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March 21, 2019

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

**RE: PROGRESS REPORT, OCTOBER THROUGH DECEMBER 2018
REMEDIAL INVESTIGATION MONITORING AND FEASIBILITY STUDY
CAPITAL INDUSTRIES, INC.
5801 THIRD AVENUE SOUTH, 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 fourth quarter of 2018, October through December, as part of the ongoing remedial investigation monitoring and feasibility study being conducted at the Capital facility at 5801 3rd Avenue South in Seattle, Washington (herein referred to as the Capital Site). 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.; and 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 by the Washington State Department of Ecology (Ecology) (Agreed Order). Capital and the other potentially liable persons listed 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) as depicted on the figure presented in Attachment A. 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 at the Pacific Foods Systems North Building at 5815 4th Avenue South and the Natus Medical Facility at 5900 First Avenue South in Seattle, Washington.¹
- Processing data from the semiannual groundwater monitoring and sampling event conducted in September 2018 (Attachment B).

¹ The Natus Medical Facility at 5900 First Avenue South in Seattle, Washington previously was known as the Olympic Medical Facility.



- Processing performance monitoring data from the interim action pilot study conducted at Plant 4 of the Capital Site and preparing a draft report summarizing the results of the pilot study.
- Discussions with Ecology regarding the results of the interim action pilot study and additional interim action work at Capital Plant 4.

These activities are summarized in the sections that follow.

VAPOR INTRUSION MITIGATION AND REPORTING

The subslab depressurization systems at the Pacific Food Systems North Building and the Natus Medical Facility operated continuously during the fourth quarter of 2018. No additional monitoring or sampling is scheduled until the first quarter of 2019.

FEASIBILITY STUDY REPORT

A pilot study is being conducted at SU1, and an interim action pilot study to evaluate in-situ chemical oxidation (ISCO) was conducted at Capital Plant 4 in SU2. The ISCO pilot study at Capital Plant 4 concluded in September 2018.

INTERIM MEASURES

The Stage 1 ISCO pilot study for the interim action at Capital Plant 4 was conducted during the third quarter of 2018. Performance monitoring results were evaluated and discussed with Ecology in October 2018. These performance monitoring results indicated that full-scale implementation of the ISCO technology for the interim action at Capital Plant 4 was not feasible and another technology presented in the SU2 Feasibility Study Report would need to be evaluated to meet the interim action objectives. Farallon began drafting a report summarizing the ISCO pilot study and performance monitoring results for submittal to Ecology during the first quarter of 2019. Farallon also initiated a proposed secondary remediation technology evaluation letter for Ecology review and comment during the first quarter of 2019.

GROUNDWATER MONITORING AND SAMPLING

Groundwater monitoring and sampling were performed on September 24 and 25, 2018 in accordance with the technical memorandum regarding FINAL West of 4th Groundwater Monitoring Program Plan, 2017 through Draft Cleanup Action Plan, W4 Joint Deliverable, Agreed Order No. DE 10402 dated March 21, 2017, from Ms. Janet Knox of Pacific Groundwater Group to Mr. Jones of Ecology. Groundwater elevation data were collected at select SU2 monitoring wells. Groundwater samples were collected from monitoring wells scheduled for sampling and analyzed for chlorinated volatile organic compounds. Groundwater samples from select monitoring wells also were analyzed for natural attenuation parameters, including nitrate, ferrous iron, sulfate, methane, total organic carbon, and ethane/ethene. The groundwater data are included on summary figures provided in Attachment B.



In general, groundwater results continue to demonstrate that the Capital area plumes associated with the commingled Capital Plant 2/Blaser Die Casting sources and the Capital Plant 4 source are stable to decreasing. However, the 2016 to 2018 data for monitoring well CI-19-30, proximate to the Lower Duwamish River, at the CertainTeed Gypsum, Inc. property (Attachment B, Figure 2) indicates an increasing trend in vinyl chloride concentrations. The West of 4th Group is jointly conducting work in 2018 and 2019 to refine the conceptual site model and fate and transport characteristics of the source(s) of elevated concentrations of vinyl chloride up-gradient of the CertainTeed Gypsum, Inc. property. Monitoring well CI-19-30 will continue to be monitored in March 2019 to evaluate the status of vinyl chloride concentrations in this area.

