

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** ["Nick Hoffman"](#)  
**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum  
**Date:** Tuesday, May 20, 2025 9:26:25 AM  
**Attachments:** [Site Plan Map.pdf](#)

---

Hi Nick,

Thank you very much for your Technical Memorandum (TM) providing responses to Ecology's questions and comments. That document was very helpful.

Unfortunately, Ecology has concluded that the distances between locations TE-GW-13 and MW-104 (20 feet) and B-2 and MW-2A (17 feet) are too far to be considered co-located. Hence, we cannot conclude that the more current groundwater data at locations MW-104 and MW-2A supersede the historical data from locations TE-GW-13 and B-2. We therefore request groundwater sampling as close as possible to historical locations TE-GW-13 and B-2 to verify that the petroleum in groundwater at these locations is no longer present at concentrations above cleanup levels. Although we concur that the sampling method at TE-GW-13 in 1990 was non-optimal, we believe that the sample was sufficient to demonstrate apparent high concentrations of petroleum in groundwater at this location. Provided the current results at these locations are below cleanup levels, we anticipate that one groundwater sample at each of these two locations would likely be sufficient to close out this concern. Direct push sampling could be considered for this data request.

As discussed during the Intake Meeting, there are many potential recognized environmental conditions (RECs) or historical activities of potential concern on the Property, and Ecology is not providing concurrence on due diligence efforts to characterize these RECs. We anticipate including language in our ultimate opinion letter such as the following:

*Ecology's opinion pertains to the identified contamination releases at the Site. Several areas of potential environmental concern were identified during due diligence efforts conducted at the Site. Ecology is not providing any opinions herein regarding the sufficiency of efforts to characterize these potential concerns. Prior to any redevelopment of the Property for other uses, additional due diligence investigations may be warranted.*

However, our ISIS database currently indicates that surface water contamination is suspected at the Site. The pond located on the Property appears to have received discharges (see attached Figure 4, which shows two oil/water separators adjacent to the pond). Therefore, Ecology needs additional data prior to closing out this potential concern. We request the collection of two shallow sediment samples from the pond downstream of these oil/water separators. These sediment samples should be analyzed for petroleum via NWTPH-Dx. Hopefully this will provide sufficient data to close-out this concern. If screening level/cleanup level exceedances are found, then additional investigations would likely be needed.

Ecology has one clarification comment on Table Revised RI/CAP Table 6. Rather than referring the last column as "Sum" we suggest that it be labeled as "Total CPAHs" and to add a footnote indicating the Total CPAHs were calculated consistent with Ecology's guidance based on Benzo(a)pyrene (BAP) toxicity equivalents. We are not request reissue of this TM, but rather incorporation of this comment in any future submittals.

Please forward the results from MW-2A (within a comprehensive data table) when they are

available.

Also, please let me know if you have any questions regarding this email.

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager  
Department of Ecology – Toxics Cleanup Program  
1250 W. Alder Street, Union Gap, WA 98903  
(509) 424-0543 (cell)

[Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov)

---

**From:** Nick Hoffman <nhoffman@soundearthinc.com>

**Sent:** Monday, May 19, 2025 3:10 PM

**To:** Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

External Email

Frank,

Here is the memo. Let me know if you have any questions. We should be receiving the analytical results of the additional groundwater sample collected from monitoring well MW-2A sometime later this week.

Thanks

Nicolas R. Hoffman L.G.

Principal

C 206.396.3707

1011 SW Klickitat Way, Suite 212

Seattle, WA 98134



soundearthinc.com | Employee-Owned | Small Business

Check out our new webinar series: <http://www.soundearthinc.com/webinars/soundbyte>

---

**From:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Sent:** Friday, May 9, 2025 3:21 PM

**To:** Nick Hoffman <[nhoffman@soundearthinc.com](mailto:nhoffman@soundearthinc.com)>

**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

Hi Nick,

A brief memo that we can upload to our file management system (pdf) sounds fine.

