



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 30, 2018

Mr. Shawn Perry  
Touchstone SLU LLC  
2025 First Avenue, Suite 1212  
Seattle, Washington 98121

Re: Site Wide Remedial Investigation

Reference 1: SoundEarth Strategies, Inc., "Draft Remedial Investigation Report," dated May 2, 2012

Reference 2: SoundEarth Strategies, Inc., "Draft Feasibility Study Report," dated August 9, 2012

Reference 3: SoundEarth Strategies, Inc., "Technical Memorandum – Nature and Extent of Contaminated Groundwater at the Troy Laundry Property," dated October 19, 2017

Dear Mr. Perry

This letter intends to share with you Ecology's evaluation of the 2012 draft Remedial Investigation (RI) report (Reference 1), the 2012 draft Feasibility Study (FS) report (Reference 2), and the 2017 Technical Memorandum (Reference 3), which were submitted to Ecology on behalf of Touchstone SLU LLC (Touchstone) pursuant to Agreed Order No. DE 8996. The purpose of this letter is to share with you the reasons why Ecology believes the work performed to date does not fully satisfy the requirements of a site-wide RI/FS as set forth in WAC 173-340-350.

- Agreed Order No. DE 8996 requires Touchstone to prepare and submit for Ecology's review and approval a remedial investigation and feasibility study (RI/FS) report and a draft Cleanup Action Plan (dCAP). The RI/FS report must meet the criteria of WAC 173-340-350, including the requirement to collect and evaluate sufficient information to enable the selection of an adequate remedy. In particular, under WAC 173-340-350(7)(c)(iii)(G), the RI must involve "sufficient sampling to define the location, quantity, areal and vertical extent, concentration within and sources of releases."
- MTCA requires adequate characterization of "the site" for the purpose of developing and evaluating cleanup action alternatives. WAC 173-340-350(7). A "site" is defined in MTCA as wherever a hazardous substance, other than a consumer product in consumer

use, has been deposited, stored, disposed of, or placed, or otherwise come to be located. WAC 173-340-200. Field investigations must be sufficient to adequately determine the areal and vertical distribution and concentrations of hazardous substances as part of the RI/FS process. WAC 173-340-350(7)(c). Site characterization involves defining the outer boundary of the Site in order to properly assess the alternatives and choose a remedy. A site boundary is established when a "clean" boundary can be determined to delineate the areal and vertical extent of the contamination throughout the Site.

- The 2012 draft RI report focused mainly on defining the nature and extent of contamination within the Troy Laundry property boundary. Subsequently, the 2012 draft FS report proposed cleanup alternatives (soil excavation and groundwater bio-treatment) that were also focused mainly within the Troy Laundry property boundary. The cleanup actions proposed in the draft FS were completed as interim actions in 2014 in accordance with the First Amendment to the Order.
- The 2017 Technical Memorandum indicates that "the EOS barrier installed at the Troy Property and the subsequent injection of DHC are both degrading the contaminated groundwater plume originating from the Troy Property and preventing adverse impact to groundwater quality at Troy Property from upgradient source areas." However, the "clean" boundary artificially created by the EOS barrier will not be accepted by Ecology as establishing the "clean" Site boundary as defined in MTCA.
- Ecology acknowledges the efforts Touchstone has made to date to define the nature and extent of contamination that extends beyond the Troy Laundry property boundary. In particular, Touchstone installed four monitoring wells at Boren Street (west of the Troy property) and one monitoring well at Terry Street (further west of the Troy property) in an effort to define the Site boundary. However, all the monitoring wells outside the Troy Laundry property line show concentrations of PCE and TCE that exceed MTCA cleanup levels. This could indicate that some of the groundwater contamination may have migrated from one or more sources located upgradient from the Troy Laundry property.
- Ecology also understands the complexity of the site conditions in the South Lake Union area. Various industries operated in the South Lake Union area in the past. The groundwater may flow in different directions, which could be caused by dewatering practices associated with on-going developments, or by natural geological conditions. Ecology acknowledges that this increases the difficulty of identifying the source(s) and pathway(s) of groundwater contamination.

Ecology recommends Touchstone review existing data at known solvent contaminated sites in the vicinity of Troy Property, evaluate groundwater flow directions, install monitoring wells further north, west, and south of the five existing off-property monitoring wells, and collect soil and groundwater data to define site boundary for Troy.


- In the process of characterizing the nature and extent of contamination at the Site, other contamination source(s) may be discovered. A co-mingled groundwater plume could

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also exist. At this time, Ecology does not have credible evidence to name additional PLPs for the Site. However, Ecology will work with Touchstone to identify other parties who may have caused a release of hazardous substances at the Troy Laundry site.

If you have any questions, please contact me at (425) 649-7187 or [sunny.becker@ecy.wa.gov](mailto:sunny.becker@ecy.wa.gov).

Sincerely,

  
Sunny Becker  
NWRO, Toxics Cleanup Program

cc: Caroline Cress, AGO  
Bob Warren, Ecology  
Ching-Pi Wang, Ecology

