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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits. *HURRY*

1. Article Addressed to:

**MR SHAWN PARRY  
TOUCHSTONE SLU LLC  
2025 FIRST AVENUE, SUITE 1212  
SEATTLE WA 98121**

2. Article Number  
(Transfer from service label)

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
*X [Signature]*  Agent  Addressee

B. Received by (Printed Name) *[Signature]* C. Date of Delivery *3/27/14*

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7012 3460 0000 3272 4212

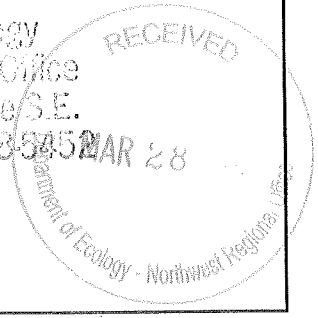
UNITED STATES POSTAL SERVICE  
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27 MAR 2014 PM 5:11

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• Sender: Please print your name, address, and ZIP+4 in this box •

Department of Ecology  
Northwest Regional Office  
3190 - 160th Avenue S.E.  
Bellevue, WA 98008-5452





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

March 26, 2014

Mr. Shawn Parry  
Touchstone SLU LLC  
2025 First Avenue, Suite 1212  
Seattle, WA 98121

Re: Request for Contained-Out Determination, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, Facility/Site Database No. 19135499, RCRA Site ID No. WAD980979884

References:

(a) Electronic Mail and Document from Erin Rothman (Sound Earth Strategies, Inc.) to D. Yasuda (Ecology) dated October 16, 2013, Contained Out Request referencing Troy Laundry Property Request for Contained-Out Determination prepared by Sound Earth Strategies, Inc.

(b) Electronic Mail and Document from Pete Kingston (Sound Earth Strategies, Inc.) to D. Yasuda (Ecology) dated March 1, 2014, Contained Out Determination referencing Troy Laundry Property – Contained-Out Determination Request with laboratory reports for supplemental borings P15 through P19 and revised figures 26A through 26J prepared by Sound Earth Strategies, Inc.

Dear Mr. Parry:

The Washington State Department of Ecology (Ecology) received a contained-out determination request (references a and b) from your environmental consultant, Sound Earth Strategies, for soil contaminated with F002<sup>[1]</sup> listed waste constituents to be generated during site cleanup activities at the Troy Laundry Property (Site), 307 Fairview Avenue North, Seattle, Washington.

Ecology received this information to determine if the contaminated soils may be exempt from management as dangerous wastes under the "Contained-In Policy." Based on the information provided and reviewed to date, Ecology has made the following determinations:

The 140,000 tons<sup>[2]</sup> of F002 (PCE) listed waste contaminated soils (as shown in attached figures 26A through 26J with Ecology designation) to be generated during excavation activities at the Site do not require management as dangerous wastes and Ecology will not require disposal of these contaminated soils as F002 (PCE) listed wastes at a RCRA permitted dangerous waste treatment, storage and disposal (TSD) facility, provided all of the conditions below are implemented.

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<sup>[1]</sup> Main constituent of listed waste in this soil is perchloroethylene (PCE)

<sup>[2]</sup> This estimate was provided by SES, Inc based on information in reference b.



Ecology understands that these soils do not designate under federal characteristics (Washington Administrative Code [WAC] 173-303-090) for F002 waste, mainly PCE, at 0.7 ug/L TCLP and State-only criteria (WAC 173-303-100) at 0.001% equivalent concentration. For

the 140,000 tons of F002 listed waste contaminated soils, you or your consultant shall comply with the following requirements:

- a. Ensure no standing water is present within any container holding the PCE contaminated soil. All water must be removed to the maximum extent possible from each of these containers and managed as F002 listed dangerous wastes without exception. The contaminated groundwater or infiltrated surface water should be removed from the contaminated soils prior to shipment to the landfill. Contaminated water cannot be disposed of into a RCRA Subtitle D (or C) landfill directly.
- b. This Ecology approval letter does not pertain to any decontamination water or groundwater.
- c. Deliver these contaminated soils directly to a permitted RCRA Subtitle D landfill (outside Washington State) such as the Columbia Ridge Solid Waste Landfill in Arlington, Oregon OR a Washington State solid waste landfill permitted under Chapter 173-351 WAC such as the Roosevelt Regional Landfill.
- d. Do not consolidate these contaminated soils with other soils that do not pertain to this contained out determination.
- e. Do not offload these contaminated soils at any temporary staging/transfer/reloading area.
- f. These contaminated soils shall not be used as fill at the Site or any other property.
- g. Plastic line the containers or delivery trucks for direct delivery to the solid waste landfill.
- h. Cover all loads and take adequate measures to prevent spills and dispersion due to wind or rain erosion.
- i. Take measures to prevent unauthorized contact with these soils at all times.
- j. Provide instructions to the landfill operator that these soils are not to be used for daily, intermediate, or final cover.
- k. Provide copies of all soil analytical data to the landfill operator, upon request.
- l. Send copies of all signed solid waste landfill receipt records for these contaminated soils to Ecology, attention of Dean Yasuda, within 15 days of your receipt. Also indicate the total volume/weight of all contaminated soils disposed of under the Ecology approved contained-in determination, and indicate if this total amount is above, below or equal to the total amount approved by this Ecology letter. This is an important verification step for you and your environmental consultant to follow in order for this Ecology decision to be valid.

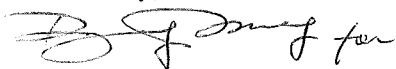
- m. Do not send these contaminated soils to any incinerator, thermal desorption unit, or recycling facility unless that facility is a RCRA Subtitle C permitted hazardous waste TSD facility.
- n. Dispose of the 140,000 tons of PCE-contaminated soils by September 30, 2014, or within 90 days of excavation, whichever comes first. This contained-out determination for these contaminated soils is no longer valid after September 30, 2014. You may submit a written request for an extension before September 30, 2014. After this date, you are required to manage these contaminated soils as dangerous wastes.
- o. This written decision for the contaminated soils does not apply to any other area or other media. Local agencies have the authority to impose additional requirements on this waste stream.
- p. Notify Ecology immediately once you are aware that to-be-excavated soils under this letter will exceed the permitted amount. Ecology needs to make sure that the additional soil qualifies for this contained out determination.

This letter is not a No Further Action (NFA) letter and not written approval for any cleanup action plan you may have submitted to Ecology. Instead, this letter only addresses the procedures for disposal of the PCE contaminated soils according to the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). The Ecology Toxics Cleanup Program will provide regulatory decisions regarding the cleanup action, applicable soil and groundwater cleanup levels and any other cleanup issues required under the Model Toxics Control Act (Chapter 173-340 WAC).

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 (RCW) Sections 70.105.080 and/or .095 (Hazardous Waste Management Act).

If you have any questions concerning this letter, please feel free to contact me by email at [dvas461@ecy.wa.gov](mailto:dvas461@ecy.wa.gov) or by telephone at (425) 649-7264.

