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March 28, 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, JANUARY THROUGH MARCH 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 first quarter of 2016, 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 potential 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 also with the Washington State Department of Ecology (Ecology) dated April 23, 2014 (Agreed Order). Capital and the other potentially liable persons 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 Site is located within 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 in Seattle, Washington. The Olympic Medical Facility SSDS will undergo repairs in March 2016 due to a break in extraction system piping.
- Completing a Tier 3 Vapor Intrusion Assessment Report for the Capital Plant 2 sampling performed in June and November 2015. An Annual Vapor Intrusion Mitigation Status Report is being prepared for the Olympic Medical Facility. These reports will be issued to Ecology as draft deliverables for review and comment in April 2016.



- Completing the Draft Remedial Investigation Data Gap Resolution Summary Report dated February 12, 2016. This report currently is being reviewed by Ecology, and will be appended to the Remedial Investigation Report dated October 2012 when finalized.
- Conducting a semiannual groundwater monitoring and sampling event the week of March 21, 2016, which included newly installed monitoring well CI-20-80.
- Completing the Draft Feasibility Study Report for SU2 dated February 12, 2016. This report currently is being reviewed by Ecology.

These activities are summarized in the sections that follow.

VAPOR INTRUSION MITIGATION AND REPORTS

The SSDS at the Pacific Food Systems North Building is operating in accordance with expected parameters and continues to be monitored periodically. Another round of air sampling will be conducted in April 2016 to confirm that the SSDS is continuing to reduce tetrachloroethene (PCE) and trichloroethene (TCE) concentrations in indoor air.

SSDS piping on the roof at the Olympic Medical Facility reportedly was damaged by a windstorm, resulting in the need to replace piping and support struts. The repairs are expected to be completed by April 2016. Prior to the damage, the SSDS had been operating in accordance with expected parameters. Sampling conducted in June 2015 indicated that PCE and TCE concentrations were not detected in indoor air.

Farallon is preparing an Annual Vapor Intrusion Mitigation Status Report documenting the June 2015 air sampling event, SSDS operation, and the repairs made to the SSDS. This report will be presented as a draft deliverable for Ecology review and comment in April 2016.

Farallon also is preparing a Tier 3 Vapor Intrusion Assessment Report for the Capital Plant 2 sampling performed in June and November 2015. This report will be presented as a draft deliverable for Ecology review and comment in April 2016.

REMEDIAL INVESTIGATION DATA GAP REPORT

The Draft Remedial Investigation Data Gap Resolution Summary Report dated February 12, 2016 completed by Farallon summarizes the results of the work completed in 2015 to address remaining RI data gaps. The work included:

- Identifying utilities and utility corridors with the potential to convey soil gas and/or groundwater contamination throughout SU2;
- Evaluating locations of potential sources of PCE and/or TCE at Capital Plant 2 and Plant 4 buildings, and assessing the lateral and vertical distribution of soil contamination where present; and
- Evaluating the vertical distribution of vinyl chloride in the commingled plume area proximate to 1st Avenue South and East Marginal Way by installing monitoring well CI-20-80.



This report currently is being reviewed by Ecology, and will be appended to the Remedial Investigation Report dated October 2012 when finalized.

GROUNDWATER MONITORING AND SAMPLING

Monitoring well CI-20-80 was installed on September 15, 2015 in accordance with the Revised Groundwater Monitoring Well Installation Plan submitted to Ecology on May 21, 2015, and was conditionally approved by Ecology on June 2, 2015. Monitoring well CI-20-80 is located on the Chevron Station property at 5940 East Marginal Way in Seattle, Washington. The monitoring well is constructed with a well screen set at a depth of approximately 75 to 80 feet below ground surface. Ecology has required that monitoring well CI-20-80 be sampled on a quarterly basis for a minimum of 1 year before revising the sampling frequency. Monitoring well CI-20-80 was sampled as part of the groundwater monitoring and sampling event conducted in September and December 2015, and March 2016. The results from the September and December 2015 groundwater monitoring indicate that concentrations of all constituents of concern are less than the laboratory reporting limits.

Groundwater monitoring and sampling was performed in March 2016 in accordance with the memorandum regarding Revised West of 4th Groundwater Monitoring Program Plan dated December 23, 2014, prepared by Pacific Groundwater Group. The results from the sampling will be summarized in the second quarter 2016 progress report, which will include summary figures and tables.

FEASIBILITY STUDY REPORT

All deliverables preceding the Draft Feasibility Study Report mandated under the Agreed Order were completed previously. The West of 4th Group completed the Draft Feasibility Study Report(s) for SU1 and SU2. The report for SU2 was submitted to Ecology for review and comment on February 12, 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. Ecology has submitted the Draft Feasibility Study Report for SU2 for public comment.

ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during the second quarter of 2016, April through June, is summarized below.

VAPOR INTRUSION

Indoor and outdoor ambient air samples will be collected at the Pacific Food Systems North Building in the next quarter for laboratory analysis to continue monitoring the performance of the



SSDS. If the results confirm that the SSDS is meeting the objective of reducing PCE and TCE below 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.

Repairs to the SSDS at the Olympic Medical Facility will be completed by April 2016, and the system will be restarted. Following completion of the repairs, an Annual Vapor Intrusion Mitigation Status Report will be prepared for the Olympic Medical Facility.

MONITORING AND SAMPLING ACTIVITIES

Data from the groundwater monitoring and sampling event conducted in March 2016 will be compiled and summarized in tables and figures for use in evaluating the remedial alternatives presented in the Draft Feasibility Study Report. The data also will be used to continue evaluating plume stability.

FEASIBILITY STUDY WORK

Comments regarding the Draft Feasibility Study Report are expected from Ecology in April 2016. The comments will be addressed, and the report will be finalized within 90 days of receipt of Ecology comments.

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 2016 and will be submitted on or before June 27, 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: Aspect Consulting Figure 1

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, PSC Environmental Services, LLC

JK/bjj

