

Ophélie Encelle

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,

Ophélie Encelle

Senior Environmental Scientist | Engineering & Technical Services Division

Project Delivery and Engineering Branch, Seattle Public Utilities

707 South Plummer St. | Seattle, WA 98134

Tel (206) 795-0193

Geotechnical Engineering ([sharepoint.com](#))

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

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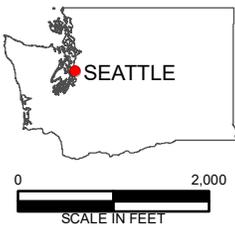
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Figures



Copyright: © 2013 National Geographic Society, i-cubed

REFERENCE: 7.5 MINUTE USGS QUADRANGLE SEATTLE NORTH, WASHINGTON, DATED 1983



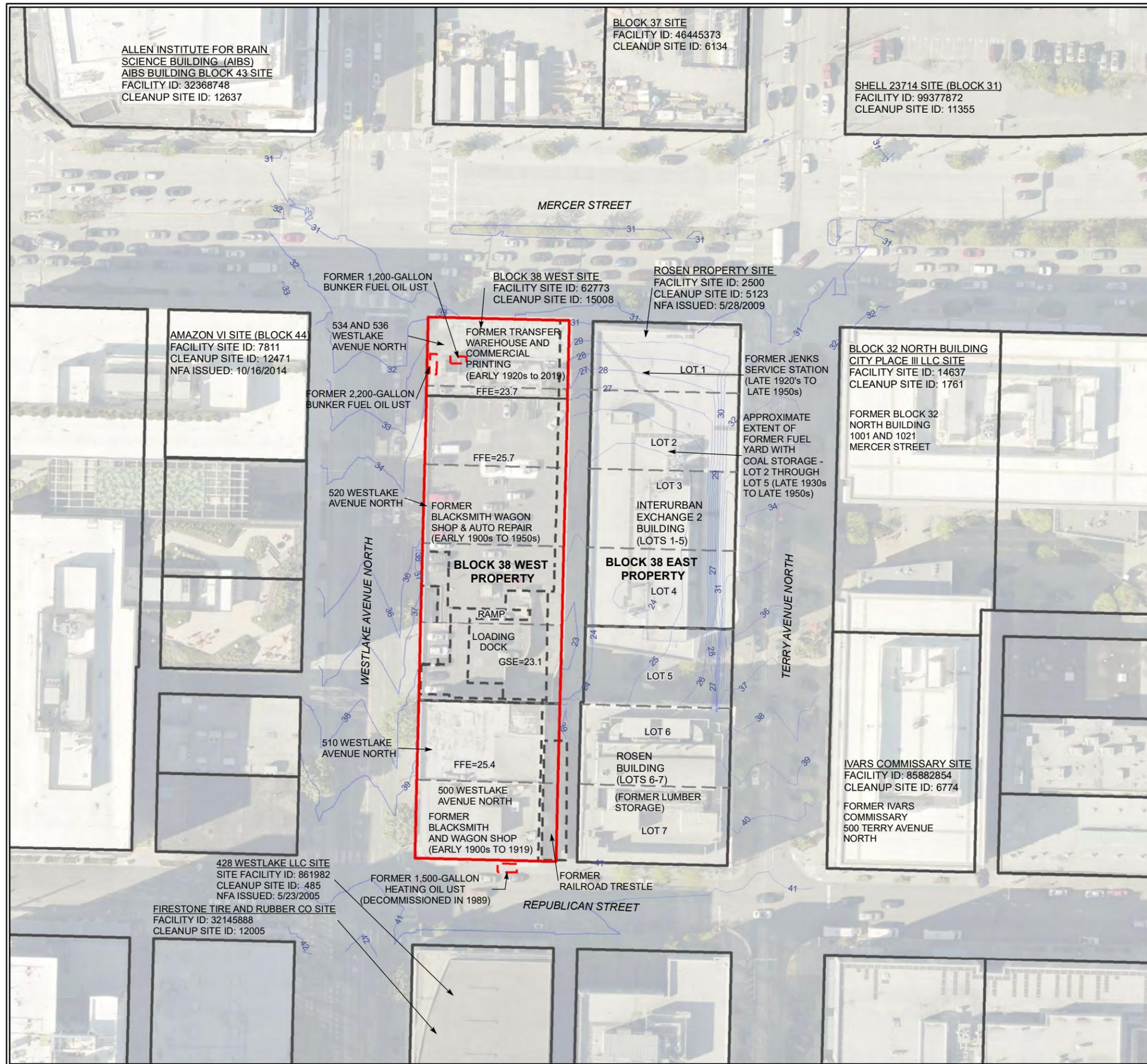
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FIGURE 1
VICINITY MAP
BLOCK 38 WEST PROPERTY
SEATTLE, WASHINGTON

FARALLON PN: 397-019

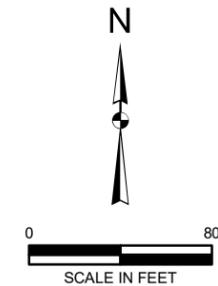


LEGEND

- PILE
- - - BUILDING FEATURES (BUILDINGS ON BLOCK 38 WEST PROPERTY DEMOLISHED IN 2019)
- · - · LOT LINE
- 30— GROUND SURFACE ELEVATION CONTOUR
- ▭ PROPERTY BOUNDARY
- ▭ KING COUNTY PARCEL BOUNDARY

NOTES:
 LOADING DOCK HIGHER THAN GSE
 ELEVATION SOURCE: BUSH, ROED, & HITCHINGS, INC. (2014)
 ELEVATION DATA PRESENTED IN FEET ABOVE MEAN SEA LEVEL IN THE NORTH AMERICAN VERTICAL DATUM OF 1988

FFE = APPROXIMATE FINISH FLOOR ELEVATIONS OF GROUND FLOOR OF FORMER BUILDING
 GSE = APPROXIMATE GROUND SURFACE ELEVATION OF FORMER LOADING DOCK AREA
 UST = UNDERGROUND STORAGE TANK



