



First Periodic Review Columbia Square Properties

320 Columbia St NW, Olympia

Facility Site ID: 91682829, Cleanup Site ID: 6851

Toxics Cleanup Program, Southwest Region

Washington State Department of Ecology
Lacey, Washington

November 2024

Document Information

This document is available on the Department of Ecology's [Columbia Square Properties cleanup site page](#).¹

Related Information

- Facility Site ID: 91682829
- Cleanup Site ID: 6851

Contact Information

Toxics Cleanup Program

Southwest Region Office
Tim Mullin, LHG
Cleanup Project Manager
PO Box 47775
Olympia, WA 98504
Email: tim.mullin@ecy.wa.gov
Phone: 360-999-9589

Website: [Washington State Department of Ecology](#)²

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact the Ecology ADA Coordinator by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#)³ for more information.

¹ <https://apps.ecology.wa.gov/cleanupsearch/site/6851>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
---	---	---------------------------------------	---------------------------------------

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Table of Contents

Introduction	1
Summary of Site Conditions	2
Site description and history	2
Site investigations.....	2
Cleanup actions	3
Groundwater monitoring.....	3
Cleanup standards	4
Environmental/Restrictive Covenant.....	4
Periodic Review	5
Effectiveness of completed cleanup actions	5
New scientific information for individual hazardous substances or mixtures present at the Site	7
New applicable state and federal laws for hazardous substances present at the Site.....	7
Current and projected Site and resource uses	7
Availability and practicability of more permanent remedies	7
Availability of improved analytical techniques to evaluate compliance with cleanup levels.....	8
Conclusions	8
Next review.....	9
Cleanup Levels Table	9
References	10
Attachment A. Vicinity Map	11
Attachment B. Site Plan	12
Attachment C. Photo Log	13

Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Columbia Square Properties cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA), Chapter 70A.305 revised code of Washington (RCW) and Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP), resulting in a Property-specific no further action opinion letter issued on December 15, 2015. Residual concentrations of total petroleum hydrocarbons (TPH) in the gasoline range (TPH-G), TPH in the diesel range (TPH-D), and TPH in the heavy oil range (TPH-O), benzene, lead, and mercury into Site soils. Additionally, residual carcinogenic polycyclic aromatic hydrocarbons (cPAHs) are present in Site soil and groundwater. At one time during the cleanup, these contaminant concentrations exceeded MTCA cleanup levels and residual contamination remains on the property. The MTCA cleanup levels for soil and groundwater are established under [WAC 173-340-740](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740)⁴ and [WAC 173-340-720](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720),⁵ respectively.

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. [WAC 173-340-420\(2\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420(2))⁶ requires Ecology to conduct a periodic review of certain sites. For this Site, a periodic review is required because institutional and engineered controls are required at the Site to ensure the remedy remains protective. As this is an independent cleanup conducted under the VCP, the periodic review occurs as resources permit.⁷ Due to staffing shortages and the pandemic, Ecology did not have resources to complete the periodic review at this site from the originally scheduled periodic review in September 2020 until the date of the periodic review process early notification letter, which was issued on August 14, 2023.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

- a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site.
- b) New scientific information for individual hazardous substances or mixtures present at the site.
- c) New applicable state and federal laws for hazardous substances present at the site.

⁴ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720>

⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420>

⁷ WAC 173-340-420(2)

- d) Current and projected site and resource uses.
- e) The availability and practicability of more permanent remedies.
- f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

Ecology publishes a notice of all periodic reviews in the *Site Register* and provides an opportunity for public comment.

Summary of Site Conditions

A detailed Site description and history, site investigations summary, and cleanup actions summary are found in the various documents associated with CSID 6851. A brief summary of each is presented here.

Site description and history

The Site is the location of the former Columbia Street Manufactured Gas Plant (MGP), located at 320 Columbia Street NW in Olympia, Thurston County, Washington. The Property is Thurston County parcel 78500200100, and is currently owned by the Condominiums at Columbia St LLC. The Condominiums at Columbia St LLC is in turn owned by Evergreen Olympia Properties Inc, which is owned by Patrick Rants, whom Ecology contacted as the property owner for this periodic review.

