



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
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August 7, 2023

Port of Olympia  
C/O Sam Gibboney  
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LOTT Clean Water Alliance  
C/O Wendy Steffensen  
Environmental Project Manager  
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**Re: Comments on Lot 11 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 Lot 11 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. **2018 Construction Completion Report:** The previous construction completion report for the larger portion of the Site<sup>2</sup> is not final and Ecology recently provided comments to you.<sup>3</sup> Please update the references to this previous construction completion report in the document to show the final version upon Ecology acceptance.

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<sup>1</sup> Pioneer Technologies Corporation (Pioneer), 2022, Cleanup Action Completion Report, East Bay Redevelopment Site (Lot 11), Westman Mill. July.

<sup>2</sup> Pioneer, 2018, Cleanup Action Completion Report, East Bay Redevelopment Site. January.

<sup>3</sup> Ecology, 2023, Comments on Cleanup Action Completion Report. August 3.

2. Long-Term Operations & Maintenance Plan: Ecology recently provided comments to you<sup>4</sup> on the Operations & Maintenance (O&M Plan).<sup>5</sup> One of the comments is the need to update the O&M plan to include the new Westman Mill development on Lot 11. Please update the references to the O&M Plan in the report to show the final version upon Ecology acceptance.
3. Construction Stormwater General Permit: This permit is listed in Section 1.2 but the report does explain the permit requirements. Please add a description of the requirements of this permit in a section of the main text. This description should include briefly mentioning the activities, reporting, and inspections that were done for this permit. For example, several of the items in Section 2.2 pertain to stormwater protection but there is no linkage of these activities to the stormwater permit requirements. Ecology also suggests including a copy of the permit in an appendix.
4. Section 3.4, Stockpile Management and Sampling: This section contains the statement that the Grease Trap, Footing, F, G, H, and J stockpiles were not sampled “due to the consistent nature of the material when compared to other previously sampled soil.” Please clarify and provide more detail and justification why the sampling of these stockpiles was not necessary. Appendix E also includes this same statement without any further explanation.
5. 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.

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<sup>4</sup> Ecology, 2023, Comments on Long-Term Operations & Maintenance Plan. August 3.

<sup>5</sup> Pioneer, 2018, Long-Term Operations and Maintenance Plan, East Bay Redevelopment Site, Olympia, WA. November.

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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Ecology Site File