

Clare Tochilin

January 29, 2026

Tena Seeds, PE

Washington State Department of Ecology

Toxics Cleanup Program

PO Box 330316

Shoreline, Washington 98133

SUBJECT: RESPONSE TO PUBLIC REVIEW DRAFT REMEDIAL INVESTIGATION REPORT

American Linen Supply Co Dexter Ave Site 700 Dexter Avenue North, Seattle, Washington Project Number: 1590-001

Dear Ms. Seeds:

At the request of Seattle City Light (SCL), SoundEarth Strategies, Inc. (SoundEarth) has prepared this letter to provide comments on the Public Review Draft Remedial Investigation Report (RI Report) prepared for the American Linen Supply Co Dexter Ave Site (American Linen Site), prepared by NV5 Environmental Inc., dated October 3, 2025. The RI Report was issued for public comment on December 1, 2025, with a comment period end date of January 29, 2026.

The RI Report was prepared noting that the evaluation of site and environmental conditions were performed using data collected through the second quarter of 2021 and preliminary cleanup levels (PCULs) issued by the Washington State Department of Ecology (Ecology) in 2021. It appears that data collected after the second quarter of 2021 and changes to the PCULs or soil gas screening levels will be incorporated in a future RI data addendum (if prepared) or in the future Feasibility Study (FS) Report. Although the RI Report states it has met the substantive requirement of the Model Toxic Control Act, including addressing any outstanding data gaps to complete the evaluation of the nature and extent of contamination at the Site, it is uncertain as to the reasoning for withholding approximately 4 years of data presentation.

Based on review of the RI Report, SoundEarth disagrees with the following general statements and other similar statements made in the RI Report:

- “The benzene plume east of the [700 Dexter Avenue North] Property appears to have originated in the Shallow Zone at and east of the Roy Aloha Shops site and has migrated to

the east and downward into the Intermediate Zone along 9th Avenue North and into the Deep Zone near the intersection of Westlake Avenue North and Broad Street” (page 115) and “For benzene, advective transport of petroleum hydrocarbons source east of the Property has led to benzene plume located in the Shallow Zone at and east of Roy Aloha Shop site that has migrated to the east and downward in the Intermediate Zone along 9th Avenue North and into the Deep Zone near the intersection of Westlake Avenue North and Broad Street” (page 144). It is noted on page 115 that “Forthcoming RIs at other cleanup sites east of the Property will provide additional definition of the benzene plume and additional information on possible sources(s) of that plume.”

–SoundEarth disagrees with this statement based on reasons described below.

- “This distribution of petroleum hydrocarbons are consistent with a source at the Seattle Roy Aloha Shops (i.e., not related to the Site), the easterly groundwater flow direction, and the general hydraulic gradient (see Figure 47)” (page 108) and “the benzene plume is consistent with a source or sources at or east of the Seattle Roy Aloha Shops, the easterly groundwater flow direction, and generally downward hydraulic gradient” (page 135).

–SoundEarth disagrees with this statement based on reasons described below.

- “Other properties that could have sourced CVOCs include Block 79E, Block 55, and the Seattle Roy Aloha Shops; however, remedial investigations for those sites are not yet complete and, therefore, potential sources or releases of CVOCs from those properties have not been confirmed” (page 142).

–Although the remedial investigation is not yet complete, there are no known sources of chlorinated volatile organic compounds (CVOCs) on the Seattle Roy Aloha Shops property (Property). Sampling that has been conducted at that Site to date does not suggest the presence of an on-property CVOC source.

For context, in December 2024, SoundEarth prepared a letter report in response to Ecology’s Preliminary Determination of Liability for Release of Hazardous Substances at the American Linen Site (Potentially Liable Party [PLP] Letter) on behalf of SCL. In the PLP Letter, Ecology proposed to find SCL liable for a release of benzene originating from the Property, which Ecology suggested may have comeled with CVOCs originating from the nearby American Linen Site. Primarily, Ecology suggested that the distribution of benzene in groundwater beneath and in the vicinity of the Property and the American Linen Site is consistent with a source of benzene originating at the Property, based on an easterly groundwater flow direction and general downward vertical hydraulic gradient.

SoundEarth does not dispute that a release of benzene originating on the Property has occurred and has resulted in current or former impacts to groundwater in the shallow water-bearing zone and potentially in the Intermediate A zone beneath and immediately downgradient (east) of the Property. However, SoundEarth refutes that a benzene release originating on the Property is the

source of benzene impacts observed in the Intermediate B or deep water-bearing zones. SoundEarth is also of the opinion that the petroleum plume at the Property does not comingle with the American Linen Site CVOC plume. Overall, SoundEarth disagreed with Ecology's proposed findings of liability as substantiated by findings presented in the December 2024 letter report to Ecology on behalf of SCL. In a letter dated January 21, 2025, Ecology deferred final determination of SCL's liability as a PLP for the American Linen Site based on the currently available data.

Respectfully,

SoundEarth Strategies, Inc.

Clare Tochilin

Senior Geologist

Levi Fernandes, PE

Senior Engineer



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Based on review of the RI Report, SoundEarth disagrees with the following general statements and other similar statements made in the RI Report:

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- SoundEarth disagrees with this statement based on reasons described below.
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- Although the remedial investigation is not yet complete, there are no known sources of chlorinated volatile organic compounds (CVOCs) on the Seattle Roy Aloha Shops property (Property). Sampling that has been conducted at that Site to date does not suggest the presence of an on-property CVOC source.

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SoundEarth does not dispute that a release of benzene originating on the Property has occurred and has resulted in current or former impacts to groundwater in the shallow water-bearing zone and potentially in the Intermediate A zone beneath and immediately downgradient (east) of the Property. However, SoundEarth refutes that a benzene release originating on the Property is the source of benzene impacts observed in the Intermediate B or deep water-bearing zones. SoundEarth is also of the opinion that the petroleum plume at the Property does not comingle with the American Linen Site CVOC plume. Overall, SoundEarth disagreed with Ecology’s proposed findings of liability as substantiated by findings presented in the December 2024 letter report to Ecology on behalf of SCL. In a letter dated January 21, 2025, Ecology deferred final determination of SCL’s liability as a PLP for the American Linen Site based on the currently available data.

Respectfully,

SoundEarth Strategies, Inc.



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