

From: [Encelle, Ophélie](#)
To: [Seeds, Tena \(ECY\)](#)
Cc: [Shivjiani, Dhroov \(ECY\)](#); [Macik, Jill](#); [Chesick, Katherine](#)
Subject: Block 38 West Comments/City of Seattle
Date: Tuesday, December 16, 2025 1:50:02 PM
Attachments: [City of Seattle Comments Figures FinalCAP Block38W.pdf](#)

External Email

Good afternoon, Tena,

Please see below and attached City of Seattle Public Review Comments regarding the [Block 38 West - \(15008\)](#) cleanup site.

The selected remedy plan leaves contamination in the right-of-way and implements an environmental covenant. The purpose of said covenant is to impose certain restrictions on the activities and uses of the Block 38 West Property and surrounding right-of-way to protect human health, the environment, and the integrity of the interim actions completed to date at the Block 38 West Site. The covenant will remain in place until concentrations of total DRO+ORO and cPAHs decrease to levels less than the cleanup levels. City of Seattle possesses assets in the right-of-way and leaving contamination associated with the [Block 38 West - \(15008\)](#) cleanup site impacts our assets and activities.

According to the site history, there are two USTs (UST02-B2 and a 1500-gallon heating oil UST) impacting the right-of-way however it is unclear to City of Seattle what the extent of this contamination is (see our comments on Figures 3, 6, 7 and 8). Additionally, it is unclear if the 1500-gallon heating oil UST has been removed and the surrounding soil cleaned up to current MTCA cleanup standard (see our comments on Figures 6, 7 and 8).

According to the CAP, the selected cleanup action will meet action-specific requirements applicable under WAC 173 340-360(3)(b) to allow for use of institutional controls, provide financial assurances, and allow for periodic reviews of annual cap inspections. We do not see proposed solutions to contain and eliminate the potential direct contact exposure pathway for the COCs remaining in soil for utility workers (see our comment on Figure 10).

We appreciate the opportunity to provide comments to Ecology regarding this cleanup site.

Regards,

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