



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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CERTIFIED MAIL

7006 3450 0001 6754 9614

May 14, 2008

Jennifer Wynkoop
Landau Associates
950 Pacific Avenue, Suite 515
Tacoma, Washington 98402

**Re: No Further Action Determination under WAC 173-340-515(5) for
the following Hazardous Waste Site:**

- Name: Meridian Campus – Campus Meadows Phase 3
- Address: Campus Glen Drive NE & Campus Park Drive NE
- Facility/Site No.: 2219897
- VCP No.: SW0954

Dear Ms. Wynkoop:

Thank you for submitting your independent remedial action report for the Meridian Campus – Campus Meadows Phase 3 facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.



Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Final Cleanup Report, Campus Meadows Phase 3, Meridian Campus Development, April 18, 2008, Landau Associates
2. Meridian Campus Sampling and Analysis Plan, 2005, Landau Associates
3. Meridian Campus Cleanup Action Plan, 2005, Landau Associates

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology SWRO for review by appointment only. Appointments can be made by calling the SWRO resource contact at 360-407-6365.

The Site is defined by the extent of contamination caused by the following release(s):

- arsenic in soil;
- lead in soil.

The Site is more particularly described in Enclosure A to this letter, which includes a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above. The Campus Meadows Phase 3 site is part of the Meridian Campus Development and is located in Section 36, Township 19, Range 1W in Lacey, Washington. The site is approximately 4.62 acres in size (Figure 1). The entire 1540 acre Meridian Campus development was characterized in 2005 and a cleanup action plan including soil mixing was issued in 2006. In 2005, soil samples were collected from 0-6" below ground surface from Campus Meadows Phase 3 during characterization of the entire Meridian Campus, and subsequently analyzed for arsenic and lead (Figure 2). Arsenic soil concentrations were between 21.2 mg/kg and 40.5 mg/kg. Lead soil concentrations were between 37 and 83 mg/kg.

Cleanup activities included scraping and mixing the upper soil layers from the surface of the site as outlined in the Cleanup Action Plan. Once the soil had been scraped and mixed it was used to fill areas under roadways and low areas of the site to bring them up to grade. After final grading, ten confirmation soil samples were collected on March 20, 2008 at locations to provide for adequate coverage of the entire tract with a focus on areas that may become residential yards and areas designated for community parks (Figure 3). After laboratory analysis, confirmation soil samples ranged from non-detect to 8 mg/kg for arsenic. Lead soil concentrations ranged from 3 mg/kg to 10 mg/kg (Table 1). These confirmation soil samples are below Model Toxics Control Act Method A cleanup levels for arsenic (20 mg/kg) and lead (250 mg/kg).

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Based on a review of the independent remedial action report and supporting documentation listed above, **Ecology has determined that the independent remedial action(s) conducted at the Site are sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the contamination at the Site.** Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that **no further remedial action is necessary** at the Site under MTCA.

Based on this no further action determination, Ecology will update the status of the Site on its site database and remove the Site from the Confirmed and Suspected Contaminated Sites List.

This no further action determination does not apply to any other release(s) or potential release(s) of contaminant(s) that may impact any other portion of any property impacted by this Site, or any other property owned or operated by Meridian Campus Development Partners, LLC.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void and further remedial action may be required at the Site.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in successfully completing cleanup under the Voluntary Cleanup Program (VCP). If you have any questions regarding this opinion, please contact me at 360-407-7115.

Sincerely,

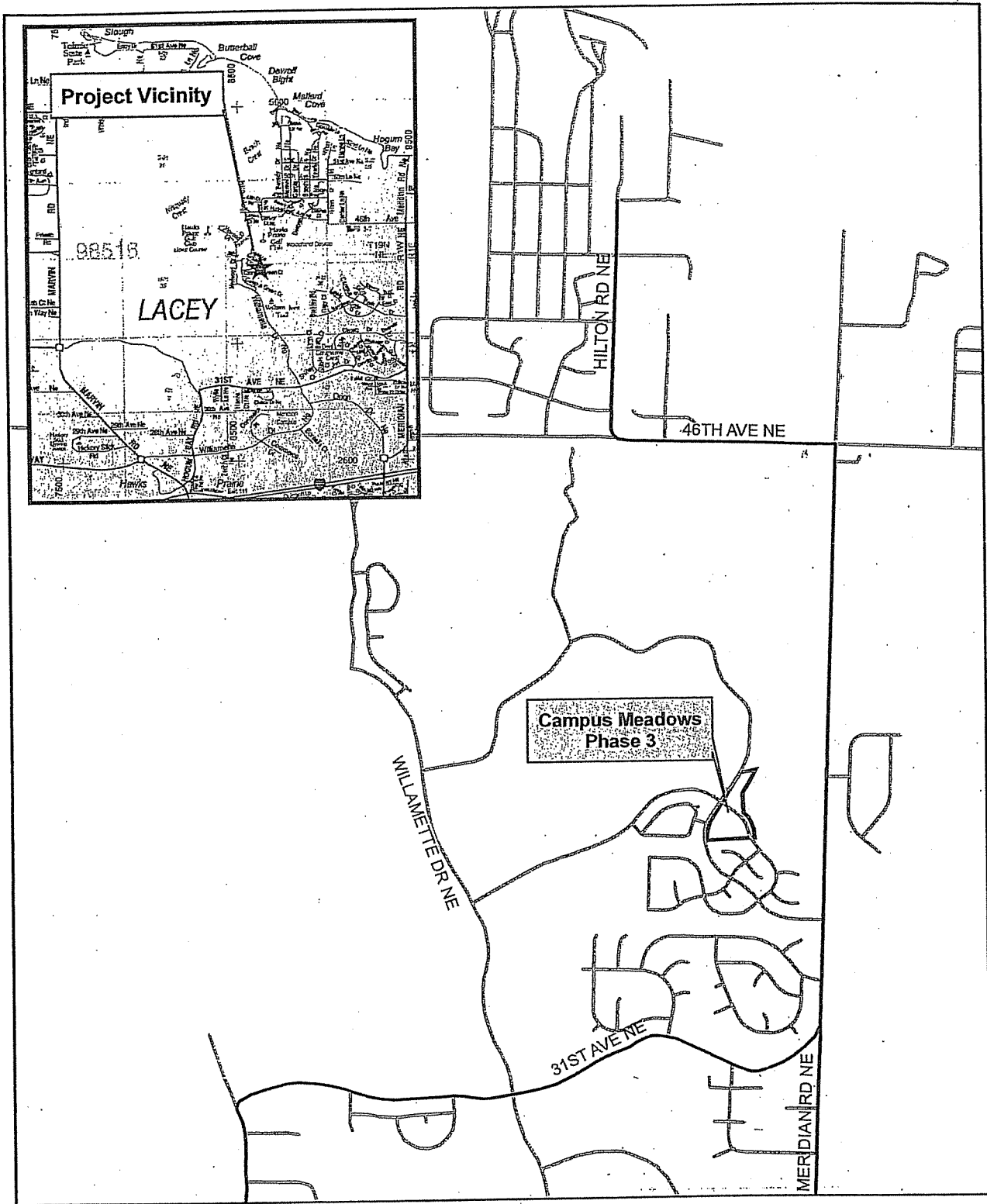


Guy Barrett
SWRO Toxics Cleanup Program

GB/ksc:Campus Meadow Phase 3 NFA

Enclosures: 4

cc: Thomas Pilkinton, Meridian Campus Development Partners LLC
Dolores Mitchell, Department of Ecology



Not To Scale

TABLE 1
 SOIL ANALYTICAL RESULTS
 CAMPUS MEADOWS PHASE 3

TOTAL METALS
 EPA Method 6010B (mg/kg)

Location	Lab ID	Date Collected	Arsenic	Lead
SF2phase3-01-CN-6	MO41A	3/20/2008	6 U	3
SF2phase3-02-CN-6	MO41B	3/20/2008	5 U	3
SF2phase3-03-CN-6	MO41C	3/20/2008	6 U	4
SF2phase3-04-CN-6	MO41D	3/20/2008	6 U	5
SF2phase3-05-CN-6	MO41E	3/20/2008	5 U	3
SF2phase3-06-CN-6	MO41F	3/20/2008	5 U	4
SF2phase3-07-CN-6	MO41G	3/20/2008	6 U	4
SF2phase3-08-CN-6	MO41H	3/20/2008	5 U	3
SF2phase3-09-CN-6	MO41I	3/20/2008	5 U	4
SF2phase3-10-CN-6	MO41J	3/20/2008	8	10

U = Analyte undetected at given reporting limit
 mg/kg = milligrams per kilogram