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August 28, 2020

Mark Dagel
Hart Crowser, Inc.
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Seattle, WA 98121
mark.dagel@hartcrowser.com

Re: Ecology Review Comments on Draft Remedial Investigation Report
Seattle DOT Dexter Parcel Site, 615 Dexter Avenue N, Seattle, WA

- **Facility/Site No. 81735**
- **Cleanup Site ID 14785**
- **VCP Project No. NW3257**

Dear Mark Dagel:

The Department of Ecology (Ecology) has reviewed the July 2, 2020 Draft Remedial Investigation (RI) report submitted for the Seattle DOT Dexter Parcel Site (Site). This correspondence provides our comments and revisions needed on the RI report to meet the requirements of the Model Toxics Control Act (MTCA).

Enclosed is a table summarizing Ecology's comments. The most notable general comments are listed below:

- The RI report lacks sufficient detail to define the nature and extent of the contamination at the Site. Additional field data will need to be collected to evaluate the data gaps identified in our comments prior to completing the feasibility study (FS).
- Ecology disagrees with the conclusion that chlorinated solvent contamination originating from the American Linen Supply Co Dexter Ave site is impacting the Site. The RI conclusion is based on limited data from one sampling event in October 2019 and does not consider more recent data from January and April 2020 that indicate no detectable concentrations of CVOCs in the wells near the northeast corner of the 615 Dexter Ave N property (Property).
- The screening levels used in this RI are not supported by an adequate conceptual site model. Based on the RI data, it is not appropriate to refer to the American Linen Supply Co Dexter Ave site screening levels for any of the contaminants detected at the Site.

- A conceptual site model needs to be developed for the Site that describes the sources of contamination, impacted media, transport pathways and mechanisms, and potential receptors. Section 7.0 currently contains a lot of this information, but needs to be restructured. Based on this conceptual site model, the potential exposure pathways and receptors are selected, and a screening level protective of the most sensitive population and exposure pathway is used. This must be presented prior to screening the data.

The purpose of the RI/FS, as stated in WAC 173-340-350(1), is to collect, develop, and evaluate sufficient information regarding a site to select a cleanup action. Because understanding the extent of the contamination is an essential part of developing, evaluating, and selecting cleanup action alternatives, it is essential to complete the collection of site characterization data during the RI and FS phases of the project, not during the actual cleanup.

In addition to our comments on the draft RI, Ecology would like to address the schedule provided in the Prospective Purchaser Consent Decree (PPCD) request in October 2019. A copy of that schedule is below and a third column has been added with our comments for documentation purposes.

Activity	**Proposed Timeframe**	**Actual Timeframe and/or Comments**
Formal Submission for PPCDs and Initiation of Negotiations	October 15, 2019	
Development of RI	October 2019 – April 2020	VCP application requested in October 2019 - received January 23, 2020.
Submittal of Draft RI to Ecology	May 2020	July 2, 2020
Ecology Review of Draft RI	May 2020	July – August 2020
Revisions to Draft RI	May 2020 – June 2020	---delayed---
Submittal of Final RI to Ecology	July 2020	Not ready – significant revisions needed
Development of FFS/CAP	January 2020 – June 2020	
Submittal of Draft FFS/CAP to Ecology	July 2020	Not received as of August 18, 2020
Ecology Review of Draft FFS/CAP	July 2020	Not received as of August 18, 2020
Negotiations for PPCD	May 2020 – August 2020	Currently with attorneys
Development of Public Participation Plan (PPP) and SEPA Notice	May 2020 – August 2020	Ecology to prepare the PPP. The SEPA environmental checklist has not yet been received.
Revisions to Draft FFS/CAP	August 2020	Draft FFS/CAP have not been received by Ecology
Finalize FFS/CAP	September 2020	Draft FFS/CAP have not been received by Ecology.

Public Notice (including Public Hearing if necessary) and Responsiveness Summary	September 2020 – October 2020	The documents for public review (RI, FFS, Draft CAP, PPCD, SEPA checklist and determination notice, and Public Participation Plan) will not be ready for this proposed time period due to delays in the receipt of technical documents
Finalize PPCDs and Exhibits	October 2020	
Lodging of Proposed PPCDs in Superior Court	November 1, 2020	
Initiation of Site Redevelopment, including Implementation of Remedial Action as provided in FFS/CAP	TBD	
Groundwater Monitoring	As Required	

Please note that negotiating the revisions to the technical documents requested by Ecology will result in additional schedule delays. We encourage that you follow available guidance to complete a remedial investigation, feasibility study, and cleanup action plan (such as Ecology's RI, FS, and CAP checklists), as well as the requirements in MTCA (WAC 173-340-350 through 173-340-390) to ensure shorter review period and less revisions.

