

October 13, 2022

Erin Hobbs
Washington State Department of Ecology
Northwest Regional Office
PO Box 330316
Shoreline, Washington 98133-9716

**RE: PROGRESS REPORT, JULY THROUGH SEPTEMBER 2022
REMEDIAL INVESTIGATION MONITORING AND FEASIBILITY STUDY
CAPITAL INDUSTRIES, INC.
5801 3RD AVENUE SOUTH
SEATTLE, WASHINGTON
AGREED ORDER NO. DE 10402
FARALLON PN: 457-008**

Dear Erin Hobbs:

Farallon Consulting, L.L.C. (Farallon) has prepared this progress report on behalf of Capital Industries, Inc. (CI) to summarize the activities conducted during the third quarter of 2022, July through September, as part of the ongoing remedial investigation monitoring and feasibility study (FS) being conducted at the CI facility at 5801 3rd Avenue South in Seattle, Washington (herein referred to as the CI 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 CI; Art Brass Plating, Inc.; Blaser Die Casting Co.; and Burlington Environmental, LLC; and by the Washington State Department of Ecology (Ecology) (Agreed Order). CI 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 CI Site is located in SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during this progress reporting period included:

- Meeting between the West of 4th Group (represented by Farallon; Mott MacDonald; Arrow Environmental, LLC; and Aspect Consulting, LLC) in August 2022 to discuss the revisions to the Feasibility Study (FS) Addenda for SU2 and SU1.
- Conducting a semiannual groundwater monitoring and sampling event in September 2022 for select SU2 monitoring wells.
- Continuing operation of the vapor intrusion mitigation subslab depressurization system (SSDS) at the Pacific Food Systems (PFS) North Building at 5815 4th Avenue South;
- Conducting SSDS operation and maintenance activities and influent, indoor air, and outdoor air sampling at the PFS North Building; and



- Completion of SSDS shut down and confirmation sampling at 5900 1st Avenue South in Seattle, Washington (5900 1st Avenue Property).¹ in July, August, and September 2022.

These activities are summarized in the sections that follow.

GROUNDWATER MONITORING AND SAMPLING

Groundwater monitoring and sampling was conducted on September 12 through 14, 2022 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 Janet Knox of Pacific Groundwater Group to Ed 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 (CVOCs). 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. Summary figures and tables will be provided to Ecology and included in the fourth quarter 2022 progress report.

VAPOR INTRUSION MITIGATION

The SSDS at the PFS North Building operated continuously during the third quarter of 2022. Confirmation samples were collected at the 5900 1st Avenue Property and the SSDS was shut down in the third quarter of 2022 in accordance with Work Plan for Vapor Intrusion Mitigation System Shut Down Technical Memorandum.²

Summaries of the September 2022 operations and maintenance event at the PFS North Building and the SSDS shut down and confirmation sampling activities at 5900 1st Avenue are provided below.

Pacific Food Systems North Building

Indoor and outdoor ambient air samples were collected at the PFS North Building on September 29, 2022 by Landau Associates, Inc. (Landau) personnel.

The SSDS vacuum blower at PFS North Building was inspected during the September 2022 site visit and is operating effectively within normal operating parameters. The current vacuum blower is applying sufficient vacuum beneath the building slab, resulting in ongoing effective depressurization and vapor intrusion mitigation.

Landau will evaluate the results of the SSDS operations and maintenance and indoor air sampling for the PFS North Building in the fourth quarter of 2022. The results will be presented in the fourth quarter 2022 progress report and 2022 Annual Vapor Intrusion Mitigation Status Report, which will be prepared by Landau during the fourth quarter of 2022 and submitted to Ecology.

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

² Agency Review Draft Work Plan for Vapor Intrusion Mitigation System Shut Down, 5900 1st Avenue South, Seattle, Washington dated February 10, 2022 prepared by Landau.



