



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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Electronic Copy

March 30, 2018

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

**Re: Notification of Indoor Air-Sampling Results for the Following Facility:**

- **Subject Property:** Double Tree Inn
- **Address:** 415 Capitol Way North, Olympia, Washington
- **County Assessor's Parcel Number(s):** 78500100300
- **Facility Site Name:** Phoenix Inn (aka Double Tree Olympia)
- **Cleanup Site ID:** 5257
- **Facility/Site No.:** 1571525
- **VCP Project No.:** SW1582

Dear Mr. Stone:

Indoor air samples were collected in June, September, and November 2017, as part of an effort to investigate contamination in the vicinity of the Double Tree Inn. Naphthalene<sup>1,2</sup>, which is present in fossil fuels, moth repellants, dyes, and certain waste byproducts, was detected in several areas of sub-slab and indoor air at the hotel. Figures showing the air sampling locations and sampling data tables to date are included as Enclosure A.

The levels of naphthalene detected at the Subject Property (up to 0.46 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ]) are not considered by The Department of Ecology (Ecology) to present a short-term health risk to workers or overnight guests. Per Washington Administrative Code (WAC) 296-841-20025, the work place permissible exposure limit (PEL) for naphthalene is 10 parts per million by air volume, which is over 113,000 times greater than the maximum concentration of

<sup>1</sup> Environmental Protection Agency (EPA) Fact Sheet on Naphthalene. Publication 91-20-3. 1991. Available at: [https://cfpub.epa.gov/ncea/iris/iris\\_documents/documents/subst/0436\\_summary.pdf](https://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/0436_summary.pdf)

<sup>2</sup> Agency for Toxic Substances and Disease Registry (ATSDR). Toxicological Profile for Naphthalene (Update). Public Health Service, U.S. Department of Health and Human Services, Atlanta, GA. 1995. Available at: <https://www.atsdr.cdc.gov/toxprofiles/tp.asp?id=240&tid=43>

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naphthalene in indoor air reported to date at the hotel. At this time, no posting at the hotel warning of naphthalene contamination in indoor air is requested; however, ongoing monitoring of indoor air is recommended to ensure conditions at the property are protective of human health and the environment.

The result of  $0.46 \mu\text{g}/\text{m}^3$  (among others listed in Table 1 included in Enclosure A) does exceed the Model Toxics Control Act (MTCA) Method B screening level for naphthalene in air of  $0.0735 \mu\text{g}/\text{m}^3$ . Naphthalene concentrations in sub-slab soil gas have been less than the sub-slab soil gas MTCA Method B screening level of  $2.45 \mu\text{g}/\text{m}^3$ , except at two locations (see Table 2 in Enclosure A). For those locations where naphthalene in indoor air exceeds the MTCA Method B screening level they are highlighted in the data tables included in Enclosure A. Cleanup related to the naphthalene in air to meet Site-specific cleanup levels is ongoing as part of Ecology's Voluntary Cleanup Project (VCP) number SW1582.

Ecology is reviewing Site data to determine the source of the naphthalene and whether any follow-up work is necessary. Periodic sampling reports have submitted to Ecology as part of the cleanup process, and are available at the Southwest Regional Office of Ecology (SWRO). Review is by appointment only and can be made by calling the SWRO resource contact at (360) 407-6365. Selected Site documents can also be viewed online at: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=5257>.

#### **Contact Information**

If you have any questions regarding this letter, please contact me at 360-407-6265 or [tim.mullin@ecy.wa.gov](mailto:tim.mullin@ecy.wa.gov).

