentrations actually increase as you move away from Precision and toward the roadways, which points to vehicle exhaust and general urban soil conditions rather than to this property. The mercury results are mostly just above the level found naturally in soil across Washington. Neither pattern suggests contamination spreading outward from this site.

On the herons and birds of prey: we are required to evaluate whether a site threatens wildlife, and we did. The evaluation concluded that this site does not pose a threat to them.

Our response — whether “mostly contained” is good enough

Your concern is the right one to have, and we will not tell you the answer is zero risk. No cleanup reaches zero. What we can tell you is what “clean enough” means here, because we set that standard for this site and we set it conservatively.

We are treating the groundwater as though someone might drink it. Our own investigation found it is not drinkable now and unlikely to be in the future, and we held it to the drinking-water standard anyway. For soil, we set the standard against a scenario in which soil from as deep as fifteen feet gets dug up and spread across the surface — not because anyone plans to do that, but because a standard should hold up if someone did.

Those margins are how a cleanup protects people who grow food, walk the street, and live next door for decades. The cleanup will be verified by sampling, the groundwater will be monitored afterward, restrictions will be recorded on the property, and Ecology reviews the site periodically to confirm the remedy is still working.

Our response — the request for a complete remedy

This is the heart of your letter, and the answer is not what most people expect.

We evaluated five options, including digging everything out. Full excavation is not the most complete remedy at this property. Inside the building, digging can only go about five feet down before the building becomes unstable. The contamination goes deeper than five feet. So the option that sounds the most thorough would reach less of it.

The option we prefer treats the contamination through its full depth. In the former plating area it mixes a binder into the soil down to about fifteen feet, locking the contamination in place where it sits. In the northern area it injects a treatment that breaks the solvent down. In the ditch along the southern edge — the one place where digging is the more complete answer — we dig the soil out and haul it away.

Set against full excavation, our preferred option leaves less contamination in the ground, reaches cleanup levels sooner, and costs about \$501,000 less. Of the five options we scored, it ranked highest on protecting people.

So we would push back on one word in your letter. This is not the good-enough option. It is the one that removes and treats the most contamination, and we chose it for that reason.

If you would like to talk any of this through rather than read it, the site manager is glad to do that, and there is a plain-language summary of the investigation on the site webpage. Thank you for writing.

About the use of AI in this document

Generative Artificial Intelligence (AI) was used by public involvement staff to help check the public comment letters against the remedial investigation and feasibility study, and to draft portions of this response. All uses of AI complied with existing and applicable state policy, and all AI-generated content was reviewed and verified by Ecology staff before use. No AI was used in decision-making. For more information about the use of AI in this document, please contact Eric Foss at 509- or [email].