

COPY



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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

April 16, 2025

Nate Dorfner  
Landau Associates  
155 NE 100th St, Ste 302  
Seattle, WA 98125  
[NDorfner@landauinc.com](mailto:NDorfner@landauinc.com)

Re: **Request to Discontinue Groundwater Monitoring at MW-09, MW-20-7, and MW-21-7 and Decommission Wells**

**Site name:** Lewis County Central Shop  
**Site address:** 109 Forest Napavine Rd E, Chehalis, Lewis County, WA 98532  
**Facility/Site ID:** 55886223  
**Cleanup Site ID:** 7098

Dear Nate Dorfner:

The Washington State Department of Ecology (Ecology) received your email on February 28, 2025, requesting to discontinue long-term groundwater monitoring at monitoring wells MW-09, MW-20-7, and MW-21-7 and decommission these wells at the above referenced Site.

I have reviewed the Draft 2024 Annual Report, dated February 13, 2025, and other available Site documents. My review indicated the following:

- Groundwater monitoring is being conducted on an annual basis in accordance with the Cleanup Action Work Plan (Aspect Consulting, LLC 2010).
- The current monitoring well network includes six monitoring wells (MW-01R, MW-09, MW-18d, MW-20-7, MW-21-7, and PT-6-7) and three out-of-service water supply wells. However, out-of-service water supply well Burkhart 19L4 has not been sampled during the last two annual events as the well was not pumping, as reported by the property owner.
- Once cleanup levels are met at a given monitoring well during the annual sampling event and the 95 percent upper confidence limit (UCL) for the current and upcoming

year indicate that concentrations will continue to be below cleanup levels, the individual well is recommended to transition to a quarterly monitoring frequency. If the concentrations in the well and the 95 percent UCL remain below cleanup levels for four consecutive quarterly monitoring events, and the time series plot trend is not significantly positive, the well may become eligible for decommissioning, pending Ecology approval.

- Based on results from the September 2023 annual sampling event, monitoring wells MW-09, MW-20-7, and MW-21-7 were sampled during each quarter in 2024 and are recommended by Landau Associates for removal from annual monitoring and decommissioning.
- Results for monitoring wells MW-09, MW-20-7, and MW-21-7 have shown concentrations of contaminants of concern (COCs) as non-detect or below cleanup levels for each quarter in 2024 and during the annual sampling event in September 2023. COCs analyzed for included tetrachloroethene (PCE), trichloroethene (TCE), 1,1-dichloroethene (1,1-DCE), and vinyl chloride (VC). In addition, the 95% UCL evaluation for these wells for 2024 and for the 2025 prediction show all results below the cleanup level for PCE, TCE, and 1,1-DCE. VC concentrations have been non-detect in these wells since at least 2010.

Ecology **approves** of your request to discontinue groundwater monitoring at MW-09, MW-20-7, and MW-21-7 and decommission these wells. Monitoring wells should be decommissioned in accordance with [WAC 173-160](#). Ecology has also reviewed the Draft 2024 Annual Report and does not have any comments.

Please note that since COCs remain in soil on the Site at concentrations exceeding cleanup levels, groundwater monitoring of the three remaining monitoring wells will need to continue indefinitely until it can be demonstrated that COC concentrations in soil are below cleanup levels.

Also, according to the 2009 Cleanup Action Plan (CAP), restrictive covenants were to be implemented to prohibit the installation of drinking water wells until cleanup levels are met. Deed restrictions were also to be implemented to ensure protection of workers performing invasive work, and to implement periodic inspection and maintenance of surface features that limit infiltration and protect terrestrial ecological receptors in areas where COC concentrations in soil exceed cleanup levels and/or concentrations of ecological concern. Ecology does not have any documentation that an environmental covenant has been recorded for this property.

Ecology requests that a copy of the environmental covenant be provided. If an environmental covenant has not been recorded, Ecology requests that you initiate this process.

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

Sincerely,



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

cc by email: Tina Correia, Lewis County, [tina.correia@lewiscountywa.gov](mailto:tina.correia@lewiscountywa.gov)  
Josh Metcalf, Lewis County, [josh.metcalf@lewiscountywa.gov](mailto:josh.metcalf@lewiscountywa.gov)  
Katie Gauglitz, Landau Associates, [kgauglitz@landauinc.com](mailto:kgauglitz@landauinc.com)  
Connie Groven, PE, Ecology, [connie.groven@ecy.wa.gov](mailto:connie.groven@ecy.wa.gov)  
Ecology Site File

**References:**

Aspect Consulting, LLC. 2009. Lewis County Central Shop, Cleanup Action Plan. May 8.

Aspect Consulting, LLC. 2010. Lewis County Central Shop, Cleanup Action Work Plan.  
February 10.

Landau Associates. 2025. Draft 2024 Annual Report, Lewis County Central Shop, 109 Forest  
Napavine Road, Chehalis, Washington. February 13.