WA0953
Correspondence

GSA

GSA Northwest/Arctic Region

JUN 1 5 2009

Ms. Claire Hong
Remedial Project Manager
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
Attn: Environmental Cleanup Office, ECL-111

Dear Ms. Hong:

In response to the letter from Sheila Eckman, EPA Unit Manager, dated April 23, 2009, I am offering the following information. Our staff has conducted research into our file archives, and conducted interviews with knowledgable staff in order to answer the questions which were posed in the April 23 letter enclosure.

Enclosed, please find our response to your inquiry, including supporting documentation.

If you have any further questions regarding this issue, please direct them to Mr. Ron Smith at 253.931.7696.

Sincerely,

(b) (6)
[redacted]

Robin G.Graf
Acting Regional Administrator

Enclosure

U.S. General Services Administration
400 15th Street SW
Auburn, WA 98001-6599
www.gsa.gov

**GSA Response to EPA Regarding CERCLA Information Request**

**Site:**
Lower Duwamish Waterway, Seattle, WA

Federal Center South (FCS)
4735 East Marginal Way South
Seattle, WA 98134

1. Respondent Information

   a. **Primary Respondent**
   Mr. Robin G. Graf, Acting Regional Administrator
   General Services Administration (GSA)
   Northwest/Arctic Region (10A)
   400 15th Street SW
   Auburn, WA 98001
   Phone: 253.931.7200
   Fax: 253.931.7195

   b. **Secondary Respondent & for Information Regarding this Submission:**
   Mr. Ron W. Smith
   Regional Industrial Hygienist
   General Services Administration (GSA)
   Northwest/Arctic Region (10A)
   400 15th Street SW
   Auburn, WA 98001
   Phone: 253.931.7696
   Fax: 253.931.7588

   c. **For Future Correspondence**
   Mr. Robin G. Graf, Acting Regional Administrator
   General Services Administration (GSA)
   Northwest/Arctic Region (10A)
   400 15th Street SW
   Auburn, WA 98001
   Phone: 253.931.7200
   Fax: 253.931.7195

   d. **Dates of Property Holdings**

   GSA took ownership of the FCS facility in 1975, and is the current owner.

   e. **Dates of GSA Activities**

GSA has conducted activities at the FCS facility from 1973 to the present day.

**f. Nature of GSA Activities**

The Federal Center South facilities provide office, warehouse and dock space for Federal agencies. Past activities have included a GSA Fleet Motor Pool, and vehicle maintenance. There are also a number of out leases to non-Federal tenants in the buildings at FCS.

**g. Material Usage**

GSA does not produce any raw materials or commercial products at FCS. Non-hazardous solid waste (garbage) is collected and disposed of as a result of building operations. Building debris is created as a result of periodic construction projects.

**2. Site Activities and Interests**

**a. Documents of Ownership**

Copies of deeds and other documents of ownership are submitted as attachments to the response to question 3(a).

Electronic copies of all available drawings for the site are provided on a compact disk. The disk is indexed as file folders by GSA building number (e.g., WA0953KC). The drawings are further referenced by date, drawing number, and discipline. **Please Note: These drawings are "Protected" material, and should not be released unless there is a verified need to know.**

Available photographs are included as an attachment to this submittal.

**b. Fill Materials and Environmental Conditions**

**In regard to fill material:** As GSA was not the original owner of the facility, nor was GSA involved with the construction of the facility, we have no information regarding the source, volume, and content of fill material used during construction.

The following documents are provided in response to questions 2(b)(ii):

- Copy of Docket No. 1086-09-26-2615, Complaint and Notice of Opportunity for Negotiation.

The following documents are provided in response to questions 2(b)(iv):

- Handwritten memo from unknown author regarding a site inspection on October 26, 1984.
- Letter from EPA to GSA dated September 1986 regarding a facility inspection.
- Memo regarding a notice of case closure from EPA to GSA, dated June 10, 1991.

