

October 10, 2016

Mr. Ed Jones, Project Manager
Washington State Department of Ecology
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

BY E-MAIL ONLY

**RE: PROGRESS REPORT, JULY THROUGH SEPTEMBER 2016
REMEDIAL INVESTIGATION MONITORING AND FEASIBILITY STUDY
CAPITAL INDUSTRIES, INC., SEATTLE, WASHINGTON
AGREED ORDER NO. DE 10402
FARALLON PN: 457-008**

Dear Mr. Jones:

Farallon Consulting, L.L.C. (Farallon) has prepared this progress report on behalf of Capital Industries, Inc. (Capital) to summarize the activities conducted during the third quarter of 2016, July through September, as part of the ongoing Remedial Investigation (RI) monitoring and Feasibility Study (FS) being conducted at the Capital Site at 5801 3rd Avenue South in Seattle, Washington. This progress report has been prepared in accordance with Agreed Order No. DE 10402 dated April 23, 2014 entered into by potentially liable persons that include: Capital; Art Brass Plating, Inc.; Blaser Die Casting Co.; PSC Environmental Services, LLC (Burlington Environmental, LLC is a wholly owned subsidiary of PSC Environmental Services, LLC, which is a wholly owned subsidiary of Stericycle Environmental Solutions, Inc.); and the Washington State Department of Ecology (Ecology) (Agreed Order). Capital and the other potentially liable persons identified above are collectively referred to as the West of 4th Group. The West of 4th Group Site under the Agreed Order consists of Site Unit 1 (SU1) and Site Unit 2 (SU2), depicted on Figure 1. The Capital Site is located in SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during this progress reporting period included:

- Continuing operation of vapor intrusion mitigation subslab depressurization systems (SSDSs) at the Pacific Foods Systems North Building at 5815 4th Avenue South, and at the Olympic Medical Facility at 5900 First Avenue South, both in Seattle, Washington. The systems at both locations operated continuously throughout this reporting period.
- Conducting performance air sampling at the Pacific Foods Systems North Building on August 31, 2016 to evaluate whether adjustments to SSDS operations further reduced concentrations of tetrachloroethene (PCE) and trichloroethene (TCE) in indoor air. Farallon also extended the vent stack height for the SSDS at that building on July 6, 2016 due to results from the April 2016 performance sampling event that indicated the potential for vented air to be recirculated into the building.



- Conducting a well-head condition survey on August 4, 2016. Farallon responded to notification that the monitoring well monument lid at monitoring well CI-7-60 was shattered by replacing the monument lid. Farallon also performed a well-head condition survey to evaluate the condition of all other monitoring wells that Capital is responsible for maintaining. Select monuments, lids, and/or bolts will be replaced in the fourth quarter of 2016. Farallon replaced monitoring well caps with tamper-proof caps as an interim measure to prevent access to the wells.
- Conducting routine semiannual groundwater monitoring and sampling between September 19 and 23, 2016. This work was performed in general accordance with the technical memorandum regarding Revised West of 4th Groundwater Monitoring Program Plan, W4 Joint Deliverable, Agreed Order No. DE 10402 dated December 23, 2014, from Janet Knox and Glenn Mutti-Driscoll, Pacific Groundwater Group, to Ed Jones, Ecology.
- Ecology requested that a fifth sampling event be conducted at monitoring well CI-20-80, which was installed on the Chevron Station property at 5940 East Marginal Way in Seattle, Washington on September 15, 2015 to evaluate the vertical limits of the vinyl chloride plume within the intermediate groundwater interval. This monitoring well is constructed with a well screen set at a depth of approximately 75 to 80 feet below ground surface. Constituents of concern were not detected at concentrations exceeding laboratory reporting limits during the previous four quarterly groundwater monitoring events.
- Revising the *Draft Remedial Investigation Data Gap Resolution Summary Report, Site Unit 2, Seattle, Washington* dated February 12, 2016, prepared by Farallon. This report was finalized after Ecology comments were addressed, and was submitted for Ecology records on August 11, 2016.
- Revising the *West of Fourth Site Unit 2 Draft Feasibility Study, Seattle Washington* dated February 2016, prepared by Pacific Groundwater Group. This report was finalized after Ecology comments were addressed, and was submitted for Ecology records on August 11, 2016.