Thanks, Frank

---

**From:** Nick Hoffman <[nhoffman@soundearthinc.com](mailto:nhoffman@soundearthinc.com)>

**Sent:** Friday, May 9, 2025 2:34 PM

**To:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

External Email

Hi Frank,

The edits to figures got held of in the PQ queue this week. I should have the revised figures, tables, and an additional table showing relative distances between remaining documented historical exceedances relative to locations of our recent Phase II sampling locations over to you by early next week. Do you have a preferred format to present the revisions, or will a simple memo describing the revisions with the figures and tables work?

Thanks

Nicolas R. Hoffman L.G.

Principal

C 206.396.3707

1011 SW Klickitat Way, Suite 212

Seattle, WA 98134



[soundearthinc.com](http://soundearthinc.com) | Employee-Owned | Small Business

Check out our new webinar series: <http://www.soundearthinc.com/webinars/soundbyte>

---

**From:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Sent:** Thursday, May 1, 2025 2:02 PM

**To:** Nick Hoffman <[nhoffman@soundearthinc.com](mailto:nhoffman@soundearthinc.com)>

**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

Hi Nick,

Thank you for the clarifications.

Based on the narrative description in the 1990 report, it appears that location TE-GW-13 can be shown on the Site plan in the center of the Bunker C UST location. BTW – I previously missed that more report text was below the lab data in that 1990 report!

As previously mentioned, our having an estimated distance from the nearest current monitoring well to the historical exceedance location would be helpful to make a case for the current data superseding the historical data. On the face, it appears that locations DPT-1 through DPT-4 and especially MW-104 likely make a case for no remaining exceedances at this location, but the estimated distance between TE-GW-13 and MW-104 is appropriate to consider before finalizing this question (as well as for the other locations discussed in our April 30 email).

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager  
Department of Ecology – Toxics Cleanup Program  
1250 W. Alder Street, Union Gap, WA 98903  
(509) 424-0543 (cell)

[Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov)

---

**From:** Nick Hoffman <[nhoffman@soundearthinc.com](mailto:nhoffman@soundearthinc.com)>

**Sent:** Thursday, May 1, 2025 9:23 AM

**To:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Subject:** RE: XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

External Email

Frank,

Thanks for following up on this. I am working on the tables this week. Unfortunately, we were never provided with sample location plans for the samples associated with the three tank removals in the AGI tank removal reports. The tank reports themselves do not reference any sample location plans in the text, so it is likely none were ever produced. The text in last paragraph of the Hydrocarbon Contamination Distribution section of the 1990\_09\_13\_UST Removal Report by AGI indicates sample TE-GW-13 was collected from an excavator bucket and is not likely representative of actual groundwater conditions. As part of our Phase II ESA work, we advanced four soil probes (DPT-1 through DPT-4) and constructed a monitoring well (MW-104) in the vicinity of the former Bunker C UST location. Low levels of oil-range hydrocarbons (120-140 mg/kg) were identified in the HSA boring advanced for the monitoring well near the surface (1-2.5 feet bgs). No other

hydrocarbon impacts were identified in the area at depths of up to 14 feet bgs.

We understand that the lack of a sample location plan for the samples collected as part of historical tank removals, particularly groundwater sample TE-GW-13 presents an issue. If Ecology does not agree that the results of the soil and groundwater samples from DPT-1 through DPT-4 and MW-104 show attenuation has occurred related to the release from the former bunker C UST, we can expand investigation in that area when remedial activities take place.

We did not observe any surface staining during our Phase I and Phase II activities. We will re-examine the areas noted on the figure during remedial activities.

We will create an inset figure to show the HA-Series soil samples collected along the south margin of the site.

A two-cell infiltration pond is present at the north end of the property in the vicinity of the historical small pond you mentioned below. The existing pond footprint is larger than the historical pond and extends further eastward. The location of MW-101 correlates to the west edge (relative downgradient position) of both the historical and existing ponds.

We will modify table two to remove the SGC column noted below.

We will schedule MW-2A to be re-sampled in the next week or two.

If you have any more questions, feel free to reach out. I may be a week or so before the revised tables and figures make it your way.

Thanks

Nicolas R. Hoffman L.G.