ALL LOCATIONS ARE APPROXIMATE.
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FIGURE 2
 SITE PLAN WITH
 HISTORICAL FEATURES
 BLOCK 38 WEST SITE
 SEATTLE, WASHINGTON

FARALLON PN: 397-019

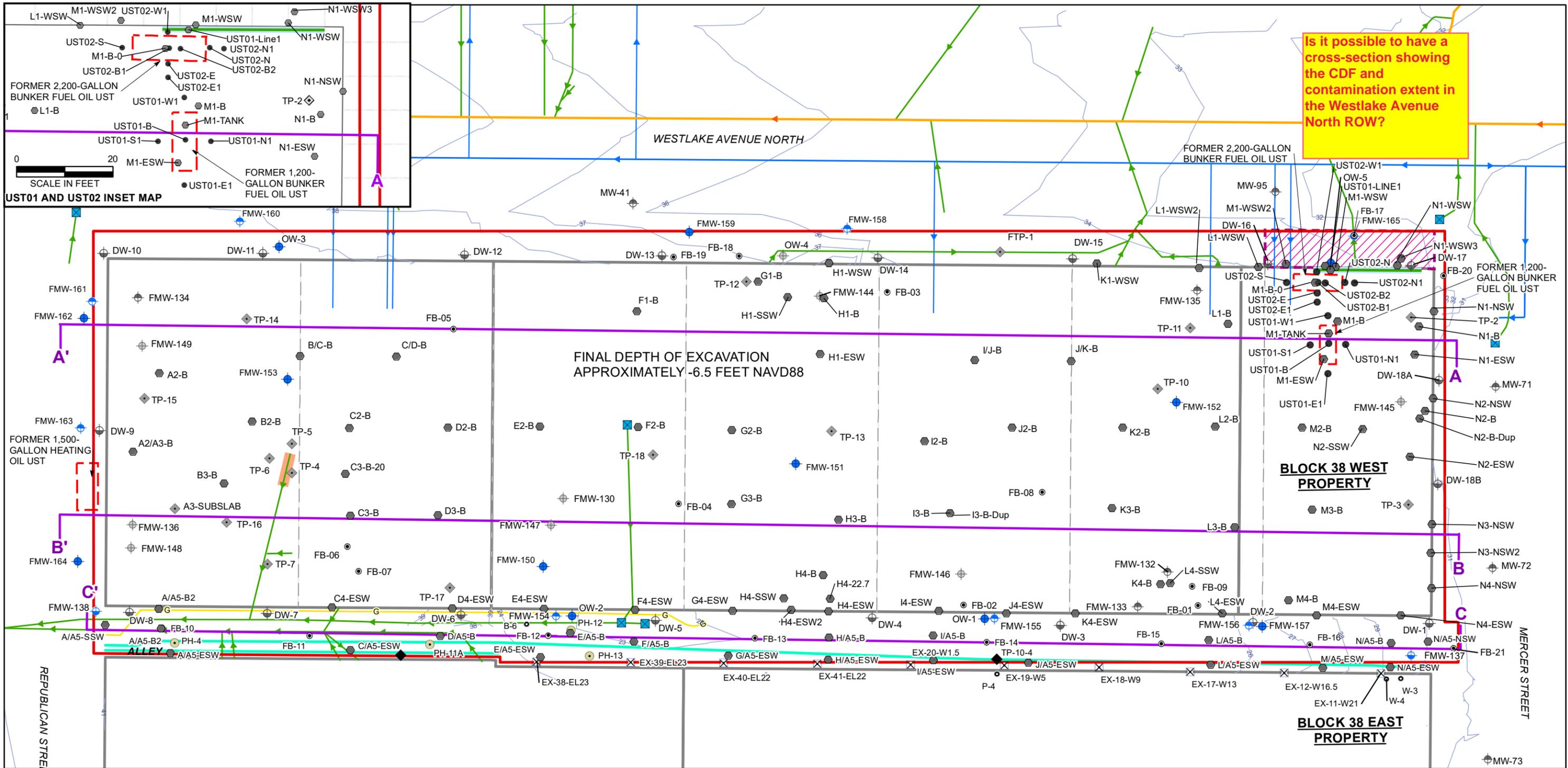
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Checked By: SS

Date: 12/23/2023

Disc Reference:

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LEGEND

- SHALLOW WATER-BEARING ZONE MONITORING WELL
- ⊕ DEWATERING WELL
- ⊕ DEEP OUTWASH AQUIFER WELL
- ⊕ DECOMMISSIONED SHALLOW WATER-BEARING ZONE MONITORING WELL
- ⊕ INTERMEDIATE WATER-BEARING ZONE MONITORING WELL / OBSERVATION WELL
- ⊕ DECOMMISSIONED INTERMEDIATE WATER-BEARING ZONE MONITORING WELL
- BORING (FARALLON)
- BORING (GEOENGINEERS)
- ⊗ EXCAVATION BORING (FARALLON)
- ◆ TEST PIT (GEOENGINEERS)
- POTHOLE (FARALLON)
- UST SAMPLE LOCATION (FARALLON)
- EXCAVATION SAMPLE LOCATION (FARALLON)
- ◆ TEST PIT (FARALLON)

- PIPING DISCOVERED IN SIDEWALL [BELIEVED TO BE ASSOCIATED WITH DISCOVERED USTs]
- MTCA SITE BOUNDARY
- FORMER UNDERGROUND STORAGE TANKS (USTs)
- MECHANICAL EQUIPMENT AREA DECOMMISSIONED AND FILLED WITH CDF
- KING COUNTY PARCELS
- LOT LINE
- LINE OF CROSS SECTION

- ⊕ CATCH BASIN
- APPROXIMATE SECTION OF THE SIDE SEWER WHERE OILY SUBSTANCE OBSERVED
- COMBINED SEWER LATERAL
- WATER LINE
- COMBINED MAIN
- FIBER OPTIC LINE
- NEW GAS LINE

