



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

May 3, 2024

Amy Sikora Washington State Department of Natural Resources 1111 Washington St SE Olympia, WA 98501 amy.sikora@dnr.wa.gov

Re: Technical Assistance at the following Site:

- Site Name: Cedar Creek Corrections DNR
- Site Address: 12200 Bordeaux Rd, Littlerock, WA 98556
- Facility/Site ID: 1388
- Cleanup Site ID: 662
- VCP Project ID: SW1693

Dear Amy Sikora:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Cedar Creek Corrections DNR facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the <u>Model Toxics</u> <u>Control Act (MTCA)</u>,¹ <u>chapter 70A.305 Revised Code of Washington (RCW</u>).²

Issue Presented and Opinion

Ecology understands that you are requesting technical assistance on the Site remedial investigation, the feasibility study and the draft cleanup action plan to implement a permanent cleanup action for the Site.

This opinion is based on an analysis of whether the proposed remedial action meets the substantive requirements of MTCA, chapter 70A.305 RCW, and its implementing regulations, Washington Administrative Code (WAC) chapter 173-340 (collectively "substantive requirements of MTCA"). The analysis is provided below.

¹https://apps.ecology.wa.gov/publications/SummaryPages/9406.html ²https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Total petroleum hydrocarbons (TPH) as gasoline, diesel, and heavy oil, into soil.
- Metals (arsenic, barium, chromium [total], lead, and mercury) into soil.
- Pentachlorophenol (PCP) into soil.
- Dioxins/furans into soil.
- Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into soil.

A parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the documents found in **Enclosure B**.

Landau Associates, Inc.'s RI/FFS/CAP report dated January 18, 2024, is referred to herein as the Report.

You can request these documents by filing a <u>records request</u>.³ For help making a request, contact the Public Records Officer at <u>recordsofficer@ecy.wa.gov</u> or call 360-407-6040. Before making a request, check whether the documents are available on <u>Ecology's Cleanup Site Search</u> web page.⁴

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **further remedial action** is necessary to clean up contamination at the Site.

³ https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

⁴ https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=662

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DNR proposes to remove contaminated soil by excavation with off-Site disposal at a permitted facility. The excavation depth is proposed to a conditional point of compliance of 3 feet below ground surface. An environmental covenant (EC) or equivalent deed restriction is also proposed, if needed. Ecology encourages performance of the excavation scope to remove contaminated material within the top 6 feet of soil, which typically encompasses the biologically active zone for soil biota.

1. Characterization of the Site.

This opinion seeks to answer the primary question in the Report about whether the proposed interim action will likely remove contaminated soil to the extent practicable. Ecology concurs that the proposed cleanup action is likely to remove contaminated soil to the extent practicable. The proposed excavation can be completed as an interim action, as it is consistent with WAC 173-340-430, or as the permanent Site cleanup action.

Ecology has the following comments on the proposed excavation and removal of Site contamination.

- **a.** Several trees are anticipated to be removed to access the contaminated soil. The Report proposes to re-plant the affected area with Douglas Fir trees consistent with DNR policies.
 - i. Though not a MTCA requirement, Ecology encourages at least two for one replacement of the trees either in the same area or elsewhere on DNR-owned or operated land to support resilience to climate change.
 - Root balls should be inspected for excess soil at the time of removal. For example, this could be done using the procedures provided in Ecology's Tacoma Smelter Plume Model Remedies Guidance.⁵
 - iii. Additionally, please note the estimated maximum depth of the tree roots, to confirm that 6 feet below ground surface (bgs) is sufficiently representative of the biologically active zone at the Site. If root systems extend deeper than 6 feet, please adjust the field scope as needed.
- **b.** Updated Site Hazardous Substances List. Based on additional sampling of soil and groundwater in 2022-2023, Ecology concurs with the contaminants associated with the release in the Description of the Site section above.