Ecology appreciates the effort that your team has put into the draft RI report and encourages you to contact us if you have further questions regarding our expectations on an RI. We look forward to continuing to work with you on this project. If you have questions please contact me by phone at (425) 457-3143 or by email at tena.seeds@ecy.wa.gov.

Sincerely,

Tena Seeds

Tena Seeds
Cleanup Project Manager
Toxics Cleanup Program, NWRO

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Section and Paragraph	Page No.	Review Comment
GENERAL COMMENTS		
The current draft of this document does not provide enough detail within the text and relies too heavily on information within the attachments (tables, figures, appendices). As such, it is difficult to follow and there are too many points where the reader has to search for information in other places. Please note that this document is subject to public review and will need to present a clear story of the site—the text should contain enough information and details to clearly describe the site and the remedial investigation, while the tables, figures, and appendices provide information to support the text. The comments provided in this table are intended to make the Remedial Investigation (RI) report easier to read as well as compliant with the requirements in the Model Toxics Control Act (MTCA). It is important that this document provides sufficient information to understand what was done, who did what, when, and how, and what the results mean for characterization of the Seattle DOT Dexter Parcel site (Site).		
When using abbreviated site name on text, tables, figures, and appendices, please use "SDOT Dexter Site" instead of "615 Dexter Site". Use "Site" when referring to the full site (Seattle DOT Dexter Parcel Site). "Property" should only be used when referring to the property itself (located at 615 Dexter Ave N) and not the Site. MTCA generally defines a "Site" (or "Facility") as an "area where 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). Therefore, the Site boundary may extend beyond the Property boundary.		
Do not use "BMR-Dexter" nor "BMR-D" to refer to the American Linen site. Please use the name as listed by Ecology (American Linen Supply Co Dexter Ave), you can shorten to "American Linen" to refer to that site.		
Analytical methods are missing from this document. Please specify in the text (4.2.1.3, 4.2.2.3), tables (4-3, 4-4, 6-4, 6-5), and Appendix B (Tables B-1 and B-2) which analytical methods were used to analyze the soil and groundwater samples (e.g., EPA Method 8260C, NWTPH-Gx, etc.).		
Please provide copies of all applicable sampling field notes/forms in an Appendix.		
Insert a section to summarize the analytical results for the soil and groundwater samples from the current (2019/2020) investigation. This should be presented either as a subsection at the end of Section 4.2 or as individual subsections for soil characterization (under 4.2.1) and groundwater characterization (under 4.2.2). Alternatively, this could be presented as a new Section following Section 4. The discussion should summarize the concentration ranges for each of the compounds analyzed without comparison to any cleanup levels or screening levels. You can have an intro sentence for each medium that says something like "The compounds that were detected in the RI [soil or groundwater] samples are summarized below…" and then list bullet summaries for each of the detected compounds, including concentration range, sample IDs for the ones that contained the detectable concentrations, and which one had the highest concentration and when it was detected (since this RI work spanned 2019 and 2020).		
Please incorporate the text of Appendix D into the main text of the report (in Section 5.2) instead of having it in two places. The tables in Appendix D should also be incorporated into (or included with) the main report tables for Section 5 (a couple of them appear to have duplicate info already). Reserve Appendix D for containing raw testing data, graphs, and other supporting information.		
The information in Section 6.0 (identification of COCs and their nature and extent) should be presented after the Conceptual Site Model (see specific comments below).		
A Conceptual Site Model is needed before screening levels are selected. The data cannot be screened until after the potential exposure pathways are identified and adequate levels, protective of those pathways, are selected. Use one set of screening levels for each contaminant.		

