



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 18, 2019

Pacific Industrial Supply Company, Inc.
c/o Leslie Williams
1231 South Director Street
Seattle, WA, 98108-4877

CL Frazier Properties, LLC
c/o C. Leon Frazier
1231 South Director Street
Seattle, WA 98108

Dick Morgan
9117 NE 21st Place
Clyde Hill, WA 98004

Precision Engineering Inc.
c/o Mark Okel
5104 NW 129th Cir.
Vancouver, WA 98685-2129

Heather Good
Maul Foster & Alongi, Inc.
1329 N. State Street, Suite 301
Bellingham WA 98225

Re: Request for Evaluation of Trichloroethene Risk at the following Site:

- **Site Name:** Precision Engineering Inc.
- **Site Address:** 1231 South Director Street, Seattle, WA
- **Facility/Site No.:** 2056
- **CSID No.:** 4532



To All Concerned:

This letter formalizes the Washington State Department of Ecology's (Ecology) request for an additional vapor intrusion investigation at the referenced Site. Ecology notified Heather Good and Jim Maul (Maul Foster & Alongi, Inc.), Mark Meyers (Williams Kastner), and Eric Stelter in a September 26, 2019 email of possible short-term risks associated with the presence of a volatile organic chemical detected in air samples collected within the existing Pacific Industrial Supply building. The volatile chemical—trichloroethene or TCE—has been detected at concentrations of concern in soil vapor below the floor slab and in indoor air. Because the last air sampling event was in 2015, current conditions are unknown. Additional sampling is therefore necessary to assess current risk.

Ecology recently adopted guidelines for addressing situations where short-term exposure to TCE could pose a risk - Implementation Memorandum No. 22, "*Vapor Intrusion (VI) Investigations and Short-term Trichloroethene (TCE) Toxicity*". This memorandum provides important information, including indoor air action levels (Section 4 – Table 1) and recommendations for determining whether environmental contamination is causing elevated levels of TCE in indoor air (Section 5). An electronic version of the memorandum and additional guidance on conducting vapor intrusion investigations is available at <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview>.

Initial air sampling performed at the Site in 2006¹ found high concentrations of TCE in soil vapor below the floor slab (up to 37,000 micrograms per cubic meter or $\mu\text{g}/\text{m}^3$, compared to a screening level of $67 \mu\text{g}/\text{m}^3$). Concentrations in indoor air (maximum of $0.2 \mu\text{g}/\text{m}^3$) at the same time were below applicable air cleanup levels (Method B, $0.37 \mu\text{g}/\text{m}^3$; Method C, $2 \mu\text{g}/\text{m}^3$). TCE breakdown products were not detected in the indoor air samples.

The next vapor intrusion sampling conducted in 2015² detected a much lower level of TCE in one sample of soil vapor below the floor slab ($95 \mu\text{g}/\text{m}^3$) but a much higher concentration in one sample of indoor air ($240 \mu\text{g}/\text{m}^3$). The soil vapor sample from below the floor slab was likely diluted by air leakage, as indicated by an elevated helium detection (helium is used to check for air leaks). The indoor air concentration exceeded both the relevant Method C industrial cleanup level ($2 \mu\text{g}/\text{m}^3$) and the action level for short-term exposures to women of childbearing age ($7.5 \mu\text{g}/\text{m}^3$).

Based on the historical concentrations of TCE in samples from beneath the floor slab and indoor air at this Site, it is possible that current concentrations of TCE in indoor air exceed the protective concentrations identified in Ecology's Implementation Memorandum No. 22.

¹ Remedial Investigation and Risk Assessment, Precision Engineering, Inc. Site, July 17, 2006, Maul Foster & Alongi, Inc.

² Remedial Investigation Report, former Precision Engineering Property, August 6, 2015, Kennedy-Jenks

Next Steps:

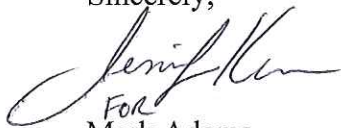
Further assessment is required. Ecology expects that a vapor intrusion investigation will be conducted in accordance with Implementation Memorandum No. 22, beginning with the preparation and submittal of a Sampling and Analysis Plan (SAP) for Ecology review on or before October 30, 2019. The investigation should include concurrent, comprehensive sampling of multiple vapor probes installed to sample beneath the floor slab, multiple indoor air sampling locations and at least one outdoor air sample, all analyzed for tetrachloroethene (PCE), TCE, cis-1,2-DCE, and vinyl chloride. Sampling results should be provided to Ecology as soon as they are available. A building survey must be conducted prior to the sampling event to identify potential sources of contaminants inside the building.

Ecology also requests a meeting in the near future at the Site. We would specifically like to meet with the current property owner and whomever is in charge of day-to-day operations at Pacific Industrial Supply.

Contact Information:

Ecology is committed to working with you to accomplish the prompt and effective actions necessary at the Site. If you have any questions about this request, please contact me at 425-649-7107 or mark.adams@ecy.wa.gov.

Sincerely,



FOR
Mark Adams

Site Manager

Toxics Cleanup Program, NWRO

By certified mail: 9171969009350214215594

ecc: Eric Stelter
Mark Myers, Williams Kastner
Heather Good, Maul Foster & Alongi, Inc.
Jim Maul, Maul, Foster & Alongi, Inc.
Kara Tebeau, Assistant Attorney General
Bob Warren, TCP NWRO
Tamara Cardona, TCP NWRO