⁵ Ecology publication 19-09-101, 2019 Tacoma Smelter Plume Model Remedies Guidance, July 2019. https://apps.ecology.wa.gov/publications/SummaryPages/1909101.html

- Based on the additional sampling results, PCBs, MTBE, EDB, EDC, cadmium, hexavalent chromium, selenium, and silver do not need to be further sampled at the Site. However, additional metals in soil data may be required to satisfy disposal requirements at the landfill facility's request.
- c. Delineation into the woods beyond the existing hand auger borings to the northwest and north of the currently known Site contamination may be necessary. This contingency should be added for the planned excavation.
- **d.** Generally, the Final Site Investigation Report dated December 8, 1988, showed the delineation of pentachlorophenol in soil to the southwest and southeast of the former dip tank. Should additional contamination be found in the proposed area of excavation, please expand the excavation laterally and/or vertically to remove contaminated soils to the maximum extent practicable.
- e. Ecology supersedes our previous opinion regarding the sufficiency of soil sampling locations B04 and B05, which were near surface soil samples collected under the former landfarm area.
 - i. We recommend at two additional shallow soil samples in this area, bringing the total to four, which would be at least one soil sample every 400 square feet.
 - **ii.** Shallow test pits, hand auger, or other suitable method between soil sampling locations B04 and B05 to similar depth would be sufficient, aligned along a northwest-southeast axis.
- f. To calculate a site-specific cleanup level for total chromium in soil, ten near surface soil samples were collected from around the perimeter of the Cedar Creek Corrections facility. The 90th percentile value calculated for total chromium in soil was 130 milligrams per kilogram (mg/kg) and is proposed as the Site cleanup level for total chromium in soil.
 - i. Two soil samples were analyzed for hexavalent chromium. Hexavalent chromium was detected in only one sample at 8.4 mg/kg, less than the MTCA Method A cleanup level of 19 mg/kg. The hexavalent chromium sampling conducted at the Site meets the requests in Ecology's opinion letter dated November 30, 2021 and no additional hexavalent chromium sampling is needed at the Site.
 - ii. Please add the title block and legend to all figures and size appropriately for the pdf. Figure 5, for example.

- iii. Ecology concurs with the demonstration that the site-specific calculation of the total chromium in soil CUL more likely than not meets the requirements of WAC 173-340-700, WAC 173-340-709, and WAC 173-340-740. WAC 173-340-700 requires that cleanup levels cannot be more stringent than background.
- iv. However, with the revised MTCA rule effective January 1, 2024, log-normally distributed data sets require using the lower of the 90% percentile or four times the 50% percentile value for the dataset. In the case of chromium in soil for the Site, the 90% percentile was calculated by Ecology at 112 mg/kg, and should be used as the Site-specific cleanup level for chromium in soil, at least for soil biota in the upper 6 feet of the biologically active zone.
 - (1) Ecology calculated the 90% percentile using the general statistics function in EPA's Pro UCL 5.2.
- Therefore, the Site-specific 112 mg/kg CUL total chromium in soil supersedes the TEE value for chromium protective of unrestricted land use 42 mg/kg from Table 749-2 and the Puget Sound background value of 48 mg/kg.
- vi. The total chromium in soil value of 2,000 mg/kg for MTCA Method A, can be used as a remediation level for contaminant concentrations between 6 and 15 feet bgs or deeper than 15 feet bgs. Use of remediation levels at a Site, requires the use of institutional and/or engineered controls memorialized by an environmental covenant or equivalent deed restriction.
- **g.** The Report details the cultural resources consultation process outcomes. Consultation with Department of Archeology and Historic Preservation (DAHP) and affected Tribes occurred before groundbreaking, and an inadvertent discovery plan as stipulated by DAHP is anticipated to be used during the interim action to ensure the applicable plans were followed. When another state agency completes the cultural resources consultation process, Ecology is not currently required to consult about cultural resources.⁶ It appears the cultural resources consultation process used for the Site meets the requirements of Governor's Executive Order 21-02.⁷
- **h.** The health and safety plan and procedures described in the Report appear to meet the requirements of WAC 173-340-830.