Sincerely,

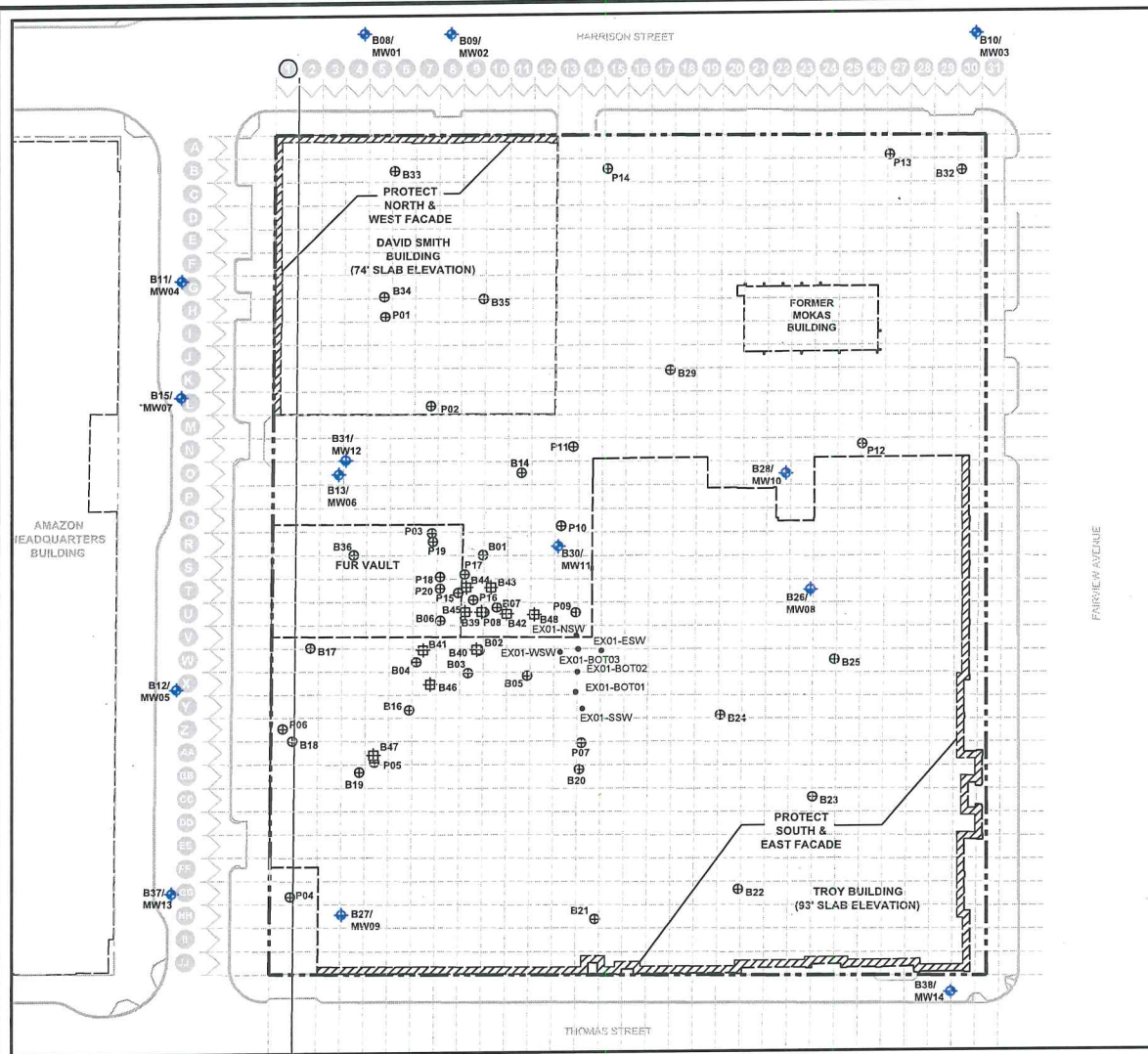


Dean Yasuda, PE  
Hazardous Waste and Toxics Reduction Program

By certified mail 7012 3460 0000 3272 4212

cc: Lisa Brown, Ecology-ERO  
Greg Caron, Ecology-CRO  
Donna Musa, Ecology-NWRO  
Byung Maeng, Ecology-NWRO  
Samuel Iwenofu, Ecology-SWRO  
Maura O'Brien, Ecology-NWRO  
Pete Kingston, Sound Earth Strategies, Inc.  
Bill Lasby, Seattle-King County Public Health ([Bill.Lasby@kingcounty.gov](mailto:Bill.Lasby@kingcounty.gov))  
Dave Christensen, Seattle-King County Public Health  
([david.christensen@kingcounty.gov](mailto:david.christensen@kingcounty.gov))  
FS Database No. 19135499 RCRA Site ID No. WAD9809

P:0731 TOUCHSTONE 0731-004 TROY LAUNDRY TECHNICAL CAD 2013 EXC-CONTAINED OUT 0731-004 2013 EXC-CO SMP-GRID\_PCE\_BLR/JQC.DWG 2/28/2014



### LEGEND

- MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- SOIL MANAGEMENT GRID (10' x 10' x 10' : 1000FT)

### SOIL MANAGEMENT LAYER - 01 (105' - 100' ELEVATION - NAVD88)

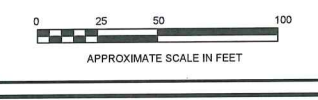
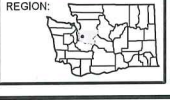
\*BASED ON EMPIRICAL AND MODELED DATA

	PCE IN SOIL DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)	} 0 FT <sup>3</sup>	0 CY
	DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	} 0 FT <sup>3</sup>	0 CY
	10' BUFFER ZONE	} 0 FT <sup>3</sup>	0 CY
	SOIL INCLUDED WITHIN CONTAINED OUT REQUEST	}	

--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 - - - MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)

DATE: 02/28/2014  
 DRAWN BY: VPB/BLR/JQC  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON

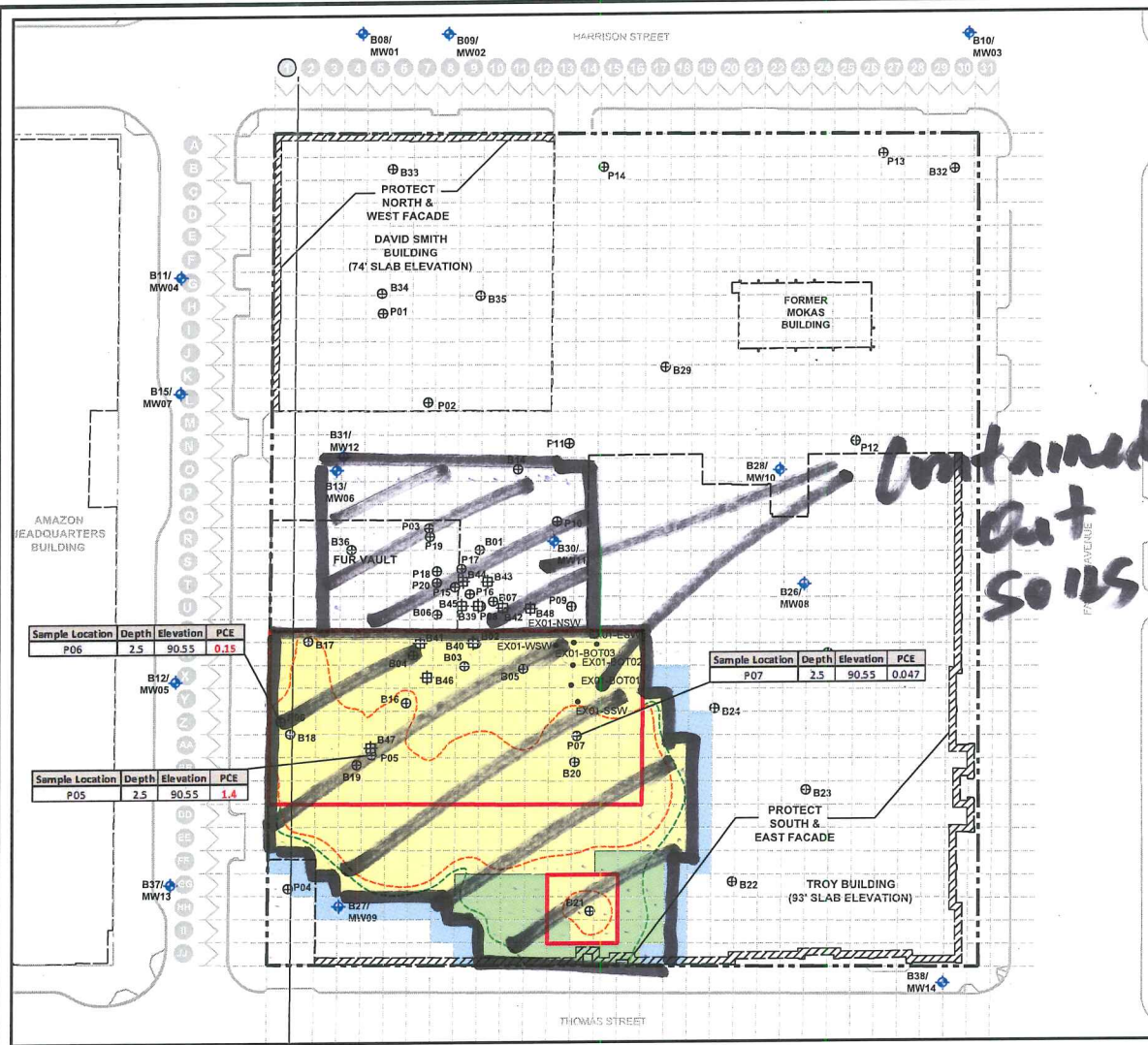


**FIGURE 26A**  
 SOIL MANAGEMENT GRID  
 LAYER - 01 (105' - 100')



2/28/2014

P:\0731 TOUGHSSTONE\0731-004 TROY LAUNDRY\TECHNICAL\CAD\015 EXC CONTAINED OUT\0731-004\_2013EXC-CO\_SMP-GRID\_PCE\_BLR\JQC\DWG



Sample Location	Depth	Elevation	PCE
P06	2.5	90.55	0.15

Sample Location	Depth	Elevation	PCE
P05	2.5	90.55	1.4

Sample Location	Depth	Elevation	PCE
P07	2.5	90.55	0.047

### LEGEND

- MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- SOIL MANAGEMENT GRID (10' x 10' x 10' : 1000FT)

### SOIL MANAGEMENT LAYER - 02 (100' - 90' ELEVATION - NAVD88)

\*BASED ON EMPIRICAL AND MODELED DATA

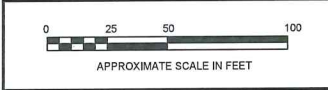
	PCE IN SOIL DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)	28,000 FT <sup>3</sup>	1,037 CY
	DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	189,000 FT <sup>3</sup>	7,000 CY
	10' BUFFER ZONE	30,000 FT <sup>3</sup>	1,111 CY
	SOIL INCLUDED WITHIN CONTAINED OUT REQUEST	129,000 FT <sup>3</sup>	4,778 CY

--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 - - - MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)



DATE: 02/28/2014  
 DRAWN BY: VPB/BLR/JQC  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