NOTES:
 1. ALL LOCATIONS ARE APPROXIMATE.
 2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.
 3. CDF = CONTROLLED DENSITY FILL
 4. MTCA = WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION
 5. ELEVATION DATA PRESENTED IN FEET ABOVE MEAN SEA LEVEL IN THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88) ELEVATION SOURCE: BUSH, ROED, & HITCHINGS, INC. (2014)



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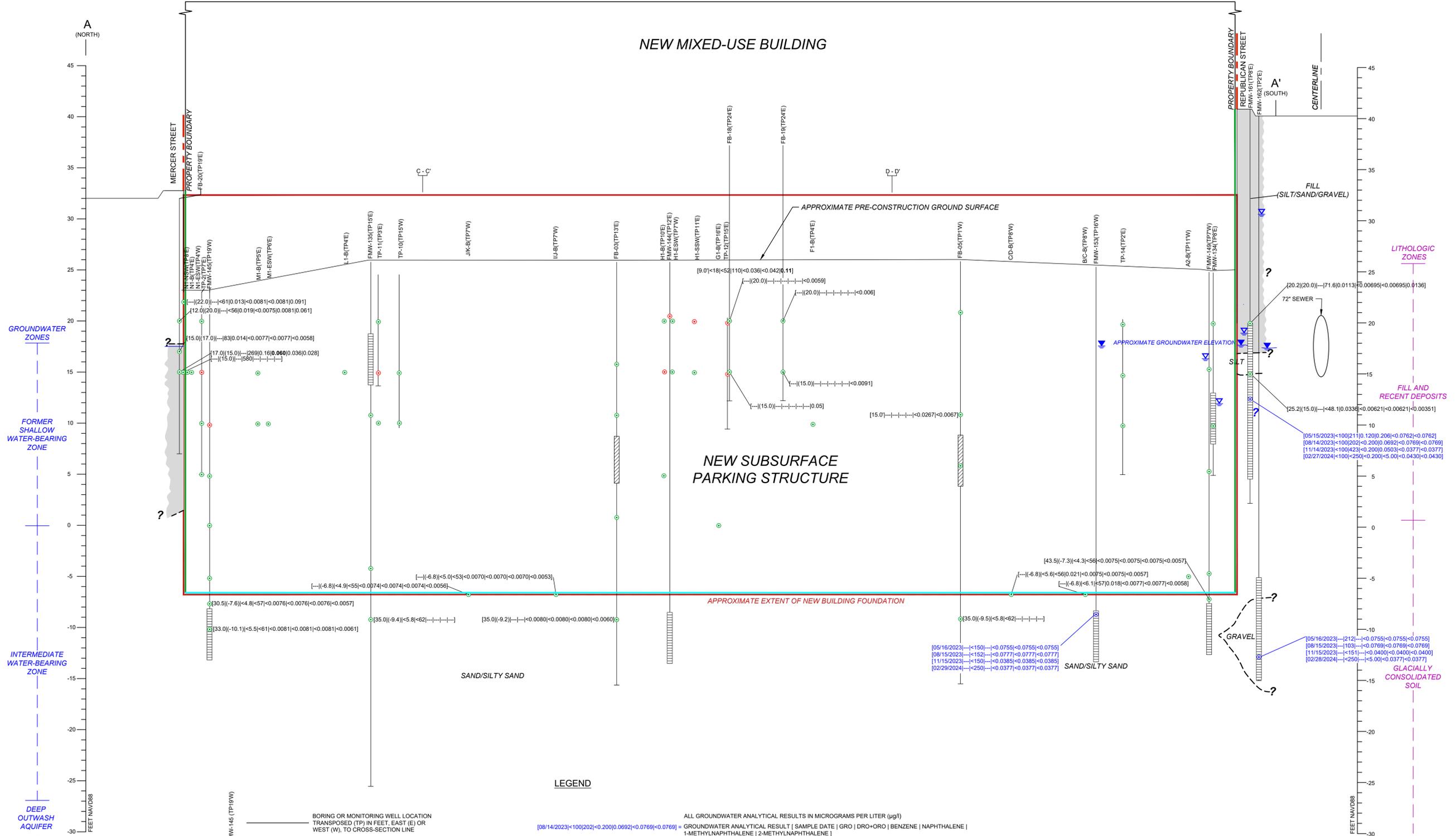
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Is it possible to have a cross-section showing the CDF and contamination extent in the Westlake Avenue North ROW?