⁶ https://ecology.wa.gov/About-us/Payments-contracts-grants/Grants-loans/Find-a-grant-or-loan/Area-wide-groundwater-investigation-grants/Cultural-resources-review

⁷ https://governor.wa.gov/sites/default/files/exe_order/eo_21-02.pdf

- Groundwater Evaluation. Depth to groundwater has been measured in properly constructed monitoring well MW-1 from approximately 13.83 feet below top of casing (TOC) to 17.13 below TOC.
 - i. Based on the additional extent of contamination, Ecology recommends at least three monitoring wells to confirm groundwater compliance with cleanup levels after the excavation is complete. We identified this possibility in our opinion dated November 30, 2021. The expanded monitoring well network seems appropriate based on the larger area of contaminated soil.
 - ii. Groundwater has been sampled from boring B01 at 22 feet bgs and then from properly constructed monitoring well five times, quarterly from February 2022 through March 2023. Site hazardous substances have generally not been detected in groundwater sampled, or at concentrations less than screening levels.
 - iii. At this Site, there is a fair potential for contaminated soils to stay in place exceeding at least one MTCA Method A cleanup level. Long-term monitoring may be required under WAC 173-340-410(3), whenever containment is used as part of the cleanup remedy.
 - iv. The dip tank area of the Site is located within the 10-year travel zone of the supply wells at the facility. The drilled depth for these wells is up to 200 feet deep.
 Groundwater at boring B01 showed only detections of diesel in groundwater, and PCP detected at a J flagged detection. Contaminant concentrations at monitoring MW-1 have not been detected.
- j. Diesel and heavy oil contaminant concentrations should be compared to a single cleanup level, consistent with Ecology's Implementation Memorandum No. 4.⁸
- **k.** Ecology recommends additional Site delineation, both lateral and vertical. This delineation will likely be completed by the proposed cleanup action. After the excavation, additional delineation and/or compliance monitoring of Site hazardous substances in groundwater is anticipated to be needed.
- I. Ecology notes that the Site is located outside of any mapped Washington Department of Fish and Wildlife (DFW) priority habitat species areas. No wetlands appear to be present on or adjacent to the Site.

⁸ https://apps.ecology.wa.gov/publications/SummaryPages/0409086.html

- m. Air/vapor intrusion. Based on the information presented in the Report, all structures are least 30 feet away from the Site. There are no plans to build any new structures at the Site. The air/vapor pathway is incomplete.
- n. Under WAC 173-340-515, cleanups under the Voluntary Cleanup Program (VCP) are considered independent actions conducted without department oversight or approval. Ecology does not provide *approval* of the Report or any work plan for a VCP project. Rather, under WAC 173-340-515(3) we provide our concurrence with the completed or proposed work (or not), supported by non-binding informal advice and technical assistance.⁹
- **o. EIM Data Reminder.** As also mentioned in the Report, please continue to upload all Site data to EIM per WAC 173-340-840(5) and TCP Policy 840. All Site data have to be finalized in EIM prior to issuance of any no further action determination.

⁹ WAC 173-340-515(5)

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2. Establishment of Cleanup Standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site, given the modifications presented in this opinion letter, meet the substantive requirements of MTCA.

a. Points of Compliance. Points of compliance are anticipated to be proposed after the Site has been defined.¹⁰ Ecology concurs with this approach. Ecology currently understands the points of compliance to be thus at the Site:

Media	Points of Compliance	
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. WAC 173-340-740 (6)(d) Currently incomplete – pending additional soil sampling results.	
Soil- Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. WAC 173-340-747 Currently incomplete – pending additional soil and groundwater sampling results.	
Soil – Protective of Ecological Receptors	Based on the protection of ecological receptors, the proposed conditional point of compliance is to six feet bgs. A standard point of compliance is to 15 feet bgs. WAC 173-340-7490. <i>Currently incomplete – pending additional soil sampling results.</i>	
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. WAC 173-340-720(8)(b) Currently incomplete – pending additional soil and groundwater sampling results.	

The air/vapor, surface water, and sediment pathways are incomplete at the Site.

b. Cleanup Levels. Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment. Site cleanup levels are set for the entire Site. Remediation levels may be set in media that are less stringent as supported by a FS/DCA, with Ecology concurrence.