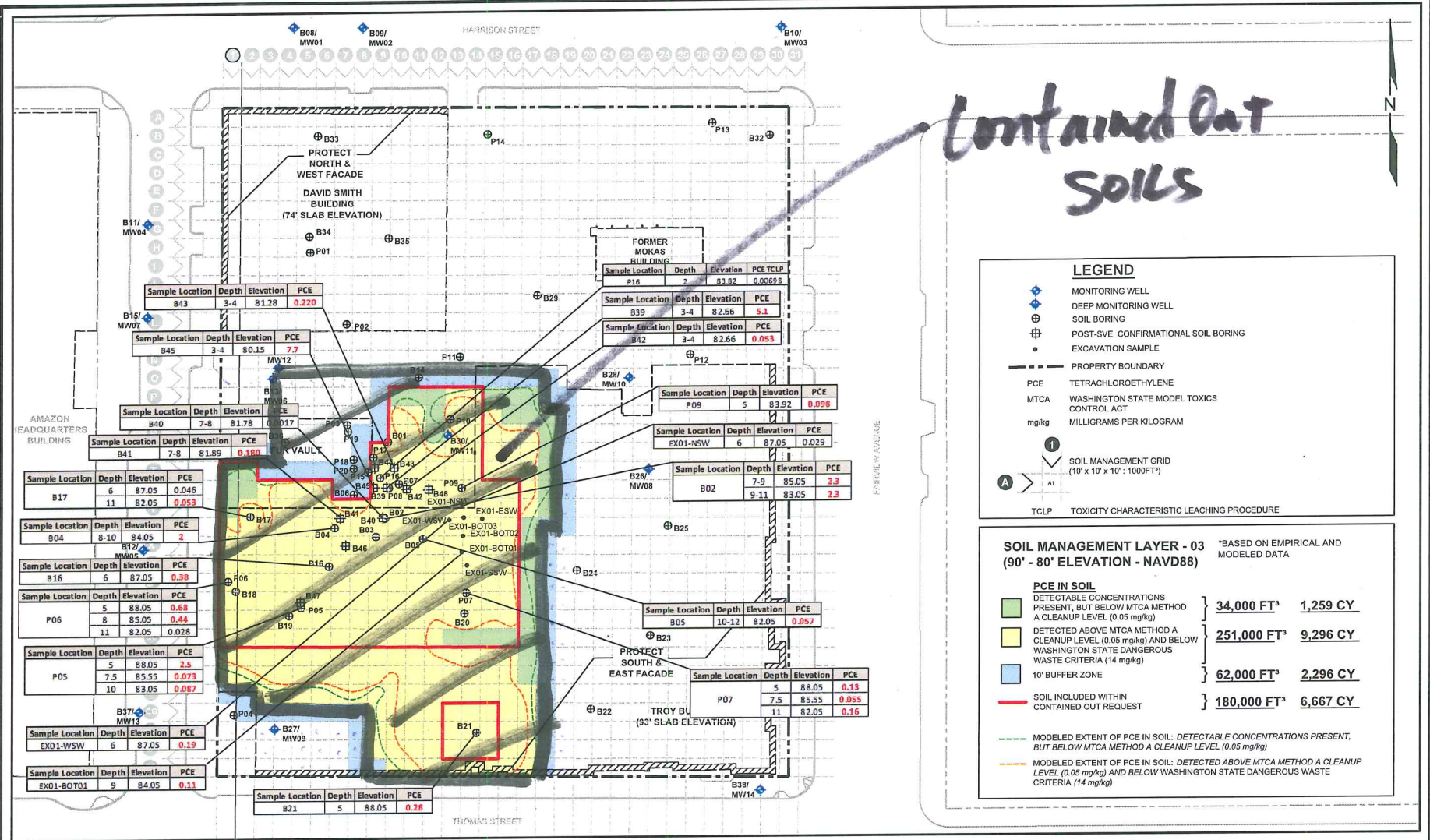
PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 26B**  
 SOIL MANAGEMENT GRID  
 LAYER - 02 (100' - 90')

2/28/2014

R:\0731 TOUGLUSTONE\0731-004 TROY LAUNDRY\TECHNICAL\CAD\03 EXC CONTAINED OUT\0731-004\_2013EXC-CO\_SMP\_GRID\_PCE\_BLR\DCM\DCM.DWG



**LEGEND**

- Monitoring Well
- Deep Monitoring Well
- Soil Boring
- Post-SVE Confirmational Soil Boring
- Excavation Sample
- Property Boundary
- PCE (Tetrachloroethylene)
- MTCa (Washington State Model Toxics Control Act)
- mg/kg (Milligrams per Kilogram)
- Soil Management Grid (10' x 10' x 10' = 1000FT<sup>3</sup>)
- TCLP (Toxicity Characteristic Leaching Procedure)

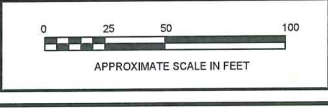
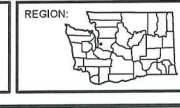
**SOIL MANAGEMENT LAYER - 03 (90' - 80' ELEVATION - NAVD88)** \*BASED ON EMPIRICAL AND MODELED DATA

PCE IN SOIL	Volume	Quantity
DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg)	34,000 FT <sup>3</sup>	1,259 CY
DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	251,000 FT <sup>3</sup>	9,296 CY
10' BUFFER ZONE	62,000 FT <sup>3</sup>	2,296 CY
SOIL INCLUDED WITHIN CONTAINED OUT REQUEST	180,000 FT <sup>3</sup>	6,667 CY

MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)

DATE: 01/13/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON

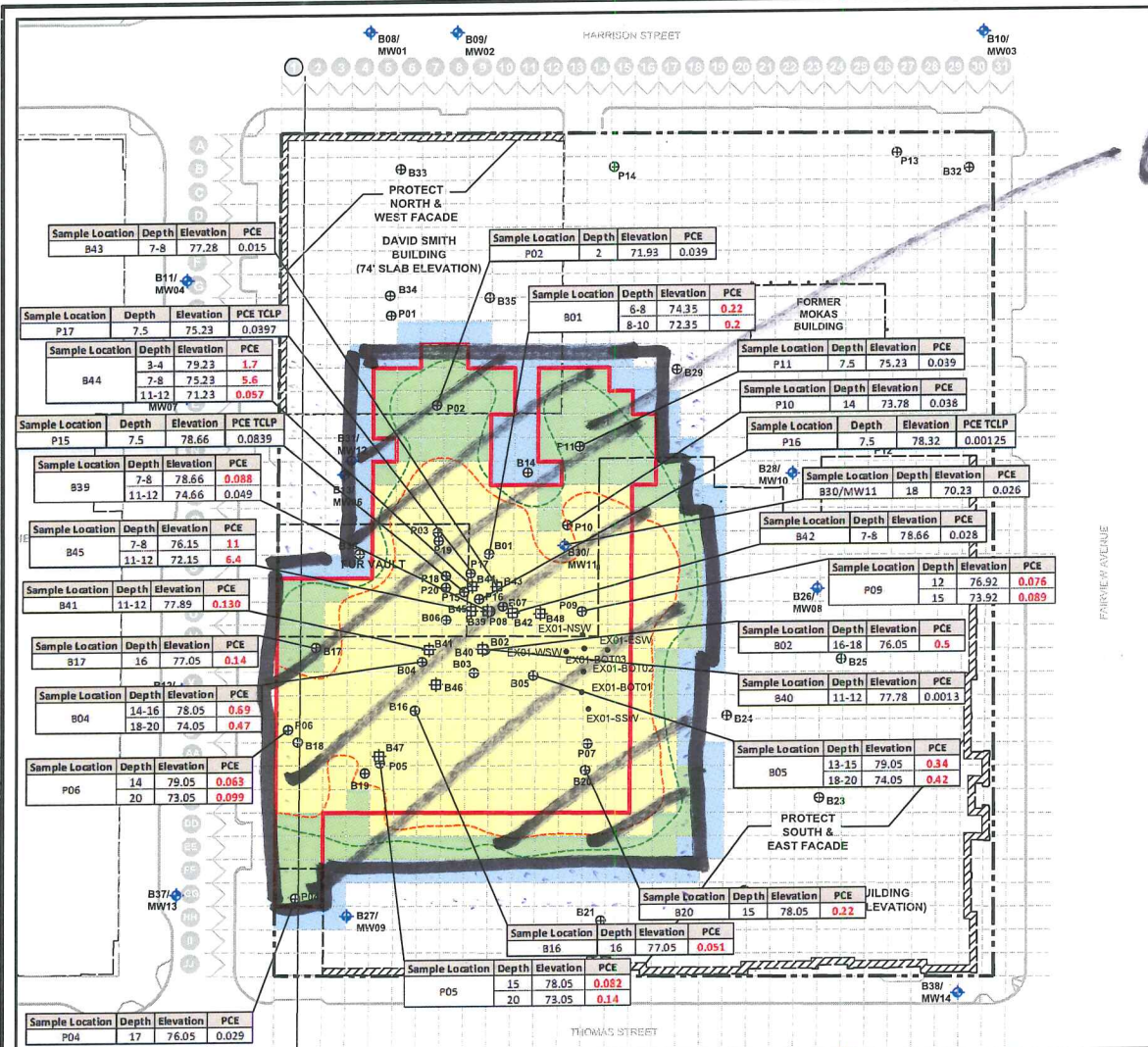


**FIGURE 26C**  
 SOIL MANAGEMENT GRID  
 LAYER - 03 (90' - 80')



2/28/2014

P:0731 TOUCHSTONE/0731-004 TROY LAUNDRY/TECHNICAL CAD/2013 EXC-GRID PCE BLR/JQC/MG DIVS



Contained Out Soils

**LEGEND**

- Monitoring Well
- Deep Monitoring Well
- Soil Boring
- Post-SVE Confirmational Soil Boring
- Excavation Sample
- Property Boundary
- PCE: Tetrachloroethylene
- MTCA: Washington State Model Toxics Control Act
- mg/kg: Milligrams per Kilogram
- Soil Management Grid (10' x 10' x 10' : 1000FT')
- TCLP: Toxicity Characteristic Leaching Procedure

