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**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
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May 28, 2024

Inger Jackson
Mott MacDonald
1601 5th Avenue, Suite 800
Seattle, WA 98101
inger.jackson@mottmac.com

**Re: Request to Discontinue Groundwater Monitoring at DBA-MW-8 and DBA-MW-9
and to Revise Site Boundary**

Site name: Citifor Inc
Site address: 13120 Tilley Road South, Olympia, Thurston County, WA 98512
Facility/Site ID: 1391
Cleanup Site ID: 754

Dear Inger Jackson:

The Department of Ecology (Ecology) received the "2024 Annual DNT Cleanup Action Groundwater Monitoring Report," dated May 17, 2024, for the above referenced Site. In this report, you recommended the following:

- Continue groundwater quality monitoring for nitroaromatics + nitroamines annually, consistent with the Performance Groundwater Quality Monitoring Plan (ASPECT Consulting 2009), with the exception of wells DBA-MW-8 and DBA-MW-9 where water quality has achieved the Site total dinitrotoluene (DNT) groundwater cleanup level and monitoring can be discontinued in accordance with the Performance Groundwater Quality Monitoring Plan.
- Collect a field duplicate at one of the Mix House Area wells for future monitoring events, as field duplicate samples have historically been collected at DBA-MW-9.
- Conduct the next annual monitoring event in January when seasonally high concentrations have been observed.

Ecology **concurs** with the recommendations above. The groundwater cleanup level for total DNT has been achieved for four consecutive sampling events at DBA-MW-8 and DBA-MW-9. Therefore, monitoring of these wells can be discontinued.

In the “2024 Annual DNT Cleanup Action Groundwater Monitoring Report,” dated May 17, 2024, you also recommended the following regarding the Site boundary:

- The definition of the Citifor Site boundary, or Citifor Remediation Area, be reduced as groundwater quality in the Drum Burial Area has been achieved.
- The proposed Site boundary revision, depicted in Figure 1 of the report, was developed using Geographic Information System (GIS) to identify the centroid of the Mix House Area wells and a 500-foot polygon centered on that location that encompasses the monitoring wells.

Ecology **does not concur** with revising the Site boundary. Agreed Order DE 6901, Section IV, defines the Site as “the extent of contamination caused by the release of hazardous substances at the Site.” Ecology interprets the extent to be the maximum extent of the release and we do not change that definition. It is Ecology’s policy not to change the boundary of a Site once it has been established.

If you have any questions, please contact me at (360) 409-6164 or danielle.gibson@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle K. Gibson", with a long horizontal flourish extending to the right.

Danielle Gibson
Site Manager/UECA Coordinator
Toxics Cleanup Program
Southwest Region Office

cc by email: Scott Hooton, Port of Tacoma, shooton@portoftacoma.com
Grant Hainsworth, CRETE Consulting, grant.hainsworth@creteconsulting.com
Andrew Smith, Ecology, andrew.smith@ecy.wa.gov
Ecology Site File