

March 24, 2015

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, JANUARY THROUGH MARCH 2015
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 in the first quarter of 2015, January through March, 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 entered into by 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) dated April 23, 2014 (Agreed Order). Capital and the other Potentially Liable Parties listed above are referred to collectively 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) as depicted on Figure 1. The Capital property is located at SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during the progress reporting period included:

- Installing a vapor intrusion mitigation subslab depressurization system (SSDS) at the Pacific Foods North Building at 5815 4th Avenue South in Seattle, Washington;
- Performing semiannual groundwater monitoring at the monitoring wells within SU2;
- Meetings with Ecology regarding the SU2 data gaps specific to Capital; and
- Continuing work on the Feasibility Study components under the Agreed Order.

The activities above are summarized in the sections that follow.



MONITORING AND SAMPLING ACTIVITIES

Activities conducted during this reporting period included vapor intrusion mitigation work and groundwater sampling. The activities completed are described below.

Vapor Intrusion Mitigation Work

A Vapor Intrusion Mitigation Design Plan for the Pacific Food Systems North Building was submitted to Ecology and conditionally approved on November 19, 2014. A tentative schedule for installation of an SSDS was set forth under Ecology's conditional approval letter.

The SSDS installation work will be completed the week of March 23, 2015. Farallon and Ecology met at the Pacific Food Systems North Building on March 20, 2015 to inspect the SSDS prior to startup. Confirmation indoor air sampling will be performed in April 2015. Farallon will be preparing documentation regarding the SSDS installation, operations, maintenance, and indoor air sampling for Ecology review and comment.

Groundwater Monitoring and Sampling

Routine groundwater monitoring and sampling was performed in March 2015 in accordance with the Revised West of 4th Groundwater Monitoring Program Plan dated December 23, 2014. The results of the sampling are expected to be provided to Ecology during the second quarter of 2015 in the next progress report.

INTERIM MEASURES

No interim measures were implemented during this reporting period.

FEASIBILITY STUDY WORK

Agreed Order No. DE 10402 was signed on April 23, 2014. Farallon has since been working with the West of 4th Group to complete the following documents during this reporting period:

- Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum submitted to Ecology on December 15, 2014 and conditionally approved by Ecology on February 5, 2015.
- Revised Fate and Transport Modeling Plan submitted to Ecology on February 27, 2015 and conditionally approved by Ecology on March 19, 2015.
- Revised Site Unit 2 Data Gaps Memorandum, submitted to Ecology on March 2, 2015 and conditionally approved by Ecology on March 16, 2015.
- Draft Technology Screening Memorandum submitted to Ecology on February 27, 2015. Ecology has responded with comments dated March 11, 2015 that will be addressed by May 2015.

Copies of all deliverables, including comments received by Ecology, are available on the West of 4th website (<http://aspectconsulting.com/clients/W4/>).



PUBLIC COMMUNICATIONS

No public communication activities were completed during this period.

ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during second quarter 2015, April through June, is summarized below.

MONITORING AND SAMPLING ACTIVITIES

The groundwater monitoring and sampling event scheduled for March 2015 was completed and the data will be validated and summarized on tables and figures. The data will be used to continue to evaluate plume stability and potential cleanup alternatives for the FS.

In accordance with the Revised Site Unit 2 Data Gaps Memorandum, Farallon will be performing the following work on behalf of Capital:

- Soil gas and/or soil sampling at select locations in the Capital Plant 2 and Plant 4 locations as well as the Pacific Food Systems buildings area to refine the understanding of the distribution and source areas of chlorinated solvents in soil prior to selection of a cleanup alternative for the FS.
- Refining the understanding of utility locations and construction throughout SU2 to better understand contaminant fate and transport characteristics. This work will focus on utilities with the potential to transport contaminated soil gas and/or groundwater through the utility or utility backfill materials.

Work plans will be prepared for Ecology review in April 2015.

VAPOR INTRUSION

Farallon will complete installation and begin operation of an SSDS at the Pacific Food Systems North Building. Confirmation testing of the effectiveness of the system will be completed following start-up in March 2015.

In accordance with the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum, additional Tiers 1 through 3 vapor intrusion assessments will be performed to assess the potential for vapor intrusion risk within Site Unit 2. Tier 3 indoor air sampling will be performed at the Capital office buildings, the south-adjacent Mobile Crane office building, and the east-adjacent Pacific Food Systems South Building. Farallon will also be performing a confirmation indoor air sampling event at the Olympic Medical Building to confirm that the SSDS at the building is operating as expected. The air sampling will be initiated in April 2015 following approval of the sampling plan(s).

INTERIM MEASURES

No interim measures are anticipated during the next reporting period.



PUBLIC COMMUNICATIONS

The project website (<http://www.farallonconsulting.com/client-portal/public/capital-industries-document-and-data-maintenance>) will be updated with an electronic copy of this progress report. The next progress report will summarize activities completed from April through June 2015 and will be submitted on or before June 30, 2015.

CLOSING

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

Sincerely,

Farallon Consulting, L.L.C.

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

Peter Jewett, L.G., L.E.G.
Principal

Attachments: Figure 1, *Site Diagram*

cc: Ron Taylor, Capital Industries, Inc. (by e-mail)
Donald Verfurth, Gordon and Rees, L.L.P. (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
Bill Beck, Phillips Service Corporation

JK/PJ:tlc



TERMINAL 108

KELLOGG ISLAND

DUWAMISH WATERWAY

TERMINAL 115

99

99

509

99

5

SITE UNIT #1 (SU1)

SITE UNIT #2 (SU2)

Diagonal Ave S

E Marginal Way S

Ohio Ave S

Colorado Ave S

S Alaska St

S Hudson St

Denver Ave S

2nd Ave S

3rd Ave S

S Dawson St

S Bennett St

S Brandon St

S Lucile St

S Findlay St

S Orcas St

S Mead St

S Fidalgo St

S Fidalgo St

E Marginal Way S

4th Ave S

5th Ave S

6th Ave S

Denver Ave S

Airport Way S

Philip Services Corporation

Art Brass Plating

Blaser Die Casting

Capital Industries

S Homer St

S Orcas St

S Fidalgo St

Corson Ave S

GEORGETOWN

S Front St

6th Ave S

S Michigan St

Corson Ave S

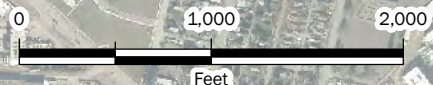
Carleton Ave S

Flora Ave S

Ellis Ave S

SLIP #3

E Marginal Way S



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: pmwtrn | Print Date: 10/10/2014