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Section and Paragraph	Page No.	Review Comment
SPECIFIC COMMENTS – TEXT		
Section 1.0, 2nd paragraph	1	The PPCD will be between the purchaser and the State of Washington; please modify text as follows: "…pursuit of a Prospective Purchaser Consent Decree (PPCD) ~~from the Washington State Department of Ecology (Ecology)~~ with the State of Washington."
Section 1.0, 3rd paragraph	1	Purpose of the RI should be in accordance with MTCA, which includes the sufficient collection of data to select a cleanup action. Distinguishing contamination that originated from historical uses at the Property from contamination that originated from off-site sources should not be the objective of an RI; it can be a result, after the RI is complete, but not the purpose.
Section 2.0	1	Change the name of Section 2.0 to "General Facility Information and Property Description" and add summary information to provide context for later sections regarding the different hydrgeologic zones that are present in the area; introduce the shallow and intermediate zones and their corresponding depths/elevations; refer the reader to Section 5.0 for more details. If referencing others' interpretation of these zones in this summary, you will need to provide Hart Crowser's justification for using the same interpretation or explain why yours differs from theirs.
Section 3.0, 3rd paragraph	2	Change text as follows: "Operations on the Property and ~~nearby sites judged to be the likeliest potential sources of contamination on the Property~~ its vicinity that may have resulted in releases of contaminants are listed below…"
Section 3.0, 3rd paragraph (bullets)	2	There appears to be no mention of the plastics mixing operations (on 1950 Sanborn) or the wood working area with the paint spray booth (on 1969 Sanborn) that were located in the central portion of the property (west end of the east building). Please add these to the bullet list, even if the data later shows that there are no COCs in these areas. There is still potential to encounter COCs from these uses later on, after the structures are removed for property redevelopment. All neighboring sites need to mentioned and described, not only selected sites. Please include 601 Dexter, American Linen Supply CO Dexter Ave, 701 Dexter, and SDOT Mercer Parcels.
Section 3.0, 3rd paragraph, 1st bullet	2	Please add more information about the structures associated with the former gas station on the eastern portion of the property and show all of them on the figures. The historical aerial photos and maps in Shannon & Wilson's 2018 Phase I report appear to show three structures there: a small structure to the NE, another to the SE and a larger rectangular structure to the west. The photo for the '621 Dexter' service station in the archives files suggests the dispensers and associated building were the NE structure and the larger structure to the west was a garage. It's not clear what the SE structure was, but presumably associated with the gas station.
Section 3.0, 3rd paragraph, 3rd bullet	2	Provide more information and references to support the claim that the solvents were petroleum-based and not chlorinated. Chlorinated solvents were in use earlier than the 1950s (see SCRD's "Chemicals Used In Drycleaning Operations", revised July 2009). Given the various historical operations on the 601 and 615 Dexter parcels, the solvents could have been used for laundry services and/or for the painting/coating operations associated with Colotyle. What compounds would potentially be associated with the types of solvents here?

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Section 3.0, 3rd paragraph, 6th bullet	3	You should mention that 601 Dexter is also a listed site (Cleanup Site ID No. 15113). Also provide more information to support the claim that petroleum-based cleaning solvents would have been used in the historical laundry services. Please also mention the former Colotyle operations (coated wall board manufacturing) on 601 Dexter, which occurred after the laundry business. The 1950 Sanborn shows coating and drying operations and a paint rack associated with that building; what compounds would potentially be associated with those operations?
Section 3.0, 3rd paragraph, 7th bullet	3	Please add the following text at the end of the third sentence: "…caused an extensive on- and off-site CVOC plume in groundwater to the east and southeast of the American Linen property."
Section 4.0	3	Include a concise summary list of Contaminants of Potential Concern (COPCs) at the beginning of this section, based on the past uses and potential sources identified in Section 3.0. Consider incorporating the info that is provided in the second paragraphs of Section 4.2.1.3 and Section 4.2.2.3 to this discussion.
Section 4.0, 1st paragraph	3	Change "the BMR-D Site" to "adjacent sites" at the end of the first sentence, since investigation data for 601 Dexter is also incorporated into this RI. Also, modify the text regarding presentation of relevant information, as follows: "A chronological list of ~~Reports describing~~ these investigations ~~were reviewed,~~ is provided in Table 4-1 and relevant information ~~summarized below and presented in Table 4-1~~ is presented below in Sections 4.1 and 4.2. The locations of ~~relevant~~ explorations relevant to this RI ~~is~~ are provided on Figure 4-1." Please see specific comments regarding Table 4-1 (page 10 of this table).
Section 4.1	3/4	This section needs more information about each of the previous investigations. The public will be reviewing this document, so it needs to provide a clear understanding of what was done, when, why, and what was found in order to tell the story. Please add a summary paragraph (or bullet) for each of the investigations that includes the following information: 1) Who performed the work and type/purpose of investigation 2) Which contaminated site was the focus of the investigation 3) Date(s) of the work performed 4) Number of explorations and their IDs, with explanation of which ones are relevant to investigation of the SDOT Dexter Parcel Site (if not all explorations) 5) Number of soil and groundwater samples collected/analyzed, of which XX are relevant to the SDOT Dexter Parcel Site (if not all samples) 6) Brief summary of findings related to contaminants detected in soil and groundwater on/near the Property, their associated concentration ranges, and any other pertinent conclusions 7) Reference to the original report that documented the investigation. Direct the reader to the cited documents for additional details and refer to Appendix A2 for copies of the boring logs, Appendix B for a summary of the data collected, and Appendix C2 for copies of the lab reports.