These activities are described in greater detail in the sections that follow.

VAPOR INTRUSION MITIGATION

The applied vacuum of the SSDS at the Pacific Food Systems North Building was maximized to assess whether PCE and TCE concentrations in indoor air can be further reduced. Performance air sampling that was conducted on April 26, 2016 indicated that TCE concentrations in outdoor air remained elevated. Farallon identified the height of the exhaust stack and its direction relative to prevailing winds as a potential issue, and increased the stack height to 6 feet above the roof, and directed the exhaust to the north/northeast on July 6, 2016. A survey of roof conditions also was conducted to identify vents or other points of entry that would allow SSDS exhaust to recirculate into the building. The roof survey conducted during the stack modification did not identify obvious points of entry of exhaust into the building.



Resampling of indoor and outdoor air was conducted on August 31, 2016 to evaluate the effects of the increased stack height and maximized applied vacuum. The indoor and outdoor air sampling was conducted at a time of low barometric pressure due to incoming rainfall. Two indoor samples, and one outdoor and one effluent stack sample from the SSDS were collected. Concentrations of the constituents of concern detected inside the building decreased since the April 2016 sampling event. The results also indicated that constituents of concern were not detected in the outdoor air sample, which may correspond to the adjustments to the vent stack. The effluent stack sample confirmed that concentrations of PCE and TCE were being captured by the SSDS. An additional performance sampling event will be conducted in November or December 2016 to confirm that the adjustments made to SSDS operations continue to mitigate the potential for vapor intrusion.

The SSDS at the Olympic Medical Facility operated continuously during the third quarter of 2016. Farallon is preparing a Vapor Intrusion Mitigation Status Report documenting the monitoring, sampling, and operation and maintenance activities conducted between 2015 and 2016, which will be presented as a draft deliverable for Ecology review and comment before the close of the fourth quarter of 2016.

REMEDIAL INVESTIGATION DATA GAP REPORT

The *Draft Remedial Investigation Data Gap Resolution Summary Report, Site Unit 2, Seattle, Washington* dated February 12, 2016, prepared by Farallon summarizes the results of the work completed in 2015 to address remaining RI data gaps. This report was reviewed by Ecology, and Ecology comments subsequently were addressed. The final report was issued for Ecology records on August 11, 2016. Ecology will issue an approval or a conditional approval of the report in October 2016.

GROUNDWATER MONITORING AND SAMPLING

Farallon conducted a well-head condition survey on August 4, 2016 to evaluate the condition and security of the monitoring well monuments Capital is responsible for maintaining. The survey was conducted in response to notification that the monitoring well monument lid at monitoring well CI-7-60 was shattered. Farallon contracted a licensed well driller to replace the monument and lid because of damaged concrete at this location, and Farallon replaced the monument lid to protect the well-head as an interim measure. Select monuments, lids, and/or bolts will be replaced in the fourth quarter of 2016 after street use permits have been obtained from the City of Seattle, and sufficient traffic-control measures have been employed to ensure the safety of personnel replacing well-head components. Farallon also replaced monitoring well caps with tamper-proof caps as an interim measure to prevent access to wells.

Groundwater monitoring and sampling was conducted between September 19 and 23, 2016 in general accordance with the technical memorandum regarding Revised West of 4th Groundwater Monitoring Program Plan dated December 23, 2014, from Janet Knox and Glenn Mutti-Driscoll, Pacific Groundwater Group, to Ed Jones, Ecology. Groundwater analytical results will be summarized and included on summary figures attached to the fourth quarter 2016 quarterly progress report.



FEASIBILITY STUDY REPORT

The West of 4th Group completed the Draft Feasibility Study Reports for SU1 and SU2. The report for SU2 was submitted to Ecology for review and comment on February 12, 2016, and Ecology comments subsequently were received and addressed. A revised version of the SU1 and SU2 FS Reports comprising the West of 4th Group FS were submitted to Ecology for its records on August 11, 2016. Ecology will issue an approval or a conditional approval of the report in October 2016. Copies of historical deliverables and comments received from Ecology are available on the West of 4th website: <http://aspectconsulting.com/clients/W4/>.