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 first quarter of 2019, January through March, is summarized below.

MONITORING WELL MAINTENANCE

Evaluation of the condition of the monitoring wells is conducted during each semi-annual groundwater monitoring event. Based on the results of the September 2018 groundwater monitoring event, routine monitoring well maintenance activities, including replacement of monuments at monitoring wells CI-12-WT, CI-12-60, MW-4, and CI-14-70, will be coordinated during the first quarter of 2019 for implementation the following quarter.

FEASIBILITY STUDY WORK

Continued interim action work at Capital Plant 4 is the only Feasibility Study-related work anticipated for the first quarter of 2019 and is expected to continue throughout 2019. In 2020, following completion of the SU1 pilot study and Capital Plant 4 interim action, an addendum to the Feasibility Study Reports will be prepared, and a final remedial alternative will be proposed for Ecology approval.

INTERIM MEASURES

Farallon will submit the finalized summary report for the interim action pilot study using ISCO at Capital Plant 4. In addition, Farallon will prepare a draft pilot study work plan to evaluate soil vapor extraction as the next cleanup technology for the Capital Plant 4 interim action.

GROUNDWATER MONITORING AND SAMPLING

A groundwater monitoring and sampling event will be scheduled for March 2019. The purpose of the ongoing groundwater monitoring is to evaluate the stability of the plumes, monitor the ongoing natural attenuation processes to refine the time frame for achieving cleanup levels, evaluate existing and potential vapor intrusion risk, and provide data to refine evaluation of the cleanup alternatives presented in the feasibility study.



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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 January through March 2019, and will be submitted on or before April 8, 2019.

CLOSING

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

Sincerely,

Farallon Consulting, L.L.C.

A handwritten signature in blue ink that reads "J.L. Moore".

Jennifer L. Moore
Senior Scientist

A handwritten signature in blue ink that reads "Jeffrey Kaspar".

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

Attachments: Attachment A, Site Diagram
Attachment B, Groundwater Data Figures

cc: Ron Taylor, Capital Industries, Inc.
Donald Verfurth, Gordon and Rees, L.L.P.

Email with link to electronic copy on project website:
Janet Knox, Pacific Groundwater Group
Dana Cannon, Aspect Consulting
Bill Carroll, Arrow Environmental
Bill Beck, PSC Environmental Services, LLC