**SOIL MANAGEMENT LAYER - 04 (80' - 70' ELEVATION - NAVD88)** \*BASED ON EMPIRICAL AND MODELED DATA

**PCE IN SOIL**

- DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) } **98,000 FT<sup>3</sup> 3,630 CY**
- DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg) } **221,000 FT<sup>3</sup> 8,185 CY**
- 10' BUFFER ZONE } **84,000 FT<sup>3</sup> 3,111 CY**
- SOIL INCLUDED WITHIN CONTAINED OUT REQUEST } **251,000 FT<sup>3</sup> 9,296 CY**

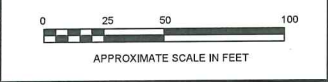
MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)

MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)



DATE: 02/28/2014  
 DRAWN BY: VPB/BLR/JQC  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



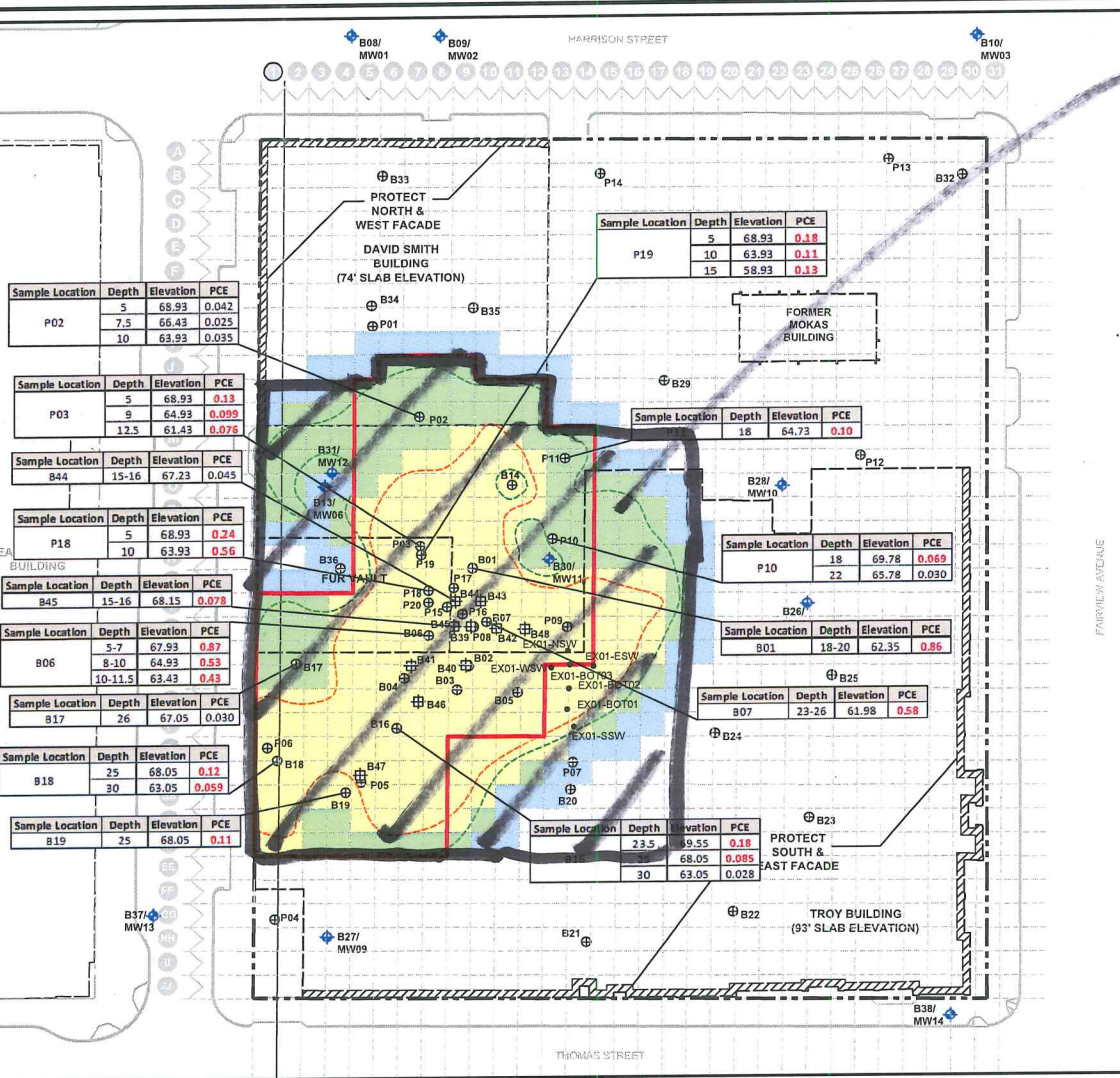
**FIGURE 26D**  
 SOIL MANAGEMENT GRID  
 LAYER - 04 (80' - 70')



2/28/2014

P:\0731-TOUGHSTONE\0731-004 TROY LAUNDRY\TECHNICAL\CAD\2013 EXC-003 EXC CONTAINED OUT\0731-004\_2013EXC-CO\_SMP-GRID\_PCE\_BLR\JOC\AC.DWG

Contained Out Soils



### LEGEND

- Monitoring Well
- Deep Monitoring Well
- Soil Boring
- Post-SVE Confirmational Soil Boring
- Excavation Sample
- Property Boundary
- PCE: TETRACHLOROETHYLENE
- MTCA: WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg: MILLIGRAMS PER KILOGRAM
- Soil Management Grid (10' x 10' x 10' : 1000FT<sup>3</sup>)
- TLIP: TOXICITY CHARACTERISTIC LEACHING PROCEDURE

### SOIL MANAGEMENT LAYER - 05 (70' - 60' ELEVATION - NAVD88)

\*BASED ON EMPIRICAL AND MODELED DATA

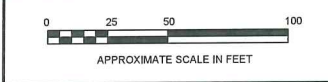
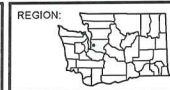
Category	Volume (FT <sup>3</sup> )	Volume (CY)
PCE IN SOIL DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)	101,000 FT <sup>3</sup>	3,741 CY
DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	178,000 FT <sup>3</sup>	6,593 CY
10' BUFFER ZONE	64,000 FT <sup>3</sup>	2,730 CY
SOIL INCLUDED WITHIN CONTAINED OUT REQUEST	209,990 FT <sup>3</sup>	7,777 CY

MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)



DATE: 02/28/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

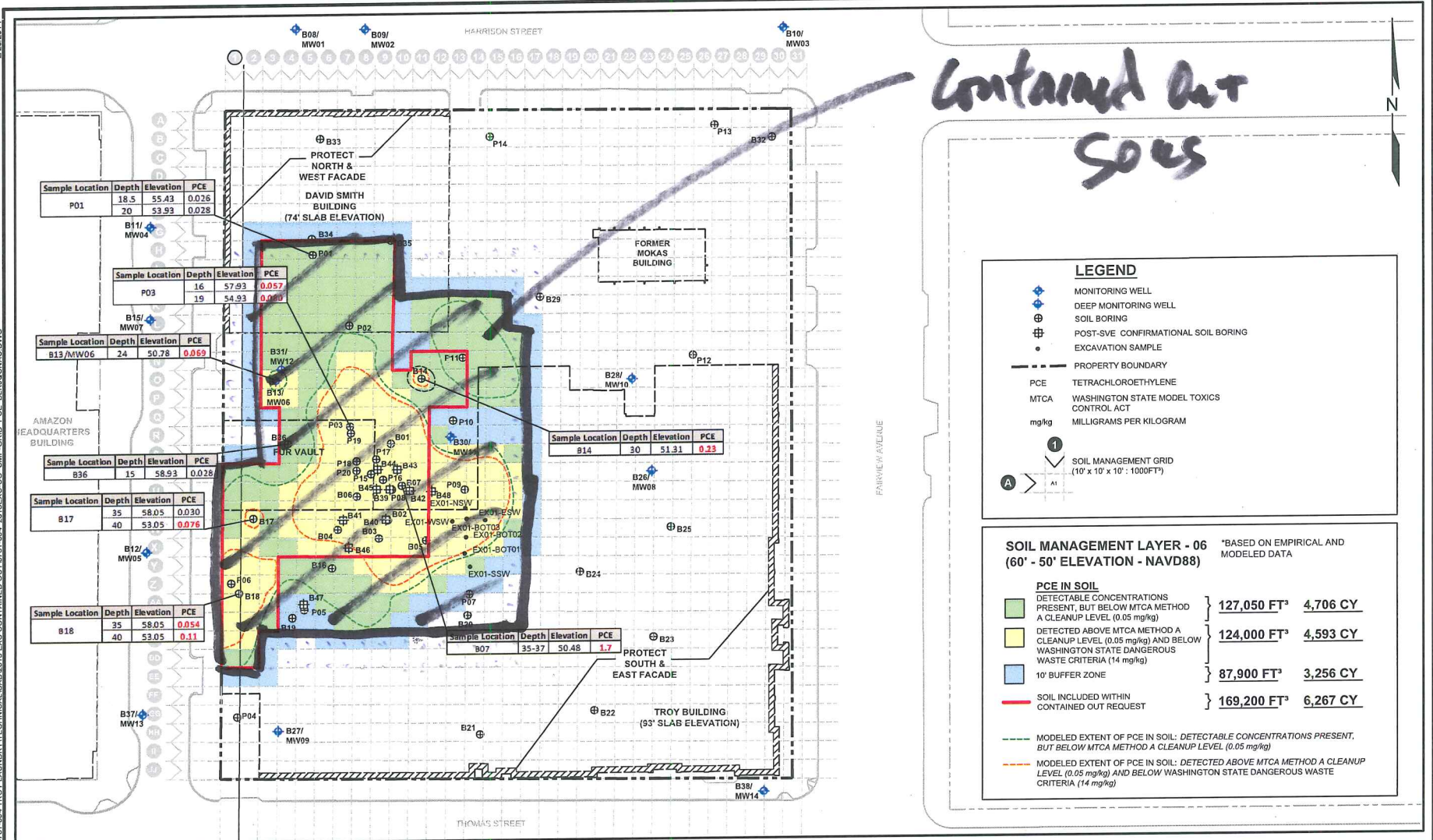
PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 26E**  
 SOIL MANAGEMENT GRID  
 LAYER - 05 (70' - 60')

