STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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September 26, 2017

Electronic Copy

Mr. Michael Stone
Assistant General Counsel
Blackstone Real Estate Advisors, L.P.
501 E. Camino Real
Boca Raton, FL 33432

Re: Results of Confirmation Indoor Air Sampling

- **Site Name:** Phoenix Inn
- **Site Address:** 415 Capitol Way North, Olympia, WA
- **Cleanup Site ID:** 5257
- **Facility Site ID:** 1571525
- **VCP Project Number:** SW1582

Dear Mr. Stone:

The Department of Ecology (Ecology) has received an update from your consultant (Arcadis US, Inc. [Arcadis]) regarding the results of recent confirmation indoor air sampling activities conducted at the DoubleTree Inn (former Phoenix Inn; Facility). Arcadis communicated that the results of those sampling activities confirmed the presence of naphthalene above Method B (Cancer) limits (0.0735 micrograms per cubic meter [µg/m3]) inside DoubleTree Inn Room numbers 132, 142, and 146. To initially address this concern, Arcadis proposed the following activities:

- Performing a chemical inventory at the Facility (noting that the highest results of naphthalene occurred adjacent to the laundering area [0.46 µg/m3 and 0.32 µg/m3 during the initial and confirmation events, respectively, in Room #146]), and
- Adjusting the Facility's heating, ventilation and air-conditioning (HVAC) system to increase turnover of indoor air.

Arcadis also indicated that a routine groundwater monitoring event is planned for the Site and noted that the results of this monitoring, as well as the recent indoor air sampling events, would be provided to Ecology in a forthcoming deliverable.

Given the confirmed presence of naphthalene above Method B (Cancer) limits and potential exposure to long-term guests and staff, Ecology feels that a meaningful and definitive evaluation of the source and potential pathways for this constituent is currently warranted. Such an evaluation should occur in an expedited timeframe given the potential risk present at the Facility.

As such, Ecology is requesting a Work Plan to sufficiently evaluate the nature and extent of naphthalene in shallow soil-vapor and indoor air, including the temporal variability of this constituent along with a strategy for appropriately monitoring and mitigating this potential threat. In addition to the initial, proposed activities described above, the Work Plan should consider and address the following elements:

- Effect of the Facility's HVAC system on naphthalene concentrations associated with building pressurization/depressurization and air-exchange cycles;
- Collection of indoor-air samples from additional rooms to evaluate for vapor "hot spots" and preferential pathways;
- Evaluation of preferential vapor-pathways in rooms exhibiting elevated concentrations of naphthalene in indoor air; and
- Evaluation of sub-slab concentrations of naphthalene in soil-vapor immediately beneath the Facility to assist in the identification of potential source-area(s) of this constituent.

Ecology is requesting receipt of this Work Plan by October 24, 2017.

If you have any questions regarding this letter, please contact me at (360) 407-0276 or Jeremy.Hughes@ecy.wa.gov.

Sincerely,

Jeremy Hughes, LG
VCP Site Manager
Toxics Cleanup Program, Southwest Regional Office
Washington State Department of Ecology

Enclosures [1]: Figure 6 – Air Sample Locations and Select Analytical Results

By certified mail: [91 7199 9991 7037 0277 7613]

cc: Paul McCullough, Arcadis
Nicholas Acklam, Ecology
Matthew Alexander, Ecology
Ecology Site File

LEGEND:

- PMW-1 — MONITORING WELL LOCATION
- MW-2 — EXISTING MONITORING WELL ASSOCIATED WITH ADJACENT SITE
- MW3 — APPROXIMATE PREVIOUS MONITORING WELL LOCATION
- FORMER FEATURES (SOURCE: ENVIROS 1994a)
- APPROXIMATE SOIL EXCAVATION LOCATION
- VAPOR SAMPLE LOCATION

SAMPLE ID	
Date	Date of Sample
B	Benzene
1,2 DCA	1,2-Dichloroethane
1,2,4 TMB	1,2,4-Trimethylbenzene
NAPH	Naphthalene
EDB	1,2-Dibromoethane
E	Ethylbenzene
T	Toluene
m,p-X	m,p-Xylene
o-X	o-Xylene
MTBE	Methyl-t-Butyl Ether
1,3 B	1,3-Butadiene

NOTES:

BOLD ANALYTE DETECTED ABOVE THE MODEL TOXICS CONTROL ACT METHOD B CLEANUP LEVEL (CUL)

B = COMPOUND WAS FOUND IN THE BLANK SAMPLE

J = RESULT IS LESS THAN THE RL BUT GREATER THAN OR EQUAL TO THE MDL AND THE CONCENTRATION IS AN APPROXIMATE VALUE.