Sincerely,



Tim Mullin, LHG  
Toxics Cleanup Program  
Southwest Regional Office

Enclosure: A – Figures and Tables

By Certified Mail: 91 7199 9991 7037 7521 2776

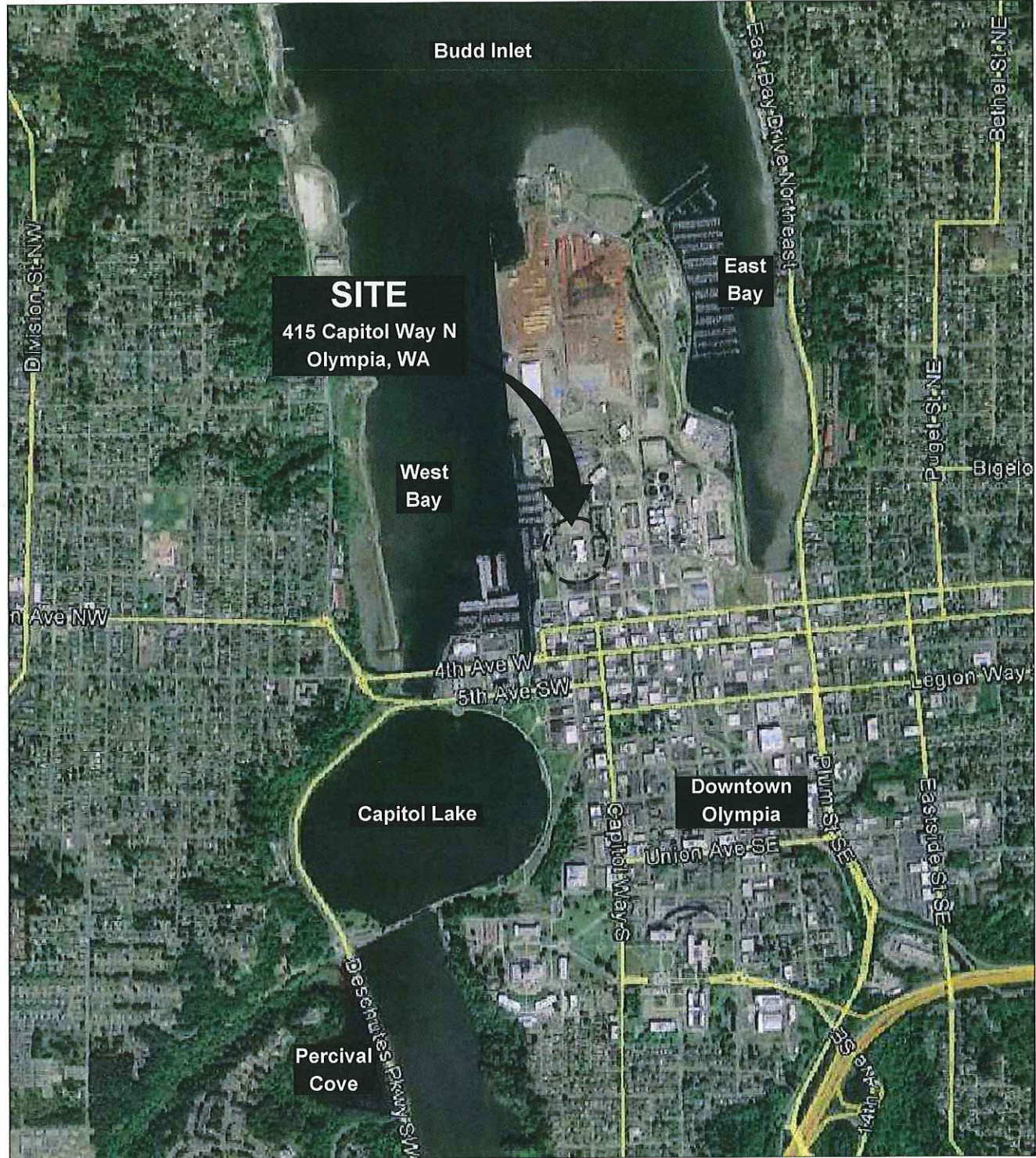
cc: Robyn Neely, Esq., Ackerman LLP  
Paul T. McCullough, Arcadis  
Allyson Bazan, Office of the Attorney General  
Patrick Soderberg, Thurston County Health Department, Environmental Health Division  
Nicholas M. Acklam, Ecology  
Mark Gordon, Ecology  
Ecology Site File

# **Enclosure A**

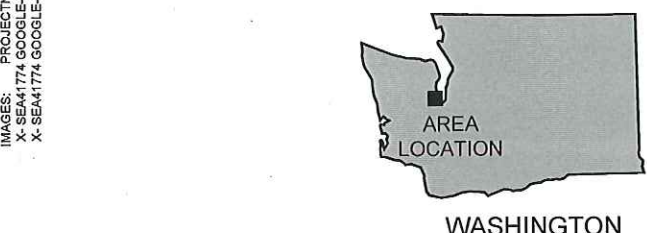
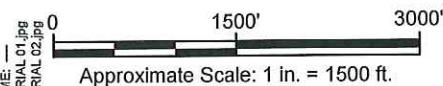
## **Site Description and Figures and Tables**

