STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
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March 3, 2026

Scott Rose, LHG
AEG Atlas, LLC
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Re: Sundberg Gravel Pit Final Groundwater Monitoring Well Network Evaluation Report

- **Site Name:** Sundberg Gravel Pit
- **Site Address:** 2200 Cooper Point Road NW, Olympia, WA, 98502
- **Facility/Site ID:** 82016954
- **Cleanup Site ID:** 10635

Dear Scott Rose (Project Coordinator):

This work is being done under Amended Agreed Order (AO) No. DE 21913 between Washington State Department of Ecology (Ecology) and Green Cove Park LLC (Green Cove), and in compliance with the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

AEG Atlas, LLC (AEG), on behalf of Green Cove, submitted a draft Groundwater Monitoring Well Network Evaluation Report to Ecology on August 15, 2025. Ecology reviewed this report and provided comments to AEG on November 14, 2025. On December 18, 2025, AEG submitted their Final Groundwater Monitoring Well Network Evaluation Report (Report) to Ecology. This report was submitted to fulfill in part the requirements of the Data Gap Report and Remedial Investigation Work Plan (RIWP; Exhibit B of the AO).

Ecology has reviewed the Report and has determined that the report does NOT adequately characterize site conditions or fully address identified data gaps necessary to meet the objectives of the Remedial Investigation (RI).

Specifically, the report does not sufficiently characterize site conditions, resolve key data gaps identified during Ecology's review, or provide the information necessary to support conclusions regarding the adequacy of the existing monitoring well network. Pursuant to MTCA (RCW 70A.305.030 and RCW 70A.305.050) and Sections 6.4, 7.6, and 8.13 of the AO, Ecology has the authority to require additional investigation and remedial actions when such work is necessary to protect human health and the environment.

The RIWP establishes a phased investigation approach in which the Report is intended to assess adequacy and identify data gaps. Ecology's review has identified remaining uncertainties that the report fails to resolve:

1. **Characterization of Soil Contamination**

    a. **Subsurface Characterization**
    Ecology finds that subsurface characterization remains inadequate to meet RIWP objectives. The investigation completed to date does not provide systematic, sitewide characterization of the fill/native interface, deeper subsurface conditions, or vertical extent of contaminants. While localized borings and test pits were advanced, the dataset remains insufficient to evaluate whether deeper materials (including historical waste) are present, whether contamination is vertically delineated, and whether deeper stratigraphic conditions may influence groundwater flow and contaminant migration. As a result, conclusions regarding the adequacy of the monitoring network and the extent of contamination are premature.

    Ecology requires the Phase 2 RIWP to include a defensible subsurface characterization strategy sufficient to evaluate vertical extent, confirm stratigraphic controls on groundwater flow, and address uncertainties regarding deeper materials beneath fill.

    b. **Metals**
    Several metals exceed screening levels and need to be evaluated. Ecology requires that you identify the nature and extent of contamination and address it. If soil background concentrations are suspected as being the source of metals concentrations above preliminary cleanup levels, you can prepare a site-specific background study to evaluate this.

c. Use of Silica-gel Cleanup (SGC) in Soil Samples

The Report states that two (2) soil samples were found to contain diesel-range total petroleum hydrocarbons (TPH-D): B-22-10 and B30-10. The Report states that SGC was used in the analysis of the B30-10 sample and it goes on to conclude, since TPH-D was not detected after SGC, this sample is not to be considered part of a possible TPH-D plume in soil. This conclusion is supported by the plume depiction on Figure 3 of the Report.

SGC guidance and associated cleanup values apply to groundwater only. Although SGC may be applied to soil samples as an interpretive tool to help evaluate whether elevated TPH results are petroleum-derived or associated with non-petroleum organic matter, SGC results for soil do not replace MTCA soil cleanup levels and may not be used to demonstrate soil compliance or to eliminate the need for additional investigation. This soil sample should be considered contaminated with TPH-D and may contribute to the possibility of a larger area of TPH-D contamination in soil.

d. Area Northwest of Wetland D

There is an area of dense vegetation in the northwestern portion of the property (northwest of Wetland D) that was previously mined and filled with unknown materials. During on-field activities, it was determined that the equipment on hand was inadequate to access this densely wooded region; the field team should return to the area with adequate equipment and attempt again to take samples.

e. Off-property Soil Investigation

A data gap remains in the off-property section to the northwest, which was clearly disturbed in a fashion similar to the on-property activities. Given the presence of fill in the northernmost test pits, this off-property disturbed area warrants investigation. There appears to be both a ditch structure and the remains of a possible pond that could represent preferential pathways for contaminants. Ecology requests soil borings and/or test pits in both the ditch area and the pond area as well as any other possible points of interest within this disturbed area to determine the presence and depth of off-property fill and to identify possible off-site soil contamination.

f. Soil Gas

Ecology acknowledges and supports the ongoing collection of methane data through regular soil gas and groundwater monitoring, as this provides important baseline information. The revised report documents methane detections at multiple locations and recommends continued monitoring.

However, Ecology finds that the current evaluation of methane is limited to comparison with screening thresholds and does not sufficiently assess other aspects necessary to determine whether methane conditions are adequately characterized. Specifically, the report does not evaluate methane generation potential, source material, spatial distribution, or potential migration pathways. Ecology would also like to note that where petroleum hydrocarbons are present, a more conservative screening threshold (approximately 50 percent of the lower explosive limit (LEL)) is typically applied, and results approaching that threshold warrant further evaluation.

2. Adequacy of the Existing Groundwater Monitoring Well Network

Ecology previously commented that conclusions regarding the adequacy of the groundwater monitoring well network were premature given remaining uncertainties and unresolved data gaps. Although the revised report adds important discussion and qualifiers, it fails to fully address Ecology's concerns.

a. Polar Metabolite Plume

The revised Report identifies three (3) plumes of polar metabolite contamination. This contamination of polar metabolites is a remainder from detections of TPH-D that were analyzed using SGC. Each of these 3 contaminant plumes is insufficiently delineated. Ecology requests additional well locations as required to complete the lateral and vertical characterization of these groundwater plumes.

b. Groundwater flow

Groundwater flow direction on the eastern portion of the site is not clearly defined according to the groundwater gradient map. Ecology requests additional well locations to define flow and gradients in the eastern and southeastern portion of the site.

c. MW-19 Incomplete

As stated in the Report, MW-19 was not completed. Given the presence of a polar metabolite plume upgradient of this proposed well location, Ecology requests that AEG propose replacement well locations with the intent of delineating shallow groundwater in the approximate vicinity of this incomplete well.

d. Off-property Groundwater Investigation

As stated earlier, a data gap remains in the characterization of groundwater off-property to the north. Given the groundwater contamination found in MW-2 in close proximity to the northern property border and fill containing debris was found in test pits along the northern property boundary, the off-property disturbed area to the north warrants investigation. There appears to be both a ditch structure and the remains of a pond that could represent preferential pathways for contaminants. Ecology requests additional well locations in this area to analyze the possibility of off-site groundwater contamination.

e. Deeper Aquifer

A remaining data gap is the deep aquifer, which has never been analyzed. Ecology requests sampling the deep aquifer by utilizing nearby drinking water wells, including wells on neighboring properties. There is also an on-site water well that will need to be decommissioned eventually; Ecology requests sampling it ahead of said decommissioning to rule out vertical migration of contaminants. AEG may also suggest the installation of new monitoring wells so long as the intent of closing this data gap is met.

3. Sediment and Surface Water Evaluation

a. Wetland E

The RIWP identified several wetlands on the site property that require sampling of surface water and sediment. As stated in the Report, Wetland E was not present when field work was performed. Ecology requires that AEG return to the site during the wet season to obtain this sample when possible. If this wetland was misidentified or was not delineated properly, AEG must provide documentation that demonstrates such.

b. Surface Water Contamination

The Report identifies ammonia, total sulfide, and nickel in sediment from all sampled wetlands. Carcinogenic polycyclic aromatic hydrocarbons (cPAHs) were detected in surface water in Wetland C. Manganese was detected in wetlands A, B and D. Ecology requests additional analysis of these contaminants, including but not limited to quarterly sampling to evaluate seasonal trends, analysis to determine whether they are site-related, and an evaluation of potential transport pathways.

c. Stormwater Runoff

Given the observed exceedances in surface water and sediment and the presence of wetlands and drainage features at and near the Site, Ecology finds that stormwater runoff represents a plausible migration pathway that has not been adequately evaluated. Ecology therefore requires the new RIWP to evaluate stormwater runoff and erosion pathways, including identification of drainage features and assessment and sampling to determine whether contaminants are being transported via overland flow to wetlands, nearby water bodies, or other offsite areas.

Conclusion

Ecology approves the Report as sufficient to document Phase 1 sampling results of the RIWP. Pursuant to the AO and MTCA, Ecology hereby requires submittal of a Phase 2RIWP that proposes additional investigation to address the identified data gaps.

Ecology will review the Phase 2 RIWP upon submittal and provide comments or approval prior to implementation. If you have any questions, you may contact me at (564) 669-4866 or thomas.praisewater@ecy.wa.gov. I would be happy to meet via Teams, as well.

Sincerely,

Thomas Praisewater, PE
Cleanup Project Manager
Toxics Cleanup Program
Southwest Region Office

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Ecology Site File