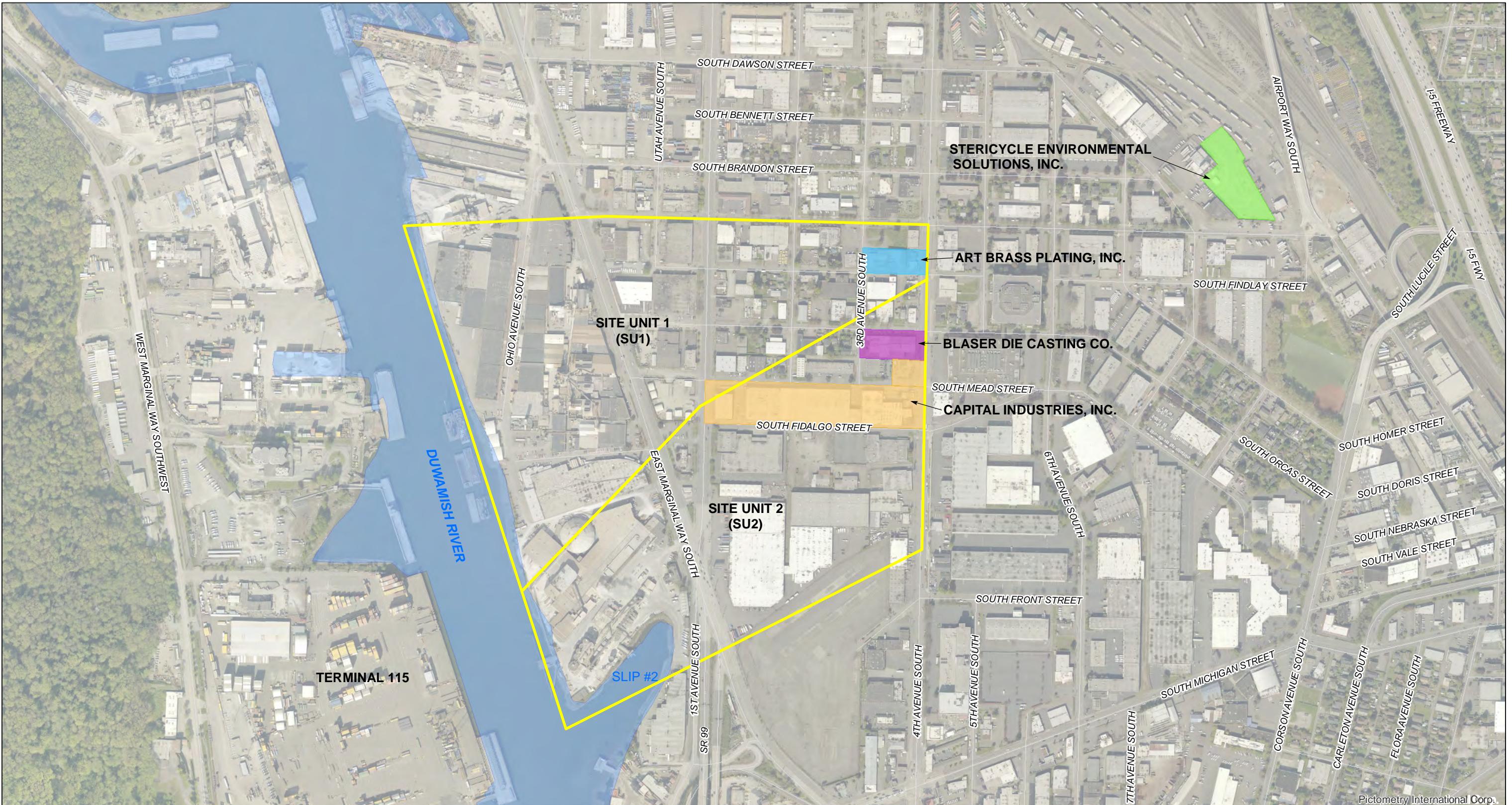
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**ATTACHMENT A
SITE DIAGRAM**

PROGRESS REPORT, OCTOBER THROUGH DECEMBER 2018

Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

Farallon PN: 457-008



LEGEND

- ART BRASS PLATING, INC.
- BLASER DIE CASTING CO.
- CAPITAL INDUSTRIES, INC.
- STERICYCLE ENVIRONMENTAL SOLUTIONS, INC.
- SITE UNIT BOUNDARY

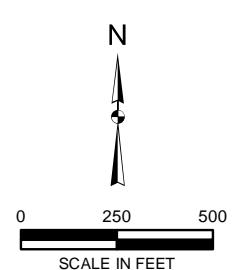


FIGURE 1

SITE DIAGRAM
WEST OF 4TH GROUP SITE
CAPITAL INDUSTRIES, INC.
5801 3RD AVENUE SOUTH
SEATTLE, WASHINGTON

FARALLON PN: 457-008

Drawn By: tperrin Checked By: JK Date: 5/7/2018
Disc Reference:
Document Path: Q:\Projects\457 CapitalIndust\008 PilotStudy\InterimWorkPlan\Revision_20180507\Figure1_Sitemap.mxd

ATTACHMENT B
GROUNDWATER DATA FIGURES

PROGRESS REPORT, OCTOBER THROUGH DECEMBER 2018

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