

June 23, 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, APRIL THROUGH JUNE 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 during the second quarter of 2015, April through June, 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 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 property is located within SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during the progress reporting period included:

- Startup of a vapor intrusion mitigation subslab depressurization system (SSDS) at the Pacific Foods North Building at 5815 4th Avenue South in Seattle, Washington;
- Processing data collected during the semiannual groundwater monitoring event completed in March 2015;
- Working with Ecology to develop work plans to address SU2 data gaps specific to Capital;
- Implementing continued Tier 3 Vapor Intrusion Assessment work at buildings where Tier 1 and Tier 2 Assessment work has indicated additional sampling is required to confirm air quality remains below action levels for Tier 4 Mitigation measures; 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 air 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. The SSDS installation work was completed in March 2015 and startup procedures were initiated. An initial confirmation indoor air sampling event was performed in May 2015 to evaluate air quality in the building while the SSDS is in operation. A second sampling event will be performed in early July to confirm the initial air sampling results. Ecology will review the analytical data and determine whether continued air sampling is required.

Similarly, an air sample was collected at the Olympic Medical Facility, in which an operating SSDS also is present. Periodic sampling at this location is required under the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum dated February 22, 2015, prepared by Farallon. The periodic air sampling is required to confirm that operation of the SSDS system is continuing to mitigate the potential for volatile organic contaminants in groundwater beneath the buildings to enter the buildings as a vapor at levels that exceed the criteria for protection of human health, as described in the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum.

Vapor Intrusion Assessment Work

In accordance with the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum and the Revised Sampling and Analysis Plan for Air Quality Monitoring dated May 18, 2015, prepared by Farallon, Tier 3 Vapor Intrusion Assessment sampling was performed at the following locations:

- Pacific Food Systems South Building at 5815 4th Avenue South in Seattle, Washington; and
- The Capital QC and Laser Office, Office Area 2, and the Shipping Office at 5801 3rd Avenue South in Seattle, Washington.

Air samples were collected inside and outside these locations in June 2015 to evaluate current air quality and determine whether conditions have changed since the previous assessment work performed between 2011 and 2013. The Mobile Crane property was eliminated from the sampling program based on the sale of the property and vacating of the premises. Farallon understands that the existing structures may be demolished to facilitate redevelopment of the property. Capital and Ecology will monitor the proposed use of the property in the event



subsurface work is planned or new structures are constructed, presenting a potential risk for exposure to subsurface contaminants.

Groundwater Monitoring and Sampling Data Management

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 prepared by Pacific Groundwater Group. The results of the sampling are included on summary figures attached to this report. The groundwater data continue to indicate that natural attenuation of the contaminants in groundwater is occurring, reducing concentrations of all constituents of concern to levels less than the preliminary cleanup levels protective of surface water prior to groundwater discharging to the Lower Duwamish Waterway at Site Unit 2.

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 Technology Screening Memorandum submitted to Ecology on April 27, 2015 and conditionally approved by Ecology on April 30, 2015.
- Revised Groundwater Monitoring Well Installation Plan submitted to Ecology on May 21, 2015 and conditionally approved by Ecology on June 2, 2015.
- Revised Sampling and Analysis Plan for Air Quality Monitoring, submitted to Ecology on May 18, 2015 and conditionally approved by Ecology on March 19, 2015.
- Draft Soil Investigation Work Plan was submitted to Ecology on May 28, 2015. Ecology submitted comments regarding the draft work plan on June 12, 2015. A response will be issued to Ecology by July 10, 2015.
- Draft Fate and Transport Summary Memo for Site Unit 2 submitted to Ecology on June 10, 2015.

Copies of each of these deliverables, including comments received from 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 third quarter 2015, July through September, is summarized below.



MONITORING AND SAMPLING ACTIVITIES

A groundwater monitoring and sampling event is scheduled for September 2015. 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. This work will occur in late July 2015 following resolution of the scope of work with Ecology.
- Installing a supplemental monitoring well in the Intermediate groundwater zone, down-gradient of the CI-15 well cluster (Attachment B, Figure 3). Details are presented in the Revised Groundwater Monitoring Well Installation Plan. This work will occur in July 2015.

VAPOR INTRUSION

Farallon has completed installation and operation of an SSDS at the Pacific Food Systems North Building. Confirmation testing of the effectiveness of the system was initiated in June 2015 and will continue through August 2015.

In accordance with the Revised Vapor Intrusion Assessment Monitoring and Mitigation Memorandum, the additional Tier 3 vapor intrusion assessments described above were performed in June 2015. The results will be assessed and additional sampling will be performed in July 2015 to compare to the June 2015 results and determine whether mitigation measures, continued monitoring, or no further action is necessary.

