



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 10, 2017

Ms. Janet Frentzel
Georgetown Crossroads, LLC.
Pier 1, Bay 1
San Francisco CA 94111

Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:

- **Site Name:** Consolidated Freightways Seattle
- **Site Address:** 6050 E. Marginal Way, Seattle, WA 98108
- **Facility/Site No.:** 54757868
- **Cleanup Site ID No.:** 6262
- **VCP Project No.:** NW3050

Dear Ms. Frentzel:

Thank you for submitting the ground water monitoring work plan regarding your proposed remedial action for the Consolidated Freightways Seattle facility (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following releases at the Site:

- Total petroleum hydrocarbons-as gasoline (TPH-G), diesel (TPH-D), waste oil range (TPH-O) organics, and volatile organic compounds (benzene, ethylbenzene, toluene, xylenes – BETX) in soil.
- TPH-G, TPH-D, TPH-O, and volatile organic compounds (benzene, naphthalene, and vinyl chloride (VC)) in ground water.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).



Ms. Janet Frentzel

March 10, 2017

Page 2

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial action:

1. Farallon Consulting, February 11, 2016, Environmental Media Management Plan
2. Farallon Consulting, February 11, 2015, Remedial Investigation, Focused Feasibility Study, and Cleanup Action Plan

The documents listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7235 or sending an email to nwro_public_request@ecy.wa.gov.

The Site is more particularly illustrated in Enclosure A to this letter, which includes a detailed Site diagram.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site, Ecology has approved the work plan with the following determinations:**

- Based on the previous Site assessments, contamination in soil and ground water was detected at concentrations exceeding MTCA Method A cleanup levels. The sources of contamination were confirmed to be the former underground storage tanks (USTs) at this Site and on the adjacent property to the East of Capital Industries facility at 5801 Third Avenue South.
- Contamination on the Site has been fully characterized, and the chemicals of concern (COCs) defined at this Site include TPH-G, TPH-D, TPH-O, BETX, naphthalene and VC.
- The Cleanup Action Plan dated February 11, 2016 proposes to over-excavate the impacted soil, dispose the removed soil off-Site to an appropriate facility, and sample and dispose of the contaminated ground water encountered in the soil excavations by using dewatering methodology.
- It may be necessary to drill additional soil borings and/or install ground water monitoring wells in addition to those proposed (Figure 1 and 2) to confirm success of the remedial efforts. In addition, contamination in ground water must be at

Janel Frentzel
March 10, 2017
Page 3

concentrations below the MTCA Method A cleanup levels for a minimum of four consecutive quarterly monitoring events.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

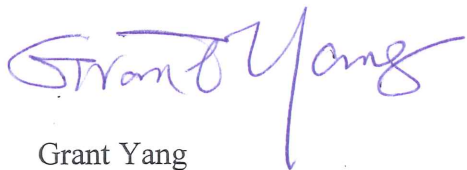
Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions about this opinion, please contact me by phone at (425) 649-7126 or by e-mail at grant.yang@ecy.wa.gov.

Sincerely,



Grant Yang
Site Manager
NWRO Toxics Cleanup Program

cc: Donald Lance, Farallon Consulting
Sonia Fernandez, VCP Coordinator, Ecology

Enclosure A: Figure 1 Site Plan Showing Locations of the Proposed Soil Excavations
Figure 2 Site Plan Showing Locations of the Proposed Monitoring Wells

Enclosure A: Figure 1 Site Plan Showing Locations of Proposed Soil Excavations

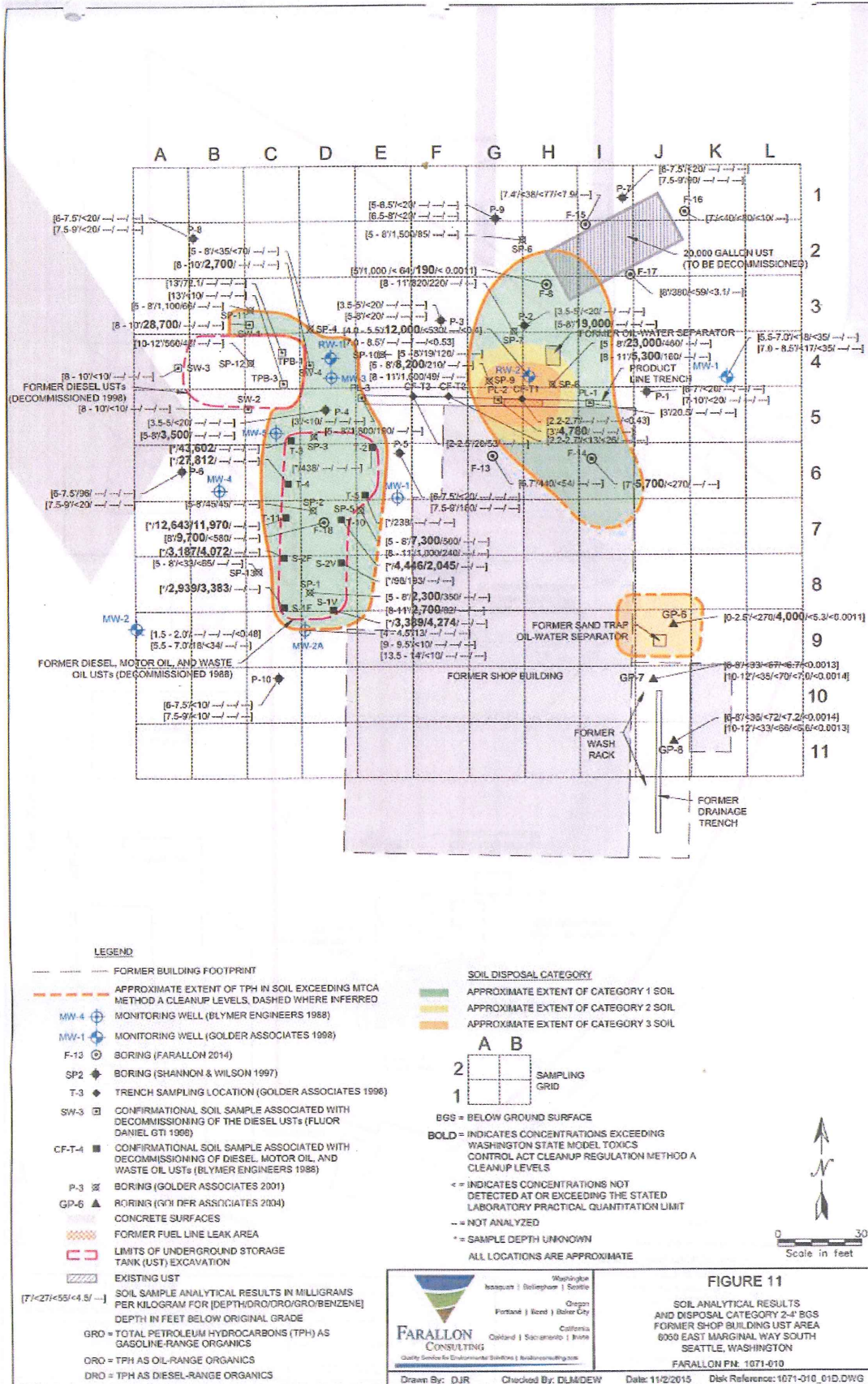


Figure 2 Site Plan Showing Locations of Proposed Monitoring Wells

