***Compliance Monitoring and Contingency Plan***

*Prepared for:*

**Lacey Urban Center**

7131-7269 Martin Way East

Olympia, Washington 98516

*Prepared for:*

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**Attachments:**

Figure 1 *– Vicinity Map*

Figure 2 *– Site Map*

Figure 3 *– Area of Restrictions*

# Introduction

AEG Atlas, LLC (AEG) has prepared the proposed ***Compliance Monitoring and Contingency*** ***Plan*** for Lacey Urban Center, located at 7131-7269 Martin Way East, in Olympia, Thurston County, Washington (Site). The purpose and objectives of this report are to summarize the plan for ongoing compliance in support of a request of No Further Action with an Environmental Covenant for the Property.

## Site Location and Description

The Site consists of four buildings, occupying one footprint with a total square footage of approximately 89,000 square feet, and the shopping center occupies a 4‑acre area and multiple tax parcels. The building that housed the former dry cleaner from 1965 to 1997 is a slab-on-grade, single-story masonry building located in the western portion of the shopping center. Occupancy of the multi-tenant shopping center has primarily been for retail, office, and service tenants, and have included a bank, barber shop, post office, donut shop, drapery shop, hair salon, drug store, restaurants, shoe repair, floral and gift shops, nail shops, bakery, dentist, and chiropractic center.

The Site is located within a mixed commercial and residential area of Thurston County. The Site is bound to the north by Martin Way East with commercial properties beyond; to the east by Ranger Drive Southeast with commercial properties beyond; to the west by Tanglewilde Lumber; and to the south by residential single-family homes. Figure 1, *Vicinity Map*, presents the general vicinity of the Site. The Site’s current layout can be seen in Figure 2, *Site Map.*

# Proposed Compliance/Contingency Plan

Vapor Compliance and Contingency are needed because concentrations of tetrachloroethylene (PCE) are present beneath the Site building above Model Toxics Control Act (MTCA) Method A cleanup levels (CULs) for soil and MTCA Method B screening levels for sub-slab vapor. Contaminated soil could not be removed due to the building foundation.

**Soil:** Residual contamination above the MTCA Method A CUL for PCE is present at the Site from about 2 to 5 feet below ground surface (bgs) beneath the Site building (see Figure 3, *Area of Restrictions*).

**Groundwater:** Depth to groundwater beneath the Site ranges from about 17 to 31 feet bgs. PCE is not present within the groundwater saturated zone, and not in contact with the groundwater at the Site. The direction of groundwater flow at the Site has been generally to the southwest.

**Vapor:** The sub-slab vapor data collected to date has had detections of PCE above its respective Method B screening level of 1,500 μg/m3 for a commercial worker scenario (the land use is commercial and consistent with operation of a laundromat). Confirmation vapor monitoring is necessary to ensure PCE concentrations in indoor air remain below MTCA Method B CULs pending the 5-year Periodic Review.

## Compliance/Contingency Plan for Petroleum Hydrocarbon (TPH) constituents, based on WAC 173-340-820

**Vapor:** Two previously utilized ambient air locations (Indoor-1 and Indoor-4), one outdoor ambient air sampling location (Ambient-4), and five sub-slab vapor sampling pins (SS-1 through SS-5) will be used for the confirmation sampling and will be sampled and analyzed every 18 months following the issuance of the NFA. The sampling and analytical results will be submitted to PLIA for review. Vapor probe locations are illustrated on Figure 2, *Site Map*, and Figure 3, *Area of Restrictions*.

### Contingency Plan

If constituents are detected in the adjusted ambient air (Indoor-1 and Indoor-4) above MTCA Method B CULs, AEG will consider a follow-up round of sampling to confirm the results. If the results are confirmed, AEG will coordinate with Ecology on additional mitigation measures.

### Vapor and Sub-Slab Sampling

Vapor (i.e., ambient air) and sub-slab vapor samples will be collected in accordance with Ecology’s *Guidance for Evaluating Soil Vapor Intrusion in Washington State*. Ambient air samples will be collected using 6-liter (L) Summa canisters with 8-hour inlet flow regulators, and placed within the breathing zone at about 4 to 5 feet above the ground surface. After placing the canisters at each sampling location, the inlet valves will be opened, and staff will return at the end of the 8-hour event to close the canisters. Sub-slab samples will be collected using 1-L Summa canisters with 10-minute inlet flow regulators, hooked up to existing sub-slab vapor testing pins.

Vapor sample locations are illustrated on Figure 2, *Site Map*.

### Quality Controls

All sub-slab vapor samples will be collected in accordance with industry protocols for the collection, documentation, and handling of samples.

All Summa canisters will be certified clean prior to use, and will be located away from areas of potential interference.

All samples will be transported to the laboratory under industry standard chain-of-custody protocols.

### Inspection

As part of sampling activities, the condition of the Site building, which is acting as a cap for remaining PCE-contaminated soil and vapor contamination, will be inspected for integrity as part of the Site Institutional Control to ensure the integrity of the Site remedy for the continued protection of the human health and the environment. Inspection will be conducted once every 18 months during the vapor sampling activities.

To document inspection activities, AEG will include a summary in the vapor monitoring reports.

### Reporting and Record Keeping

All records associated with this work plan will be sent to Ecology within 30 days of finalizing the reports for the individual sampling events outlined in Section 2 pending the 5-year Review.