



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Response to Comments**

### **Draft Interim Action Work Plan – Alley Area of Block 38 West Site**

### **Block 38 West Cleanup Site Seattle, WA**

*Facility Site ID: 62773*

*Cleanup Site ID: 15008*

January 2021

## Publication Information

This document is available on the Department of Ecology's website at:

<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=15008>

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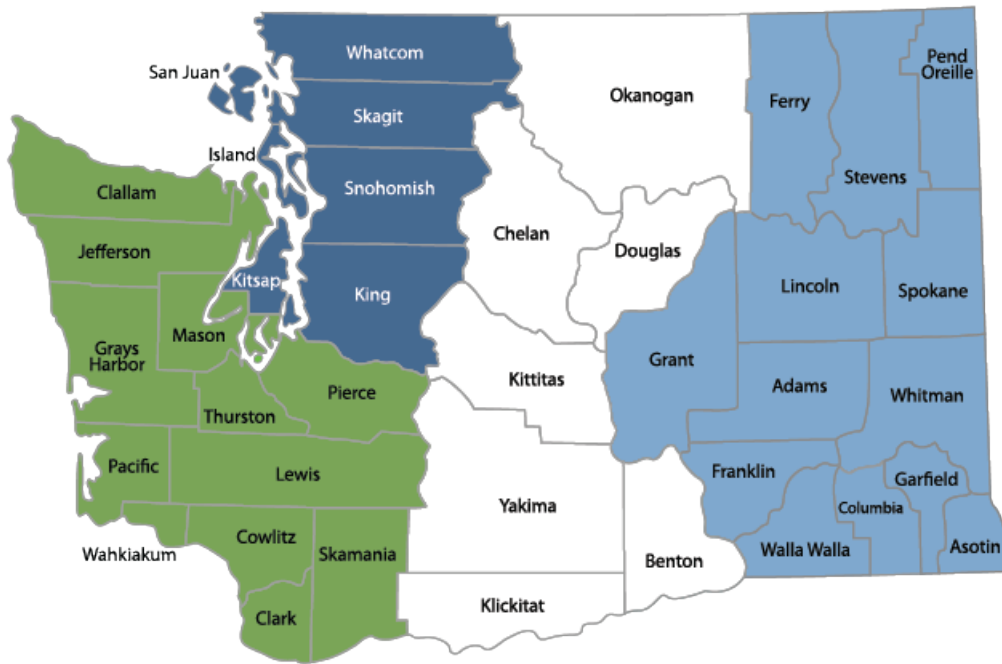
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<sup>1</sup> [www.ecology.wa.gov/contact](http://www.ecology.wa.gov/contact)

# Department of Ecology's Regional Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 425-649-7000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	3190 160th Ave SE Bellevue, WA 98008	425-649-7000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

# Response to Comments

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**Draft Interim Action Work Plan – Alley Area of Block 38 West Site**

**Block 38 West Cleanup Site  
Seattle, WA**

Toxics Cleanup Program  
Washington State Department of Ecology  
Northwest Regional Office  
Bellevue, WA

**January 2021**



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# Public Outreach Summary

The Block 38 West cleanup site (Site), located in the South Lake Union neighborhood of Seattle, is beginning an Interim Action under Washington State's [formal cleanup process](#)<sup>2</sup> as directed under the Model Toxics Control Act ([MTCA](#))<sup>3</sup>. From December 21, 2020 to January 19, 2021, the Department of Ecology solicited public comments on an Interim Action Work Plan – Alley Area of Block 38 West Site.

The Department of Ecology's public involvement activities related to this Site's 30-day comment period included:

- **Fact Sheet:**
  - US mail distribution of a fact sheet providing information about the cleanup documents and the public comment period to approximately 8,000 people including neighboring businesses and other interested parties.
- **Legal Notices:**
  - Publication of one paid display ad in *The Seattle Times*, dated Friday, December 18, 2020.
- **Site Register:**
  - Publication of 3 notices in Ecology's Toxics Cleanup Site Register:
    - Comment Period Notice: December 17 and December 31, 2020 and January 14, 2021
    - Visit [Ecology's Site Register website](#)<sup>4</sup> to download PDFs.
- **Social Media:**
  - **Twitter:** Ecology – Northwest Region @ecyseattle posted a tweet on Friday, December, 17 2020<sup>5</sup> connecting readers to the comment period including the cleanup site webpage, a virtual tour, and how to submit comments.
- **Websites:**
  - Announcement of the public comment period and posting of the fact sheet and associated documents for review on [Ecology's Block 38 West webpage](#)<sup>6</sup> and Ecology's [Public Inputs & Events webpage](#)<sup>7</sup>.
- **Document Repositories:**
  - In consideration of public health and safety, Ecology made documents available online as well as by appointment at the Northwest Regional Office.