2/28/2014

P:0731-TOUCHSTONE-0731-004-TROY LAUNDRY TECHNICAL CAD:0731-004-2013EXC-CO-SMP-GRID.PCE-BLUECOC.MXD



Sample Location	Depth	Elevation	PCE
P01	18.5	55.43	0.026
	20	53.93	0.028

Sample Location	Depth	Elevation	PCE
P03	16	57.93	0.057
	19	54.93	0.000

Sample Location	Depth	Elevation	PCE
B13/MW06	24	50.78	0.069

Sample Location	Depth	Elevation	PCE
B36	15	58.93	0.028

Sample Location	Depth	Elevation	PCE
B17	35	58.05	0.030
	40	53.05	0.078

Sample Location	Depth	Elevation	PCE
B18	35	58.05	0.054
	40	53.05	0.11

Sample Location	Depth	Elevation	PCE
B14	30	51.31	0.23

Sample Location	Depth	Elevation	PCE
B07	35-37	50.48	1.7

**LEGEND**

- Monitoring Well (Blue diamond)
- Deep Monitoring Well (Blue diamond with cross)
- Soil Boring (Circle with cross)
- Post-SVE Confirmational Soil Boring (Circle with cross and dot)
- Excavation Sample (Circle with dot)
- Property Boundary (Dashed line)
- PCE (Tetrachloroethylene)
- MTCa (Washington State Model Toxics Control Act)
- mg/kg (Milligrams per kilogram)
- Soil Management Grid (10' x 10' x 10': 1000FT)

**SOIL MANAGEMENT LAYER - 06 (60' - 50' ELEVATION - NAVD88)** \*BASED ON EMPIRICAL AND MODELED DATA

**PCE IN SOIL**

- DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) } **127,050 FT<sup>3</sup> 4,706 CY**
- DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg) } **124,000 FT<sup>3</sup> 4,593 CY**
- 10' BUFFER ZONE } **87,900 FT<sup>3</sup> 3,256 CY**
- SOIL INCLUDED WITHIN CONTAINED OUT REQUEST } **169,200 FT<sup>3</sup> 6,267 CY**

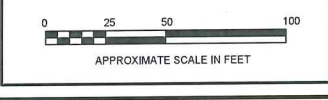
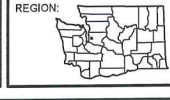
--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg)

--- MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)



DATE: 02/28/2014  
 DRAWN BY: VPB/BLR  
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 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON

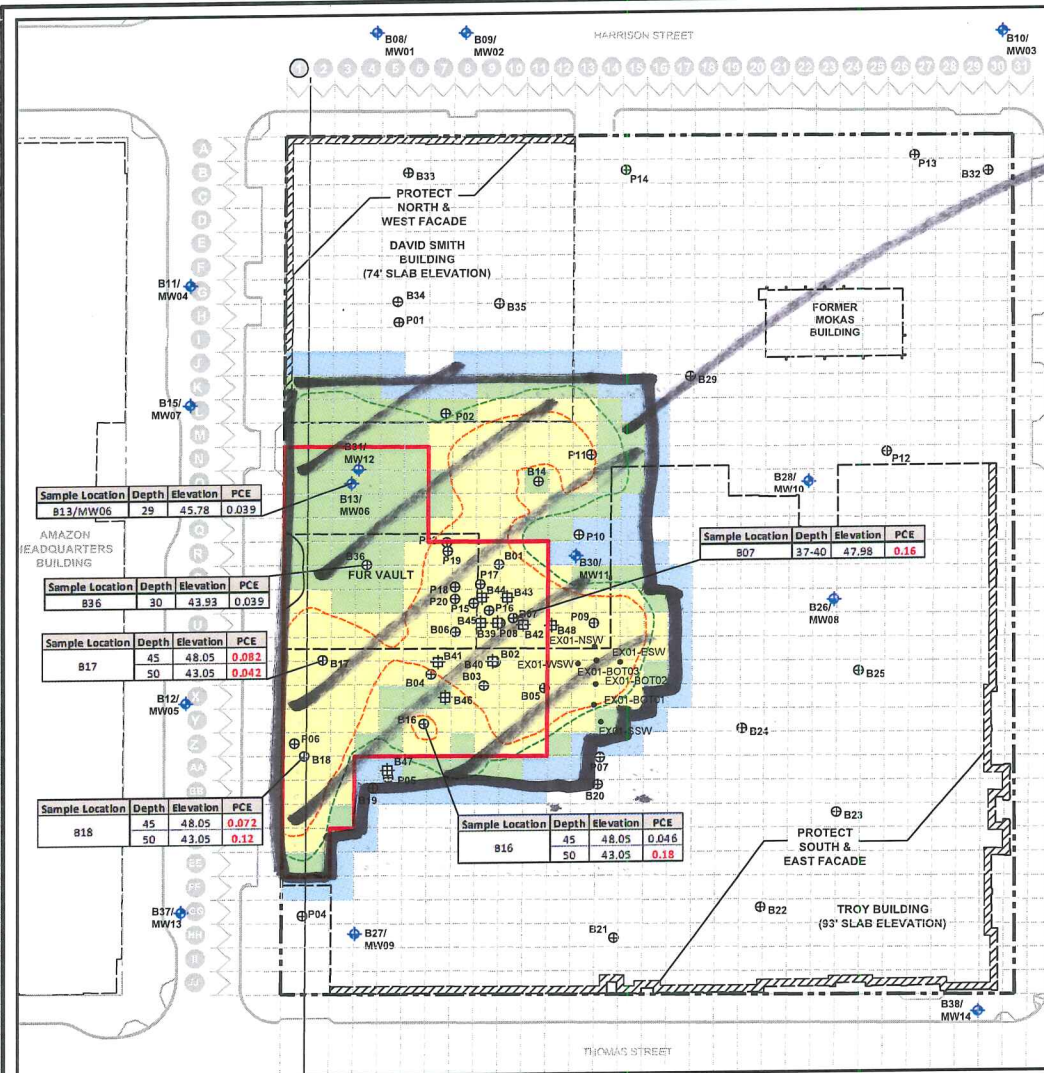


**FIGURE 26F**  
 SOIL MANAGEMENT GRID  
 LAYER - 06 (60' - 50')



2/28/2014

P:\0731 TOUCHSTONE\0731-004 TROY LAUNDRY\TECHNICAL\GD\2013 EXC-CONTAINED OUT\0731-004\_2013EXC-CO\_SMP\_GRID\_PCE\_BLR.DWG



Contained Out Soils

Sample Location	Depth	Elevation	PCE
B13/MW06	29	45.78	0.039

Sample Location	Depth	Elevation	PCE
B36	30	43.93	0.039

Sample Location	Depth	Elevation	PCE
B17	45	48.05	0.082
	50	43.05	0.042

Sample Location	Depth	Elevation	PCE
B18	45	48.05	0.072
	50	43.05	0.12

Sample Location	Depth	Elevation	PCE
B16	45	48.05	0.046
	50	43.05	0.18

Sample Location	Depth	Elevation	PCE
B07	37-40	47.98	0.16

**LEGEND**

- MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- SOIL MANAGEMENT GRID (10' x 10' x 10' : 1000FT)

**SOIL MANAGEMENT LAYER - 07 (50' - 40' ELEVATION - NAVD88)** \*BASED ON EMPIRICAL AND MODELED DATA

**PCE IN SOIL**

- DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) } **97,000 FT<sup>3</sup> 3,593 CY**
- DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg) } **146,000 FT<sup>3</sup> 5,407 CY**
- 10' BUFFER ZONE } **66,000 FT<sup>3</sup> 2,444 CY**
- SOIL INCLUDED WITHIN CONTAINED OUT REQUEST } **135,713 FT<sup>3</sup> 5,026 CY**

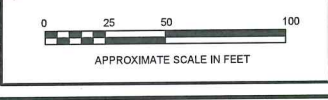
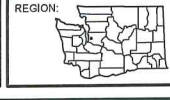
--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)

--- MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)



DATE: 01/13/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 26G**  
 SOIL MANAGEMENT GRID  
 LAYER - 07 (50' - 40')



Contained Out Soils

**LEGEND**

- MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCa WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- SOIL MANAGEMENT GRID (10' x 10' = 1000FT<sup>2</sup>)

