



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 9, 2018

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

Re: Opinion on Proposed Cleanup of the following Site:

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

Dear Ms. Frentzel:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your proposed independent cleanup of the Consolidated Freightways Seattle facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Upon completion of the proposed cleanup, will further remedial action likely be necessary to clean up contamination at the Site?

NO. Ecology has determined that, upon completion of your proposed cleanup, no further remedial action will likely be necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:



Ms. Janet Frentzel
October 9, 2018
Page 2

- Total petroleum hydrocarbons as gasoline (TPH-G), diesel (TPH-D), and oil (TPH-O) range organics, and benzene, ethylbenzene, toluene, and xylenes (BTEX) in Soil.
- TPH-G, TPH-D, TPH-O, BTEX, and vinyl chloride (VC) in Ground Water.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology (**Enclosure A**).

Please note the parcel(s) of real property associated with this Site are also located within the projected boundaries of the West of 4th facility (FSID # 47779679) and Capital Industries Inc. (FSID # 11598755). At this time, we have no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the West of 4th or Capital Industries, Inc. facilities.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Farallon Consulting, July 25, 2018, Cleanup Action Closure Report.
2. Department of Ecology, March 10, 2017, Opinion Letter on Environmental Media Management Plan.
3. Farallon Consulting, February 11, 2016, Environmental Media Management Plan.
4. Farallon Consulting, February 11, 2015, Remedial Investigation, Focused Feasibility Study, and Cleanup Action Plan.

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by completing a Request for Public Record form (<https://www.ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>) and emailing it to PublicRecordsOfficer@ecy.wa.gov, or contacting the Public Records Officer at (360) 407-6040. A number of these documents are accessible in electronic form from the Site web page (<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=6262>).

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that, upon completion of your proposed cleanup, **no further remedial**

action will likely be necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A (Enclosure A, Figure 1)**.

Numerous phases of the Site investigations conducted between 1988 and 2017 at this former trucking terminal facility revealed that petroleum hydrocarbons were present either in soil or in ground water. All the reports concluded the contamination sources originated from 12 underground storage tank (UST) systems and the associated operations, which served for the company's vehicle fleet. The *Remedial Investigation, Focused Feasibility Study, and Cleanup Action Plan* concluded that the probable source of vinyl chloride detected in ground water at the Site is the regional volatile organic chemical (VOC) plume associated with historical releases from the Capital Industries facility. Vinyl chloride and other VOCs were not detected in soil samples collected at the Site.

The Site investigations were performed for various purposes, which included identifying contamination in soil and ground water, determining chemicals of concern (COCs), locating the contamination sources, and characterizing the nature and extent of contamination. Subsequent soil and ground water sampling completed through February 2017 has sufficiently characterized this Site, with the exception of ground water downgradient of the former northwest UST area and upgradient of the Site. Steps needed to resolve this data gap are discussed below in section 3 of this letter.

2. Establishment of cleanup standards.

Soil. Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

Cleanup levels for soil at this Site are defined as the MTCA Method A cleanup levels for unrestricted land use. The Site qualifies for an exclusion from conducting a terrestrial ecological evaluation (WAC 173-340-7491(c)(i)). There is no undeveloped land or potential terrestrial habitat on or within 500 feet of the Site. Therefore, adjustment of soil cleanup levels for protection terrestrial habitat is not needed for this Site.

The point of compliance for soil contamination is based on the protection of ground water and it is applied Site-wide throughout the soil profile, which will extend below the water table.

Ground Water. Cleanup levels for ground water contamination at this Site are defined as the MTCA Method A cleanup levels.

The point of compliance for ground water is throughout the Site from the uppermost level of the perched zone to the lowest saturated aquifer which could potentially be affected by the Site.

3. Selection of cleanup action.

Ecology has determined the cleanup action you proposed for the Site meets the substantive requirements of MTCA.

Following discovery of the twelve USTs stored for diesel, gasoline and waste oil, all of the USTs ranging from 500-gallon to 20,000-gallon capacity and their associated pipelines and dispensers were removed and disposed off-site (**Enclosure A, Figure 2**). A total of 6,480 tons of the impacted soils at the excavations and vicinity were also over-excavated and disposed at the regulatory facilities. Confirmation soil samples were collected from bottoms and walls of the excavations. The laboratory results indicated the COCs in the soil samples were at concentrations either below MTCA Method A cleanup levels or the laboratory detectable limits.

Cleanup efforts also included spreading 2,500 pounds of oxygen release compound (ORC) in the excavations prior to backfilling. Approximately 320,000 gallons of ground water was pumped and treated from the excavations during removal of the USTs and the impacted soil.

Based on the Site investigations, the contamination plume in ground water was found to be limited within the Property boundary (**Enclosure A, Figure 3**). Completion of the contamination source removal and application of ORC will enhance the natural attenuation of residual COCs in ground water.

The Property will be redeveloped for a warehouse facility. Following completion of the redevelopment construction, five monitoring wells will be installed for monitoring the COCs in ground water and detecting status of the plume migration. Ground water samples are proposed to be collected on a quarterly basis from all the monitoring wells. A no further action (NFA) request will be submitted to Ecology for its determination if the analytical results show the COCs are at concentrations below the cleanup levels in four consecutive quarterly sampling events.

For Ecology to consider providing a No Further Action (NFA) determination, we are requesting the following additional ground water data:

- Five monitoring wells are proposed to be installed at the southern portion of the Property (**Enclosure A, Figure 4**). Two more monitoring wells are requested along the upper portion of the western Site boundary, downgradient of the gasoline, lube oil, and heating oil USTs formerly located in the northwestern part of the Site (**Enclosure A, Figure 5**). The monitoring data will be used to confirm the extent of ground water impacts and to determine if the contaminant plume is migrating to the southwest off the Site.
- Two current cleanup sites, west of 4th and Capital Industries Inc., are located immediately adjacent to the Property in the north. Data for these sites indicate that the VOC contaminant plumes in ground water are migrating to the southwest toward the Consolidated Freightways VCP Site. Therefore, one additional monitoring well is requested along the Site's northern boundary (**Enclosure A, Figure 5**). The analytical data for VOCs will be used to further assess if the plumes at the West of 4th and Capital Industries are migrating onto this VCP Site.
- Analytical results from the monitoring well network will provide the basis to show that all the COCs are at concentrations below the cleanup levels in four consecutive quarterly sampling events, and to confirm that vinyl chloride detections in Site monitoring wells are likely attributable to off-Site sources (the regional solvent plume associated with the West of 4th and Capital Industries Inc. facilities).

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or

Ms. Janet Frentzel
October 9, 2018
Page 6

Ecology-supervised action. This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Site upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

4. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at (425) 649-7126 or e-mail at grant.yang@ecy.wa.gov.

Sincerely,



Grant Yang, Site Manager
NWRO Toxics Cleanup Program

Enclosures 1: A - Description and Diagrams of the Site

cc: Pete Kingston, Farallon Consulting
Sonia Fernandez, VCP Coordinator

Enclosure A
Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms part of the basis for the opinion expressed in the letter.

Site: The Site is located at 6050 East Marginal Way South in Seattle, Washington (the Property, **Figure 1**) and consists of TPH-G, TPH-D, TPH-O and BTEX in Soil and TPH-G, TPH-D, TPH-O and VC in Ground Water. The Property covers King County tax parcel number 53720-4646.

Area and Property Description: The Site is classified as an industrial area (**Figure 1**) with an area of 13.58 acres. The vicinity surrounding the Property is also located within the King County's Industrial Zone.

Property History and Current Use: The Property was constructed as a military barracks-type facility in 1943. In 1956, the facility was transferred to a construction-trucking business center. The trucking business was operated until early 2017. A proposed land redevelopment project began in June 2017, that included building a three-floor industrial warehouse and the associated construction.

Sources of Contamination: The Site investigations confirmed that petroleum contaminants in soil and ground water originated from releases due to the twelve leaking USTs and operations of the former construction-trucking business. In addition, VC in ground water at the Site could originate from the adjacent two MTCA's cleanup sites: West of 4th and Capital Industries to the north.

Physiographic Setting: The Site is located in the Puget Sound Lowland, which is characterized as a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains and Willapa Hills to the west. The Site is relatively level, with a slight slope toward the west.

Surface/Storm Water System: The nearest surface water body is the Lower Duwamish Waterway (LDW). Slip 1 of the LDW is approximately 350 feet west of the Property, and the main river body is about 600 feet away to the west. Surface water and storm water runoff on and in the vicinity of the Site disperse via sheet flow to King County's storm water drainage-treatment system.

Ecological Setting: The Site is surrounded by developed land occupied by office buildings, workshops, storages, paved areas and other physical barriers. Therefore, the urban environment prevents wildlife from feeding on plants, earthworms, insects, or other food sources in or on the soil affected by the Site.

Geology: The materials at the Site mainly consist of the Vashon recessional outwash deposits, silty clay, sand and gravel. The thickness of the glacial sediments ranges from 1 foot to 24 feet below ground surface (bgs).

Ground Water: Ground water was encountered approximately from 6 to 9 feet bgs at the Site. The ground water flow direction is generally to the west toward the LDW.

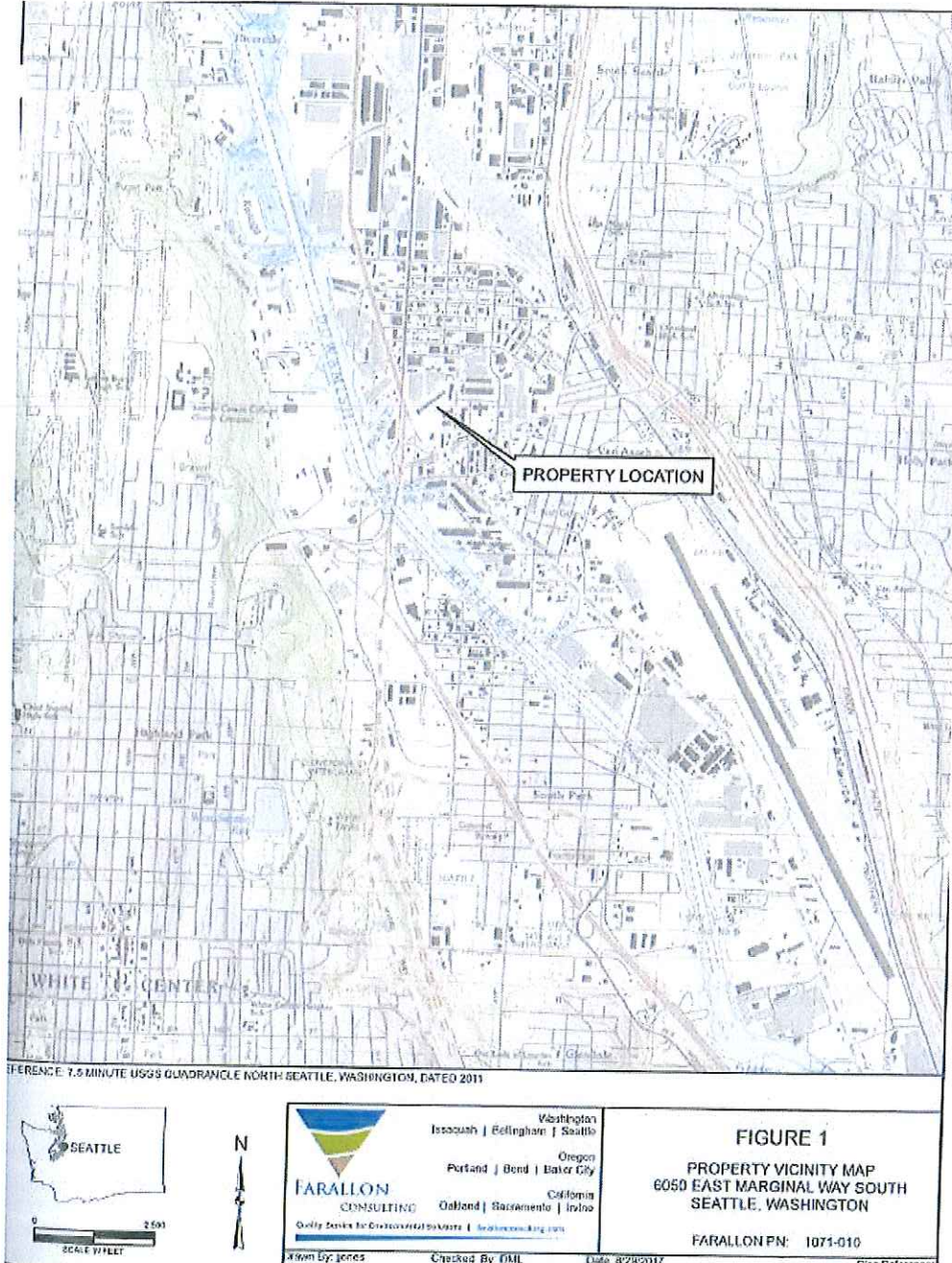
Water Supply: A public water supply is currently provided to the Property by the City of Seattle. According to Ecology's well log data base, there are no private drinking water wells located within approximately 1,000 feet of the Property.

Releases and Cleanup of Contamination: Soil and ground water were contaminated due to releases from the twelve USTs and the business operation at the former construction-trucking facility. Since 1988, various phases of investigations and cleanup actions were conducted at the Site, which included characterization of the Site contamination, removal of the USTs, over-excavation and off-site disposal of the contaminated soil, soil cleanup confirmation sampling, application of chemical agents to treat the impacted ground water, and ground water monitoring.

