West of 4th Site
Seattle, WA

Responsiveness Summary

To Public Comment on the:

- proposed Agreed Order Amendment
- SEPA Determination of Non-significance
- proposed pilot study work plans (two)
- proposed interim action

PUBLIC COMMENT PERIOD SEPTEMBER 28, 2017 through OCTOBER 31, 2017

November 2017
Washington State Department of Ecology

Facility Site ID: # 47779679
Cleanup Site ID: 12260

Responsiveness Summary

September 28, 2017 through October 31, 2017, public comment period

Ecology compiled this Responsiveness Summary to respond to public comments received during the recent comment period. Ecology reviewed and carefully considered all comments. We determined that no significant changes to the Draft version of the Agreed Order Amendment were needed.

Finalization of the Agreed Order Amendment required the signatures of the four West of 4th PLPs, and then Ecology's signature. This was completed on November 20, 2017, and on that date the amended Order became "effective."

Next Steps

The next steps at the West of 4th site include:

- finalizing the pilot study and interim action work plans. This requires that Ecology prepare and send comment letters based on our review of the three work plans. Once the PLPs receive our comment letters, they will have 30 days to revise and re-submit their work plans; and,
- completing the post-work plan pilot study and interim action tasks and deliverables (plans and reports) identified in the Agreed Order Amendment.

Ecology's Comment Review

Between September 28 and November 1 Ecology received public comments in emails, during phone conversations, and via written letters. We also discussed the site with several members of the public, and tried to answer a number of questions that – for the purposes of this Responsiveness Summary – we did not consider "comments."

Comments and Ecology responses are organized below per the following topics:

1. Draft Agreed Order Amendment
2. SEPA Determination of Non-significance
3. Proposed Site Unit 1 "CVOC" pilot study
4. Proposed Site Unit 1 "Metals Immobilization" pilot study
5. Proposed Site Unit 2 interim action

In certain cases a comment referred to more than one of these categories. In these instances we acknowledge that this is the case, but do not repeat the question and response under multiple topic headings.

We have also included a sixth heading below called "Other Comments." Under this heading are comments we received between September 28 and November 1 that are site-related, but do not directly concern the five documents subject to the comment period.

1. Draft Agreed Order Amendment

No comments were received.

2. SEPA Determination of Non-significance

No comments were received.

3. Proposed Site Unit 1 "CVOC" pilot study

One commenter encouraged Ecology to complete the long-term pilot studies and the interim cleanup action. This comment has not been repeated below under the 4th and 5th topic headings.

4. Proposed Site Unit 1 "Metals Immobilization" pilot study

No (additional) comments were received.

5. Proposed Site Unit 2 interim action

No (additional) comments were received.

6. Other Comments

One commenter stated that the recent documents Ecology has asked the public to review suggest that trichloroethene (TCE) in groundwater could be contaminating indoor air. The commenter asked if the health of people living and working in areas above the groundwater contamination could be at risk.

> Ecology response: The commenter is referring to "vapor intrusion." Certain contaminants in groundwater (or in soils above groundwater), such as TCE, can volatilize and contaminate the soil *gas* above the water table. If buildings are located nearby, the contaminants in the soil gas can enter those buildings through foundation cracks and other openings. Once inside, the contaminated vapors mix with indoor air; this can result in indoor air contaminant levels that are potentially harmful.
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> When Ecology notified the public about the recent comment period, our mailer stated that potential risks associated with the West of 4th site included: "[l]owered air quality inside buildings on-site. When chemicals, such as trichloroethene (TCE), from contaminated soil and groundwater vaporize, they can enter buildings." It did not go on to describe the actions the four companies and Ecology have taken over the past 14 years to protect indoor air quality at the site.
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> In some areas of the West of 4th site the levels of TCE in shallow groundwater, or in soils, remain high enough to potentially lead to levels of TCE in indoor air that could potentially be harmful. For that reason the West of 4th PLPs are required to carry out a "vapor intrusion" program. This program essentially uses groundwater monitoring data, and soil sampling data, to identify those buildings within the site where vapor intrusion is possible. Then, where the concentrations of TCE or other volatile chemicals in groundwater or soil are high enough to