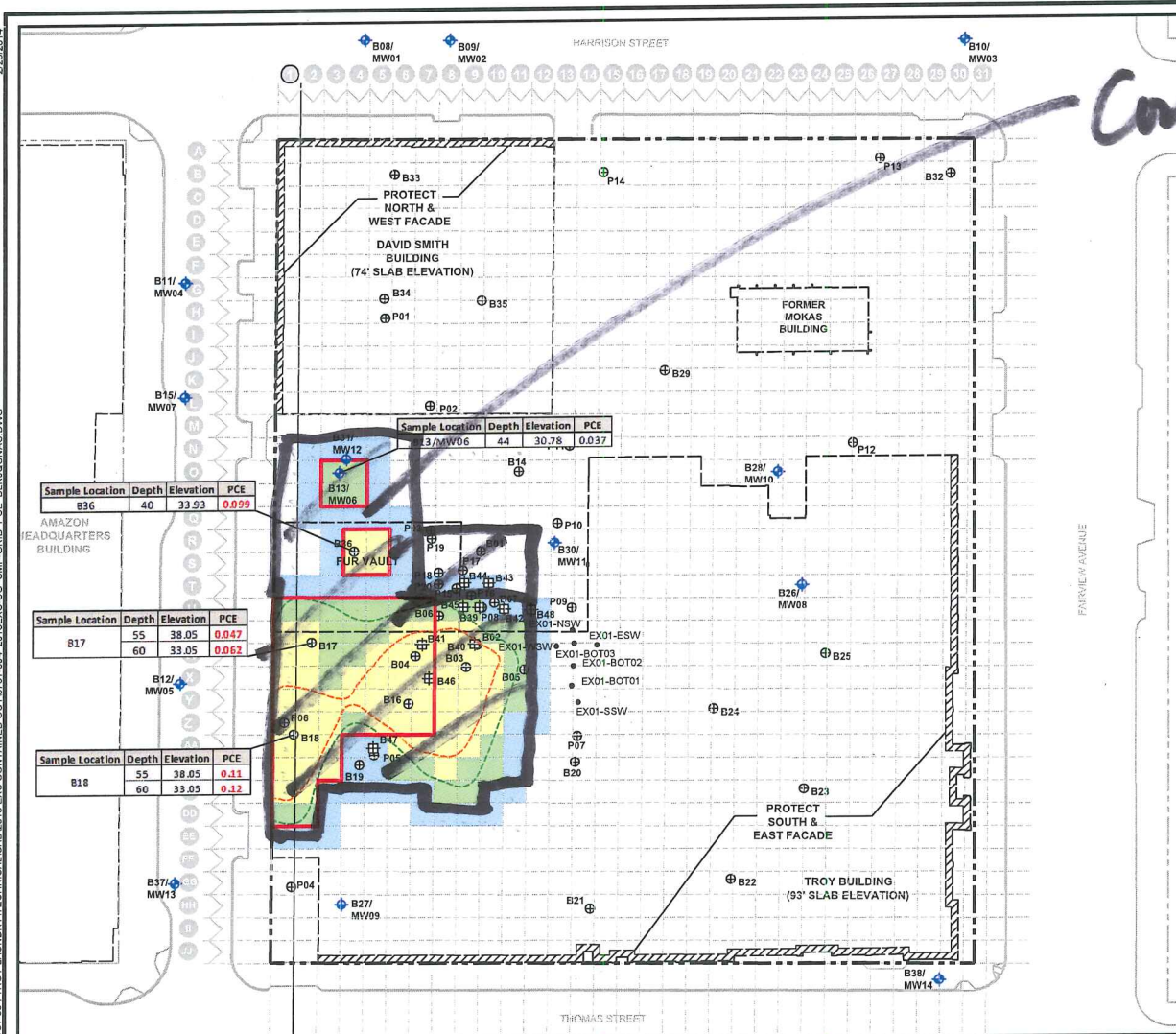
**SOIL MANAGEMENT LAYER - 08**  
(40' - 30' ELEVATION - NAVD88)

\*BASED ON EMPIRICAL AND MODELED DATA

	PCE IN SOIL DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg)	34,000 FT <sup>3</sup>	1,259 CY
	DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	59,000 FT <sup>3</sup>	2,185 CY
	10' BUFFER ZONE	57,000 FT <sup>3</sup>	2,111 CY
	SOIL INCLUDED WITHIN CONTAINED OUT REQUEST	60,032 FT <sup>3</sup>	2,223 CY

--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg)

--- MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCa METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)

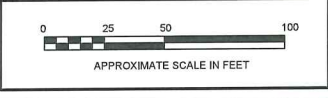
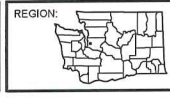


2/25/2014  
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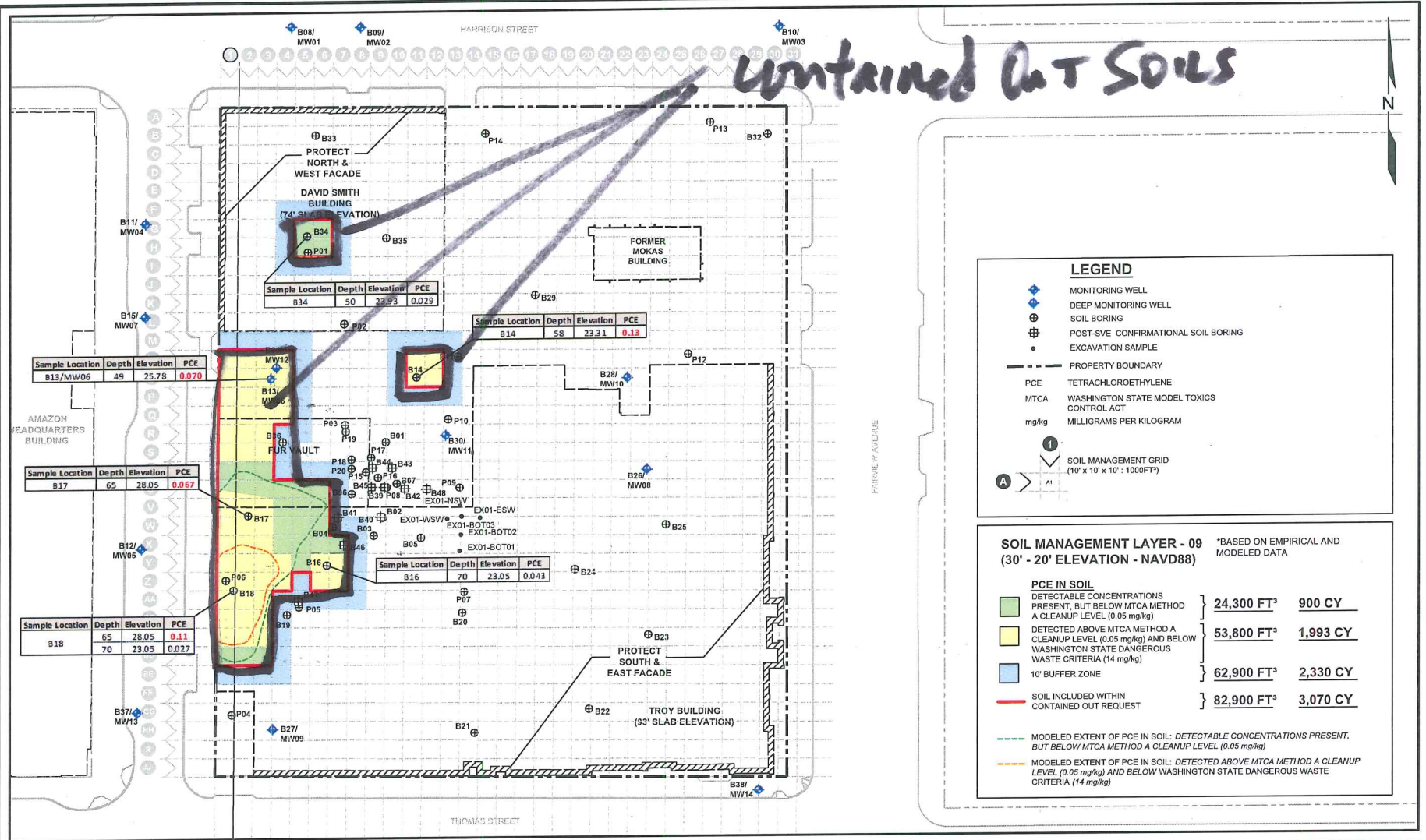
DATE: 01/13/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO-SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 26H**  
SOIL MANAGEMENT GRID  
LAYER - 08 (40' - 30')

P:\0731 TOUCHSTONE\0731-004 TROY LAUNDRY\TECHNICAL\CAD\2013 EXC CONTAINED OUT\0731-004\_2013EXC-CO\_SMP-GRID\_PCE\_BLR.IDOC\MAC.DWG 2/28/2014



Contained Out Soils

**LEGEND**

- ◆ MONITORING WELL
- ◆ DEEP MONITORING WELL
- ⊕ SOIL BORING
- ⊕ POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- ① SOIL MANAGEMENT GRID (10' x 10' x 10' : 1000FT)

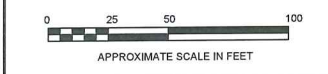
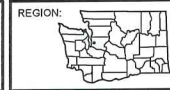
**SOIL MANAGEMENT LAYER - 09 (30' - 20' ELEVATION - NAVD88)** \*BASED ON EMPIRICAL AND MODELED DATA