Principal

C 206.396.3707

1011 SW Klickitat Way, Suite 212

Seattle, WA 98134



soundearthinc.com | Employee-Owned | Small Business

Check out our new webinar series: <http://www.soundearthinc.com/webinars/soundbyte>

---

**From:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>

**Sent:** Wednesday, April 30, 2025 12:39 PM

**To:** Nick Hoffman <[nhoffman@soundearthinc.com](mailto:nhoffman@soundearthinc.com)>

**Subject:** XN0057 - Olympian Precast - Ecology feedback on RI/FS/CAP Addendum

Hi Nick,

I checking my emails, it looks like I neglected to follow up with you following our intake meeting on April 16, 2025. I apologize for missing that.

I believe we had requested during that call a comprehensive map showing all historical soil and groundwater sampling locations. An inset map may be needed if data density is too great. If soil samples have been previously removed, please show those locations with a gray font. Similarly, tables that show soil samples have been removed via gray shaded rows is a format preferred by Ecology.

Part of the reason for the requested map is the groundwater sampling results from 1987-1990 at locations B-2, TE-GW-13, MW-2, and MW-4. We need to validate whether or not the monitoring wells presented within the RI/FS/CAP addendum are in sufficiently close proximity to these historical sampling locations. This is particularly important at location TE-GW-13, where 16,000 µg/L DRO was present in 1990, and location B-2, where 6,400 µg/L DRO was present in 1987. Although concentrations have likely significantly attenuated at those locations since that time, we need to be able to demonstrate that is the case. Estimated distances from these wells to current or more recent monitoring wells would also be helpful.

It looks like B2, MW-2, and MW-4 from the 1989 PA Report (attached) are shown on RI/FS/CAP Figure 4, but TE-GW-13 is not. I did not find the document that presents the sampling at location TE-GW-13 in 1990. I also noted the HA-series sampling locations from the 2015 Cleanup Action Summary were not shown on RI/FS/CAP Figure 4.

We noted on pdf page 121 of the 1989 PA, a map showed areas of surface soil staining. Re-examination of those areas may be appropriate to see if any stained soils remain prior to performing the soil cleanup work.

I see that a small pond on the property was discussed in the 1992 Receiving Waters Monitoring Plan. That document may have been the basis for petroleum in surface water being listed as suspected within our ISIS database. I will look closer at that document. Can you verify whether or not that small pond is still present on the property, and if not, when it was filled in? It does not seem evident on the July 2024 aerial photo coverage in GoogleEarth.

Ecology notes that the anomalous round at MW-2A (1,100 ug/L DRO in December 2024) was followed by one sampling round in January 2025. We recommend one additional sampling round at this monitoring well to further verify the December 2024 results were not representative.

Ecology notes on one table (Table 2) in the June 2024 RI/FS/CAP that results for soil presented additional columns for with silica gel cleanup. We would note that the standard method for soil includes silica gel cleanup (SGC) – it is only groundwater that should have separate reporting for with and without SGC.

Ecology concurs with proceeding with the excavation cleanup of contaminated soil. A cleanup action completion report documenting cleanup should include disposal receipts from a permitted disposal facility, and confirmation soil samples demonstrating all soil with concentrations above Method A cleanup levels have been achieved. This should include a minimum of four sidewall samples and one floor sample (more samples may be needed for larger excavations per our 2016 guidance, Remediation of Petroleum Contaminated Sites). Please feel free to run confirmation sampling locations by us prior to or during cleanup work to ensure that we concur that a sufficient number of samples have been collected. Based on the depth of soil contamination within the RI/FS/CAP, it appears unlikely that groundwater will be encountered, with the depth to groundwater ranging from 9.0 to about 15 ft bgs at the site. However, if any excavation into groundwater or dewatering were to occur, Ecology would anticipate additional requirements, and should be contacted first.

Please let me know if you have any questions regarding the above.

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager  
Department of Ecology – Toxics Cleanup Program  
1250 W. Alder Street, Union Gap, WA 98903  
(509) 424-0543 (cell)

[Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov)