



February 5, 2020

Ms. Rachel McCrea
Washington State Department of Ecology
Attn: Water Quality Program, Construction Stormwater
PO Box 47696
Olympia, Washington 98504

Re: Notice of Intent #26531 for Construction Stormwater General Permit

Maddux South Cleanup and Affordable Housing Development
2800 MLK Jr Way S
Seattle, WA 98104
Aspect Project No. 160324

Dear Ms. McCrea:

Aspect Consulting, LLC (Aspect) has prepared this cover letter to accompany the Notice of Intent (NOI #26531) application for a Construction Stormwater General Permit (CSWGP) associated with the Maddux South project planned at 2800 MLK Jr Way S in Seattle, Washington. The Maddux North and South redevelopment projects are within one contaminated Site, see paragraph below. This NOI is for Maddux South.

The Maddux South **redevelopment** is permitted through the City of Seattle (City) as Project #6743827. The **cleanup** is required by the Prospective Purchaser Consent Decree (PPCD #16-2-29584-3 SEA) between Washington State Department of Ecology (Ecology) and Mt. Baker Housing Association (MBHA), a nonprofit housing association. The Maddux South redevelopment and cleanup is expected to start in April 2020 and be completed in early 2022.

As stated above, the Maddux North and Maddux South projects are within the same site and are listed in Ecology's database with identical Facility Site ID #96127971 and Cleanup Site ID #13054. A final Remedial Investigation and Feasibility Study (RIFS) Report, a Cleanup Action Plan (CAP), and a Determination of Non-Significance (DNS) for the State Environmental Policy Act (SEPA) review that captures both Maddux North and South projects have been approved by Ecology. These three documents are attached to the NOI application and can also be accessed on the Ecology website using the link below:

<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=13054>

The cleanup required by the PPCD and defined in the CAP includes cleanup of parcels located north and south of S McClellan Street: Maddux North and Maddux South redevelopment projects. *However, the scope of this NOI application is only for the cleanup/redevelopment project proposed at the parcel (King County tax parcel number 000360-0055) located on the southeast corner of MLK Jr Way S and S McClellan Street (referred to as Maddux South project) consistent with the City's permitting of Project #6743827.* Aspect previously submitted a separate NOI Application (NOI #26388) for Maddux North to Ecology on February 4, 2020. This application is for Maddux South redevelopment project. The two separate NOI approach is consistent with City's construction permitting approach for Maddux North (City Project #6743826) and Maddux South (City Project #6743827).



Site Contamination

Soil and/or groundwater at the Maddux South project site are contaminated with petroleum hydrocarbons (gasoline-, diesel-, and oil ranges), BTEX (benzene, ethylbenzene, toluene, and xylenes), tetrachloroethene (PCE) and its degradation products (trichloroethene [TCE], cis-1,2 Dichloroethene [cis-DCE], and vinyl chloride [VC]). Cleanup requires remedial excavation and low rates (5–10 gallons per minute [gpm]) of contaminated groundwater will be generated and recovered with sumps and pumps (no active dewatering anticipated). The management of recovered groundwater, and stormwater, within the excavation is the scope of this NOI application.

The analytical tables in the Final RIFS and CAP include all results for the Site (as defined in the PPCD), including both Maddux North and South projects. For your ease of review, Aspect summarized the chemical data associated with the Maddux South project in Tables 1, 2, and 3 (soil analytical results) and Tables 4 and 5 (groundwater analytical results) attached to this NOI application.

The civil site design permitted through the City will specify the temporary erosion and sediment controls (TESC), and stormwater best management practices (BMPs). The Contractor is required to develop a construction stormwater pollution prevention plan (SWPPP) prior to construction. The pretreatment prior to permitted discharge will utilize chitosan enhanced sand filtration (CESF) and granular activated carbon (GAC) to remove the contaminants to the anticipated indicator levels determined by Ecology.

Please feel free to contact me with any questions or if you need more information regarding this NOI application.

Sincerely,

Aspect consulting, LLC



Adam Griffin, PE

Associate Remediation Engineer
agriffin@aspectconsulting.com