<p><b>PCE IN SOIL</b></p> <ul style="list-style-type: none"> <li><span style="color: green;">■</span> DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)</li> <li><span style="color: yellow;">■</span> DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)</li> <li><span style="color: blue;">■</span> 10' BUFFER ZONE</li> <li><span style="color: red;">■</span> SOIL INCLUDED WITHIN CONTAINED OUT REQUEST</li> </ul>	<table border="0"> <tr> <td style="font-size: 2em;">}</td> <td style="font-size: 1.5em;"><b>24,300 FT<sup>3</sup></b></td> <td style="font-size: 1.5em;"><b>900 CY</b></td> </tr> <tr> <td style="font-size: 2em;">}</td> <td style="font-size: 1.5em;"><b>53,800 FT<sup>3</sup></b></td> <td style="font-size: 1.5em;"><b>1,993 CY</b></td> </tr> <tr> <td style="font-size: 2em;">}</td> <td style="font-size: 1.5em;"><b>62,900 FT<sup>3</sup></b></td> <td style="font-size: 1.5em;"><b>2,330 CY</b></td> </tr> <tr> <td style="font-size: 2em;">}</td> <td style="font-size: 1.5em;"><b>82,900 FT<sup>3</sup></b></td> <td style="font-size: 1.5em;"><b>3,070 CY</b></td> </tr> </table>	}	<b>24,300 FT<sup>3</sup></b>	<b>900 CY</b>	}	<b>53,800 FT<sup>3</sup></b>	<b>1,993 CY</b>	}	<b>62,900 FT<sup>3</sup></b>	<b>2,330 CY</b>	}	<b>82,900 FT<sup>3</sup></b>	<b>3,070 CY</b>
}	<b>24,300 FT<sup>3</sup></b>	<b>900 CY</b>											
}	<b>53,800 FT<sup>3</sup></b>	<b>1,993 CY</b>											
}	<b>62,900 FT<sup>3</sup></b>	<b>2,330 CY</b>											
}	<b>82,900 FT<sup>3</sup></b>	<b>3,070 CY</b>											

--- MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 --- MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)

**SoundEarth Strategies**  
 DATE: 02/28/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON

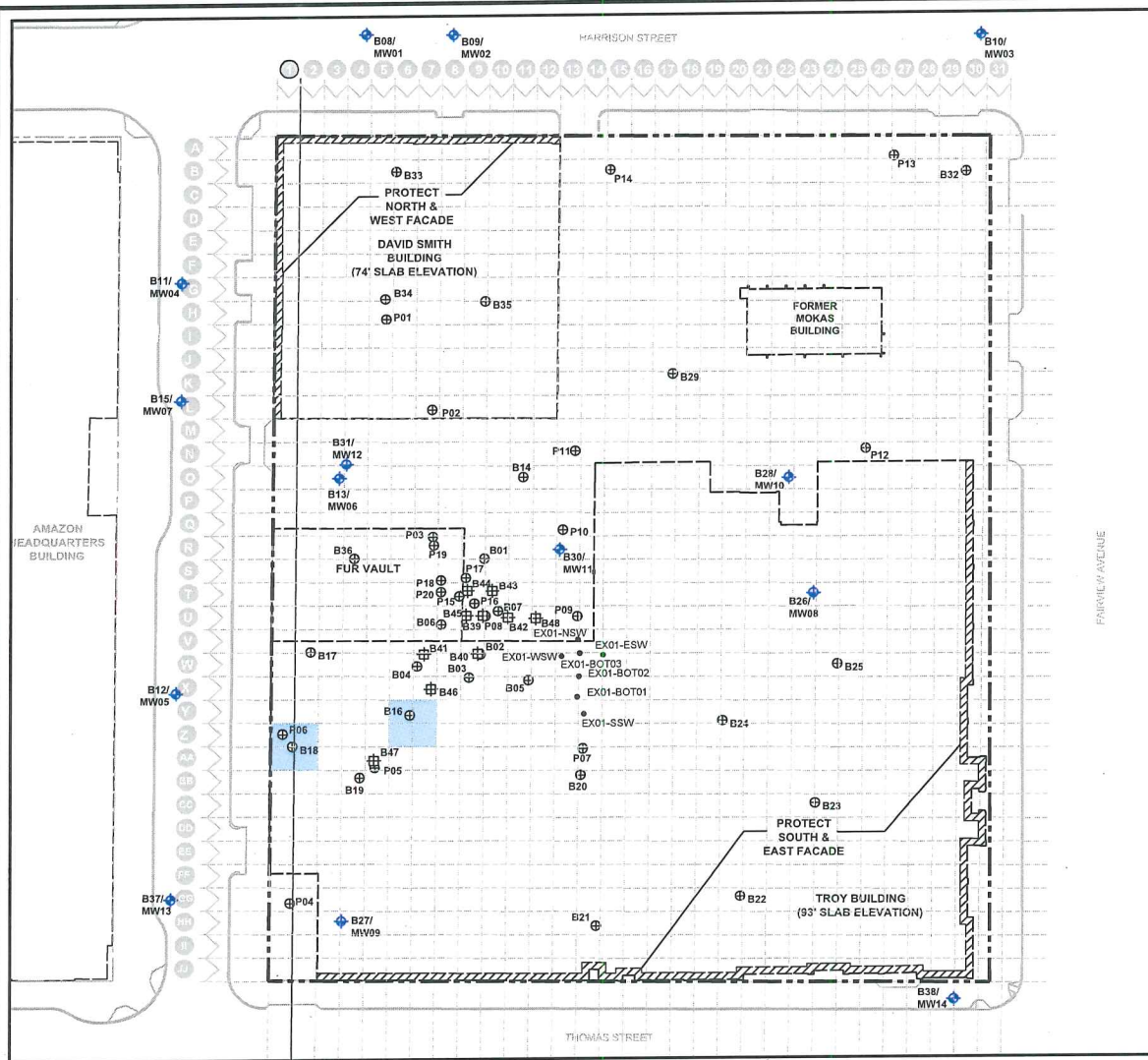


**FIGURE 26I**  
 SOIL MANAGEMENT GRID  
 LAYER - 09 (30' - 20')



2/28/2014

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### LEGEND

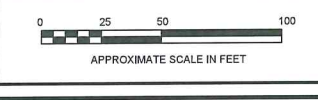
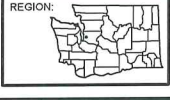
- MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- POST-SVE CONFIRMATIONAL SOIL BORING
- EXCAVATION SAMPLE
- PROPERTY BOUNDARY
- PCE TETRACHLOROETHYLENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- SOIL MANAGEMENT GRID (10' x 10' x 10' - 1000FT<sup>3</sup>)

SOIL MANAGEMENT LAYER - 10 (20' - 10' ELEVATION - NAVD88)		*BASED ON EMPIRICAL AND MODELED DATA	
DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)	0 FT <sup>3</sup>	0 CY	
DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	0 FT <sup>3</sup>	0 CY	
10' BUFFER ZONE	8,000 FT <sup>3</sup>	296 CY	
SOIL INCLUDED WITHIN CONTAINED OUT REQUEST			

MODELED EXTENT OF PCE IN SOIL: DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)  
 MODELED EXTENT OF PCE IN SOIL: DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)

**SoundEarth Strategies**  
 DATE: 01/13/2014  
 DRAWN BY: VPB/BLR  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2013EXC-CO\_SMP

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 26J**  
SOIL MANAGEMENT GRID LAYER - 10 (20' - 10')



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

January 29, 2015

Mr. Shawn Parry  
Touchstone SLU LLC  
2025 First Avenue, Suite 1212  
Seattle, WA 98121

Re: Second Request for Contained-Out Determination, Troy Laundry Property, 307 Fairview Avenue North, Seattle, Washington, Facility/Site Database No. 19135499, RCRA Site ID No. WAD980979884

References:

- (a) Electronic Mail and Document from P. Kingston (Sound Earth Strategies, Inc) Inc.) to D. Yasuda (Ecology) dated January 22, 2015, Request for Contained Out Determination Addendum, Troy Laundry Property – Agreed Order DE8996 - 307 Fairview Avenue North, Seattle, Washington.

Dear Mr. Parry:

The Washington State Department of Ecology (Ecology) received a second contained-out determination request (reference a) from your environmental consultant, Sound Earth Strategies, for additional soil contaminated with F002<sup>[1]</sup> listed waste constituents to be generated during site cleanup activities at the Troy Laundry Property (Site), 307 Fairview Avenue North, Seattle, Washington.

Ecology received this information to determine if the contaminated soils may be exempt from management as dangerous wastes under the “Contained-In Policy.” Based on the information provided and reviewed to date, Ecology has made the following determinations:

The 1,700 additional tons<sup>[2]</sup> of F002 (PCE) listed waste contaminated soils (as shown in attached figure 26I between 20-30 feet below ground surface) to be generated during excavation activities at the Site do not require management as dangerous wastes and Ecology will not require disposal of these contaminated soils as F002 (PCE) listed wastes at a RCRA permitted dangerous waste treatment, storage and disposal (TSD) facility, provided all of the conditions below are implemented.

Ecology understands that these soils do not designate under federal characteristics (Washington Administrative Code [WAC] 173-303-090) and State-only criteria (WAC 173-303-100). For the additional 1,700 tons of F002 listed waste contaminated soils, you or your consultant shall comply with the following requirements:

- a. Ensure **no standing water** is present **within any container** holding the PCE contaminated soil. All water must be removed to the maximum extent possible from each of these containers and managed as F002 listed dangerous wastes without exception. The contaminated groundwater or infiltrated surface water should be removed from the

<sup>[1]</sup> Main constituent of listed waste in this soil is perchloroethylene (PCE)

<sup>[2]</sup> This estimate was provided by SES, Inc based on information in reference a.





contaminated soils prior to shipment to the landfill. Contaminated water cannot be disposed of into a RCRA Subtitle D (or C) landfill directly.

