



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office  
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

May 6, 2024

Rich Hoey  
Assistant City Manager  
Public Works Department  
City of Olympia  
PO Box 1967  
Olympia, WA 98507-1967  
[rhoey@ci.olympia.wa.us](mailto:rhoey@ci.olympia.wa.us)

**Re: Requirement for additional groundwater sampling at the following Site:**

- **Site Name:** West Olympia Landfill
- **Site Address:** Hwy 101 & Black Lake Blvd Olympia
- **Facility/Site ID:** 1425
- **Cleanup Site ID:** 4807
- **Agreed Order:** DE 13793

Dear Rich Hoey:

Thank you for your revisions for the draft Cleanup Action Plan (dCAP) and Agreed Order (AO) with the Department of Ecology (Ecology). Before we can finalize the CAP and AO, additional groundwater samples must be collected for per- and polyfluoroalkyl substances (PFAS).

PFAS Sampling: Ecology recently published guidance for investigating and remediating PFAS contamination in Washington State.<sup>1</sup> According to the Interstate Technology Regulatory Council (ITRC, 2022), landfills can be sources of PFAS to the environment.<sup>2</sup> Therefore, it is necessary to sample for PFAS at the West Olympia Landfill to ensure it is not a contaminant of concern at the Site. To begin the investigation of PFAS at the Site, please prepare a sampling and analysis plan (SAP) for collecting groundwater samples for PFAS at monitoring wells LAI-MW-2 and LAI-1.

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<sup>1</sup> Ecology, 2023, *Guidance for Investigating and Remediating PFAS Contamination in Washington State*, Toxics Cleanup Program Publication No. 22-09-058, June.

<sup>2</sup> Interstate Technology Regulatory Council (ITRC), 2022, *Technical Resources for Addressing Environmental Releases of Per- and Polyfluoroalkyl Substances (PFAS)*, <https://pfas-1.itrcweb.org/> June.

The SAP shall include quality assurance and quality control (QA/QC) measures specific for PFAS sampling with the following:

- Samples must be analyzed for the standard list of the 40 PFAS under EPA Method 1633. As noted by EPA Method 1633 (2024)<sup>3</sup>, the full list is more suitable to wider environmental surveillance (including landfill leachates) rather than the smaller list traditionally used for fire-fighting training area investigations.
- If positive displacement pumps will be used, please confirm that they do not contain Teflon® or polytetrafluoroethylene (PTFE). We assume that no dedicated pumps or tubing are in use. If there are dedicated pumps/tubing, then special decontamination procedures would need to be used.
- Refer to Ecology's PFAS guidance document as you prepare the SAP.

**Submit the SAP for Ecology review and approval within 60 days of the date of this letter.**

If you have any questions regarding this letter, please contact me at 360-819-0460 or [john.pearch@ecy.wa.gov](mailto:john.pearch@ecy.wa.gov).

Sincerely,



John Pearch, LHG  
Cleanup Project Manager/Hydrogeologist  
Toxics Cleanup Program  
Southwest Region Office

cc by email: Mike Reid, City of Olympia, [mreid@ci.olympia.wa.us](mailto:mreid@ci.olympia.wa.us)  
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Ecology Site File

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<sup>3</sup> January 2024, Method 1633, Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS, U.S. Environmental Protection Agency Office of Water (4303T) Office of Science and Technology Engineering and Analysis Division, EPA 821-R-24-001, <https://www.epa.gov/system/files/documents/2024-01/method-1633-final-for-web-posting.pdf>