Farallon will evaluate the results of the June 2015 confirmation indoor air sampling event at the Olympic Medical Building to confirm that the SSDS at the building is operating as expected. If further action is necessary, Ecology will be consulted regarding proposed modifications to the mitigation measures.

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 July through September 2015 and will be submitted on or before September 21, 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: Attachment A, Figure 1, *Site Diagram*
Attachment B, Groundwater Analytical Results

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

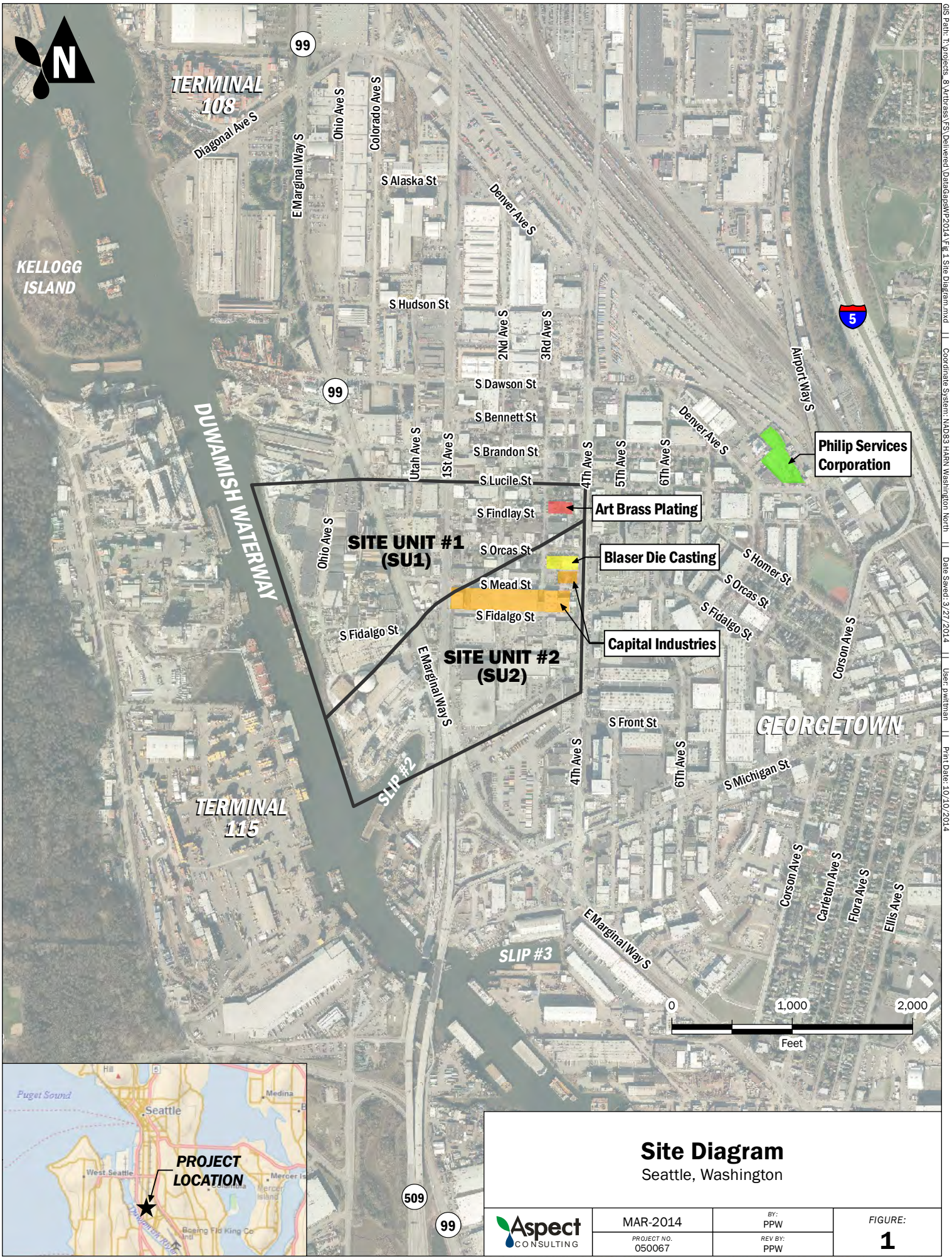
JK/PJ:tlc

**ATTACHMENT A
SITE DIAGRAM**

PROGRESS REPORT, APRIL THROUGH JUNE 2015

