ENVIRONMENTAL HEALTH & SAFETY

UNIVERSITY of WASHINGTON

December 8, 2021

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WA State Department of Ecology (SWRO)

Thomas Middleton
Toxics Cleanup Program
Southwest Regional Office
Washington Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

SUBJECT:

UNIVERSITY OF WASHINGTON TACOMA CAMPUS

Request for Extension to Agreed Order No. DE 11081

Dear Mr. Middleton,

The University of Washington is formally requesting an extension to Agreed Order No. DE 11081, currently set to expire on December 31, 2021.

The remedial investigation at The University of Washington Tacoma reached a major milestone in April 2021 with the completion of all planned field work on the Tacoma campus. All planned wells have been installed and groundwater monitoring has been conducted for at least two years. The majority of the work done in 2021 occurred on the four potential source properties owned by three named PLPs. Soil borings were completed on all four of the potential source properties, with multiple borings on each property converted to permanent monitoring wells. Soil testing and groundwater monitoring were conducted on all of the properties. GeoEngineers has completed technical letters describing the findings on the four potential source properties.

The monitoring work completed on the potential source properties took much longer than originally anticipated. There were several issues which slowed progress on the properties. The initial process of notifying the three PLPs of their status took months longer than expected. Once notifications were made, UW's outside counsel needed to draft access agreements and gain approval by PLP's own legal counsel, a process which also took several months. One of the PLPs retained their own environmental consultant (Farallon Consulting). UW and GeoEngineers had to wait for Farallon to conduct their own environmental investigation on the potential source property before reviewing their findings and proposing further work to investigate data gaps in the Farralon study. The property owner was eventually amenable to further study, but UW's investigative work was delayed by several months. Finally, the initial soil vapor study conducted on one of the properties revealed findings which required further investigation. This additional work added three months to the investigation on that property.

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Some additional work, not included in the originally planned field work on the UW Tacoma campus, was conducted in 2021 due to the construction of a new building (Milgard Hall). Several groundwater monitoring wells needed to be decommissioned and relocated due to the construction of this building. Additionally, investigative work was conducted on the site of construction and soil remediation was conducted.

As stated above, the originally planned field work on the University of Washington Tacoma campus has been completed, as has the investigative work conducted on the four potential source properties. At this point, GeoEngineers has moved on to the process of building a conceptual site model which will aid in the completion of the draft remedial investigation. Completion of this conceptual site model and drafting of the remedial investigation will take many months. We are requesting a final project deadline of September 30, 2022.

Due to the reasons we have outlined above, we believe it would be appropriate and there is good cause to grant an extension to Agreed Order No. DE 11081. Thank you for your consideration of this matter. We look forward to your response.

Sincerely,

Douglas W. Gallucci

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