- b. This Ecology approval letter does not pertain to any decontamination water or groundwater.
- c. Deliver these contaminated soils directly to a permitted RCRA Subtitle D landfill (outside Washington State) such as the Columbia Ridge Solid Waste Landfill in Arlington, Oregon OR a Washington State solid waste landfill permitted under Chapter 173-351 WAC such as the Roosevelt Regional Landfill.
- d. Soils in secure containers can be sent to a rail loading area, but contaminated soils shall not be removed from those secure containers and placed on the ground (creating a contaminated soil pile) at the transfer facility.
- e. Do not consolidate these contaminated soils with other soils that do not pertain to this contained out determination.
- f. These contaminated soils shall not be used as fill at the Site or any other Property.
- g. Plastic line the containers or delivery trucks for direct delivery to the solid waste landfill.
- h. Cover all excavated soils and take adequate measures to prevent spills and dispersion due to wind or rain erosion.
- i. Take measures to prevent unauthorized contact with these soils at all times.
- j. Provide instructions to the landfill operator that these soils are not to be used for daily, intermediate, or final cover.
- k. Provide copies of all soil analytical data to the landfill operator, upon request.
- l. Send copies of all signed solid waste landfill receipt records for these contaminated soils to Ecology, attention of Dean Yasuda, within 15 days of your receipt. Also indicate the total volume/weight of all contaminated soils disposed of under the Ecology approved contained-in determination, and indicate if this total amount is above, below or equal to the total amount approved by this Ecology letter. This is an important verification step for you and your environmental consultant to follow in order for this Ecology decision to be valid.
- m. Do not send these contaminated soils to any incinerator, thermal desorption unit, or recycling facility unless that facility is a RCRA Subtitle C permitted hazardous waste TSD facility.
- n. Dispose of the 1,700 tons of PCE-contaminated soils by March 18, 2015. This contained-out determination for these contaminated soils is no longer valid after March 18, 2015. After this date, you are required to manage these contaminated soils as dangerous wastes.
- o. This written decision for the contaminated soils does not apply to any other area or other media. Local agencies have the authority to impose additional requirements on this waste stream.
- p. Notify Ecology immediately once you are aware that contaminated soils under this letter will exceed the permitted amount. Ecology needs to make sure that the additional soil qualifies for this contained out determination.

Mr. Shawn Parry  
January 29, 2015  
Page 3 of 3

This letter only addresses the procedures for disposal of the above described PCE contaminated soils generated at the Site in accordance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC). This letter is not an Ecology approval for dangerous waste designation process or disposal of soils that may be generated in the future or already excavated outside the locations for which this contained out approval letter applies. Designation (as dangerous wastes or non-dangerous wastes) and proper disposal of those "outside" soils is a responsibility of the generator of excavated soils.

This letter is not a No Further Action (NFA) letter and not written approval for any cleanup action plan you may have submitted. 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 (MTCA).

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 (RCW) Sections 70.105.080 and/or .095 (Hazardous Waste Management Act).

If you have any questions concerning this letter, please feel free to contact me at (425) 649-7264 or by email at [dyas461@ecy.wa.gov](mailto:dyas461@ecy.wa.gov).

Sincerely,

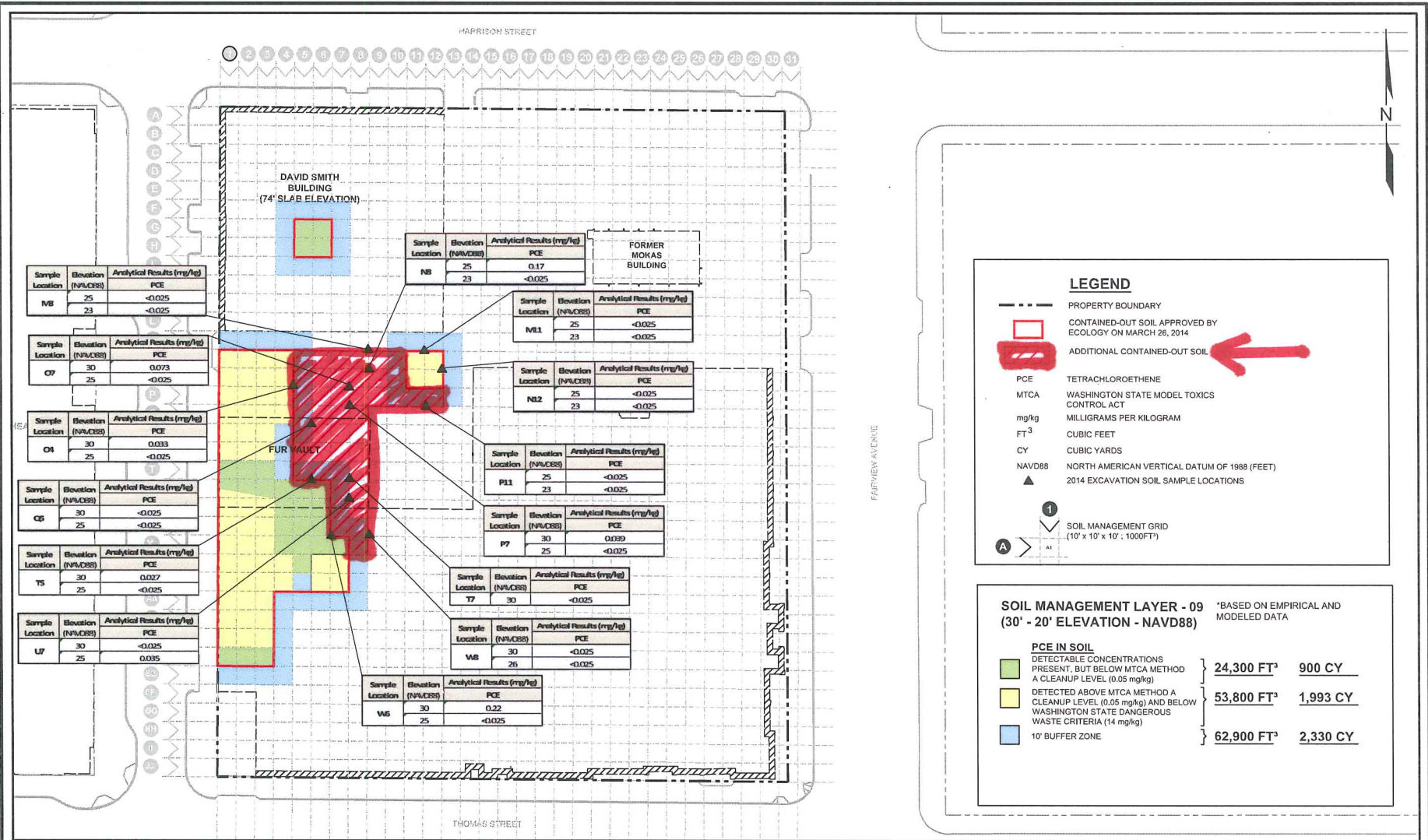


Dean Yasuda, PE  
Hazardous Waste and Toxics Reduction Program

By certified mail: 7013 2250 0000 3614 6932

cc: Yolanda Pon, Seattle-King County Public Health ([Yolanda.Pon@kingcounty.gov](mailto:Yolanda.Pon@kingcounty.gov))  
Dave Christensen, Seattle-King County Public Health  
([david.christensen@kingcounty.gov](mailto:david.christensen@kingcounty.gov))  
Lisa Brown, Ecology-ERO  
Greg Caron, Ecology-CRO  
Mindy Collins, Ecology-BFO  
Samuel Iwenofu, Ecology-SWRO  
Byung Maeng, Maura O'Brien, Ecology-NWRO  
Pete Kingston, Sound Earth Strategies, Inc.  
FS Database No. 19135499 RCRA Site ID No. WAD980979884

12/2/2015 P:\0731 TOUCHSTONE\0731-004 TROY LAUNDRY\TECHNICAL\CAD\2015 CONTAINED OUT ADDRESS\0731-004\_2015\_COA\_FDWG



### LEGEND

- PROPERTY BOUNDARY
- CONTAINED-OUT SOIL APPROVED BY ECOLOGY ON MARCH 26, 2014
- ADDITIONAL CONTAINED-OUT SOIL
- PCE TETRACHLOROETHENE
- MTCA WASHINGTON STATE MODEL TOXICS CONTROL ACT
- mg/kg MILLIGRAMS PER KILOGRAM
- FT³ CUBIC FEET
- CY CUBIC YARDS
- NAVD88 NORTH AMERICAN VERTICAL DATUM OF 1988 (FEET)
- 2014 EXCAVATION SOIL SAMPLE LOCATIONS
- SOIL MANAGEMENT GRID (10' x 10' x 10'; 1000FT³)

### SOIL MANAGEMENT LAYER - 09 (30' - 20' ELEVATION - NAVD88)

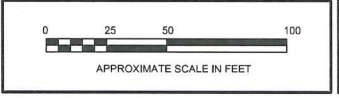
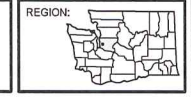
\*BASED ON EMPIRICAL AND MODELED DATA

PCE IN SOIL	Volume	Quantity
DETECTABLE CONCENTRATIONS PRESENT, BUT BELOW MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg)	24,300 FT³	900 CY
DETECTED ABOVE MTCA METHOD A CLEANUP LEVEL (0.05 mg/kg) AND BELOW WASHINGTON STATE DANGEROUS WASTE CRITERIA (14 mg/kg)	53,800 FT³	1,993 CY
10' BUFFER ZONE	62,900 FT³	2,330 CY



DATE: 1/21/15  
 DRAWN BY: NAC/JQC  
 CHECKED BY: PJK  
 CAD FILE: 0731-004\_2015\_COA

PROJECT NAME: TROY LAUNDRY PROPERTY  
 PROJECT NUMBER: 0731-004  
 STREET ADDRESS: 307 FAIRVIEW AVENUE NORTH  
 CITY, STATE: SEATTLE, WASHINGTON



**FIGURE 261**  
 SOIL MANAGEMENT GRID  
 LAYER - 09 (30' - 20')

BY: KANDY@PACIFIC