Hazardous Substance	Soil	Soil	Groundwater	Groundwater
	(mg/kg) ¹²	Basis	(μg/L) ¹³	Basis
TPH as gasoline	100	Method A	1,000	Method A
DRO and HRO	460	Table 749-2	500	Method A
Benzene	0.03	Method A	5	Method A
Toluene	7	Method A	1,000	Method A
Ethylbenzene	6	Method A	700	Method A
Total Xylenes	9	Method A	1,000	Method A
Arsenic	20	Method A	8	Background
Barium	1,600	Method B (protection of groundwater)	2,000	ARAR; federal MCL
Chromium (total)	112	TEE	50	Method A
Lead	220	Table 749-2	15	Method A
Mercury	2	Method A	2	Method A
cPAHs as benzo[a]pyrene	0.1	Method A	0.1	Method A
Pentachlorophenol (PCP)	2.5	MTCA Method B cancer direct contact	1.0	ARAR; federal MCL
Dioxin TEQ	5	Table 749-2	30	ARAR; federal MCL
Furan TEQ	3	Table 749-2	30	ARAR; federal MCL

 However, Ecology does not concur that an empirical demonstration has been satisfactorily made at the Site. Depth to groundwater is at approximately 13.83 feet below top of casing (TOC) to 17.13 ft bgs at MW-1. Contamination has mostly been reported between 0 and 3 feet bgs and is never in contact with groundwater.

¹¹ More stringent of protection of groundwater or direct contact

¹² mg/kg = milligrams per kilogram

 $^{^{13}}$ µg/L = micrograms per Liter

- **ii.** Any contamination shallower than at least 13.83 feet bgs should be considered in the vadose zone. For those contaminant concentrations in the vadose zone, should be compared against the most stringent applicable CUL, which is typically protective of the leaching pathway to groundwater (with exceptions like diesel and heavy oil protective of the ecological pathway). The empirical demonstration would be for saturated soils in constant contact with groundwater.
- **iii. TEE path forward**. Ecology previously concurred that a simplified TEE for the Site is appropriate,¹⁴ and that was carried out in the Report.
 - (1) Parcel 14611000000 is approximately 40 acres in size.
 - (2) Ecology previously concurred with the cleanup level of 460 mg/kg for diesel and heavy oil (combined) protective of the ecological pathway as part of the simplified TEE, WAC 173-340-900, Table 749-2.
 - (3) The MTCA Method A and B cleanup levels should be the most stringent for remaining Site contaminants (e.g., cPAHs).
- iv. Remediation levels, following WAC 173-340-355 and WAC 173-340-740(3), and conditional points of compliance for the TEE, following WAC 173-340-7490(4), require institutional and/or engineered controls memorialized by an EC. Between state agencies, the EC can look like an equivalent deed restriction issued in accordance with a memorandum of understanding (MOU) or a formally-recorded EC.
 - (1) However, an EC cannot be used to extend the restoration time frame, when active remedial measures are practicable.
 - (2) Additionally, per the revised MTCA rule effective January 1, 2024, a restoration time frame is not reasonable if an active remedial measure with a shorter restoration time frame is practicable. As the soils are accessible for excavation, Ecology supports deepening and expanding the excavation as needed to remove contaminated soils to meet the CULs listed in the table above.¹⁵ Groundwater compliance will need to be confirmed post-excavation.

¹⁴ Ecology, RE: Further Action at the following Site, April 7, 2020.

¹⁵ WAC 173-340-360(4)(c)(ii)

- v. Ecology notes that the Site is located outside of any mapped Washington
 Department of Fish and Wildlife (DFW) priority habitat species areas. There are also no mapped wetlands at the Site.
- vi. Adjustments to the Site CULs may need to be made for the hazard index and total cancer risk,¹⁶ applicable laws,¹⁷ and terrestrial ecological receptors when those evaluations are completed. When adjustments are needed, a discussion of the hazard index, total cancer risk, applicable laws, and terrestrial ecological receptors should be included when proposing or establishing Method B CULs.
- vii. No surface water or sediment is likely to be impacted by the Site. Absent new data, the surface water and sediment pathways are incomplete.
- viii. Ecology reviewed applicable state and federal requirements and concurs that no adjustments to the cleanup levels and points of compliance presented above are necessary.