5900 1st Avenue Property

The SSDS at the 5900 1st Avenue Property was shut down on July 8, 2022. Confirmation indoor and outdoor ambient air samples were collected on July 12, July 26, August 22, and September 6, 2022 by Landau personnel. Confirmation subslab soil gas samples were collected from seven locations (S1 through S7) on July 11 and August 19, 2022 by Landau personnel.

Confirmation indoor air, outdoor air, and subslab soil gas samples were analyzed for trichloroethene (TCE). Analytical results are provided in Attachment B. Results from the confirmation sampling events were compared to the current Modified Method B commercial screening levels for TCE (2.1 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$] for indoor air and 69 $\mu\text{g}/\text{m}^3$ for soil gas).

TCE was detected in the indoor air confirmation sample collected on July 12, 2022 at a concentration of 0.0382 $\mu\text{g}/\text{m}^3$, which is less than the Modified Method B commercial screening level for indoor air. TCE was not detected in any other confirmation indoor air and outdoor air samples collected on July 26, August 22, and September 6, 2022. TCE was detected in sub-slab soil gas confirmation samples collected from one location on July 11, 2022 and August 19, 2022 at concentrations of 7.61 and 1.48 $\mu\text{g}/\text{m}^3$, respectively, both of which were less than the Modified Method B commercial screening level for subslab soil gas. TCE was not detected in confirmation sub-slab soil gas samples from other locations or samples collected on August 19, 2022. The preliminary evaluation of the confirmation sampling results support permanent shutdown of the system in accordance with the Ecology-approved protocols in the Work Plan for Vapor Intrusion Mitigation System Shut Down Technical Memorandum.³ The results of the confirmation indoor air and sub-slab soil vapor sampling and findings will be described in detail in a technical memorandum which will be prepared by Landau during the fourth quarter of 2022 and submitted to Ecology.

PUBLIC COMMUNICATIONS

No public communications activities were completed by CI during this period.

ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during the fourth quarter of 2022, November through December, is summarized below.

GROUNDWATER MONITORING AND SAMPLING

Analytical results from the semiannual groundwater monitoring and sampling event conducted in September 2022 will be used to evaluate CVOC plume stability and the status of the ongoing natural attenuation processes. The data will be summarized on figures and in tables that will be provided to Ecology and included in the fourth quarter 2022 progress report.

³ Agency Review Draft Work Plan for Vapor Intrusion Mitigation System Shut Down, 5900 1st Avenue South, Seattle, Washington dated February 10, 2022 prepared by Landau.



VAPOR INTRUSION MITIGATION

SSDS operations will continue at the PFS North Building during the fourth quarter of 2022. Further evaluation will be conducted by Landau at the PFS North Building to assess and evaluate the additional source of TCE that has resulted in persistent detections of TCE concentrations in indoor air samples.

Results of investigation and mitigation measures at the PFS North Building will be summarized in the 2022 Annual Vapor Intrusion Mitigation Status Report. Results of the confirmation indoor air and subslab soil vapor sampling and findings for the SSDS at the 5900 1st Avenue Property will be described in detail in a technical memorandum prepared by Landau in the fourth quarter of 2022.

FEASIBILITY STUDY WORK

The West of 4th Group and Ecology have resolved comments to the SU1 and SU2 FS Addenda and are proceeding to finalizing the addenda. The FS Addenda for SU1 and SU2 will be finalized in the fourth quarter of 2022 and together will comprise the final components of the West of 4th Group FS Report. Upon concurrence from Ecology that the FS requirements have been completed, draft Cleanup Action Plans will be prepared for SU1 and SU2 that will comprise the West of 4th Group draft Cleanup Action Plan.

PUBLIC COMMUNICATIONS

The project website (<<https://www.farallonconsulting.com/public-access/>>) will be updated with an electronic copy of this progress report and other project documentation cited herein related to the SSDS operations.

The next progress report will summarize activities completed from October through December 2022 and will be submitted on or before January 15, 2022.



CLOSING

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

Sincerely,

Farallon Consulting, L.L.C.