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Section 4.2	4	Explain the rationale for the RI sampling locations. Consider moving the information that is in the last paragraph of Section 4.2.1.3 to here and adding the summaries from the work plan and rationale for the 2019 locations.
Section 4.2.1.1, 1st paragraph	4	Explain the reason why the different drilling methods were used; either explain in this introductory paragraph or insert in description of each of the technologies (paragraphs 3 and 4).
Section 4.2.1.2, 1st paragraph	5	Field screening is noted as one of the criteria for selecting soil samples for chemical analysis. How did you choose which samples to send to the lab? What specific field screening result was used to determine subsequent lab analysis?
Section 4.2.1.2, 5th paragraph	5	How many soil samples from each boring were collected? How were they selected? How did you select what to analyze for? Ecology has seen the work plan for the work performed in 2020 and associated rationale for those locations, but we were not provided one for the work performed in 2019. The samples collected in 2019 were not all analyzed for every compound, so more information is needed to explain why.
Section 4.2.1.3, 1st paragraph	6	Please list the soil analytical methods.
Section 4.2.1.3, 2nd paragraph	6	This information can be moved up to an earlier discussion of COPCs (see previous comment regarding Section 4.0).
Section 4.2.1.3, 3rd paragraph	6	This information should be moved up to Section 4.2.1 and incorporated into discussion of rationale for the RI locations. Also, the discussion of CVOCs needs more clarification; suggested revision: "CVOCs were selected ~~based on the~~ to evaluate potential releases on the Property and confirm that the known CVOC ~~soil plume~~ contamination present on the adjacent parcels to the east (presumed downgradient) and northeast of the Property has not impacted the SDOT Dexter Site which is hydraulically upgradient ~~originating from the nearby BMR-D Site~~."
Section 4.2.2.1, 1st paragraph	6	Take out the reference to the BMR-D hydrogeologic zones: "The wells were classified into two categories: Shallow and Intermediate A." However, note that these categories should not apply to the SDOT Dexter Site unless you have sufficient information to determine that they are also applicable to the Site (see comment on page 6 of this table regarding Section 5.2).
Section 4.2.2.1, 4th paragraph	7	Please include information on when the wells were developed (i.e., date range for the 2019 wells and date range for the 2020 wells).
Section 4.2.2.2, 1st paragraph	7	Explain how you selected where to collect grab groundwater samples vs regular well samples, and how the results may differ between the two types of samples.
Section 4.2.2.2, 2nd paragraph	7	Please include the dates that the grab samples were collected (i.e., date range for the 2019 grab samples and date range for the 2020 grab samples). Did collection of grab groundwater samples occur at least 12 hours after the temporary wells were installed and were they purged to reduce turbidity in the samples, as stipulated in the sampling and analysis plan?
Section 4.2.2.2, 2nd paragraph	7	The text indicates that bailers may have been used to collect grab samples. Use of a bailer was not part of the sampling and analysis plan; please include details about which locations required the use of a bailer instead of the low-flow pumping equipment and why. State that bailer sampling is a deviation from the sampling and analysis plan.

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Section 4.2.2.2, 5th paragraph	7	The observations described in this paragraph (odors, sheen) are not necessary to include in the text, as long as they are part of the field notes. Please provide the field notes in an Appendix and refer to it.
Section 4.2.2.3, 1st paragraph	8	Please list the groundwater analytical methods.
Section 4.2.2.3, 2nd paragraph	8	This information can be moved up to an earlier discussion of COPCs (see previous comment regarding Section 4.0). Take out "including investigations of the adjacent BMR-D Site" from the last sentence.
Section 4.2.3.2, 1st paragraph	9	Please provide more detail on how many wells were used for the groundwater level measurements and which ones were included. Consider the following for suggested modifications to this text: "Groundwater elevation was measured in 10 selected monitoring wells on and adjacent to the Property (Table 5-2). These included: • 4 wells screened in the shallow zone (Property wells DMW-1S and DMW-2S, and off-Property wells DMW-4S and MW-305); • 5 wells screened in the upper intermediate (Intermediate A) zone (Property wells DMW-3IA and DMW-6, and off-Property wells DMW-5IA, HC-4, and MW-306); and • 1 well screened in the lower intermediate (Intermediate B) zone (off-Property well MW-307). Note that well HC-4 is incorrectly listed as a Shallow well in Table 5-2. Based on the other tables and the groundwater contour maps, it appears to be an Intermediate A well.
Section 4.2.3.2, 1st paragraph	9	Measurements were taken in how many wells during the short synoptic events? "Many" is not specific enough. Was it the 10 that are listed in Table 5-2? Regarding the various additional measurements collected throughout 2019 and 2020, what was their purpose?
Section 4.2.3.2, 2nd paragraph	9	Please include a brief section on the wellhead survey work that was performed after the well installation and development details (either as a paragraph at the end of 4.2.2.1 and rename section to "Monitoring Well Installation, Development, and Survey" or as a new section 4.2.2.2 "Wellhead Survey"). Include dates, who performed the survey, horizontal datum information, vertical datum information, and any other pertinent details. Present the survey data in an Appendix.
Section 5.1, 1st paragraph	9	Consider also referencing the boring logs in in Appendix A to the reader for more information regarding lithology.
Section 5.1, 2nd paragraph	9	Not sure what you mean by "Little fill was observed…" in the first sentence. You could take out "Little" from this and perhaps state that fill was observed in XX of the borings at/near the Property. Clarify boring locations relative to the Property: DGW-3, DMW-2S, and DMW-4S are southeast; DGW-4 and DMW-5IA are southwest, and DPP-4 is south (or south-central).
Section 5.1, 3rd paragraph	9	Corrections needed regarding directional language when referencing DGW-3 and DGW-4: • DGW-3 is in the southeast portion of the Property – text says western. • DGW-4 is to the southwest – text says eastern.

