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DEPARTMENT OF ECOLOGY

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July 14, 2020

Jeffrey D. Laveson
Carney Badley Spellman, P.S.
701 Fifth Avenue, Suite 3600
Seattle, WA 98104-7010

Re: Comments on the Remedial Investigation Report

- **Site Name:** Seattle Times
- **Site Address:** 1120 John Street, Seattle, WA 98109
- **Cleanup Site ID:** 14495
- **Facility/Site ID:** 4377754

Dear Jeffrey Laveson:

Thanks for submitting Remedial Investigation (RI) Report by Environmental Partners, dated January 21, 2020, and a letter, dated January 29, 2020.

Mr. John Level and I have reviewed the RI report and your letter. We are providing the following responses to your comments stated in your letter:

“The RI by EPI confirms that the sole source of the subject solvent contamination was due to the historical operations at the neighboring Troy Laundry site.”

Ecology is not able to conclude at this time that the sole source of the solvent contamination at Onni Property/Seattle Times site is from Troy Laundry site. The solvent contamination found at Troy Laundry site contains both PCE and TCE, while the solvent contamination found in the shallow groundwater zone at Onni Property/Seattle Times site contains only TCE, with no PCE.

For example, the groundwater sample at MW2, up gradient from Onni Property/Seattle Times site, shows PCE concentrations of 10ppb and TCE concentration of 5.6ppb, while the groundwater sample at boring U6 at Onni Property/Seattle Times site shows PCE concentration as non-detect, and TCE concentrations of 9ppb. Similarly, the groundwater sample at bring U13 at Onni Property/Seattle Times site shows PCE concentration as non-detect, and TCE concentrations of 7.9ppb. This shows the source for the TCE groundwater contamination at Onni Property/Seattle Times could be from a different source.

“Releases to soil on the Seattle Times Site do not extend beyond 30 feet in depth and do not impact the same aquifer impacted by Troy Laundry. This is demonstrated by the extensive on-property data contained within the RI Report and by the vertical separation between the soil samples collected by the Troy Laundry Site PLPs at wells MW-29 and MW-30. Those soil samples demonstrate an approximate 60 foot vertical separation between shallow soil (30 feet below grade) and the top of the aquifer (95 feet below grade). Sampling within the interior of the Seattle Times Site demonstrates a maximum depth of impacts to soil of 20 feet and an approximate 75-foot vertical separation between those impacts and the impacted deeper aquifer.”

Solvent contamination in the groundwater tends to migrate downward into deeper aquifer. It is not clear if the TCE contamination in the shallow groundwater zone at Onni Property/Seattle Times site has migrated to deep groundwater zone, and co-mingled with Troy solvent groundwater plume. One pair of shallow and deep monitoring wells are recommended to be installed in the APOC2 and APOC5 area, where groundwater samples show solvent exceedances at borings U6, U11, U12, U13, and T9. The additional samples from the pair of shallow and deep wells could help us to determine if the TCE contamination in the shallow groundwater zone has migrated into deep aquifer.

“Numerous soil samples collected within shallow soil on the northern and northwestern portion of the Seattle Times Site were tested for the presence of chlorinated volatile organic compounds and were not detected. For example, no VOCs were detected in soil samples collected from boring U-16 (5 and 15 feet below grade), MW-2 (10 feet below grade), U-10 (5 and 10 feet below grade), and U-14 (10 and 15 feet below grade). These sampling locations surround MW-29 and MW-30 within an arc of approximately 40 to 50 feet in the south and east directions. This finding demonstrates that a shallow source of TCE is not present in this location.”

It is unclear what rationales were used in the RI report for selecting the depths for the soil samples that were collected. For example, only one soil sample at MW2 was taken at 10' below ground surface (bgs), while two soil samples at U6 were taken at 10' and 15' bgs, two soil samples taken at U-16 at 5 and 15 feet bgs, U-10 at 5 and 10 feet bgs, and so on.

Monitoring well MW2 is located right next to monitoring well MW29, installed by SES in 2019. MW29 was sampled at 20', 30', 40', 60', and 80' bgs, respectively. While no VOCs were detected in the soil sample at MW2 at 10' bgs, soil sample at MW29 was detected at 0.093ppm of TCE at 30' bgs, exceeding MTCA soil clean up level of 0.03ppm.

It is also unclear what rationales were used in the RI report for selecting the chemicals that the soil samples were analyzed for. For example, no VOCs were analyzed at borings U1, U2, U3, U7, U8, and U9, located in the area between MW2/MW29 and U6/U10, while GRO/DRO/ORO and BETX were analyzed at these borings.

Since the soil samples collected to date appear to have no systematic patterns for depths and chemicals analyzed, it is hard to draw a conclusion that chlorinated VOCs are not present in the soil at Onni Property/Seattle Times site.

“Chlorinated solvents do not appear to have been released on the Seattle Times property. A total of 65 soil samples were collected at the Seattle Times property. Of these 65 samples, only one sample contained a chlorinated solvent (trichloroethene; TCE) at a concentration exceeding the method detection limit (MDL). The detected concentration was located at boring U-11 at 15 feet below grade and was below the MTCA Method A cleanup level of 0.03 mg/kg. TCE was not detected in a sample located at 20 feet below grade in boring U-11. The vast majority of the other samples collected were from shallow soils (i.e, immediately below surface or 5 to 10 feet below grade) and are representative of the operational areas of the property. No chlorinated VOCs were detected in any of these samples. The absence of impacts within the upper 15 feet of soil does not suggest a historical on-property release of TCE or other VOCs in this area or that a mechanism exists for the northward transport of those compounds to the areas where the impacts were detected in MW-29 and MW-30.”

The vast majority of the soil samples collected and analyzed for VOCs are at 10' or more bgs (except U10 and U16). At boring U11, the one soil sample contained TCE at a concentration exceeding MDL was detected at 15' bgs, but no soil samples were collected at shallower depths, such as 5' bgs, or 10' bgs at U11. Unlike VOCs, other chemicals such as BETX, GRO/DRO, PCBs, and metals were collected at shallower depths, less than 10' bgs throughout the Onni Property/Seattle Times site. Therefore, it is hard to draw a conclusion that no VOC contamination exists in the shallow soil at Onni Property/Seattle Times site.

In addition, Ecology is providing the following comments on the RI report:

1. If soils at Onni Property are to be excavate to 50ft or greater bgs, as part of the proposed development plan, soil samples should be collected at the bottom of the excavation within a surveyed grid to confirm that concentrations of PCE, TCE and other contaminations of concerns are below the MTCA soil cleanup levels.
2. The groundwater flow directions in the shallow and deep aquifers should be evaluated and presented in the RI report.
3. The site boundary needs to be further defined, which should be done as part of remedial investigation under an Ecology agreed order.

If you have any questions, please call me at (425) 649-7187 or sunny.becker@ecy.wa.gov.

Sincerely,



Sunny Becker

Toxics Cleanup Program, NWRO

cc: Michael Dunning, Perkins Coie
John Level, Office of the Attorney General