The following documents are provided in response to questions 2(b)(i-iv):

- Underground Storage Tank (UST) Site Assessment, May 1999, Herrera Environmental Consultants
- Environmental Site Assessment and Ground Water Monitoring, January 7, 2000, Herrera Environmental Consultants
- Baseline Ground Water Monitoring Report, December 11, 2001, Herrera Environmental Consultants
- Independent Remedial Action Report, July 17, 2003, Herrera Environmental Consultants
- Bunker C Tank Investigation, November 2004, Herrera Environmental Consultants
- Phase One Environmental Site Assessment, November 2004, PBS Environmental
- Phase Two Environmental Site Assessment, December 2004, PBS Environmental
- Supplemental Site Characterization, April 7, 2005, Herrera Environmental Consultants
- US GSA Groundwater Monitoring Activities, FCS Former Motor Pool, Final Report, November 13, 2008, EHS International

**c. Dredging**

The GSA is aware that river dredging has been conducted in the vicinity of FCS, but has not been responsible for its implementation, nor have we maintained a record of these events.

**d. Summary of Activities**

The primary activities at FCS while under GSA control have been providing office and warehouse storage space for Federal and non-Federal tenants. Known activities at the site include warehouse storage, vehicle maintenance, fabrication of artwork, furniture, display cases, and other products by out-lease tenants, restoration and final fabrication of passenger train cars, repair and alterations projects, routine operations and maintenance, and ship moorage.

**e. Materials Transfer**

In response to this question, the following documents are submitted regarding hazardous materials disposal/recycling at the facility:

- Dangerous Waste Annual Report Verification Form, 1998. Includes the annual report with supporting documentation and uniform waste manifests for calendar year 1998.
- Soil data sheet for drill cuttings, 1/10/2000.
- Soil manifest for drill cuttings, 1/24/2005.
- Disposal certificates and manifests for PCB-containing ballast disposal. Cover letter from Ecolights NW dated June 2007.
- Disposal records and correspondence with Missouri Dept. of Natural Resources, circa 1998.
- Notification of Regulated Waste Activity, Missouri Dept. of Natural Resources, 1998.
- Asbestos Waste Shipment Records (1996-2007).
- Waste manifests and certificates of destruction/recycling for PCB Transformer fluid, and other misc. disposal records.

**f. Electrical Equipment**

All known PCB containing equipment at the site is attached as a letter response to EPA dated November 5, 1986. Attached to this letter is an inventory of PCB transformers and equipment from 1978 to 1985.

It is likely that there are still some existing fluorescent light ballasts which contain small PCB containing capacitors.

**g. Oils and Hazardous Chemicals**

Attached are all available material safety data sheets for known chemicals which have been, or are being used at FCS.

**h. Site Drainage and Sewers**

All of the information regarding site drainage is likely included in the drawings, which were included as a response to question 2(a). No other information regarding this topic was found.

**i. Stormwater**

No specific documents were found in response to this question. Any information regarding stormwater discharge is likely included in the drawings, which were included as a response to question 2(a).

**3. Information About Others**

## a. Business Relationships

The following is a description of GSA's primary business dealings involving property acquisitions, additional acquired interests, out grants, out leases, disposals, and other interests with outside entities. Supporting documentation is attached, unless otherwise noted.

ACQUISITIONS
GSA acquired the subject property by Federal Transfer letter dated February 18, 1975 with reimbursement in the amount of $2,350,000. The transfer letter does not include acreage; however, GSA's acceptance of custody and accountability notes the acreage as 44.89 acres. The legal descriptions attached to the transfer letter reflect the two parcels being conveyed to GSA as Parcel A (west of East Marginal Way S.) and Parcel B-3 (east of East Marginal Way S.). No acreage totals were included in these descriptions.

A chart of the various acreage, legal descriptions and surveys is included.

**Following the description of Parcel A, the legal description notes:**

*TOGETHER WITH:*

**Resolution No. 13912.** Permit from the City of Seattle for construction and maintenance of a railroad spur north of Diagonal Avenue. (Rescinded - see reference to LaFarge permit below.)

*SUBJECT TO:*

**DACA 67-1-72-32.** License to Radio Corporation of America. (Per surveyor, this property not on GSA property.)

A right of entry to the railroads.

The reservations and exceptions shown in the deed from the State of Washington to the Ford Motor Company dated May 20, 1930, and recorded in Volume 1489 of Deeds, Page 541, Records of King County, Washington.

Rights of the Pioneer Towing Company under an agreement to erect piling and moor logs along the Duwamish River waterfront.

Rights of the public relative to cuts and fills as granted in the dedication of the subject land.

**Following the description of Parcel B-3, the legal description notes:**

*TOGETHER WITH:*

**Permit D7456.** Permit from the City of Seattle to fence and use Ohio Avenue… (no copy found).

**Permit 56313.** Permit from the City of Seattle to install conduit in Ohio Avenue about 50 feet south of West Alaska Street. (No copy found)

**Additional rights and interests noted in the Report of Excess**
The Army's Report of Excess includes descriptions of the parcels identified on Segment 1 and 2 maps and an Opinion of Title. Additional interests listed in the Opinion of Title that could impact the property:

Rights of the State of Washington and third parties by Virtue of the Act approved March 9, 1893 relative to tide and shore lands.

**ADDITIONAL ACQUIRED INTERESTS**

**Permit A-3012** from the City of Seattle for use of Ohio Avenue.

**Permit 56313** from the City of Seattle for installation of conduit in Ohio Avenue.

**Permit D-9028** from the City of Seattle for use of a portion of Colorado Street.

**Permit D-7456,** June 11, 1953, from the City of Seattle to fence and use Ohio Avenue between West Alaska and West Hudson and erect fence across Ohio at southerly line of Alaska. No termination date.

**Permit D-0850** from the City of Seattle. Per Surveyor, this permit does not impact the Federal Center South property.

**Permit A-3264** from the City of Seattle for installation of water line in Denver Avenue. (no copy found)

**Ordinance Number 99555,** December 30, 1970, from the City of Seattle vacating a portion of Diagonal Avenue South.

**Permit 72857** from the City of Seattle to maintain Government railroad track on the east side of Ohio Avenue from West Hudson Street to Diagonal Avenue. (copy not found).

**Permit from the City** of Seattle to use the northerly half of Diagonal Avenue for maintenance of a concrete ramp, dock and guardhouse, plus a

general use area. This Permit was rescinded and subsequently GSA granted LaFarge a **Revocable License 10PLA-92-12-30** to extend a railroad spur through GSA property along Diagonal Avenue South. In exchange for the license from GSA, LaFarge granted the Federal government access to a portion of LaFarge property for truck access and maneuvering, and paid to remove tracks and restore the street. Term: January 1, 1993 - Indefinite.

**OUTGRANTS**

**Revocable License 10PRA-L-117** to Liquid Carbonic Corporation for operation and maintenance of waste disposal system. (copy not found)

**Revocable License 10PRA-L-118** to Seattle-King County Civil Defense for operation and maintenance of alarm system, warehouse number 1. (copy not found)

**Revocable License 10PRA-L-189** to Pacific Northwest Bell to install buried cable along north access road adjoining East Marginal Way South, on south side of Alaska Street access road and north to Diagonal Avenue South. Term: March 1, 1978 - Indefinite.

**Revocable License 10PRA-L-216** to Metro, Municipality of Metropolitan Seattle for installation and use of bus passage shelter. Term: March 15, 1982 - Indefinite.

**Revocable License 10PEU-L-255** to Corps of Engineers for 6 lineal feet of dock space to install ramp. Cover letter September 12, 1984, license not found.

**Revocable License 10PLA-92-12-30** to LaFarge Corporation to extend a railroad spur through GSA property along Diagonal Avenue South. In exchange for the license from GSA, LaFarge granted the Federal government access to a portion of LaFarge property for truck access and maneuvering, and paid to remove tracks and restore the street. Term: January 1, 1993 - Indefinite.

**Revocable License DACA 67-2-71-136** Easement granted to the City of Seattle for overhead electrical transmission pole lines crossing the north portion of the described tract. (copy not found)

**Revocable License DA(S) 45-108-ENG-1145** Easement to the City of Seattle for the installation, operation and maintenance of storm and sanitary truck sewer lines in Diagonal Avenue and South Oregon Street affecting a small portion of the north end of the tract. (copy not found)

**Revocable License DA(S) 45-108-ENG-1372** Easement to the City of Seattle for the installation, operation and maintenance of a sanitary truck sewer line in Diagonal Avenue and South Oregon Street affecting a small portion of the north end of the tract. (copy not found)

**Revocable License DACA 67-2-70-308** Easement for a right-of-way to the railroad for operating on a spur tract across Diagonal Avenue and South Oregon Street and a portion of Colorado Avenue.