Property cleanup activities have been administered by Puget Sound Energy (PSE) and its consultants, as a legacy cleanup property. Starting in 1908, the Site operated as a MGP for about 16 years before it was converted into a gas storage facility; receiving coal gas that was manufactured in Tacoma. During the 1950s, the manufactured gas storage operations had ceased at the Site. After closing the gas storage operation, the property was used as a warehouse until the 1970s and then was used as retail office space. The property has been a vacant lot since at least 2006 and has been used for parking. The property is currently unpaved, with the exposed gravel cap visible.

From the time the Property-specific NFA opinion letter was issued in September 2015 until about 2021, the plan was to develop the property into a condominium tower, with two floors of open area parking overlain by at least four floors of residences. However, the plans to develop this project are now on hold for the foreseeable future.

A vicinity map is in Attachment A, and a Site plan is in Attachment B.

Site investigations

In 1990, Estern Geotechnical, Inc. (Estern) conducted the removal of a 1,000-gallon underground storage tank (UST). Soil sampled from the UST excavation was analyzed for TPH,

benzene, toluene, ethylbenzene, and xylenes. The analytical results for the excavation bottom exceeded the soil cleanup level of 100 milligrams per kilogram (mg/kg) for TPH as gasoline. Estern allowed the excavation bottom soils to aerate for one week and then collected new samples and analyzed them; the new soil results were reported at 11 mg/kg for TPH as gasoline. The excavation was backfilled to the original grade.

From 2006 until 2011, four investigations have been conducted to delineate the extent of the soil and groundwater contamination.

In February 2009, Ecology provided a Further Action at a Property Opinion Letter for the Property. Ecology recommended additional monitoring wells to further define Site contamination and the extents of the contamination plume in groundwater. A total of sixteen monitoring wells have been drilled at the Site. At the time of the no further action opinion letter issued in September 2015, five monitoring wells remained at the Site (MW-6, MW-10, MW-14, MW-15, and MW-16). See Attachment B for a Site plan showing the monitoring well locations.

Cleanup actions

In October 2010, GeoEngineers submitted a draft Cleanup Action Plan (dCAP) for Ecology review and revised their plan in July 2012 based on two additional investigations and a data analysis of a previous investigation. Based on GeoEngineers' analysis, the most wide-spread contaminant was cPAHs. GeoEngineers estimated that ninety-four percent of the total cPAH contaminant mass was within 6 feet of the ground surface (see Figure 4). In their feasibility study and disproportionate cost analysis (FS/DCA), GeoEngineers evaluated three cleanup alternatives. The selected cleanup alternative for the Site was alternative 3, excavation of soil to a maximum depth of 6 feet below ground surface (bgs) using sloped excavation sidewalls around the Property perimeter to protect the integrity of surrounding structures. Ecology concurred with the FS/DCA results and concurred with the dCAP.

In October 2012, GeoEngineers implemented the preferred cleanup alternative on the Property, and excavation and disposal of contaminated soil to six feet bgs occurred. A total of approximately 4,400 tons of material were removed from the Property between October 10-26, 2012. During the excavation, an artesian well was uncovered and properly decommissioned as part of the process. The excavation was backfilled to six feet bgs with structural backfill.

Groundwater monitoring

Groundwater monitoring has occurred at the Site since 2008. A total of 16 monitoring wells have been installed over the course of the cleanup. Depth to groundwater at the Site is shallow, ranging from approximately 4 to 6 feet bgs. Site groundwater flow direction is generally flat, with a slight west-northwest component, towards Budd Inlet of Puget Sound. Site shallow

groundwater is not used, and the environmental covenant restricts use of Site shallow groundwater per section 2.c.