1. Figure 1 – Vicinity Map
2. Figure 2 – Sample Location and Analytical Results Map
3. Table 1 – Historical Indoor Air Sampling Analytical Results
4. Table 2 – November 2017 Naphthalene Sampling Analytical Results





SOURCE: GOOGLE EARTH PRO



415 CAPITOL WAY NORTH  
 OLYMPIA, WASHINGTON 98501  
**VAPOR INTRUSION INVESTIGATION REPORT**

**SITE LOCATION MAP**

	Design & Consultancy for natural and built assets	FIGURE
		<b>1</b>



**Table 1**  
**Historical Indoor Air Sampling Analytical Results**  
**PIH Olympia LLC**  
**415 Capitol Way North, Olympia, WA**

All Concentrations are in micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) unless otherwise indicated

Sample Location	Sample ID	Method	Date Collected	Benzene	1,2-DCA	1,2,4-TMB	Naphthalene	EDB	Ethylbenzene	Toluene	m,p-Xylene	o-Xylene	MTBE	1,3-Butadiene	TBA	Methane (% v/v)
Model Toxics Control Act (MTCOA) Method B Screening Levels (CULs) in $\mu\text{g}/\text{m}^3$																
Room 142	IND-8HR-R142	TO-15	6/26/2017	0.23	0.055 J	0.20	<0.329 UB	< 0.054	0.40 J	2.4	1.2 J	0.44J	< 2.9	< 1.8	< 6.1	0.00036
Room 132	IND-8HR-R132	TO-15	6/26/2017	0.32	0.063 J	< 0.20	<0.329 UB	< 0.054	< 1.7	2.2	< 3.5	< 1.7	< 2.9	< 1.8	< 6.1	0.00035
Room 146	IND-8HR-R146	TO-15	6/26/2017	0.26	0.058 J	0.27	0.46 B	0.028 J	0.37 J	2.8	1.2 J	0.47 J	< 2.9	< 1.8	< 6.1	0.00036
Parking Lot	OUTD-8HR-PARK	TO-15	6/26/2017	0.19	0.046 J	0.10 J	<0.329 UB	< 0.054	< 1.7	0.92 J	0.52 J	< 1.7	< 2.9	< 1.8	< 6.1	0.00035
Hotel Roof	OUTD-ROOF	TO-15	6/26/2017	0.25	0.045 J	0.071 J	<0.329 UB	< 0.054	< 1.7	0.74 J	0.52 J	< 1.7	< 2.9	< 1.8	< 6.1	0.00031
Lab Blank	Lab Blank	TO-15	7/5/2017, 7/14/2017	<0.064	<0.081	<0.20	0.0658 J	<0.054	< 1.7	< 1.5	< 3.5	< 1.7	< 2.9	< 1.8	< 6.1	<0.00002
Room 142	IND-8HR-R142	TO-17	9/8/2017	NS	NS	NS	0.18	NS	NS	NS	NS	NS	NS	NS	NS	NS
Room 132	IND-8HR-R132	TO-17	9/8/2017	NS	NS	NS	0.19	NS	NS	NS	NS	NS	NS	NS	NS	NS
Room 146	IND-8HR-R146	TO-17	9/8/2017	NS	NS	NS	0.32	NS	NS	NS	NS	NS	NS	NS	NS	NS
Parking Lot	OUTD-8HR-PARK	TO-17	9/8/2017	NS	NS	NS	<0.057	NS	NS	NS	NS	NS	NS	NS	NS	NS
Hotel Roof	OUTD-8HR-ROOF	TO-17	9/8/2017	NS	NS	NS	<0.070	NS	NS	NS	NS	NS	NS	NS	NS	NS
Field Blank	Field Blank	TO-17	9/8/2017	NS	NS	NS	<0.068	NS	NS	NS	NS	NS	NS	NS	NS	NS
Lab Blank	Lab Blank	TO-17	9/14/2017	NS	NS	NS	<0.057	NS	NS	NS	NS	NS	NS	NS	NS	NS