possibly contaminate indoor air, the PLPs either sample those buildings' indoor air or offer the building owner a mitigation system.[1] After indoor air is sampled, the PLPs must offer the building owner a mitigation system if vapor intrusion is causing indoor air contamination above acceptable, health-based levels. But if the indoor concentrations of TCE and other site-related volatile chemicals do not exceed acceptable levels, the building is usually not mitigated. Instead, we can keep an eye on the groundwater concentrations near the building, and base our decisions on whether, and when, to re-sample indoor air on how those concentrations change over time.

Ecology believes the West of 4th vapor intrusion program is currently ensuring that indoor air is not being unacceptably impacted by site groundwater contamination. For those buildings where Ecology has required the PLPs to install and operate mitigation systems, however, protection is only ensured as long as the systems continue to operate and are properly inspected, maintained, and repaired as needed.

Another commenter noted that the fume odors associated with the Art Brass Plating property are quite strong. The commenter also stated that: a) sometimes in the middle of the night, the Art Brass Plating building lights come on and the exterior doors are opened; and, b) a "shiny runoff" was observed coming out of the facility and into the storm drain.

Ecology response: Since the information provided by the commenter was communicated to us via telephone, we suggested several follow-up actions the commenter could take. When a spill or other environmental problem that may pollute land, air, or water is observed in Seattle, for example, the public is encouraged to "formally" report their observations. Reports to Ecology's Northwest Regional Office can be made by phone (1-425-649-7000), email (NWROERTS@ecy.wa.gov), or on-line (please see http://www.ecy.wa.gov/reportenviroproblem.html). Ambient air odors or other indications of compromised air quality should be reported to the Puget Sound Clean Air Agency at 800-552-3565 (see http://www.pscleanair.org/262/File-a-Complaint).

With respect to the commenter's observation of a "shiny runoff" coming out of the Art Brass Plating facility and running into the storm drain, Ecology's West of

[1] Vapor intrusion "mitigation" employs many of the same techniques used to minimize the amount of radon entering buildings. At the West of 4th site the systems are of two general types: (1) piping and fan systems that reduce the pressure below the building's slab or basement, collect contaminated soil gas, and discharge it above the roofline; or, (2) piping, fan, and vapor barrier systems installed at buildings with crawlspaces. Perforated piping is laid on the ground in the crawlspace, with a vapor barrier over it. The piping collects contaminated soil gas just above the crawlspace's ground surface (but below the vapor barrier) and discharges it above the roofline.

Currently, there are 11 such systems operating within the site. Seven others were retired, once it became apparent that nearby groundwater contamination had decreased to levels incapable of unacceptably impacting indoor air quality. At one additional building (to the 11) the mitigation system continues to operate, at the owner's request, even though groundwater contamination no longer poses a potential vapor intrusion threat.

4th site management team notified our Hazardous Waste and Toxics Reduction Compliance Unit, who regularly inspect the facility's compliance with dangerous waste generation and management regulations. They then contacted inspectors at Seattle Public Utilities (SPU) and King County Industrial Waste (KCIW).[2] Though none of these groups was certain what the "shiny runoff" may have been, KCIW is working with SPU to investigate the commentator's report of unusual discharge to the storm drain. Because Art Brass is permitted by KCIW for industrial wastewater discharges, reports of future unusual discharges at this location can also be made directly to KCIW by phone 206-477-5300 or e-mail info.kciw@kingcounty.gov.

[2] To make a report to Seattle Public Utilities use the pollution report form or call the Surface Water Pollution Report Line at (206) 684-7587. To report chemical spills in City streets or storm drains for weekends or after business hours, call (206) 386-1800.
See: http://www.seattle.gov/util/EnvironmentConservation/OurCity/ReportPollution/index.htm

The King County Industrial Waste program's website is http://www.kingcounty.gov/services/environment/wastewater/industrial-waste.aspx