



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
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August 3, 2023

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LOTT Clean Water Alliance  
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Environmental Project Manager  
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**Re: Comments on Cleanup Action Completion Report**

- **Site Name:** East Bay Redevelopment
- **Address:** 315 Jefferson St NE, Olympia, Thurston County, WA 98501
- **Agreed Order:** DE 14072
- **Facility/Site No.:** 5785176
- **Cleanup Site ID No.:** 407

Dear Sam Gibboney, Jay Burney, and Wendy Steffensen:

Thank you for submitting the Cleanup Action Completion Report (report) for review to the Department of Ecology (Ecology).<sup>1</sup> Ecology has the following comments on the report:

1. As previously communicated via email, the report should include maps that illustrate the locations of the elevation values shown in Tables 1 through 4.<sup>2</sup> Ecology concurs with the revised figures and tables that were sent via email for Ecology review.<sup>3</sup> Ecology also

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<sup>1</sup> Pioneer Technologies Corporation (Pioneer), 2018, Cleanup Action Completion Report, East Bay Redevelopment Site, January.

<sup>2</sup> Question about 2018 East Bay Redevelopment Cleanup Action Completion Report, email from Steve Teel, Ecology, to Chris Waldron, Pioneer, April 19, 2023.

<sup>3</sup> RE: Question about 2018 East Bay Redevelopment Cleanup Action Completion Report, email from Joel Hecker, Pioneer, to Steve Teel, Ecology, April 28, 2023.

previously communicated this concurrence via email.<sup>4</sup> Please revise the report to include these new figures and tables.

2. Section 1.4, Completion Criteria, 2<sup>nd</sup> sentence: This sentence includes the statement “...and assuming all institutional controls [ICs] are enforced, the site is considered protective of human health and the environment (ICs are presented in Appendix B).” However, Appendix B only contains draft environmental covenants (ECs), which are not legally binding. Currently, only ECs for Lots 9, 10, 11, and 12 have been finalized and recorded.<sup>5</sup> The ECs for Lots 4, 5, 6, and 7 are still in draft form but Ecology has some minor comments on these and will be submitting these to you for review and finalization soon. ECs are only one type of IC. Please revise the text of this section to describe all of the institutional controls that are currently or in the process of being implemented. Also, since not all the ECs have been recorded yet, Ecology recommends that the ECs not be included in Appendix B.
3. Section 6: 2017 Controls, 2<sup>nd</sup> sentence: This section states that “ICs were applied to the site as part of legally binding environmental covenants, which are presented in Appendix B.” Please revise this section to incorporate the comments above.
4. Section 6: 2017 Controls, 3<sup>rd</sup> sentence, O&M Plan: Ecology is currently preparing comments on the Operations & Maintenance (O&M Plan).<sup>6</sup> These comments will be submitted to you soon. One of the comments that will be included is the need to update the O&M plan to include new development activities (Westman Mill development, on Lot 11). Please update the references to the O&M Plan in Section 6 accordingly.
5. Figures 2, 4, 6, and 7: Please add a note to these figures stating that the parcel designations for Parcels 2 and 3 have changed since 2017 and that these parcels are now designated as Lots 10, 11, and 12.
6. Appendix A: This large appendix (3,035 pages) contains copies of the Infrastructure Interim Action Report,<sup>7</sup> Parcel 4/Parcel 5 Interim Action Work Plan,<sup>8</sup> and Parcel 4/Parcel 5 Interim Action Report.<sup>9</sup> Since these documents have previously been submitted to Ecology and are available in Ecology’s online Document Storage and Retrieval System (DSARS), there is no need to include copies of them in the report. Also, including these documents in the report

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<sup>4</sup> RE: Question about 2018 East Bay Redevelopment Cleanup Action Completion Report, email from Steve Teel, Ecology, to Joel Hecker, Pioneer, April 28, 2023.

<sup>5</sup> Lots 10, 11, and 12 were previously designated as Parcels 2 and 3.

<sup>6</sup> Pioneer, 2018 Long-Term Operations and Maintenance Plan, East Bay Redevelopment Site, Olympia, WA, November.

<sup>7</sup> Pioneer, 2010, Infrastructure Interim Action Report for East Bay Redevelopment Site, June.

<sup>8</sup> Brown and Caldwell, 2010, Parcel 4/Parcel 5 Interim Action Work Plan, final version September 23.

<sup>9</sup> Brown and Caldwell, 2015, Parcel 4/Parcel 5 Interim Action Report. February 23.

makes the report impractically large. Please delete this appendix from the report and reference these documents instead.

7. DSARS has a document size limit of 40 megabytes (MB) for uploads. When you submit the revised report, please submit the electronic copy in reduced file size format and in tranches of less than 40 MB each (if the document is larger than 40 MB). Please also make sure that the electronic files are searchable.

If you have any questions, please contact me at [steve.teel@ecy.wa.gov](mailto:steve.teel@ecy.wa.gov) or (360) 890-0059.

Sincerely,



Steve Teel, LHG  
Cleanup Project Manager/Hydrogeologist  
Toxics Cleanup Program  
Southwest Regional Office

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