Amanda Meugniot, L.G.
Associate Geologist

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

Attachments: Attachment A, Site Diagram
Attachment B, SVE Shutdown Analytical Results – 5900 1st Avenue South

cc: Ron Taylor, Capital Industries, Inc.
Donald Verfurth, Gordon Rees Scully Mansukhani, LLP
Kenneth Luther, Chubb Group of Insurance Companies
Alborz Wozniak, Veritas Environmental Consulting, Inc.
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Alex Sage, Zurich Insurance Group
Marshall Zimmerman, The Travelers Companies
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Email with link to electronic copy on project website:

Janet Knox, Mott MacDonald
Dana Cannon, Aspect Consulting
Bill Carroll, Arrow Environmental
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AM/JK:cm

**ATTACHMENT A
SITE DIAGRAM**

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2022

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

Farallon PN: 457-008

ATTACHMENT B
SVE SHUTDOWN ANALYTICAL RESULTS – 5900 1ST AVENUE SOUTH

PROGRESS REPORT, JULY THROUGH SEPTEMBER 2022

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

Farallon PN: 457-008

Table 1
SVE Shutdown Analytical Results
5900 1st Avenue South
Seattle, Washington

Sample Type	Location	Sample Identification	Sample Date	Trichloroethene (µg/m³)	
				TO-15 SIM	Passive Sampler
Commercial Indoor Air MTCA Modified Method B Screening Level (a)				2.1	2.1
Indoor Air	5900-IA1	5900-IA1-20220712	7/12/2022	0.00375 U	--
		5900-IA1-20220726	7/26/2022 (d)	--	0.073 U
		5900-IA1-20220822	8/22/2022	0.0537 U	--
		5900-IA1-20220822	9/6/2022 (d)	--	0.068 U
	5900-IA3	5900-IA3-20220712	7/12/2022	0.0382	--
		5900-IA3-20220726	7/26/2022 (d)	--	0.073 U
		5900-IA3-20220822	8/22/2022	0.0537 U	--
		5900-IA3-20220822	9/6/2022 (d)	--	0.068 U
Outdoor Air	5900-OA2	5900-OA2-20220712	7/12/2022	0.00336 U	--
		5900-OA2-20220726	7/26/2022 (d)	--	0.073 U
		5900-OA2-20220822	8/22/2022	0.0537 U	--
Commerical Sub-slab Soil Gas MTCA Method B Screening Level (b)				69	69
Sub-slab Vapor	S1	5900-S1-VP-20220711	7/11/2022	0.0269 U	--
		5900-S1-VP-20220819	8/19/2022	0.0269 U	--
	S2	5900-S2-VP-20220711	7/11/2022	0.0269 U	--
		5900-S2-VP-20220819	8/19/2022	0.0269 U	--
	S3	5900-S3-VP-20220711	7/11/2022	0.0269 U	--
		5900-S3-VP-20220819	8/19/2022	0.215 U	--
	S4	5900-S4-VP-20220711	7/11/2022	0.0269 U	--
		5900-S4-VP-20220819	8/19/2022	0.215 U	--
	S5	5900-S5-VP-20220711	7/11/2022	7.61	--
		5900-S5-VP-20220819	8/19/2022	1.48	--
	S6	5900-S6-VP-20220711	7/11/2022	0.0269 U	--
		5900-S6-VP-20220819	8/19/2022	0.0269 U	--
	S7	5900-S7-VP-20220711	7/11/2022	0.0269 U	--
		5900-S7-VP-20220819	8/19/2022	0.215 U	--

Notes:

Bold text indicates detected analyte

- (a) Indoor air screening levels are compared to indoor air results only.
 (b) Sub-slab screening levels are compared to subslab vapor results only.
 (c) Indoor air concentrations are not normalized to outdoor air concentrations
 (d) Radiello passive samplers deployed from 7/12-7/26/2022, and 8/22/22-9/6/22.
 U = The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

Acronyms/Abbreviations:

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter
 MTCA = Model Toxics Control Act
 -- = not analyzed
 SIM = selected ion monitoring
 TCE = trichloroethene