**Capital Industries, Inc.
Seattle, Washington**

Farallon PN: 457-008

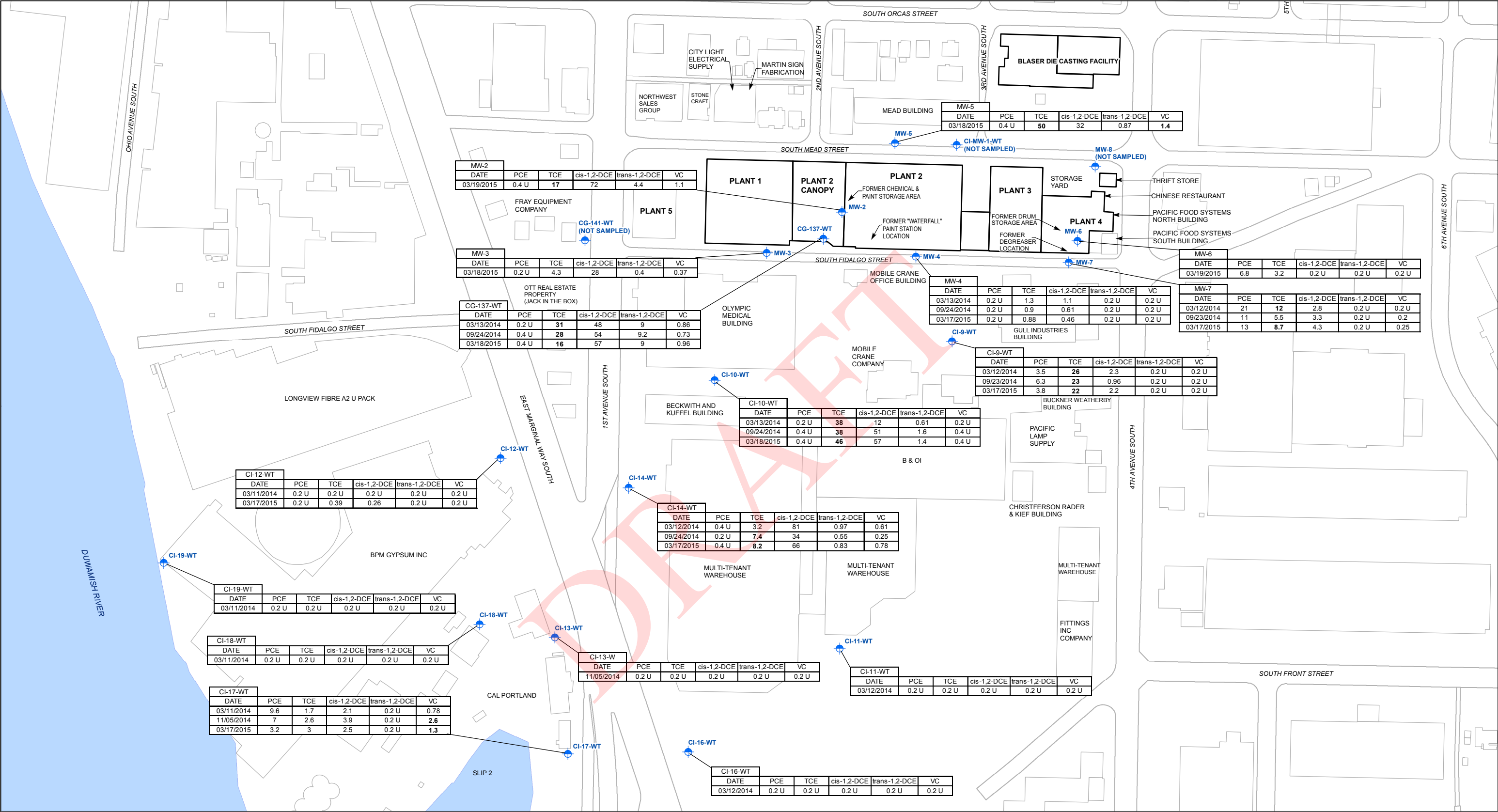


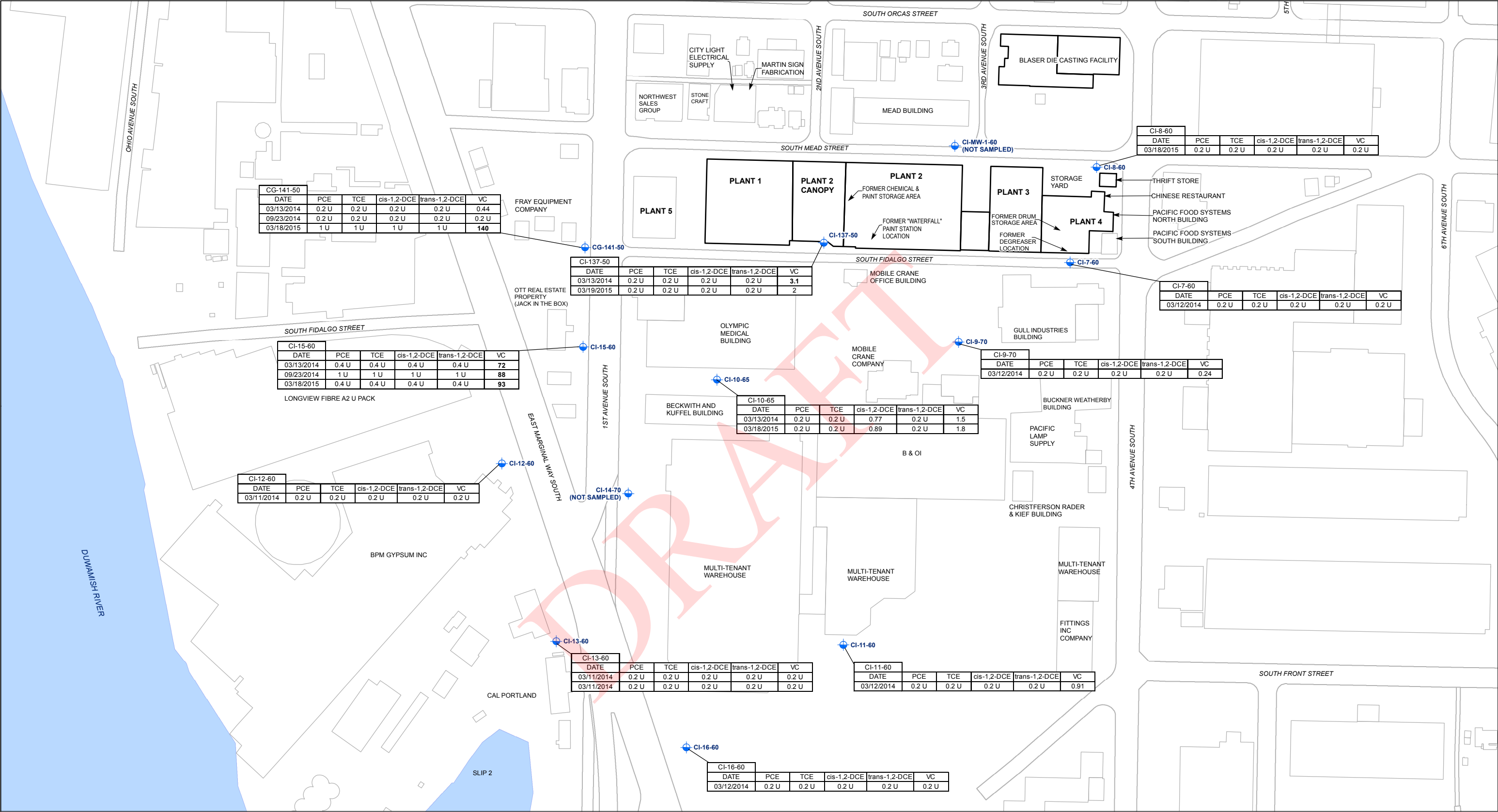
GIS Path: I:\Projects_8\Airbrass\FS\Delivered_Data\GIS\WP2014_Fig 1 Site Diagram.mxd | Coordinate System: NAD83 HARN Washington North | Date Saved: 3/27/2014 | User: pmwtrn | Print Date: 10/10/2014