Five monitoring wells, MW-6, MW-10, MW-14, MW-15, and MW-16, were present post-excavation. All other monitoring wells were properly decommissioned. The five remaining monitoring wells were sampled on a frequency of once every 18 months, consistent with the groundwater monitoring compliance plan for the Site. This plan was a requirement included with the environmental covenant and needed to obtain the Property-specific no further action. After issuing the no further action, groundwater compliance monitoring occurred from 2016-2018, until Ecology concurred with decommissioning the monitoring wells ahead of anticipated construction, which was originally scheduled to start in spring 2019. During the long-term compliance monitoring period, only cPAHs were detected in groundwater at monitoring well MW-14, and those concentrations were less than the MTCA cleanup levels.

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site.

[WAC 173-340-704](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704)⁸ states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site (standard point of compliance).

For groundwater, a standard point of compliance (meeting cleanup levels throughout the Site) was established.

Environmental/Restrictive Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human

⁸ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>

health and the environment. On July 23, 2015, institutional controls in the form of an [environmental covenant](#)⁹ were recorded for the Site.

The environmental covenant recorded for the Site imposes the following limitations:

1. Limitations on extraction of groundwater.
2. Containment of residual contaminants in soil by use and maintenance of a six foot thick structural fill cap.
3. Continued long term groundwater compliance monitoring.

Periodic Review

Site Visit

Along with representatives of Puget Sound Energy (PSE) and their environmental consultant, GeoEngineers, Ecology inspected the Site during a visit on October 18, 2023.

During the Site visit Ecology conducted on October 18, 2023, Ecology observed current Site conditions are similar to those at the time of issuance of the no further action opinion letter in 2015. That is, with the exception that the Site monitoring wells were decommissioned, which was done in 2019, with Ecology concurrence.

Originally, the vacant lot was to be re-developed into a condominium tower with two floors of open-air parking overlain by at least four floors of residences. This construction footprint would have destroyed the monitoring wells. However, due to the COVID-19 pandemic and macroeconomic factors, the building was not built.

The Property is currently vacant and operating as a parking lot. There are no current plans to develop the property. Two mystery monitoring wells were identified during the Site visit in the sidewalk along the south side of Thurston Avenue. These two monitoring wells, per PSE and GeoEngineers during the October 18, 2023 site visit, were not installed related to CSID 6851. The purpose of the monitoring well installation or who did the installation is currently unconfirmed, but is suspected to be part of the Double Tree Olympia (former Phoenix Inn; CSID: 5257) cleanup site, located across Thurston Avenue to the north of CSID 6851. A site visit photo log is included as Attachment C.

Effectiveness of completed cleanup actions

Direct contact

⁹ <https://apps.ecology.wa.gov/cleanupsearch/document/83410>

The cleanup actions were intended to eliminate exposure to contaminated soil at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by excavation of contamination to 6 feet below ground surface, and installation of a 6 foot cap of clean fill. The cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time.

Protection of groundwater

Soils with TPH-G, TPH-D, TPH-O, benzene, lead, mercury, and cPAHs at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. It is important to note that Ecology determined that the total arsenic in groundwater at the Site was more likely than not naturally occurring. Long term groundwater monitoring occurred from 2015-2019, at five locations, monitoring wells MW-6, MW-10, MW-14, MW-15, and MW-16. These monitoring wells surrounded the contaminated soils. These wells were monitored until Ecology concurred with the request to decommission them in early 2019, anticipating property construction. This was done to protect groundwater from potential construction activities and to prevent the monitoring wells acting as a preferential conduit due to construction stormwater runoff. Ecology provided groundwater monitoring well decommissioning plan comments in a letter dated July 1, 2018 and provided the final conditional response to the well decommissioning in a letter dated August 6, 2019.

Based on GeoEngineers' latest technical memorandum, no additional long term groundwater monitoring is proposed for the property-specific remedy. The five decommissioned monitoring wells would not be replaced.

Protection of Air

Soils with TPH-G, TPH-D, TPH-O, benzene, lead, mercury, and cPAHs at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. Additionally, remaining residual petroleum hydrocarbons are more than 30 feet from any current building. Other contaminants in soil (metals, cPAHs) are nonvolatile, and fugitive dust was considered in project development plans, should the cap be disturbed. Fugitive dust is not a concern as long as the cap remains in place. If construction proceeds at the Site, depending on the type of geotechnical piles advanced at the Site, piercing of the cap may occur, and fugitive dust concerns may need to be re-evaluated.

Institutional controls

Institutional controls in the form of an environmental covenant were implemented at the Site in 2015. The covenant remains active and discoverable through the Thurston County Assessor's office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the covenant. This covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of

the property that is inconsistent with the covenant, unless approved by Ecology in advance. This covenant ensures the long-term integrity of the cleanup action will be protected.

Site-specific Cleanup Outcomes

Soils with TPH-G, TPH-D, TPH-O, benzene, lead, mercury, and cPAHs at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. Groundwater was monitored at five monitoring wells prior to decommissioning in 2019. Site cleanup is ongoing.

Ecology notes that at least four compliant consecutive groundwater monitoring events have been achieved over a duration of several years, at each of the five decommissioned monitoring wells which were used for long term groundwater monitoring. It is Ecology's opinion that no additional long term groundwater monitoring is needed in support of the property-specific cleanup and remedy. The remaining contaminated soil left in place has not impacted groundwater quality. Additional groundwater monitoring for the Site cleanup may be necessary.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected Site and resource uses

The Site is used for commercial purposes, as a parking lot. The proposed residential construction is on hold for the foreseeable future. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included partial removal and containing remaining Site hazardous substances, and the selected remedy continues to be protective of human health and the environment.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- Groundwater compliance monitoring at the Property, including long term groundwater monitoring conducted from 2016-2018, demonstrates that concentrations of all Site hazardous substances in groundwater remain at concentrations less than the MTCA cleanup levels.
- The environmental covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.
- Groundwater monitoring may resume as part of the Site cleanup. However, sufficient groundwater monitoring has been done to show that remedy for the Property cleanup remains protective and additional long term groundwater monitoring is no longer needed related to the Property-specific no further action (NFA).
- Two new monitoring wells have been installed on the north side of the Property, presumably for the cleanup to the north.
- Site cleanup is ongoing.

Based on this periodic review, Ecology has determined the requirements of the environmental covenant for the Property are being sufficiently followed. No additional cleanup actions on the Property are required at this time. The cap remains in place and functioning as intended. The two new monitoring wells identified in the sidewalk along the south side of Thurston Avenue may also be potentially used for long term groundwater compliance monitoring. However, best practices would be to identify the owner of the monitoring wells and pursue access to those monitoring wells via an agreement for them to be sampled. Site cleanup is ongoing.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

Cleanup Levels Table

Table 1. Cleanup levels for soil and groundwater contaminants

Contaminant	Soil cleanup level (mg/kg)	Groundwater cleanup level (µg/L)
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000
TPH - Gasoline	30	800
TPH – Diesel and Heavy Oil	2,000	500
Lead	250	15
Mercury	2	2
cPAHs	0.1	0.1

µg/L = micrograms per liter

mg/kg = milligrams per kilogram

TPH = total petroleum hydrocarbons

References

GeoEngineers, Inc. (GeoEngineers), Re: Former Olympia Manufactured Gas Plant (MGP) Property (Columbia Street Properties) – Groundwater Compliance Monitoring Termination Request, April 19, 2024.

Ecology, Site Visit, October 18, 2023.

GeoEngineers, Groundwater Compliance Monitoring Modification Request, May 13, 2019.

GeoEngineers, Groundwater Monitoring Well Decommissioning Plan, June 8, 2018.

GeoEngineers, Groundwater Monitoring Technical Memorandum, April 5, 2018.

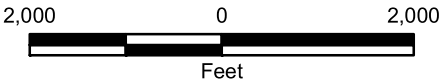
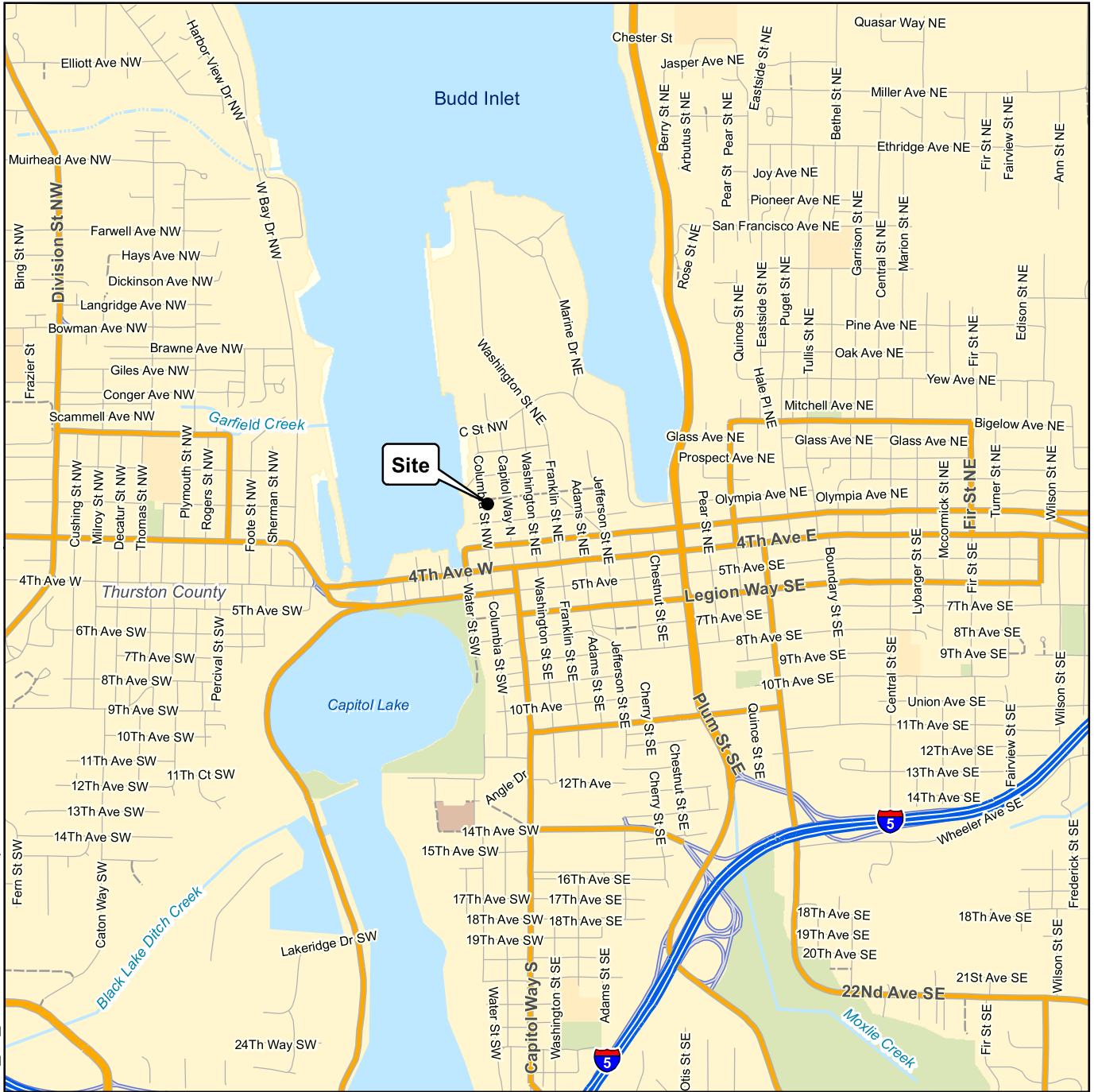
Ecology, Re: No Further Action Determination opinion letter, September 15, 2015.

Ecology, Environmental Covenant, recorded July 23, 2015.

GeoEngineers, Cleanup Action Report, January 4, 2013.

Attachment A. Vicinity Map

Office: SEA Path: \\seal\projects\010186774\GIS\018677400_F1_VM.mxd Map Revised: 14 October 2011 amanza

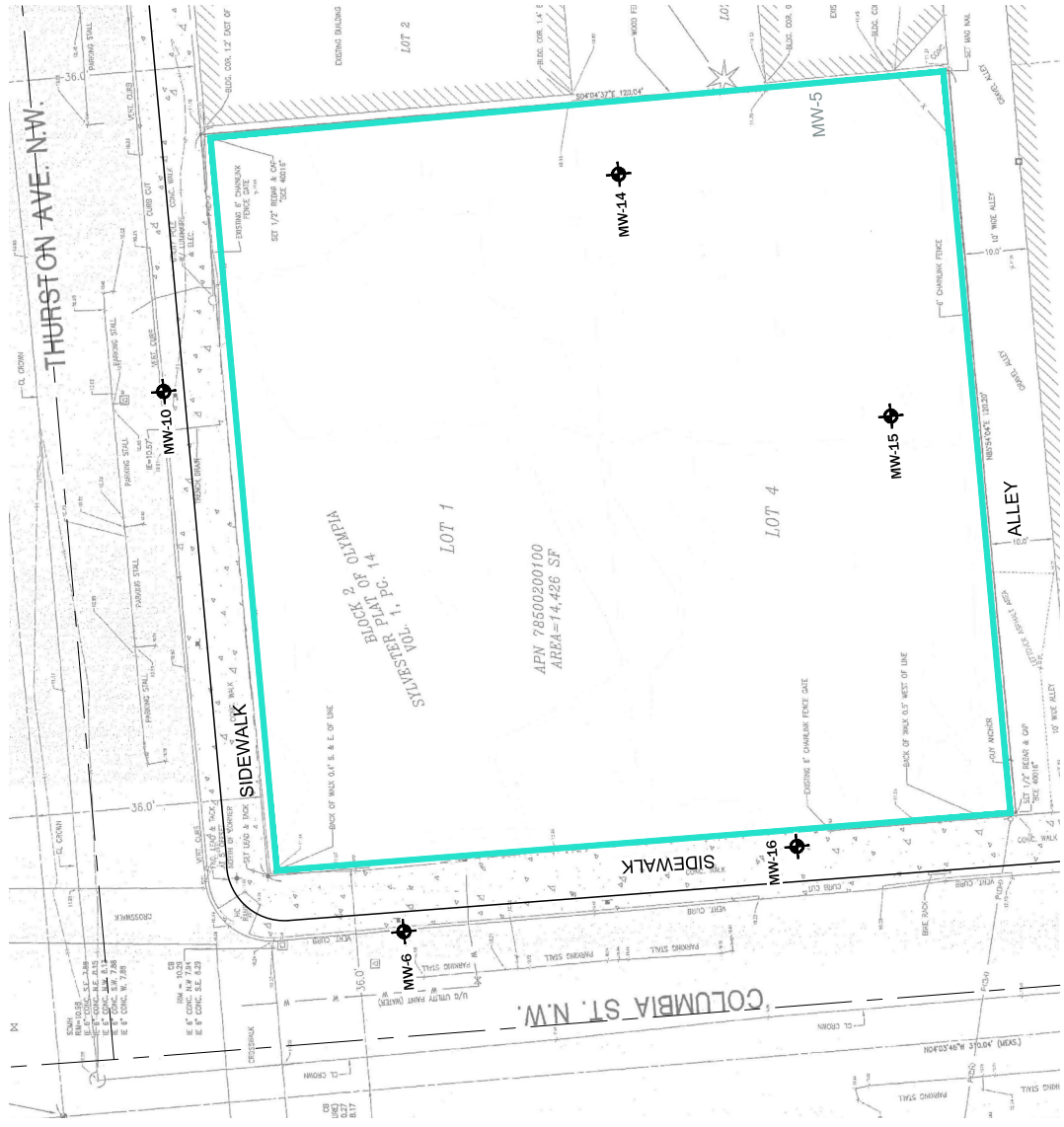


- Notes:
1. The locations of all features shown are approximate.
 2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
 3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.