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Section 5.1, 5th paragraph	10	Correction needed regarding location of HC-1, DPP-2, and DGW-3 – the text indicates they are in the central-eastern portion of the Property, but they are near the east half of the southern edge of the Property (the 615 Dexter parcel).
Section 5.2, 1st & 2nd paragraphs	10	Is there enough data for the Property that supports the hydrogeology descriptions in these paragraphs? Investigations on or in close proximity to 615 Dexter have not gone as deep as the investigations on the neighboring properties -- most explorations have been shallow or into the upper intermediate zone; only one at the NE corner went into the deeper intermediate zone and no explorations to the deep zone. If there are other exploration locations surrounding the Property that you could use to infer the likely presence of these four hydrogeologic zones beneath the Property, you could refer to those in your interpretation. Otherwise, modify the text in these paragraphs to be consistent with the data for the Property, rather than with the conditions at the other sites that are downgradient. You should refrain from using the same descriptions if they don't apply to this site.
Section 5.2.2, 2nd & 3rd paragraphs	10/11	Be consistent with what is shown in Table 5-2 (with HC-4 moved to the IA wells list--see previous comment): Use all data for the time period, including the 5/11/20 measurements. Max depth measurements should be 28.17 for Shallow (MW-105 on 10/21/19), 39.32 for IA (DMW-5IA on 5/11/20), and 43.90 for IB (on 5/11/20). Lowest elevations should be 30.88 for Shallow (DMW-1S on 12/5/19), 25.99 for IA (DMW-3IA on 5/11/20), and 16.31 for IB (on 5/11/20). Include May 2020 in the observable trends discussion – how did things change to May 2020. Text stops at March 2020. Also, there was only one IB well, but the text suggests there are more than one. Change "Intermediate B wells" to "the Intermediate B well".
Section 5.2.2, 5th paragraph	11	Use "grouped" instead of "nested" in the first sentence. "Nested" implies multiple wells within a single borehole, which is not the case for MW-305 through MW-307. Also clarify that the evaluation was limited to an area near the NE corner of the Property. The vertical gradient range from 0.26 to 0.38 ft/ft is incorrectly noted as between Shallow and Intermediate A; Table D-2 indicates those were observed between shallow and IB. Since the vertical gradients were evaluated only near the NE corner of the Property, can you say anything else to tie that information to what was observed in other areas of the Property?
Section 6	11	As noted in the general comments, this section needs to be moved down, after the Conceptual Site Model is discussed. **Discuss screening levels first, then COCs.** - Use one set of screening levels for soil and one set for groundwater that are chosen based on the pathways and receptors identified in the CSM; develop only one SL for each compound, based on the most conservative value for the exposure pathways. - The American Linen PSLs are not adequate for this Site as the data show that the American Linen CVOC and hydrocarbon plumes do not impact the SDOT Dexter Parcel Site.

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Section 6	11	- Include concentrations and their associated dates and location IDs when discussing the nature and extent of COCs in both soil and groundwater; current summaries are too vague and do not provide enough detail. Dates are important for providing context to the reader. - When summarizing the COCs in the text, list them by medium instead of by type of compound (COCs identified for soil, then COCs identified for groundwater); please include all of the ones shown in Table 6-3. - After listing the COCs for soil and groundwater, then discuss any compounds that should be considered primary COCs vs others and explain why.
Section 6.1, 1st paragraph	11	Change last portion of first sentence to read "…were selected based on the history of the Property, the results of previous investigations, and contaminants found in nearby sites." Using "nearby sites" is more inclusive and takes into consideration the 601 Dexter site as well as the American Linen site.
Section 6.2	13	There is a noticeable data gap regarding the lateral extent of GRO to the east. This needs additional discussion. Additional sampling will be necessary to define the eastern extents of GRO and whether they extend off-Property into the Dexter Ave right-of-way. The complete extent of the contamination needs to be determined prior to completion of the Feasibility Study and Cleanup Action Plan.
Section 6.3.1, 1st bullet	13	Clarify that the GRO and DRO concentrations are in <u>and near</u> the southeast corner of the Property, since two of the locations are actually off-Property in the alley. There are noticeable data gaps regarding the lateral extents of GRO and DRO in Shallow zone groundwater to the east and south, and also west of HC-1 in the alley. These need to be discussed and additional sampling will be necessary to define these extents and determine if they extend into the Dexter Ave right-of-way. Also, the DRO concentrations all appear to be flagged as not resembling the fuel standard used for quantitation. Can you get more information from the lab about what that means and what the source could be if not a diesel fuel? Please address this and include copies of the chromatograms.
Section 6.3.1, 2nd bullet	14	The extents of DRO in intermediate zone groundwater are not defined. You will need to discuss this, and additional sampling will be necessary to define the extents in all directions. It seems premature to say that the DRO exceedance is attributed to the former USTs in the alley, based on only the one data point and the apparent lack of information regarding the actual locations of the former heating oil tanks. Conditions beneath the structures immediately north and south of the alley are also unknown at this time, and the DRO detection was flagged as not resembling the fuel standard used for quantitation. Same comment as above regarding the latter—can you get more information from the lab about this? What are the implications regarding the source? Please add more discussion about this and include a copy of the chromatogram.