A monitoring well network with eight monitoring wells is proposed for installation at the Site. A NFA request will be submitted to Ecology for its consideration if concentrations of the COCs are below the MTCA Method A cleanup levels in four consecutive quarterly sampling events.

SITE DIAGRAMS

Figure 1 Location of the Site



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Drawn By: Jones Checked By: DML Date: 8/28/17

FIGURE 1
PROPERTY VICINITY MAP
6050 EAST MARGINAL WAY SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 1071-010

Figure 2 Soil and UST Excavation Locations and Contamination Plume in Ground Water

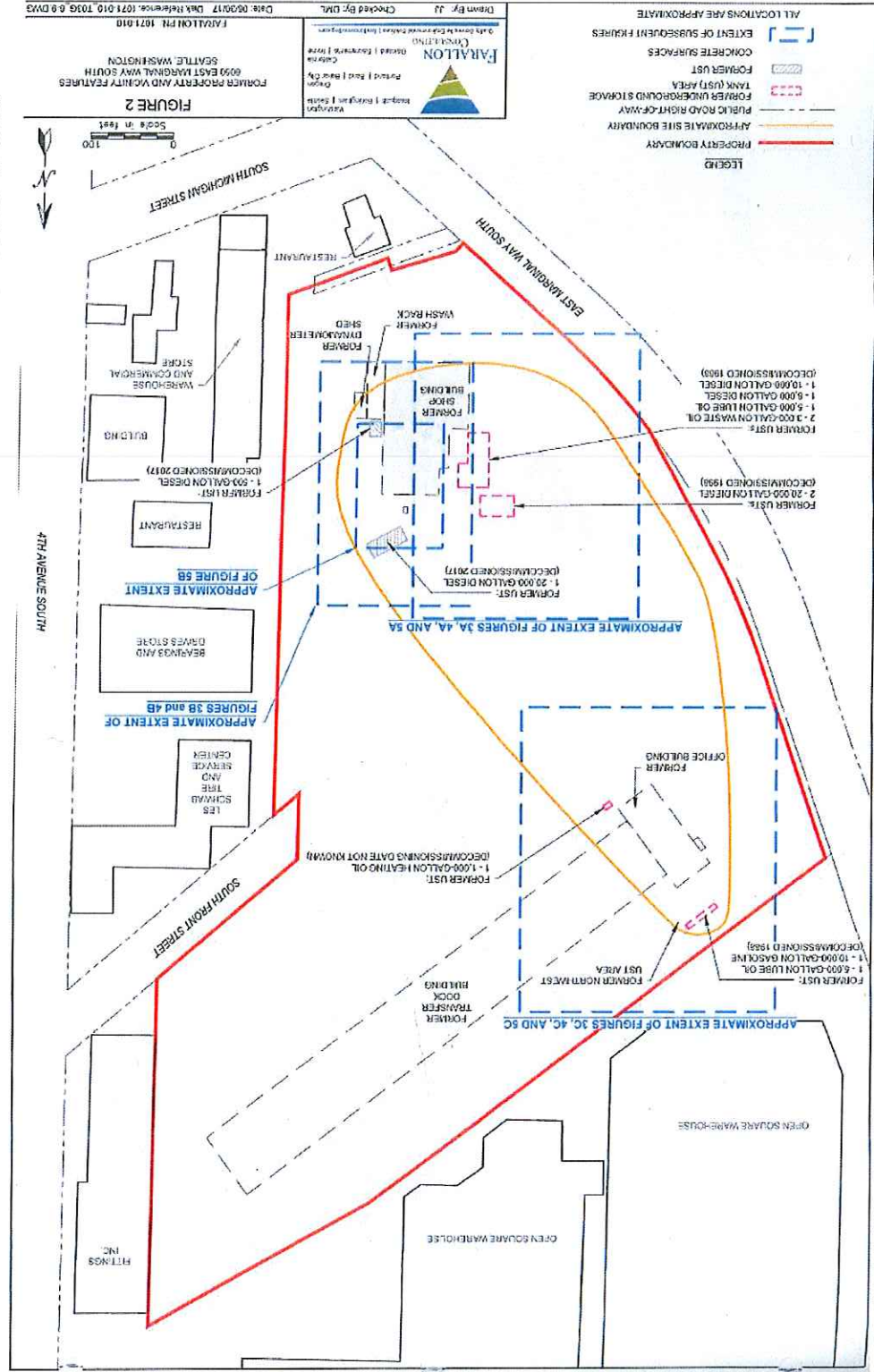


Figure 4 Proposed Monitoring Well Locations



Figure 5 Additional Monitoring Well Locations (Black Squares)