3. Selection of Cleanup Action.

Ecology has determined that the remedial investigation may be complete, pending additional compliant soil and groundwater results. We concur a cleanup action can be selected and implemented as an interim action.

The proposed excavation may be taken as an interim action, as the proposal is consistent with WAC 173-340-430. An interim action can be completed without needing approval of the RI, FS/DCA, or dCAP, to allow flexibility to meet the proposed construction schedules for summer 2024, for instance.

Proposed Excavation Comments

MTCA supports permanent cleanup solutions to the extent practicable. Therefore, please consider the following regarding the proposed excavation:

a. The most permanent solution, excavation with off-Site disposal, is proposed to clean up contaminated soils at the Site.

¹⁶ WAC 173-340-705(4)

¹⁷ WAC 173-340-705(5)

- **b.** The contaminated soil will be accessible after logging. Removal of contamination could be completed to at least 6 feet bgs, using the conditional point of compliance protective of the TEE, or 15 feet bgs, the standard point of compliance for soil.
 - Alternately, you may choose to excavate to 3 feet bgs, sample for Site hazardous substances, and continue the excavation to at least 6 feet bgs if contamination remains. Over-excavation of contaminated soils, as they will be accessible, should be completed.
 - **ii.** Additionally, excavation to 6 feet bgs is encouraged immediately if tree root ball depths extend deeper than 3 feet bgs.
- c. The Report proposes sidewall and bottom confirmational soil sampling. Ecology generally concurs with the proposed approach. Additionally, Ecology recommends collection and analysis of discrete soil samples at least once every 10-20 feet along the sidewall and at least every 400 square feet, as provided in the Guidance for Remediation of Petroleum Contaminated Sites, revised June 2016.¹⁸ Per this guidance, soil re-use anywhere that is not a permitted landfill, should follow Tables 12.1 and 12.2.
- **d.** As previously mentioned, Ecology recommends the contingency for expanding the excavation to the northwest and north into the woods. A deeper excavation than proposed may also be necessary to support permanent removal of contamination identified during field screening or based on analytical results or observed depth of tree root zone.

Stockpiled soils

Please document the excavation activities with sufficient photographs and provide those photos as an appendix in a future deliverable. As proposed in the Report, stockpile soils are planned to be profiled and sent to a RCRA Subtitle D landfill, presuming the analytical results show contaminant concentrations are non-hazardous (non-dangerous) waste.

Ecology previously determined¹⁹ that Site soils did not designate as dangerous waste and could be managed without the F032 listing for PCP, as the concentration was less than 8.33 mg/kg for PCP. Additionally, Site soils were not characteristic dangerous waste because of TCLP metals, and soils at this Site were not persistent dangerous waste because PAH total concentration of listed PAH are less than 1.0%.

¹⁸ P. 63-64.

¹⁹ Ecology, RE: Treated Soils at Cedar Creek Corrections Center, Thurston County, April 6, 1999.

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A model remedy, such as soil model remedy #3 or 4,²⁰ may eventually apply at the Site based upon excavation results for any remaining contaminated soil.

Additional Interim Action Considerations

If dioxin/furan contamination extends beyond the proposed footprint, and may be related to potential background concentrations (e.g., from a forest fire), Ecology recommends developing a background value for dioxin/furans using the same approach as that developed for chromium in soil, should dioxin/furans still exceed the proposed cleanup levels at the excavation extents.

4. Implementation of the Cleanup Action

Ecology has determined that your proposed cleanup action, with modifications specified in this letter, will likely meet the substantive requirements of MTCA.

Interim Actions Completed

In 1991, a total of 150 cubic yards of contaminated soil was excavated from the former dip tank area, and land farmed at the facility until December 13, 2017. On that date, 94 tons (60 cubic yards) were removed from the Site and disposed of at Chemical Waste Management's Landfill in Arlington, Oregon.

Post-Excavation Soil Compliance with CULs

Given the overall number of expected soil samples that will be collected during the excavation is over ten, and though direct comparison of final analytical results to CULs is valid, please keep in mind the statistical compliance option.

As a best practice, please ensure sufficient field blanks and duplicates are collected for the soil samples and reported to Ecology.