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Section 6.3.2	14	Ecology disagrees with the conclusion that the extent of the American Linen CVOC plume is based on one J-flagged vinyl chloride result from October 2019. It is not appropriate to make that conclusion since subsequent samples collected from MW-307 in January 2020 and April 2020 have been non-detect for vinyl chloride (and other CVOCs). Regarding whether 601, 615, and 701 Dexter have contributed to CVOCs in groundwater, the data collected to date from the three properties indicate no apparent releases of CVOCs from current or historical operations. However, conditions are still unknown beneath the buildings and a laundry was historically present on 601 Dexter. This discussion should address this and state that additional data will need to be collected to conclude whether operations on these three properties have contributed or not.
Section 6.3.3	14	The conclusion regarding the source of arsenic is premature and based on a limited data set. Additional samples should be collected from these wells prior to making any conclusions regarding arsenic. Additional delineation of the arsenic plume is necessary to the east and south. Also, please provide more information about what is said in the referenced document (Cozzarelli 2015) and how it applies to this Site, as well as what data you do have that supports the argument that the arsenic is associated with the petroleum. Include this discussion within the CSM.
Section 6.4	14	Ecology disagrees that the two areas of petroleum impacts are "contained" – neither area is fully delineated. The second statement should read "These figures show that the Property has two separate areas of petroleum-related impacts." While the eastern area (Area 2) does appear to be likely associated with historical on-site uses, the source of the western impacts (Area 1) is not conclusive at this time. The former USTs may be a possible source, but there is not sufficient data to support this. Figure 6-4b doesn't match any of the plume figures for the American Linen Supply Co Dexter Ave Site and is generally misleading given the more recent data. We suggest removing Figure 6-4b and changing the summary about CVOCs – that the data are inconclusive about whether the American Linen plume reaches the Property and that the data collected to date indicate no apparent releases of CVOCs from operations on the Property. This is a technical document and should be based on all available lines of evidence.
Section 7	14	Change title of this section to Conceptual Site Model. Remove all discussion of cleanup objectives/goals and CULs; this information should be presented in the FS and CAP documents and not the RI. Discuss only the elements of the CSM—release sources, transport mechanisms, exposure pathways, potential receptors, and any other specific concerns or property-related issues pertaining to things like hydrogeology, current and future zoning and land uses, etc. Discuss only the CSM as it pertains to the SDOT Dexter Parcel Site and not the American Linen Site.
Section 7.1, 1st paragraph	15	Ecology disagrees with the second bullet regarding off-property sources of chlorinated solvents and requests that it is removed. There is not sufficient evidence for this statement. If you intend to make this argument, Ecology requests that you collect samples from monitoring wells MW-305, MW-306 and MW-307 for four quarters and provide additional evidence to support this.

