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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 12, 2021

Krys Svendsen
Daniels Real Estate
2401 Utah Ave S, Ste 305
Seattle, WA 98134
(KrysC@Danielsre.com)

Stacey Lange
Property Manager
American Life, Inc.
270 S. Hanford St, Ste 100
Seattle, WA 98134
(Stacey.Lange@AmericanLifeInc.com)

Re: Compliance Groundwater and Air Monitoring at the following site:

- **Site Name:** North Lot Development
- **Site Address:** 201 and 255 South King Street, Seattle, WA
- **Cleanup Site ID:** 1966

Dear Krys Svendsen and Stacey Lange:

The Washington State Department of Ecology (Ecology) reviewed your request to reduce the compliance groundwater and indoor air monitoring frequency at the North Lot Development Site (Site). This letter constitutes Ecology's requirements for future compliance groundwater and air monitoring at the Site; these requirements are based on Ecology's review of the following documents:

- Request for Reduced Compliance Groundwater Monitoring, North Lot Development, Seattle, Washington, Cleanup Site ID 1966, prepared by GeoEngineers, dated December 18, 2020.
- Indoor Vapor Trend Evaluation, North Lot, 201 and 255 South King Street, Seattle, Washington 98134, Ecology Site ID 5378137, prepared by EHESI, dated June 15, 2020.

Since residual contamination likely remains at the Site, Ecology has determined that compliance groundwater and indoor air monitoring are still required. The detailed monitoring requirements

are described below.

Requirements for Compliance Groundwater Monitoring

Results from the last five groundwater monitoring events conducted between September 2018 and January 2020 have demonstrated compliance with MTCA cleanup levels. Therefore, compliance monitoring may occur at a reduced frequency of once every five years. Future groundwater compliance monitoring must include all the six existing monitoring wells, including two monitoring wells at the West Parcel (MW-19 and MW-20), two monitoring wells at the East Parcel (MW-21 and MW-22), and two monitoring wells located adjacent to the north of the East Parcel (MW-16D and MW-18D). Samples must be collected and analysed in accordance with the approved compliance monitoring plan (Appendix C of the 2013 Cleanup Action Plan Addendum prepared by Landau Associates).

Requirements for Compliance Indoor Air Monitoring

Five indoor air monitoring events were conducted between March 2018 and January 2020. Though the benzene concentrations from all the indoor air samples collected at the parking space exceeded the cleanup level, the concentrations from the two sampling events in March and September 2018 (samples were collected during the day) were much higher compared with the three sampling events since December 2018 (samples were collected overnight). The much heavier daytime traffic in the garage is likely to be a potential source of benzene. Ecology agrees that the concentrations of benzene detected at the parking space are consistent with typical parking garage use. Therefore no further sampling is needed from the parking space location.

Ecology agrees that the indoor air benzene concentrations in the basement office spaces have shown a decreasing trend since sampling began in March 2018. Though the adjusted benzene concentrations have shown compliance with the cleanup level during the three sampling events since December 2018, the unadjusted results in the basement office spaces still exceeded the cleanup level and may pose a health threat. The hotel office likely has the highest risk from potential vapor exposure resulting from the remaining subsurface contamination; therefore, indoor air sampling at this location is still required once every five years along with ambient air sampling to estimate the background concentration. Please note that indoor air sampling should be conducted during winter time when the heating system is on and the vapor intrusion potential is high.

Since the most recent round of groundwater and indoor air compliance monitoring was conducted in January 2020, the next monitoring event should be conducted in January 2025. Ecology will review the results from the next compliance monitoring event and make a determination if the monitoring frequency needs to be adjusted. If there are any other activities at the Site that may threaten continued protection of human health or the environment, Ecology may require additional monitoring.

Krys Svendsen and Stacey Lange
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If you have any questions regarding this letter, feel free to contact me by phone at (425) 649-4310 or by email at jing.liu@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jing Liu', with a long horizontal stroke extending to the right.

Jing Liu
Site Manager
NWRO Toxics Cleanup Program

ecc: Jason Cass, EHSI, (JasonC@ehsintl.com)
Tim L. Syverson, GeoEngineers, (tsyverson@geoengineers.com)
Tamara Cardona, Ecology, (tamara.cardona-marek@ecy.wa.gov)