FIGURE 3
 SITE PLAN WITH SAMPLE LOCATIONS
 BLOCK 38 WEST SITE
 SEATTLE, WASHINGTON

FARALLON PN: 397-019

NEW MIXED-USE BUILDING



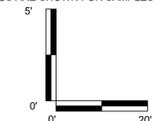
LEGEND

- BORING OR MONITORING WELL LOCATION TRANPOSED (TP) IN FEET, EAST (E) OR WEST (W), TO CROSS-SECTION LINE
 - INDICATES CONCENTRATIONS OF ONE OR MORE HAZARDOUS SUBSTANCES EXCEEDED THE APPLICABLE MTCA CLEANUP LEVELS
 - INDICATES CONCENTRATIONS OF HAZARDOUS SUBSTANCES ANALYZED DID NOT EXCEED THE APPLICABLE MTCA CLEANUP LEVELS
 - APPROXIMATE GROUNDWATER ELEVATION
 - STRATIGRAPHIC CONTACT
 - BLANK CASING OR BORING
 - STATIC GROUNDWATER ELEVATION (MOST RECENT)
 - GROUNDWATER ELEVATION AT TIME OF DRILLING
 - TEMPORARY SCREEN INTERVAL
 - GROUNDWATER SAMPLE LOCATION
 - WELL SCREEN INTERVAL
- ALL GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER (µg/l)
- GROUNDEWATER ANALYTICAL RESULT [SAMPLE DATE | GRO | DRO+ORO | BENZENE | NAPHTHALENE]
- 1-METHYLNAPHTHALENE | 2-METHYLNAPHTHALENE
- ** = DENOTES SAMPLE IS RECONNAISSANCE GROUNDWATER GRAB SAMPLE
- ++ = GRO REPORTED AT A CONCENTRATION OF 1,100 µg/l; HOWEVER, RE-EVALUATION BY THE ANALYTICAL LABORATORY INDICATED THAT THE REPORTED CONCENTRATION OF GRO WAS ATTRIBUTED TO A SINGLE PEAK ON THE CHROMATOGRAM, WHICH WAS IN THE RANGE OF NAPHTHALENE.
- ALL SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
- SOIL ANALYTICAL RESULTS [DEPTH | ELEVATION IN FEET NAVD88 | GRO | DRO+ORO | NAPHTHALENE | 1-METHYLNAPHTHALENE | 2-METHYLNAPHTHALENE | cPAH TEC]
- GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS
- DRO = TPH AS DIESEL-RANGE ORGANICS
- ORO = TPH AS OIL-RANGE ORGANICS
- DRO+ORO = SUM OF DRO AND ORO
- cPAH TEC = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBONS TOXIC EQUIVALENT CONCENTRATION
- BOLD** = DENOTES CONCENTRATIONS THAT EXCEED APPLICABLE CLEANUP LEVELS
- = SAMPLE NOT ANALYZED OR NOT APPLICABLE
- < = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED
- NAVD88 = NORTH AMERICAN VERTICAL DATUM OF 1988
- COPC = CONSTITUENT OF POTENTIAL CONCERN
- MTCA = WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION
- APPROXIMATE AREA OF WOOD DEBRIS/ORGANICS LAYER
- VERTICAL VAPOR/GROUNDWATER BARRIER SYSTEM
- SUB-SLAB VAPOR BARRIER SYSTEM

ANALYTE	SOIL (mg/kg)		GROUNDWATER (µg/L)	
	VADOSE	SATURATED	GRO	CLEANUP LEVEL
GRO	30	30	800	
DRO+ORO	2,000	2,000	500	
NAPHTHALENE	1,600	1,600	2.4	
1-METHYLNAPHTHALENE	34	34	8.9	
2-METHYLNAPHTHALENE	320	320	1.5	
cPAH TEC	0.19	0.19	32	

SOIL CLEANUP LEVELS FOR NAPHTHALENE, 1-METHYLNAPHTHALENE, 2-METHYLNAPHTHALENE, WERE UPDATED BASED ON THE DIRECT CONTACT PATHWAY SINCE THE LEACHING PATHWAY IS NO LONGER COMPLETE FOLLOWING INTERIM ACTIONS.

DATA IS ONLY SHOWN FOR PERFORMANCE AND COMPLIANCE SAMPLES THAT REMAIN IN PLACE. NO SOIL DATA STRINGS ARE SHOWN FOR SAMPLES THAT WERE REMOVED.



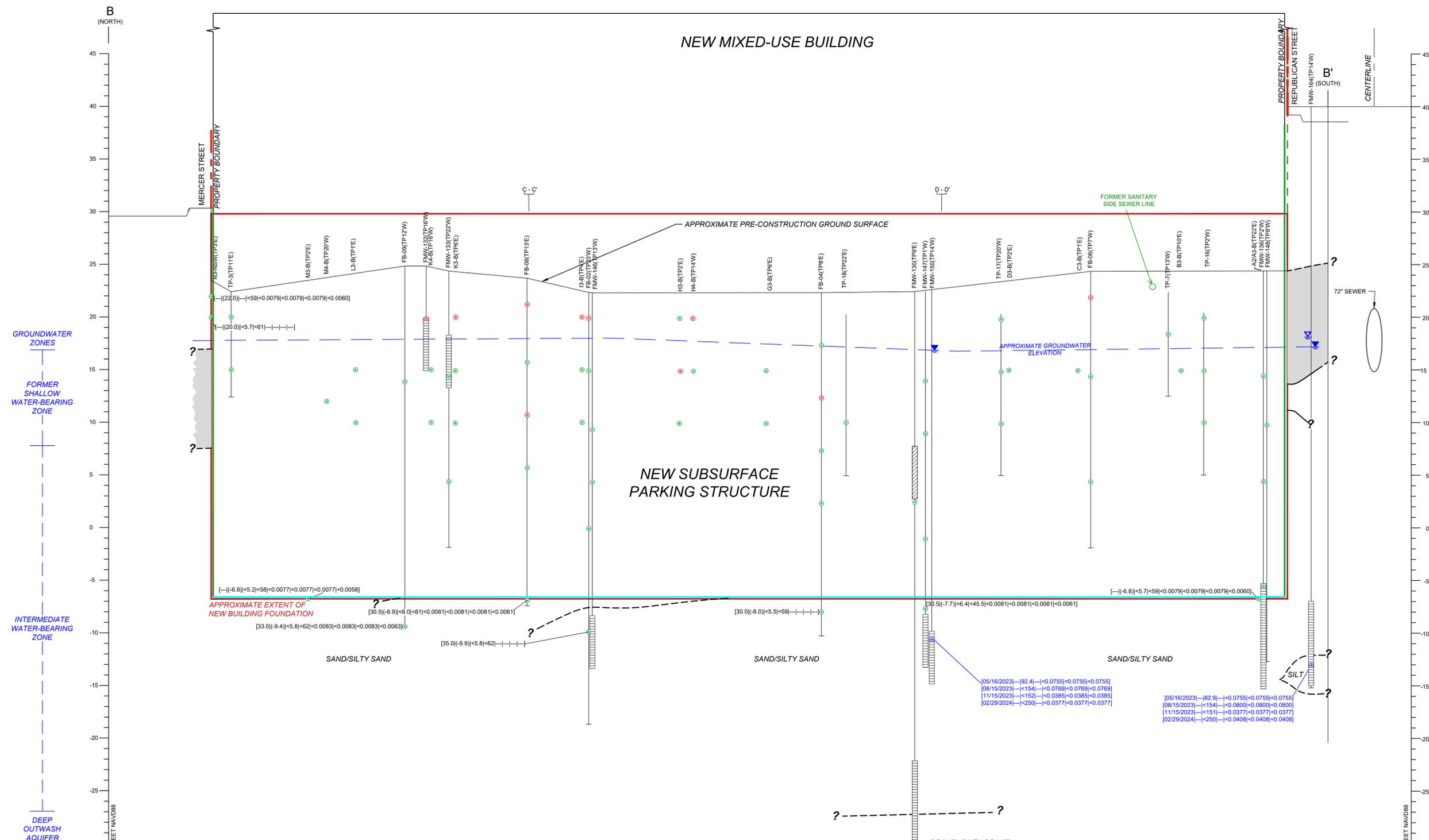
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FIGURE 4
POST INTERIM ACTION
CROSS SECTION A-A'
BLOCK 38 WEST SITE
SEATTLE, WASHINGTON
FARALLON PN-397-019
Date: 8/2/2024



LEGEND

TP-3 (TP11E) BORING OR MONITORING WELL LOCATION TRANSDUCED (TP) IN FEET, EAST (E) OR WEST (W), TO CROSS-SECTION LINE
 INDICATES CONCENTRATIONS OF ONE OR MORE HAZARDOUS SUBSTANCES EXCEEDED THE APPLICABLE MTCA CLEANUP LEVELS
 INDICATES CONCENTRATIONS OF HAZARDOUS SUBSTANCES ANALYZED DID NOT EXCEED THE APPLICABLE MTCA CLEANUP LEVELS
 APPROXIMATE GROUNDWATER ELEVATION
 STRATIGRAPHIC CONTACT
 BLANK CASING OR BORING
 STATIC GROUNDWATER ELEVATION (MOST RECENT)
 GROUNDWATER ELEVATION AT TIME OF DRILLING
 TEMPORARY SCREEN INTERVAL
 GROUNDWATER SAMPLE LOCATION
 WELL SCREEN INTERVAL

ALL GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER (µg/l)
 [08/15/2023]--[58.9]--[<0.07 69]--[<0.0769]--[<0.0769] = GROUNDWATER ANALYTICAL RESULT | SAMPLE DATE | GRO | DRO+ORO | BENZENE | NAPHTHALENE | 1-METHYLNAPHTHALENE | 2-METHYLNAPHTHALENE |
 ** = DENOTES SAMPLE IS RECONNAISSANCE GROUNDWATER GRAB SAMPLE
 ++ = GRO REPORTED AT A CONCENTRATION OF 1.100 µg/l, HOWEVER, RE-EVALUATION BY THE ANALYTICAL LABORATORY INDICATED THAT THE REPORTED CONCENTRATION OF GRO WAS ATTRIBUTED TO A SINGLE PEAK ON THE CHROMATOGRAM, WHICH WAS IN THE RANGE OF NAPHTHALENE.
 ALL SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
 -- = SOIL ANALYTICAL RESULTS | DEPTH | (ELEVATION IN FEET NAVD88) | GRO | DRO+ORO | NAPHTHALENE | 1-METHYLNAPHTHALENE | 2-METHYLNAPHTHALENE | cPAH TEC
 GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS
 DRO = TPH AS DIESEL-RANGE ORGANICS
 ORO = TPH AS OIL-RANGE ORGANICS
 DRO+ORO = SUM OF DRO AND ORO
 cPAH TEC = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBONS TOXIC EQUIVALENT CONCENTRATION
BOLD = DENOTES CONCENTRATIONS THAT EXCEED APPLICABLE CLEANUP LEVELS
 - - = SAMPLE NOT ANALYZED OR NOT APPLICABLE
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 NAVD88 = NORTH AMERICAN VERTICAL DATUM OF 1988
 COPC = CONSTITUENT OF POTENTIAL CONCERN
 MTCA = WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION

APPROXIMATE AREA OF WOOD DEBRIS/ORGANICS LAYER
 VERTICAL VAPOR/GROUNDWATER BARRIER SYSTEM
 SUB-SLAB VAPOR BARRIER SYSTEM
 ESTIMATED EXTENT OF COAL/CHARCOAL LAYER

ANALYTE	SOIL (mg/kg)		CLEANUP LEVEL	
	VADOSE	SATURATED	VADOSE	SATURATED
GRO	30	30		
DRO+ORO	2,000	2,000		
NAPHTHALENE	1,600	1,600		
1-METHYLNAPHTHALENE	34	34		
2-METHYLNAPHTHALENE	320	320		
cPAH TEC	0.19	0.19		

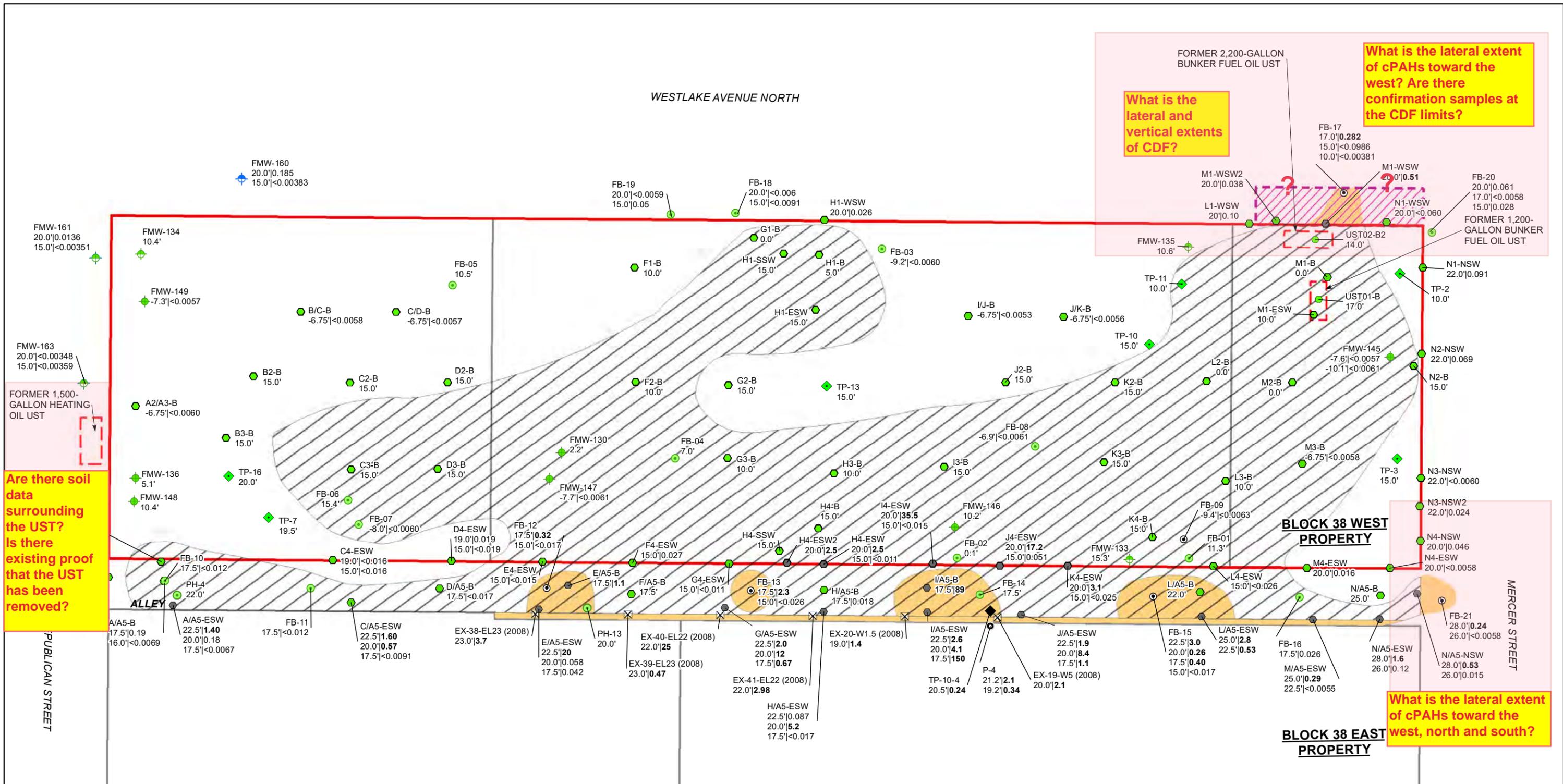
ANALYTE	GROUNDWATER (µg/L)	
	GRO	CLEANUP LEVEL
DRO+ORO	800	
BENZENE	500	
NAPHTHALENE	2.4	
1-METHYLNAPHTHALENE	8.9	
1-METHYLNAPHTHALENE	1.5	
2-METHYLNAPHTHALENE	32	

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 DATA IS ONLY SHOWN FOR PERFORMANCE AND COMPLIANCE SAMPLES THAT REMAIN IN PLACE. NO SOIL DATA STRINGS ARE SHOWN FOR SAMPLES THAT WERE REMOVED.

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[05/16/2023]--[82.9]--[<0.0755]--[<0.0755]--[<0.0755]
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 [02/29/2024]--[<250]--[<0.0377]--[<0.0377]--[<0.0377]

[05/16/2023]--[82.9]--[<0.0755]--[<0.0755]--[<0.0755]
 [08/15/2023]--[<154]--[<0.0769]--[<0.0769]--[<0.0769]
 [11/15/2023]--[<151]--[<0.0377]--[<0.0377]--[<0.0377]
 [02/29/2024]--[<250]--[<0.0408]--[<0.0408]--[<0.0408]



LEGEND

- SHALLOW WATER-BEARING ZONE MONITORING WELL
- DECOMMISSIONED SHALLOW WATER-BEARING ZONE MONITORING WELL
- DECOMMISSIONED INTERMEDIATE WATER-BEARING ZONE MONITORING WELL
- BORING (FARALLON)
- BORING (GEOENGINEERS)
- EXCAVATION SAMPLE (GEOENGINEERS)
- TEST PIT (GEOENGINEERS)
- POTHOLE (FARALLON)
- UST SAMPLE LOCATION (FARALLON)
- EXCAVATION SAMPLE LOCATION (FARALLON)
- TEST PIT (FARALLON)

- DENOTES SAMPLE LOCATION AND ELEVATION IN FEET NAVD88 WHERE cPAHs RESULTS ARE LESS THAN THE CLEANUP LEVEL
- ESTIMATED EXTENT OF SOIL EXCEEDING THE CLEANUP LEVEL REMAINING IN PLACE POST INTERIM ACTIONS OR INACCESSIBLE DUE TO EXISTING UTILITY BANK
- ESTIMATED EXTENT OF SOIL EXCEEDING THE SCREENING LEVEL THAT WAS EXCAVATED AND REMOVED BY INTERIM ACTIONS
- MECHANICAL EQUIPMENT AREA DECOMMISSIONED AND FILLED WITH CDF
- PROPERTY BOUNDARY
- FORMER UNDERGROUND STORAGE TANKS (USTs)
- KING COUNTY PARCEL BOUNDARY

NOTES:
 DATA SHOWN ARE FOR SAMPLES COLLECTED BETWEEN 2014 THROUGH 2023 UNLESS OTHERWISE NOTED. DATA IS ONLY SHOWN FOR PERFORMANCE AND COMPLIANCE SAMPLES THAT REMAIN IN PLACE. NO SOIL DATA STRINGS ARE SHOWN FOR SAMPLES THAT WERE REMOVED.

FOR SOIL SAMPLES:
 DEPTH AND CONCENTRATIONS REPORTED AS:
 ELEVATION IN FEET NAVD88 | cPAH TEC
 ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)

BOLD = DENOTES ELEVATION AND CONCENTRATIONS THAT EXCEED THE CLEANUP LEVEL OF 0.19 mg/kg
 < = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTING LIMIT LISTED FOR TOTAL TOXIC EQUIVALENT CONCENTRATION OF BENZO(A)PYRENE (mg/kg)

CDF = CONTROLLED DENSITY FILL
 cPAHs = CARCINOGENIC POLYCYCLIC AROMATIC HYDROCARBONS
 TEC = TOXIC EQUIVALENT CONCENTRATION OF BENZO(A)PYRENE FOR cPAH MIXTURE
 MTCA = WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION
 NAVD88 = NORTH AMERICAN VERTICAL DATUM OF 1988

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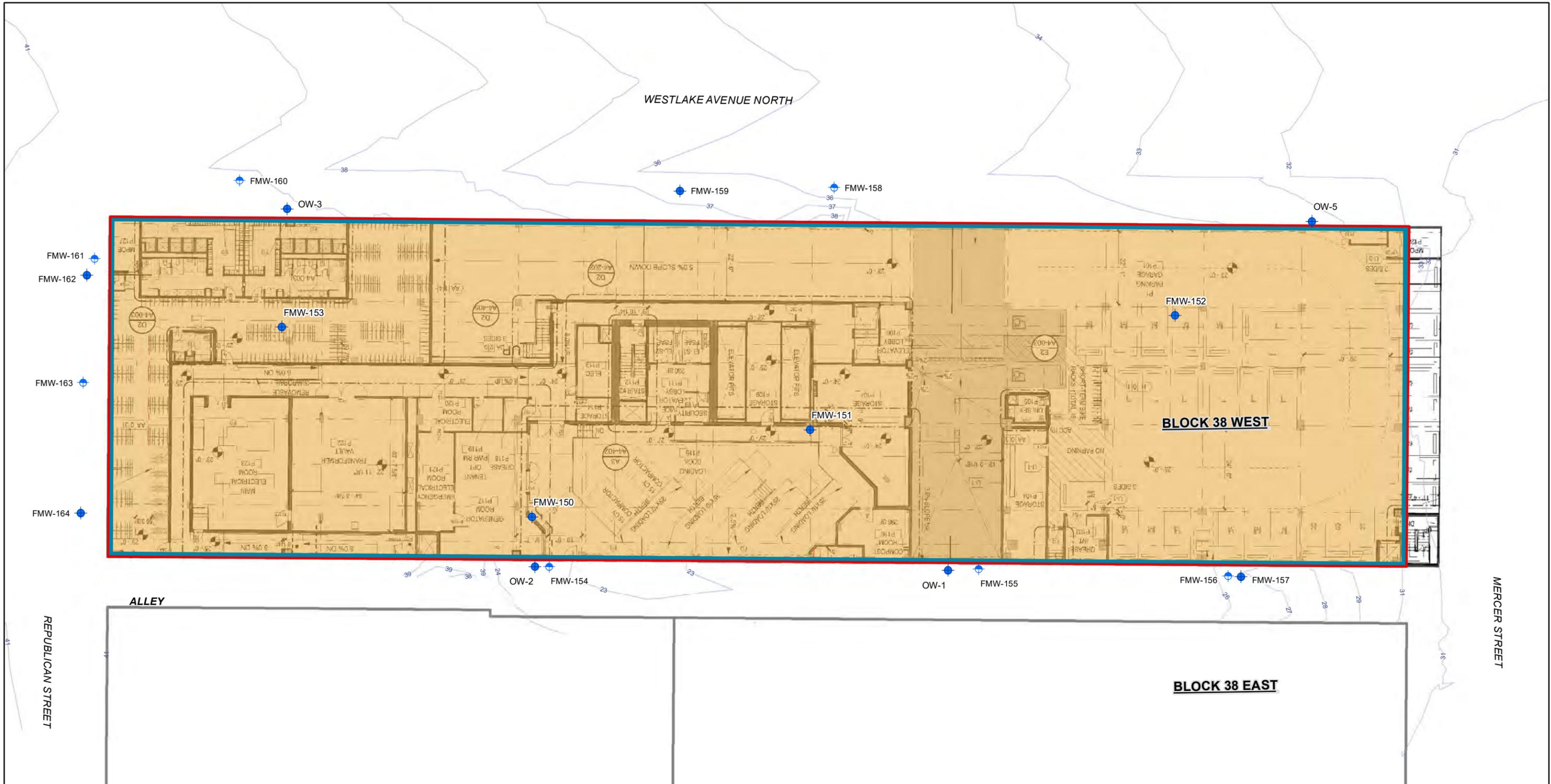
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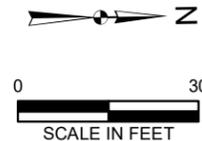
FIGURE 8
 POST INTERIM ACTION
 SOIL ANALYTICAL RESULTS
 FOR cPAH TEC
 BLOCK 38 WEST SITE
 SEATTLE, WASHINGTON
 FARALLON PN: 397-019

Drawn By: jones Checked By: JW Date: 8/2/2024 Disc Reference: Q:\Projects\397 VULCAN\019_Block38\Mapfiles\17F_2024\Figure-08_Soil-cPAHs.mxd



LEGEND

-  SHALLOW WATER-BEARING ZONE MONITORING WELL
-  INTERMEDIATE WATER-BEARING ZONE MONITORING WELL / OBSERVATION WELL
-  VERTICAL EXTENT OF VAPOR BARRIER INSTALLED, FROM BASE TO TOP OF SHORING WALL; HYCRETE WATERPROOF CONCRETE EXTENDS TO ELEVATION 20.0 FEET NAVD88
-  HORIZONTAL EXTENT OF VAPOR BARRIER INSTALLED ACROSS FOUNDATION; BARRIER PLACED ON TOP OF RAT SLAB FOUNDATION PRIOR TO POURING THE MAT SLAB FOUNDATION WITH TOP 12-INCHES CONSISTING OF HYCRETE WATERPROOF CONCRETE
-  ELEVATION CONTOUR
-  PROPERTY BOUNDARY
-  KING COUNTY PARCEL BOUNDARY



NOTES:
 1. ALL LOCATIONS ARE APPROXIMATE.
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 3. ELEVATION DATA PRESENTED IN FEET ABOVE MEAN SEA LEVEL IN THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88)
 ELEVATION SOURCE: BUSH, ROED, & HITCHINGS, INC. (2014)



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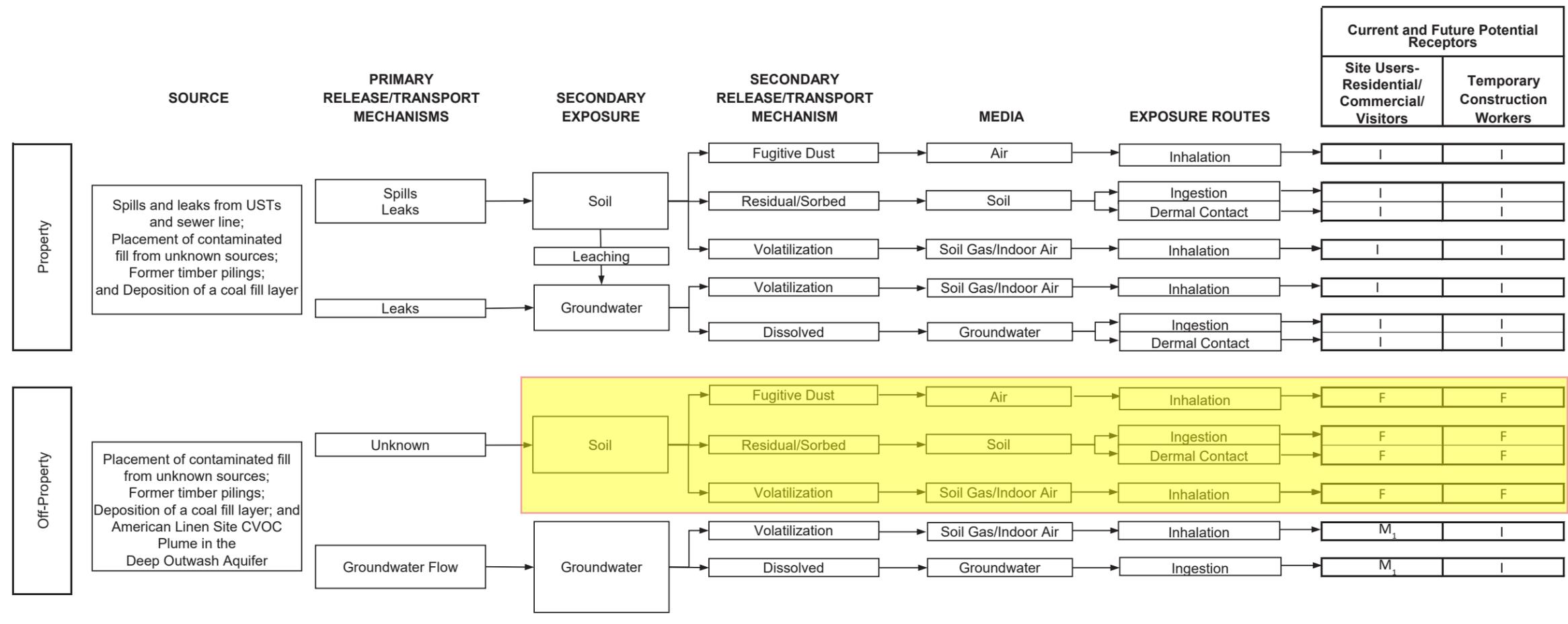
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FIGURE 9
 EXTENT OF VAPOR BARRIER
 BLOCK 38 WEST SITE
 SEATTLE, WASHINGTON

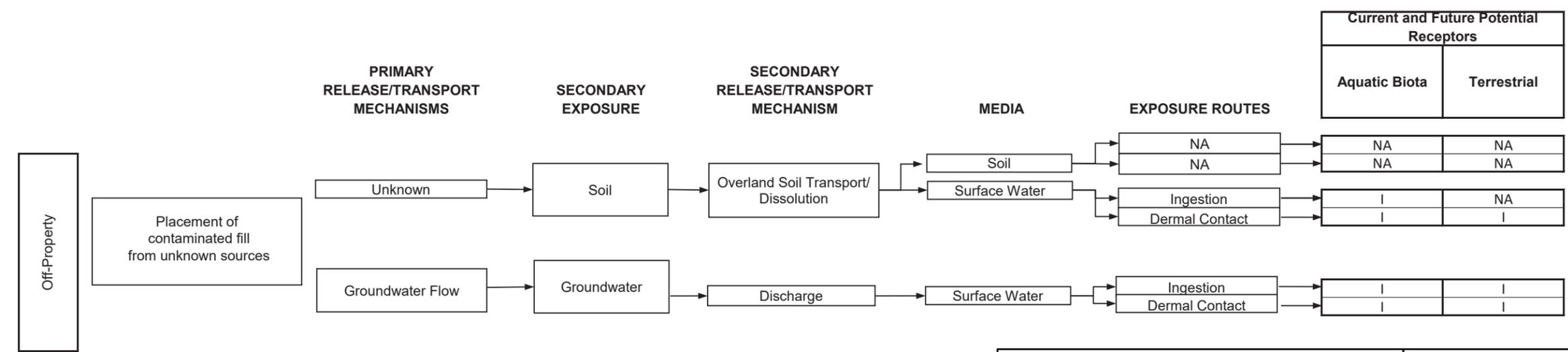
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HUMAN HEALTH RISK CONCEPTUAL SITE MODEL



How is this pathway addressed?

ECOLOGICAL RISK CONCEPTUAL SITE MODEL



I = Incomplete Pathway
 C = Complete Current Pathway
 M = Complete pathway currently on Property mitigated by presence of vapor barrier and concrete floor
 M₁ = Pathway is incomplete based on the COCs for the Block 38 West Site.
 However the pathway is potentially complete based on the presence of the American Linen Site CVOC Plume adjacent to the Block 38 West Site.
 F = Currently Incomplete, Potentially Complete Pathway in Future
 NA = not applicable



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FIGURE 10

EXPOSURE PATHWAY ANALYSIS
BLOCK 38 WEST SITE
SEATTLE, WASHINGTON

FARALLON PN: 397-019

Drawn By: Imurock

Checked By: JW

Date: 7/19/2024

Disc Reference: Q:\Projects\397 VULCAN\019_Block38\Mapfiles\17F_2024\Figure-10_ExposurePathwayAnalysis.ai