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Section and Paragraph	Page No.	Review Comment
Section 7.1	15	Arsenic should be included in the CSM discussion (a new subsection under 7.1) rather than a minor footnote, since it is a concern for groundwater. You should address possible sources and provide more information about why it may be related to the petroleum contamination. What information is in the reference you cited in Section 6.3.3 and how does it compare to what you have observed at the Site? Do you have geochemical data for impacted wells vs non-impacted wells to help support the claim that it is naturally occurring and is associated with geochemical changes in groundwater due to the presence of petroleum? If not, then additional data should be collected to determine if this is occurring or if the arsenic may be from another source.
Section 7.1.1, 1st paragraph	15	The area of petroleum-impacted soil to the SE is not contained; the eastern extent has not been defined and it may extend beyond the Property boundary and into the Dexter Ave right-of-way.
Section 7.1.1, 2nd paragraph	15	Avoid referring to the impacted area as "small". Consider revising the second statement to read "The occurrence of groundwater impacts in these areas indicates that the migration of contaminants may have been limited by natural processes including……" Can you provide more evidence or information to support that natural attenuation has been occurring?
Section 7.1.1, 3rd paragraph	15	The area of petroleum-impacted groundwater at the west end of the alley is not contained; the lateral extents have not been defined in any direction. As noted in previous comments, there is not enough data to conclude that it is from the former USTs in the alley.
Section 7.1.1, 4th paragraph, 1st bullet	15	This statement conflicts with the associated footnote. The receptor associated with the direct contact exposure pathway is future construction workers, not future building occupants. Regardless of the duration and PPE to be used by those workers, as indicated in the footnote, it is still a potential pathway.
Section 7.1.1, 5th paragraph	16	Drinking water should be considered a complete pathway for the CSM, regardless of whether institutional controls or other controls are implemented as part of the remedial action. Such controls would be implemented because it is a pathway for exposure and would be necessary to limit or prevent that exposure from occurring.
Section 7.1.1, 6th paragraph	16	A short section or paragraph needs to be inserted into the text (rather than a brief footnote) to discuss the TEE and explain the exemption and its justification. If you use the TEE form to support this discussion, please provide a copy of it in an Appendix and perhaps move Figure 7-2 into that.
Section 7.1.2	16	Remove this discussion of off-site sources of CVOCs in groundwater. There is no empirical evidence suggesting that CVOCs are a known concern for this Site.
Section 8, 1st paragraph	18	Environmental conditions have not been fully characterized. Additional sampling will be necessary to define the extents of COCs identified at the Site. Also, conditions are not known beneath the building that remains on the Property. Please address this in your conclusions.
Section 8, 2nd paragraph	19	The statement that chlorinated solvent contamination from the American Linen site is impacting the Site is in accurate and should be removed. The data are inconclusive. Please add that arsenic is also impacting groundwater at the Site.
Section 8, 3rd paragraph	19	The RI does not appear to be sufficient to complete an FS and select a cleanup action, as contamination is not fully delineated.

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Section and Paragraph	Page No.	Review Comment
Section 8, 4th paragraph	19	Remove this paragraph regarding work at the American Linen site. It is not relevant to this RI.
Section 8, 5th paragraph	19	Remove discussion about the FS and CAOs; save that for the FS document. Instead, discuss recommendations for additional sampling that should be done to address remaining data gaps.
Section 9	19	Missing a hard return after the first reference (need to add one before the Cozzarelli reference).

Figure/Table	Review Comment
SPECIFIC COMMENTS – TABLES	
Table 2-1	Remove "(615 Dexter)" from the Site name
Table 4-1	Instead of providing this table, the information should be discussed in Sections 4.1 and 4.2 of the report. If you want to provide a summary table along with the text, please include more information in the columns like the total number of explorations and the sample location IDs associated with the investigation and the specific location IDs that are relevant to the RI for the Seattle DOT Dexter Parcel Site. Also cite the report reference -- some references are listed at the bottom of the table notes, but what rows in the table do they apply to? This would be clearer to the reader. Also, change any instances of "BMR-Dexter" to "American Linen Supply Co Dexter Ave" Site.
Table 4-3 & Table 4-4	Clearly identify which explorations are from the previous investigations (on the Site and on other sites) and which are associated with the current RI. Add the more recent groundwater sampling dates for MW-305 (1/15/20 & 4/28/20), MW-306 (1/16/20 & 4/28/20), and MW-307 (1/15/20 & 4/28/20) to Table 4-4. Add acronym definitions to the notes. List the analytical methods that were used to analyze the compounds shown. Change "615 Dexter Property" in the notes to "Seattle DOT Dexter Parcel Site" Change "BMR-Dexter Site" in the notes to "American Linen Supply Co Dexter Ave Site". Since you have a note about referring to the PES 2019 document for the "other sampling", you should also mention where to find information about the sampling associated with the adjacent sites at 601 Dexter and 701 Dexter.
Table 5-1	Reference the slug testing dates in the table notes.
Table 5-2	Define "TOC" in the notes. Add footnotes explaining the vertical reference point for the elevations shown (i.e., relative to NAVD88), the reference point for the depth to groundwater (i.e., from top of casing), and how groundwater elevation was calculated (i.e., TOC elevation - DTW measurement). –these will help public when reviewing the info in the table. HC-4 appears to be incorrectly listed as a Shallow zone well. Based on the information in Table 4-2 and on the report figures, this well should be listed as an Intermediate A well (if you have demonstrated that these denominations for water bearing zones are applicable to this Site in the text).