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<sup>2</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

<sup>3</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

<sup>4</sup> <https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

<sup>5</sup> <https://twitter.com/ecyseattle?lang=en>

<sup>6</sup> <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=15008>

<sup>7</sup> <https://10ecology.wa.gov/Events/Search/Listing>

# Comment Summary

From December 21, 2020 to January 19, 2021 Ecology solicited public comments on a draft Interim Action Work Plan – Alley Area of Block 38 West Site for the Block 38 West cleanup site. Ecology received 1 comment during the 30-day comment period.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Lauren	Carroll		Individual

## Next Steps

Ecology has reviewed and considered all public comments received on the Interim Action Work Plan – Alley Area of Block 38 West Site. Based on Ecology’s evaluation of the comments, no changes were necessary in the document, and it is being finalized.

Work will begin on the Interim Action for the Alley Area of the Block 38 West Site. See graphic below and visit Ecology’s [cleanup process webpage](#)<sup>8</sup> to learn more about Washington’s formal cleanup process.

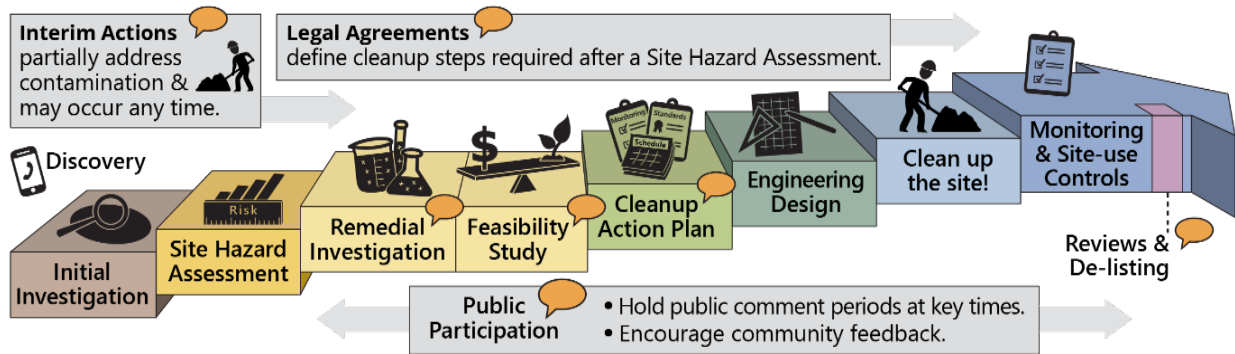


Figure 1: Washington's formal cleanup process

<sup>8</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>



## Comments and Responses

The public comments are presented below, along with Ecology's responses.

### Comment from: Lauren Carroll

Section 4.1.4 East Property - Lots 6 and 7. This section states that a heating oil release was confirmed on Lot 6 during removal in 1994, and references a report by GeoEngineers dated 1999. However, this information is not substantiated in this report, or in the Interim Action Work Plan (IAWP) for the Block 38 West property (Farallon November 8, 2019) (i.e., it is not included in Appendix E, as referenced in the document). The information in Farallon's report conflicts with a summary by CH2MHILL in the "Hazardous Materials Discipline Report" (CH2MHILL 2006), which indicates that all USTs and petroleum impacts were on Lots 1 through 5. If it exists, appropriate third-party documentation of the heating oil tank should be included in the report, or the report revised to omit it. It is requested that Ecology upload a complete copy of the 1999 GeoEngineers report onto its website. Thank you.

### Response:

The 1999 GeoEngineers report (*Phase I Environmental Site Assessment and Soil and Ground Water Sampling and Testing, UW-FAMS Rosen Property, 960-964 Republican, Seattle, Washington* dated April 22, 1999) that is referenced in the work plan contains information confirming that a heating oil release occurred on Lot 6 of the East Property. This information is documented in Section 2.4.2 (pages 11-12) and Figure 3 of the 1999 GeoEngineers report, and is further supported by statements made in Section 4.2.1 (page 15) of the 1999 report.

Ecology's files do not appear to contain a complete copy of the 1999 GeoEngineers report; however, a partial hardcopy (i.e., text, tables, and figures) can be found in the Rosen Property file (Facility Site ID 2500) in Central Records of the Northwest Regional Office. An electronic copy has also been added to the online document repository for the Rosen Property, which can be accessed at <https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=5123>.

Ecology understands that the CH2MHILL 2006 *Hazardous Materials Discipline Report* was prepared to support work associated with the City of Seattle's Mercer Corridor Improvements Project. The information concerning the East Property that is contained in the CH2MHILL 2006 report appears to be primarily focused on the former USTs that were located on the northern portion of the property (Lots 1 through 5) where a gas station had historically operated and had released petroleum hydrocarbons.

Remedial actions were conducted on Lots 1 through 5 of the East Property in 1993 and 2008, which are documented in the *Cleanup Action Report, Interurban Exchange 2, 535 Terry Avenue North, Seattle, Washington* prepared by GeoEngineers, dated October 28,

2008. The information provided in Appendix E of Farallon's 2019 Interim Action Work Plan was from the GeoEngineers 2008 report to support their discussion of the remedial action work on Lots 1 through 5.