ANALYTICAL RESULTS ARE PRESENTED IN MICROGRAMS PER CUBIC METER (µg/m³).

ALL SAMPLES COLLECTED AT GROUND FLOOR LEVEL, WITH EXCEPTION OF OUTD-ROOF. OUTD-ROOF SAMPLE COLLECTED FROM HOTEL ROOFTOP.

SOURCES:
ENVIROS, INC. - ENVIRONMENTAL SITE ASSESSMENT (JUNE 1994).
STEMEN ENVIRONMENTAL INC. - REMEDIAL INVESTIGATION AND SITE CHARACTERIZATION (2006); EMPI - UPDATE LETTER (FEBRUARY 2000)

OUTD-8HR-PARK		
Date	6/26/2017	9/8/2017
B	0.19	---
1,2 DCA	0.046 J	---
1,2,4 TMB	0.10 J	---
NAPH	**0.11 B**	<0.057
EDB	< 0.054	---
E	< 1.7	---
T	0.92 J	---
m,p-X	0.52 J	---
o-X	< 1.7	---
MTBE	< 2.9	---
1,3 B	< 1.8	---

IND-8HR-R132		
Date	6/26/2017	9/8/2017
B	0.32	---
1,2 DCA	0.063 J	---
1,2,4 TMB	< 0.20	---
NAPH	0.063 J B	**0.19**
EDB	< 0.054	---
E	< 1.7	---
T	2.2	---
m,p-X	< 3.5	---
o-X	< 1.7	---
MTBE	< 2.9	---
1,3 B	< 1.8	---

IND-8HR-R142		
Date	6/26/2017	9/8/2017
B	0.23	---
1,2 DCA	0.055 J	---
1,2,4 TMB	0.2	---
NAPH	**0.17 B**	**0.18**
EDB	< 0.054	---
E	0.40 J	---
T	2.4	---
m,p-X	1.2 J	---
o-X	0.44J	---
MTBE	< 2.9	---
1,3 B	< 1.8	---

IND-8HR-R146		
Date	6/26/2017	9/8/2017
B	0.26	---
1,2 DCA	0.058 J	---
1,2,4 TMB	0.27	---
NAPH	**0.46 B**	**0.32**
EDB	**0.028 J**	---
E	0.37 J	---
T	2.8	---
m,p-X	1.2 J	---
o-X	0.47 J	---
MTBE	< 2.9	---
1,3 B	< 1.8	---

OUTD-ROOF		
Date	6/26/2017	9/8/2017
B	0.25	---
1,2 DCA	0.045 J	---
1,2,4 TMB	0.071 J	---
NAPH	<0.068	<0.070
EDB	<0.054	---
E	<1.7	---
T	0.74 J	---
m,p-X	0.52 J	---
o-X	<1.7	---
MTBE	<2.9	---
1,3 B	1.8	---

0 50' 100'

Approximate Scale: 1 in. = 50 ft.

415 CAPITOL WAY NORTH
OLYMPIA, WASHINGTON 98501
WORK PLAN

AIR SAMPLE LOCATIONS AND SELECT ANALYTICAL RESULTS

ARCADIS Design & Consultancy for natural and built assets

FIGURE 6

CITY:EMERYVILLE, CA DIV/GROUP:ENV/CAD DB:A.REYES
G:\ENVCAD\Concord\ACT\SEA41774\0002\00004\WorkPlan\DWG\SEA41774 C06.dwg LAYOUT: 6 SAVED: 9/20/2017 11:53 AM ACADVER: 20.1S (LMS TECH) PAGESETUP: ---
XREFS: IMAGES: PROJECTNAME: ---
X- SEA41774 X01
PLOTSTYLETABLE: ARCADIS.CTB PLOTTED: 9/20/2017 12:04 PM BY: REYES, ALEC