Figure/Table	Review Comment
Table 6-1 & Table 6-2	Use one set of screening levels for soil (Table 6-1) and one set of screening levels for groundwater (Table 6-2). If you want to provide a separate table to illustrate how the screening levels were selected, then insert another table before these that lists the various cleanup levels for each compound and media, based on the methods applicable to the pathways and receptors, and selects the most conservative value. For the SLs that you include in these COC screening tables, include footnotes for each SL that indicates its basis (Method A, Method B cancer/non-cancer, etc). Any compound that was detected above its corresponding SL should be considered a COC.
Table 6-4	Use one set of screening levels. Sample dates are missing; please include a column for sample dates associated with the results presented in this table. Include results for all of the COCs that were identified for soil in Table 6-3; some of the petroleum-related VOCs appear to be missing. List the lab analytical methods that were used.
Table 6-5	Use one set of screening levels. Add the recent sampling data for MW-305, MW-306, and MW-307 from January and April 2020. List the lab analytical methods that were used.
Table 7-1	Remove this table. This information should go in the FS.
SPECIFIC COMMENTS – FIGURES	
Figure 1-1	Change “615 Dexter Site” to “SDOT Dexter Site” or just “Site” in callout
Figure 2-1	Change “615 Dexter Site” to “SDOT Dexter Site” shown at 615 Dexter Ave N Remove “(BMR-D)” shown at 700 Dexter Remove “(Broad Block Site)” shown at 800 Mercer
Figure 3-1	Add the other former structures associated with the former 621 Dexter gas station (NE and central areas of the property). Add the portion of the former building where historical plastic mixing operations and historical wood working/paint spray booth were located (central area of property) Change “BMR-D” to “American Linen Supply Co Dexter Ave Site” Change “Broad Block Site” to “Seattle DOT Mercer Parcels Site” Add “(601 Dexter Site)” to 601 Dexter Ave N Add “(701 Dexter Site)” to 701 Dexter Ave N
Figure 4-1	Show the former structures relative to the sample locations. Remove “BMR-D” and “Broad Block Site”

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Figure/Table	Review Comment
Figure 5-1a **Comments apply to all A-A' cross section figures**	Identify which property boundary is 615 Dexter and which property boundary is 601 Dexter at the top of the cross-section Include MW-305 and MW-306 on A-A' since there are data for those wells in the different zones that should be shown. Include all well/boring locations along/near the cross section alignment; locations 21417-GP4 and MW-1 appear to be missing. Change "615 Dexter Site" in the legend to "SDOT Dexter Site"
Figure 5-1b **Comments apply to all B-B' cross section figures**	Include all well/boring locations along/near the cross section alignment; locations 21417-GP5, 21417-GP6, 21417-GP7, HC-1, and DMW-4S appear to be missing. Alternatively, consider moving B-B' to run through the alley (DGW-4, DMW-5IA, GP7, GP6, GP5, HC-2, HC-1, DMW-4S) and add another cross-section at a diagonal through the Property from NW (21417-GP1) to SE (DMW-4S). Change "615 Dexter Site" in the legend to "SDOT Dexter Site"
Figures 6-1a through 6-1c	Add the sampling date to the data boxes. Add corresponding sample elevations to the data boxes. Compare data to only one set of screening levels instead of the two (red for above, green for below). Remove any sampling locations that are not relevant to the information illustrated on the map (locations with no soil data for the COCs). You don't need to include Figures 6-1b and 6-1c since all soil concentrations are below the lowest screening levels for CVOCs and metals and you are not showing any concentrations on these maps.
Figures 6-2a through 6-2f	Revise per previous comments on Figures 5-1a and 5-1b. Add soil data for the soil sample locations with concentrations that exceed a screening level. Compare data to only one set of screening levels instead of the two (red for above, green for below). Add sampling date to the data boxes. The data shown for MW-307 on Figure 6-2b are not representative of the most recent conditions. Consider eliminating Figures 6-2b and 6-2e since CVOCs are not a concern for the Seattle DOT Dexter Parcel Site.
Figures 6-3a through 6-3f	Add the sampling date to the data boxes. This is especially helpful for understanding when the exceedance was observed for any wells that were not sampled during the more recent RI activities in 2019/2020. Show only the wells with data for the hydrogeologic zone represented on the map (i.e., remove intermediate and deep wells from the shallow zone map, etc.). Compare data to only one set of screening levels instead of the two (red for above, green for below). Same comment as above regarding the data for MW-307—the vinyl chloride concentration shown on Figure 6-3d is not representative of the most recent conditions. Figures 6-3c and 6-3d can be eliminated since CVOCs are not a concern for the Seattle DOT Dexter Parcel Site.

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Figure/Table	Review Comment
Figure 6-4a	Add question marks along shaded area extents that are not bounded – to the east, south, and west/southwest for Area 2 and all directions for Area 1.
Figure 6-4b	Remove this figure. More recent data for MW-307 demonstrate that vinyl chloride is not present at MW-307, and the shaded area representing the American Linen plume is not consistent with American Linen's plume maps. The data demonstrate that the American Linen solvent plume does not reach the Seattle DOT Dexter Parcel Site.
Figure 7-1b	Remove this figure. The American Linen solvent plume does not reach the Seattle DOT Dexter Parcel Site.
Figure 7-2	Change "(615 Dexter Site)" to "(SDOT Dexter Site)"