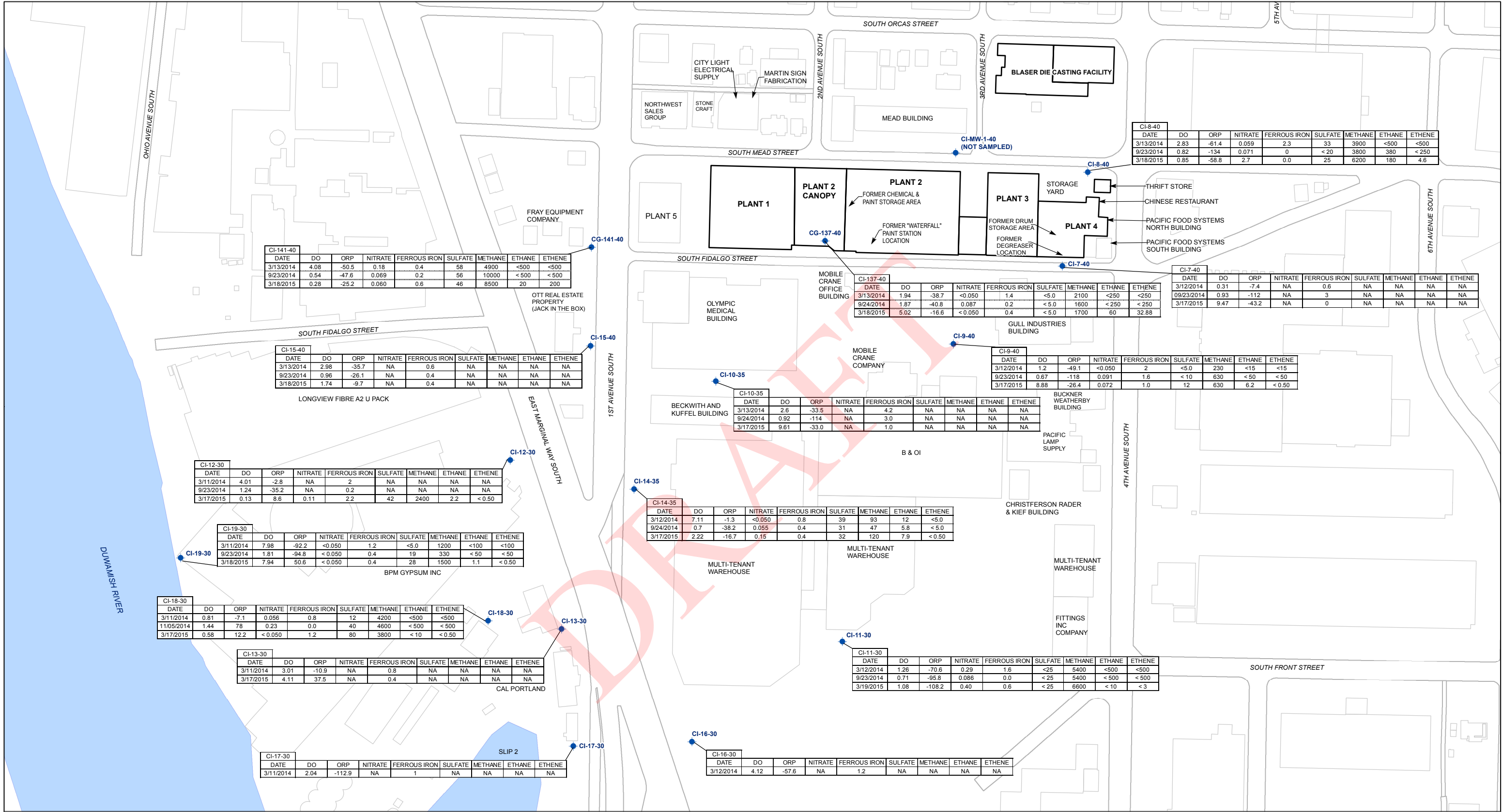
ATTACHMENT B
GROUNDWATER ANALYTICAL RESULTS

PROGRESS REPORT, APRIL THROUGH JUNE 2015
Capital Industries, Inc.
Seattle, Washington

Farallon PN: 457-008

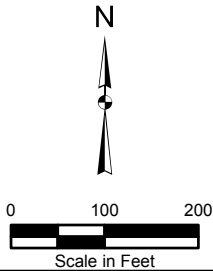






LEGEND

- CAPITAL INDUSTRIES SHALLOW WATER-BEARING ZONE WELL
- DO = DISSOLVED OXYGEN (MILLIGRAMS PER LITER)
- ORP = OXIDATION REDUCTION POTENTIAL (MILLIVOLTS)
- NA = NOT ANALYZED
- FERROUS IRON, NITRATE AND SULFATE IN MILLIGRAMS PER LITER UNITS
- METHANE, ETHANE, AND ETHENE IN MICROGRAMS PER LITER UNITS



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Drawn By: tperrin Checked By: JK Date: 6/18/2015

Document Path: G:\Projects\457 Capital Indust\457010 West of 4th - Site Unit 2\Working Folder\GIS\Figure 2A_Nat Attenu Shallow Zone NOMNII.mxd

FIGURE 2A

NATURAL ATTENUATION PARAMETERS RESULTS FOR SHALLOW ZONE: 2014 - 2015

REMEDIAL INVESTIGATION

CAPITAL INDUSTRIES, INC.

SEATTLE, WASHINGTON

FARALLON PN: 457-007

Disc Reference:

