

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation
Contaminated Soil Site, 1700 Airport Way S, Seattle, WA
Prepared by Evergreen Treatment Services and Aspect Consulting

I. Introduction & Background

a. Site Location

The site is located at 1700 Airport Way S, Seattle, WA (herein referred to as “the Site”).

b. Previous Site Use(s) and any previous cleanup/remediation

the concentrations of these compounds is expected to occur prior to redevelopment The Subject Site was listed by the U.S. Environmental Protection Agency (“EPA”) and the Washington State Department of Ecology (“Ecology”) as a contaminated Site. In the 1990s, Northwest EnviroService undertook Corrective Action measures for the Site. The northerly adjacent parcel located at 1500 Airport Way is operated by Emerald Services and is currently used as an oil recycling facility. The adjacent site is also the location of multiple storage tanks associated with this use that have historically contained, and may continue to contain, materials that are hazardous to human health; however, the operation of this facility is not expected to expose project users to outsized risk of hazard associated with the storage of processed and unprocessed materials in tanks. Employees and users of the Subject Site will not be exposed to these hazards as a result of the regular operations occurring at the Subject Site, or those at the northerly parcel.

c. Site Assessment Findings

The site was removed from the cleanup action because EPA and Ecology determined that only an Environmental Restrictive Covenant would be needed to manage limited arsenic-, lead-, cadmium, petroleum-, and benzo(a)pyrene-contaminated soil or concrete. The Environmental Restrictive Covenant, dated December 7, 2016, involves three restrictions/requirements: (1) limiting nonconforming zoning classification uses, (2) restricting use of groundwater, and (3) restricting the alteration of existing structures without prior written approval from Ecology. ETS notified Ecology of its plan to redevelop the Subject Property in a letter dated August 1, 2024. Additional cleanup actions have been identified on the Site, including for elevated levels of chlorinated solvent concentrations. Additional study regarding activities, with appropriate mitigations being proposed to prevent human exposure to these contaminants. Limitations on the extent ground-disturbing activities, proposed cleanup actions, and the ongoing effect of the Ecology restrictive covenant will limit site safety concerns resulting from soil contamination to beneath the threshold of significance.

d. Project Goal

ETS purchased the property at 1700 Airport Way S, Seattle, WA in April 2021 but was operating on the premises decades prior to purchase. Our redevelopment plan consists of demolishing all existing buildings, which do not currently serve our function to best treat our patient population following a catastrophic flood that took place in the southern building in January 2024. We have plans for a state-of-the-art opioid treatment center to

take their place, specializing in low-barrier, whole-person care. Our program includes behavioral health, addiction treatment, counseling services with associated support spaces, and we also plan to relocate existing administration on site.

The project is divided into two development phases to allow for treatment to continue for our patients throughout construction with as little disruption as possible. Phase 1 includes a three-story building of approximately 22,500 sqft to the north of the site, with 21,000 sqft of programming and office space and an additional 1,500 sqft of secured garage space to host our fleet of mobile medical units. Phase 2 includes a three-story building of approximately 18,500 sqft to the south of the site, with 16,800 sqft of programming and office space, an additional 1,700 sqft of transit space, (walkways between either building). Phase 2 also includes roughly 8,000 sqft of covered parking on the ground floor of the building, with programming taking place on floors two and three.

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The cleanup will be overseen by the Washington State Department of Ecology via an environmental covenant, as well as NEPA and SEPA.

b. Cleanup Standards for major contaminants

ETS currently anticipates that the state standards for operational use will be used as the cleanup standards.

c. Laws & Regulations Applicable to the Cleanup

III. Cleanup Alternatives

a. Cleanup Alternatives Considered

To address contamination at the Site, three different alternatives were considered, including Alternative #1: No Action, Alternative #2: Capping, and Alternative #3: Excavation with Offsite Disposal.

b. Evaluation of Cleanup Alternatives

To satisfy EPA requirements, the effectiveness, applicability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness

- Alternative #1: No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.
- Alternative #2: Capping is an effective way to prevent recreational receptors from coming into direct contact with contaminated soils if the cap is maintained. However, capping is a less effective way to control exposure, such as the risk of direct contact risks.
- Alternative #3: Excavation with Offsite Disposal is an effective way to eliminate risk at the Site, since as much contamination as possible will be removed and the exposure pathways will no longer exist.

Applicability

- Alternative #1: No Action is easy to implement since no actions will be conducted.

- Alternative #2: Capping is relatively easy to implement, although ongoing monitoring and maintenance of the cap will require periodic coordination and reporting. Because the Site is located within the floodplain of the Duwamish River, increased monitoring and additional maintenance would likely be required after flooding events. Therefore, this alternative is considered the most difficult to implement.
- Alternative #3: Excavation with Offsite Disposal is moderately difficult to implement. Coordination (e.g., dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (e.g., trucks transporting contaminated soils and backfill) are anticipated.

Cost

- Alternative #1: No Action.
- Alternative #2: Capping costs is estimated to cost roughly \$500,000.
- Alternative #3: Excavation with Offsite Disposal is estimated to cost roughly \$825,000.

c. Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #3: Excavation with Offsite Disposal. Alternative #1: No Action cannot be recommended since it does not address site risks. Alternative #2: Capping is less expensive than excavating soils and disposing them offsite. However, Alternative #2: Capping would require ongoing monitoring and maintenance of the cap and would not resolve the existence of contaminants on site. Alternative #3: Excavation with Offsite Disposal is the recommended alternative.