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February 9, 2015
Project No. 0879.01.02

Libby Goldstein
Washington State Department of Ecology
Toxics Cleanup Program, NW Region Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Re: Response to Ecology Comments
Draft Focused Site Assessment Report, Betty Brite Cleaners Site
S. 154th Street Transit-Oriented Development, SeaTac, Washington

Dear Ms. Goldstein:

Please accept this letter responding to Ecology's comments provided on December 22, 2014 pertaining to the draft revision of the Focused Site Assessment Report for the Betty Brite Cleaners Site located in SeaTac, Washington. Please do not hesitate to contact myself or Jeff Robinson with the City of SeaTac should you have any questions regarding the responses to your comments.

1. Based on the information presented in the report, it appears that the release of pentachlorophenol from the Betty Brite Cleaners to soil and ground water has not been fully characterized. The vertical and lateral extent of contaminated soil and ground water has not been determined.

   Response: Concur. As was discussed during the meeting with Ecology staff held on August 14, 2014, site characterization efforts have been limited to those allowable under the relatively limited funding provided by Ecology through the Integrated Planning Grant. The City of SeaTac maintains interest in working with Ecology to resolve contamination issues at the site while not taking on any undue liability associated with property acquisition. The City looks forward to exploring potential options for fully characterizing and remediating the site with Ecology assistance. With the limited funds remaining under the IPG, the City is pursuing completion of a supplemental, downgradient groundwater assessment to gain additional information pertaining to downgradient tetrachloroethene (PCE) impacts. The results of the supplemental investigation will be incorporated into the final revision of the Focused Site Assessment.

2. Soil – It is recognized that collecting soil samples inside a building is difficult; however, the vertical extent of potential soil contamination has not been determined. Soil samples collected within the building (beneath and immediately around the dry cleaning equipment) was limited to a maximum depth of exploration of 5 feet below ground surface (bgs). Levels of pentachlorophenol at these shallow depths which were below MTCA Method A Cleanup levels may be more of a reflection of recent operations and not represent releases that may have occurred from historical operations. Soil at deeper

depths may have levels of pentachlorophenol that are elevated and may be above MTCA Method A Cleanup levels.

The point of compliance for direct contact for soil is from the surface to 15 feet bgs. The area within the dry cleaner facility has not been fully characterized. The point of compliance for soil leaching to ground water is site-wide throughout the soil profile and may extend below the water table. These are the appropriate points of compliance for the Site.

Response: Concur. As was described in Section 3.1 of the draft Focused Site Assessment, direct push drill rig refusal prohibited boring and soil sample collection deeper than 5 feet below the Bette Brite Cleaner concrete flooring (refusal occurred because the limited access direct push drill rig anchors would break free from the brittle concrete flooring). As a result of equipment limitations, it was not feasible to investigate the potential PCE impact of the full soil column to groundwater directly beneath the Bette Brite Cleaners facility while the building remains in-place. Due to this data gap, the Conceptual Site Model, Figure 5, will maintain the dashed line (indicating a potential pathway) for contact with soil, and the residential/commercial workers and construction workers boxes will be revised to reflect potentially complete exposure routes for ingestion, dermal contact, and inhalation. The text in Section 5.3 will be revised to reflect this change to the conceptual site model, and text added that the conceptual site model will be reviewed and revised, as appropriate, should this data gap be filled in the future.

3. Ground water – Ground water at the Site was observed to be above MTCA Method A Cleanup levels. The down gradient extent of the pentachlorophenol contaminated ground water plume was not defined in the Draft Focused Site Assessment Report.

   The standard point of compliance ground water is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest depth which could potentially be affected. This is the appropriate point of compliance for the Site.

   Page 13 of the Draft Focused Site Assessment Report mention conditional point of compliance for ground water. In accordance with WAC 1730340-720(8)(c) Ecology may approve a conditional point of compliance that shall be as close as practicable to the source and not exceed the Property boundary. Because the ground water plume extends past the Property boundary a conditional point of compliance for ground water is not appropriate unless it is to protect surface water in accordance with WAC 13-340-720(8)(d).

   Response: Concur with the interpretation that a conditional point of compliance for PCE is not applicable. Reference to establishment of a conditional point of compliance will be removed from Section 5.6.2.1.

4. Comments on Conclusions. Section 7 Conclusions state that "Human and ecological exposure pathways were deemed as incomplete based on the current and unlikely future

uses of shallow ground water at the Property and surrounding area". Based on the information provided in the Draft Focused Site Assessment Report, Ecology cannot agree with this statement. Soil beneath the dry cleaner has not been adequately characterized for protection of direct contact and may pose a potential hazard when the building is demolished and soil beneath the dry cleaner facility is removed.

Response: Concur. Section 7 will be revised to reflect the changes to the conceptual site model associated with potential exposure to soil discussed in the response to Comment No. 3. In regards to exposure to groundwater, the subject sentence will be revised to read "Human direct contact pathways were deemed as incomplete based on the current and unlikely future uses of shallow groundwater at the Property and surrounding area." This will be stated because there is an indirect contact potential through groundwater volatilization and subsequent inhalation. Ecological receptors contact is incomplete because they would not dig to the depths at which the perched groundwater is present (below 25 feet below ground surface).

5. Comments on Cleanup Action Evaluation. Section 8 presents two alternatives to address contaminated ground water (in situ bioremediation and monitored natural attenuation). Based on the information provided, it is difficult for Ecology to fully evaluate the two alternatives. A source of pentachlorophenol contaminated soil may be beneath the building between 5 feet bgs to ground water assumed to be approximately 25 feet bgs and was not identified during the soil sampling. If soil is contaminated at depth beneath the building, it may act as a continual source of pentachlorophenol to ground water and may impact the efficacy of the two cleanup alternatives.

Response: Concur. Site specific cleanup alternatives were developed based upon the available data and accommodating current site uses. Remedial alternatives to remediate the PCE impacted subsurface may change as additional information is acquired. Should the City pursue a partnership with Ecology for remediating the site, it is understood that a comprehensive remedial investigation/feasibility study will be required to make an informed decision regarding site remediation.

Sincerely,

Maul Foster & Alongi, Inc.

Justin Clary, PE
Principal Engineer

cc: Jeff Robinson, City of SeaTac, Washington