**ADDITIONAL OUTLEASES**
There are numerous leases of space in the Federal Center South buildings. A list of outgrants, provided by GSA, is included.

**DISPOSALS**

By Quitclaim Deed dated November 2, 1987, a 1.25-acre portion of the Parking Lot was conveyed to Cook Inlet Region, Inc. following a public sale. The Deed was recorded on December 9, 1987 at E0977237.

**OTHER INTERESTS**

Numerous spur tracks, rail lines and street vacations have been granted, rescinded and/or changed at this property through the years. Documentation is fragmented and the current status of some of these interests cannot be determined. An Easement to railroads for rights along Ohio Avenue and the Federal government's rights along Ohio Avenue is included.

**b. Previous Tenants**

NOTE: Most of the available records which were reviewed were post 1984. Earlier information is unavailable in most cases. In addition, dates of occupancy were, in most cases, unavailable for review.

**Federal Tenants**

| Name | Address | Dates | Activities |
|---|---|---|---|
| US Postal Svc | Forwarding address of tenants not known | Moved out as of 4/09. | Repair of vending machines and storage |
| Corps of Engineers | Currently on site. | 1943-Present | Office and storage |
| Dept. of Defense | Currently on site. | Various DOD tenants since Approx. 1942 | Office and storage |
| Bureau of Indian Affairs | Currently on site. | Early 1980's to Present | Office and storage |
| NOAA | Currently on site. | ? to Present | Ship moorage |
| Dept. of Homeland Security | Currently on site. | ? to Present | Office and vehicle storage |

| | | | |
|---|---|---|---|
| FBI | Currently on site. | ? to Present | Office, storage and vehicle maintenance |
| Government Printing Office | Currently on site. | ? to Present | Office and printing operations |
| ATF | Currently on site. | ? to Present | Vehicle storage and Office |
| US Marshals | Currently on site. | ? to Present | Vehicle storage and Office |
| US EPA | Currently on site. | ? to Present | Storage |
| Social Security Administration | Currently on site. | ? to Present | Storage |
| IRS | Currently on site. | ? to Present | Storage |
| Dept. of Agriculture | Forwarding address of tenants not known | Unknown Term | Storage |
| Consumer Product Safety Commission | Forwarding address of tenants not known | Unknown Term. Left the site in Approx. 2000. | Office |
| National Parks Service | Currently on site. | ? to Present | Storage |

**Non-Federal Tenants**

The attached spreadsheet lists all known non-federal tenants which have been present on site since 2003. Older records, in most cases, are not available.

In addition to the list provided, it is believed that Boeing Airplane Co. occupied the site from 1956 to possibly as long as 1973.

**c. Previous Employees and Agents**

Bill Galloway, Former GSA Operations Manager. Unable to obtain address or phone number.

**4. Compliance with This Request**

**a. Sources Reviewed & Consulted**

**i. Names & Job Titles of Individuals Consulted**

Mr. Ron Smith, Regional Industrial Hygienist, GSA R-10

Mr. John Mutton, Asst. Property Manager, GSA R-10

Mr. Richard Hall, Sr. Property Manager, GSA R-10

Mr. Michael Levine, Regional Environmental Program Officer, GSA R-10

Mr. Mark Howard, Facilities Programs Branch Manager, GSA R-10

Mr. Doug Gunwaldsen, Senior Portfolio Manager, GSA R-10

Ms. Lorraine Parham, Realty Specialist, GSA R-10

**ii. Location(s) Where All Documents Reviewed are Currently Kept**

Copies of the submitted documents are maintained at the following location:

**GSA Regional Office**
**400 15th Street SW**
**Auburn, WA 98001**

**& FCS**
**4735 E. Marginal Way So.**
**Seattle, WA 98134**