INTERIM MEASURES

No interim measures were implemented during this reporting period.

PUBLIC COMMUNICATIONS

No public communication activities were completed by Capital during this period.

ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during the fourth quarter of 2016, October through December, is summarized below.

VAPOR INTRUSION

Indoor and outdoor ambient air samples will be collected at the Pacific Food Systems North Building for laboratory analysis to continue monitoring the performance of the SSDS and the effects of increasing the height of the exhaust stack. If analytical results confirm that the SSDS is meeting the objective of reducing PCE and TCE concentrations to less than the action levels set forth in the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum submitted to Ecology on December 15, 2014, a report documenting the air sampling activities since installation of the SSDS will be prepared after concurrence from Ecology has been received.

Farallon will submit a Vapor Intrusion Mitigation Status Report for the Olympic Medical Facility, and a Tier 3 Vapor Intrusion Assessment Report for Capital Plant 2.

MONITORING AND SAMPLING ACTIVITIES

Groundwater monitoring and sampling likely will continue on a semiannual basis until a cleanup alternative is approved by Ecology. The next sampling event likely would be March 2017. The data collected will be used to continue the evaluation of plume stability.

FEASIBILITY STUDY WORK

Revised versions of the SU1 and SU2 FS Reports composing the West of 4th Group Feasibility Study were submitted to Ecology on August 11, 2016. Assuming there are no disputes regarding the remedial alternative, a Draft Cleanup Action Plan will be prepared for SU1 and SU2.



INTERIM MEASURES

No interim measures are anticipated.

PUBLIC COMMUNICATIONS

The project website: <http://www.farallonconsulting.com/457-capital-industries> will be updated with an electronic copy of this progress report.

The next progress report will summarize activities completed from October through December 2016, and will be submitted on or before January 6, 2016.

CLOSING

Farallon trusts that this quarterly progress report provides sufficient information for Ecology's needs. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Jeffrey Kaspar, L.G., L.H.G.
Principal Geologist

Attachment: Attachment A, Aspect Consulting Figure 1

cc: Ron Taylor, Capital Industries, Inc. (by e-mail)
Donald Verfurth, Gordon & Rees, LLP (by e-mail)

E-mail with link to electronic copy on project website:

Janet Knox, Pacific Groundwater Group
Dana Cannon, Aspect Consulting
Bill Carroll, Arrow Environmental, LLC
Bill Beck, PSC Environmental Services, LLC

JK/bjj



**ATTACHMENT A
ASPECT CONSULTING FIGURE 1**

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2016
Capital Industries, Inc.
Seattle, Washington

Farallon PN: 457-008



TERMINAL 108

KELLOGG ISLAND

DUWAMISH WATERWAY

TERMINAL 115

99

99

509

99

5

Philip Services Corporation

Art Brass Plating

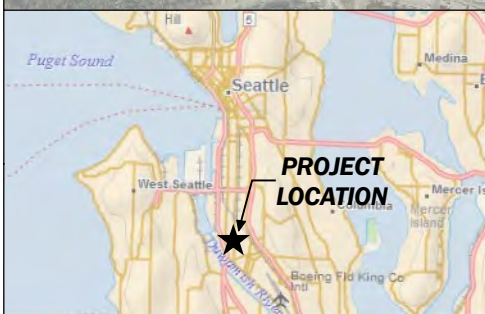
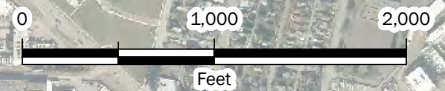
Blaser Die Casting

Capital Industries

SITE UNIT #1 (SU1)

SITE UNIT #2 (SU2)

GEORGETOWN



Site Diagram

Seattle, Washington



MAR-2014

PROJECT NO. 050067

BY: PPW

REV BY: PPW

FIGURE:

1

GIS Path: I:\Projects_8\Address_ES\Delivered_Data\GIS\PPW\2014_Fig_1_Site_Diagram.mxd | Coordinate System: NAD83 HARN Washington North | Date Saved: 3/27/2014 | User: pmwittman | Print Date: 10/10/2014