Post-Excavation Groundwater Compliance Monitoring

Based on the proposed use of an environmental covenant at the Site, post-excavation compliance monitoring would be best supported with at least three total monitoring wells surrounding the excavation extents. New installed wells should be screened at shallow depths (e.g., 13-23 feet bgs) to best capture the seasonal groundwater fluctuations. Ecology recognizes that we previously considered agreeing with only MW-1 based on grab

²⁰ Ecology publication 15-09-043, Model Remedies for Sites with Petroleum Contaminated Soils, revised December 2017.

groundwater results at B-01. Based on the expanded soil contamination footprint, it is important in our opinion to confirm groundwater quality to the north of the former dip tank. These monitoring wells could not previously be installed because of tree cover.

Environmental Covenant

Ecology concurs that an environmental covenant with applicable supporting monitoring plans will likely be necessary at the Site. We concur an EC would be required for the use of a conditional point of compliance, should a standard point of compliance not be ultimately used per the TEE guidance provided earlier in this letter.

Public Notice and Comment Period Update

As the DNR Cedar Creek Corrections Center Site cleanup is in VCP, Ecology will not be finalizing any cleanup action plan. As a point of procedure, the final draft CAP will be the final proposal for any Site cleanup action. Please submit a separate deliverable to document the results of the proposed excavation.

Limitations of the Opinion

1. Opinion Does Not Settle Liability with the State.

Liable persons are strictly liable, jointly, and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

2. Opinion Does Not Constitute a Determination of Substantial Equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

3. State is Immune from Liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70A.305.170(6).

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Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our Voluntary Cleanup Program web site.²¹ If you have any questions about this opinion, please contact me at 360-999-9589 or tim.mullin@ecy.wa.gov.

Sincerely,

Turthy C Mulhi

Tim Mullin, LHG Toxics Cleanup Program Southwest Region Office

TCM/kw

- Enclosure: A Site Description and Site Diagrams B – Document List
- cc by email: Sarah Fees, LG, Landau Associates, <u>SFees@landauinc.com</u> Sierra Mott, Landau Associates, <u>SMott@landauinc.com</u> Jerome Lambiotte, CPG, Ecology, <u>jerome.lambiotte@ecy.wa.gov</u> Ecology Site File

²¹ https://www.ecy.wa.gov/vcp

Enclosure A

Site Description and Site Diagrams

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Site Description

The Property consists of one Thurston County parcel, 14611000000. The parcel is about 40 acres in size.

Property History and Current Use: The Property has been used as a prison for decades and land use is planned to continue as the same for the foreseeable future.

Property Vicinity: The Site is located in a forest located on the east side of Capitol Forest near the unincorporated town of Littlerock.

Soils and Geology: To the maximum depth explored of approximately 35 feet bgs, the Site is primarily underlain by clays with some sand, silt, and gravel.

Groundwater: To date, groundwater has been encountered in lone Site monitoring well MW-1, between 13.83 feet TOC and 17.13 feet TOC. Groundwater was also encountered at 22 feet bgs in boring B01, which was replaced by MW-1.

Surface/Storm Water/Septic Systems/Wetlands: There is no surface water or sediment at the Site. There are no septic systems at the Site. There are no mapped wetlands at the Site. Mill Creek is the nearest surface water, located about 0.25 miles northeast of the Site.

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Site Diagrams

Figure 3	Investigation Locations: Dip Tank and Landfarm Areas.
Figure 4	Excavation Areas

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Enclosure B

Document List

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Document List

- 1. Landau Associates (Landau), RI/FFS/CAP, January 18, 2024.
- 2. Ecology, RE: Technical Assistance at the following Site, November 30, 2021.
- 3. Landau, Technical Memorandum, 2021 Additional Investigations Results, June 30, 2021.
- 4. DAHP, RE: Cedar Creek Corrections Dis Tank Soil Sampling Project, December 8, 2020.
- 5. Ecology: RE: Further Action at the following Site, April 7, 2020.
- 6. Landau, Cedar Creek Site Investigation Report, June 29, 2019.
- 7. Ecology: RE: Technical Assistance, April 6, 1999.
- 8. DNR, Final Site Investigation Report, December 8, 1988.