**Notes:**

- % v/v = Volume concentration as percent
- < = analyte was not detected at indicated reporting limit
- 1,2,4-TMB = 1,2,4-Trimethylbenzene
- 1,2-DCA = 1,2-Dichloroethane
- B = Compound was found in the blank sample
- EDB = 1,2-Dibromoethane
- J - Result is less than the reporting limit but greater than or equal to the method detection limit and the concentration is an approximate value
- MTBE = Methyl tert-butyl ether
- N/A = Compound does not have a MTCOA Method B cleanup level
- ND = Analytical result is less than reporting limit; reporting limits were not available for historical analytical results
- NS = Not Sampled
- TBA = Tert-butyl alcohol
- UB = compound not detected above elevated reporting limit. Reporting limited is elevated due to detection of naphthalene in method blank.
- BOLD ITALIC = Reporting limit exceeds cleanup level**
- BOLD** Analyte detected above MTCOA Method B Cleanup Level
- Benzene, 1,2-dichloroethane, 1,2,4-trimethylbenzene, naphthalene, and 1,2-dibromoethane analyzed using USEPA Method TO-15 SIM
- Ethylbenzene, toluene, m,p-xylene, o-xylene, methyl tert-butyl ether, 1,3-butadiene, tert-butyl alcohol analyzed using USEPA Method TO-15
- Methane analyzed using ASTM Method D1946

**Table 2**  
**November 2017 Naphthalene Sampling Analytical Results**  
**PIH Olympia LLC**  
**415 Capitol Way North, Olympia, WA**

Building Location	Sample Location	Sample ID	Sample Type	Date Collected	Sample Duration (min)	Average Flow Rate (mL/min)	Sample Volume (mL)	Naphthalene Result (µg/m <sup>3</sup> )
<b>MTCA Method B Indoor Air CUL</b>								
<b>MTCA Method B Sub-Slab Soil Vapor SL (AF = 0.03)</b>								
Conference Room	IA-01	IA-1	Indoor Air	11/13/2017	472	29.5	13,924	0.20
	SSV-01	SSV-01-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Office Area	IA-02	IA-2	Indoor Air	11/13/2017	466	55.5	25,863	0.19
	SSV-08	SSV-08-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Gym	IA-02	IA-3	Indoor Air	11/13/2017	481	70.0	33,670	0.30
	SSV-03A	SSV-03A-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Laundry	IA-04	IA-4	Indoor Air	11/13/2017	489	66.0	32,274	0.29
	SSV-07A	SSV-07A-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Room 132	IA-05	IA-5	Indoor Air	11/14/2017	362	30.0	10,860	0.37
	SSV-04	SSV-04-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Room 142	IA-06	IA-6	Indoor Air	11/13/2017	487	44.5	21,672	0.17
	SSV-05	SSV-05-60	Sub-Slab	11/14/2017	--	--	60	20
Room 146	IA-07	IA-7	Indoor Air	11/13/2017	483	36.0	17,388	0.26
	SSV-06	SSV-06-450	Sub-Slab	11/14/2017	--	--	450	12
Room 107	IA-08	IA-8	Indoor Air	11/13/2017	470	34.0	15,980	0.26
	SSV-02	SSV-02-450	Sub-Slab	11/14/2017	--	--	450	<2.2
Roof	OA-01	OA-1	Outdoor Air	11/13/2017	478	28.5	13,623	NA
Parking Lot	OA-02	OA-2	Outdoor Air	11/13/2017	509	34.5	17,561	<0.057

**Notes:**

< = analyte was not detected at indicated reporting limit

-- = not applicable

µg/m<sup>3</sup> = micrograms per cubic meter

CUL = cleanup level

NA = not analyzed

min = minute

mL = milliliter

mL /min = milliliter per minute

MTCA = Washington Department of Ecology Model Toxics Control Act

SL = screening level

**BOLD**

Analyte detected above MTCA Method B Cleanup Level (CUL) for Indoor Air or Screening Level (SL) for Sub-Slab Soil Vapor (Ecology 2015)

Naphthalene analyzed using USEPA Method TO-17

Indoor air samples collected over approximately 8-hours

Sub-slab soil vapor samples were collected as grab samples after a 100 milliliter purge

Date: May 2, 2018

T M:

The following is in response to your May 2, 2018 request for delivery information on your Certified Mail™ item number 9171999991703775212776. The delivery record shows that this item was delivered on April 2, 2018 at 2:31 pm in BOCA RATON, FL 33432. The scanned image of the recipient information is provided below.

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