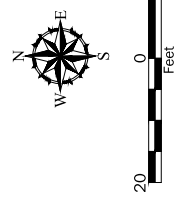
Data Sources: ESRI Data & Maps, Street Maps 2005
 Transverse Mercator, Zone 10 N North, North American Datum 1983
 North arrow oriented to grid north

Vicinity Map	
Former Olympia MGP Site Olympia, Washington	
	Figure 1

Attachment B. Site Plan



- Legend**
- Property boundary
 - Existing building
 - Existing fence
 - Monitoring well to be decommissioned



Notes:

- The locations of all features shown are approximate. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.
- The locations of all features shown are approximate. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.

The content of this drawing is the property of GeoEngineers, Inc. and will serve as the official record of this communication.

Data Source:
Background from Barghausen Consulting Engineers, dated 3/25/2012.

Existing Monitoring Well Locations to be Decommissioned
Former Olympia MGP Site Olympia, Washington
Figure 2

Attachment C. Photo Log

Photo Log

Facility name: Columbia Square Properties

CSID: 6851

Date: 10/18/23

Photographer: Tim Mullin

Lead Inspector: Tim Mullin

Camera Type/Model: iPhone 11

Page 1 of 4

Photograph	Description
	<p>Property, looking northeast.</p>
	<p>Typical condition of six foot thick structural fill cap.</p>

Photo Log

Facility name: Columbia Square Properties

CSID: 6851

Date: 10/18/23

Photographer: Tim Mullin

Lead Inspector: Tim Mullin

Camera Type/Model: iPhone 11

Page 2 of 4



Photograph	Description
	<p>Decommissioned MW-16 and sidewalk west side of property.</p>
	<p>MW-6 decommissioned, looking southwest across Columbia St NW from Property.</p>

Photo Log

Facility name: Columbia Square Properties

CSID: 6851

Date: 10/18/23

Photographer: Tim Mullin

Lead Inspector: Tim Mullin

Camera Type/Model: iPhone 11

Page 3 of 4



Photograph	Description
 A photograph showing a street intersection. In the foreground, a red car is partially visible on the right side. A long shadow of a street light pole is cast across the asphalt. In the background, there is a multi-story brick building with several windows and a covered entrance area. The sky is clear and blue.	<p>MW-10 decommissioned, looking north across Thurston Avenue from Property.</p>
 A photograph of a parking lot filled with several cars. In the background, there is a long, low building with a flat roof. The sky is bright blue with the sun visible in the upper left quadrant. The ground is asphalt with white parking lines.	<p>Property and Site, looking south.</p>

Photo Log

Facility name: Columbia Square Properties

CSID: 6851

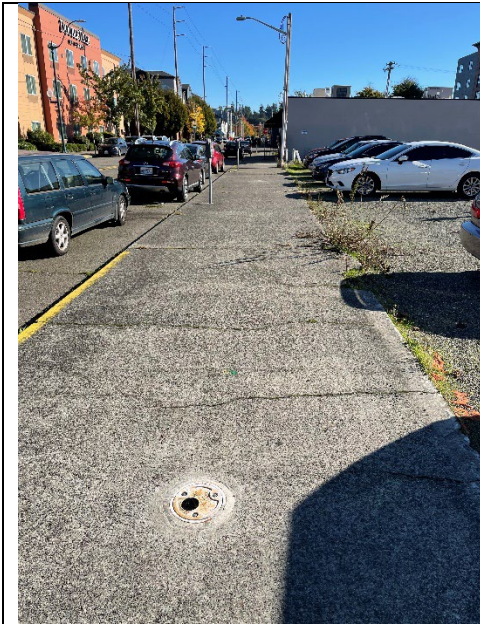
Date: 10/18/23

Photographer: Tim Mullin

Lead Inspector: Tim Mullin

Camera Type/Model: iPhone 11

Page 4 of 4



Mystery monitoring well #1, in sidewalk along Thurston Avenue.



Mystery monitoring well #2, in sidewalk along Thurston Avenue.

