



Responsiveness Summary

Sundberg Gravel Pit

Cleanup Site ID: 10635

Facility ID: 82016954

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County: Thurston

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2024 Public Comment Period Summary

Ecology held a public comment period for the Sundberg Gravel Pit cleanup project from August 16 to September 16, 2024. Ecology held this public comment period to gather feedback on two documents that will move the project into its next phase of cleanup. A summary of these documents is below:

- **Agreed Order DE 21913:** Among several requirements, this legal agreement requires the party responsible for cleanup, Green Cove Park LLC, to:
 - Conduct the investigations outlined in the Data Gap Report and Remedial Investigation Work Plan (RIWP), conduct additional investigations if needed, and prepare the Remedial Investigation (RI) report. The RI report identifies contaminants above cleanup levels and where they are located.
 - Complete a Feasibility Study (FS) based on results of the RI. The FS compares ways to clean up the contamination.
 - Prepare a preliminary Draft Cleanup Action Plan (DCAP) that outlines the method selected for cleanup.
- **Public Participation Plan:** This plan describes how we inform the community about cleanup at the site. The plan encourages community involvement in the cleanup process.

During the public comment period, Ecology also hosted a public meeting and an open house event. This event took place at The Olympia Center on August 26th, 2024, from 6:00-8:30 PM.

During the public comment period, **we received 43 comments**. A full overview of the public involvement efforts made during this public comment period, including public notice mailers and events, are in Appendix B, page 95.

Ecology's 2024 comment review

After the conclusion of this public comment period, Ecology reviewed and considered the public comments received. Based on our review of comments, we found that no major changes were needed to the Agreed Order and Public Participation Plan. However, the comments received, along with data gathered under the Agreed Order's sampling plan, have been used to inform future phases of work.

Some key areas where public feedback was considered include:

- Additional sampling of stormwater. Stormwater and deeper aquifer concerns were made very clear. Ecology also saw data that indicated surface water contamination. Public concerns and data findings influenced Ecology to pursue stormwater sampling.
- Additional sampling of the deeper aquifer. Data collected at the site show there is potentially deeper contamination at the site. The strong public response and concern about testing the deeper aquifer also was taken into consideration. Ecology understands the concerns shared, and we are going to pursue deeper aquifer testing.

More information about how Ecology has incorporated public feedback and collected data can be found in the next section and throughout this document.

Cleanup progress and incorporation of public comments

This site is being cleaned up under Washington’s cleanup law, the Model Toxics Control Act (MTCA). You can review the steps of Washington’s cleanup process in Figure 1 (below). For more information about the MTCA process, visit Ecology’s [cleanup process webpage](#).²

The Agreed Order between Green Cove and Ecology was signed on February 13, 2025. After the legal agreement was finalized, Ecology approved Phase 1 of investigation and sampling. Investigation of the site began on April 21, 2025.

This cleanup is currently in the “study the site” step of cleanup (see Figure 1). Green Cove hired consultants to conduct the sampling work. Ecology closely oversees all sampling work, data collection, and analysis.



Figure 1: The steps of Washington's cleanup law, the Model Toxics Control Act.

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

The objectives of Phase 1 of the investigation were to:

1. Establish baseline groundwater, soil, sediment, surface water, and soil gas (methane) conditions.
2. Identify contaminants of concern and potential exposure pathways.
3. Evaluate groundwater flow conditions and the adequacy of the existing monitoring well network.
4. Confirm subsurface conditions, including the presence and thickness of fill and the depth to native material where feasible.
5. Identify and prioritize data gaps that must be addressed to fully characterize the nature and extent of contamination. Data gaps are the lack of necessary information required to fully determine the type and location of contamination at the site to make the best decisions for cleaning it up.
6. Refine the conceptual site model and determine how much additional investigation will be needed in subsequent phases.

Green Cove completed Phase 1 of the investigation in 2025. Data and findings from this phase were presented to us in the [Groundwater Monitoring Well Network Evaluation Report](#).³

After reviewing this report, we have determined further investigation is needed to meet Phase 1's objectives, outlined above. We are now moving on to Phase 2 of the investigation.

The purpose of Phase 2 is to continue working on answering the objectives of Phase 1. Phase 2 should address many of the concerns members of the public had during the 2024 public comment period, specifically testing stormwater runoff and the deep aquifer.

We appreciate the patience the community has had in our response. We hope this document provides the public with better insight into cleanup efforts at the site and how their comments have already and will continue to be considered throughout.

Next steps in the cleanup process

Ecology expects the site investigation of the cleanup ("study the site") to take about two more years to complete. After the investigation is completed, a variety of cleanup options will be considered ("consider options"). The results will produce two documents: the

³ <https://apps.ecology.wa.gov/cleanupsearch/document/167905> (download link, 232KB)

Remedial Investigation (RI) Report and Feasibility Study (FS). The RI is a summary of findings, and the FS is the evaluation of cleanup options including the PLP's suggestion on which one to select. The RI and FS will be available for public review and comment before being finalized.

Ecology will select the method of cleanup based on what we know about the site. During the "plan the cleanup" step, we use data, regulations, Tribal and public feedback, and scientific best practices to draft a Cleanup Action Plan (CAP) for the site. The CAP includes details about the proposed cleanup plan, like the schedule and requirements. It will be available for public review and comment before being finalized.

Stay informed

We will keep the public informed as the cleanup progresses. To receive Ecology updates regarding the Sundberg Gravel Pit cleanup, you can sign up for updates on Ecology's [Sundberg Gravel Pit webpage](https://go.ecology.wa.gov/10635).⁴ Subscribers receive a weekly automated email whenever there's an open comment period, a new document, or other cleanup news. You can read more about this feature on Ecology's [blog](https://ecology.wa.gov/blog/may-2025/updates-on-cleanup-sites-in-your-inbox).⁵

⁴ <https://go.ecology.wa.gov/10635>

⁵ <https://ecology.wa.gov/blog/may-2025/updates-on-cleanup-sites-in-your-inbox>

Response to Public Comments by Topics of Concern

We appreciate the time people took to submit their thoughtful comments during the comment period. We carefully considered each comment while conducting our review.

In the following section, we've provided our responses to the concerns expressed. The goal of our responses is to answer questions, provide context, and to document the decisions made following the public comment period.

Appendix A, page 19, contains a table with the names of commenters. The comments we received during this comment period follow the table.

Topics of concern

- **Site Conditions and Contamination Overview**
 - Site description and historical activities
 - Characterization of hazardous substances, waste, and impacts
 - Groundwater and aquifer protection
 - Off-property impacts
- **Investigation and Sampling**
 - Sampling depth and locations
 - Groundwater and well sampling adequacy
 - Stormwater, runoff, and surface features sampling
 - Contaminant-specific sampling
 - Unknown or unidentified hazardous substances
 - Sampling of biologically active zones
- **Exposure and Risk**
 - Exposure pathways and risk assessment
- **Cleanup and Mitigation**
 - Cleanup of dumped materials and refuse
 - Habitat protection and federal agencies involvement
 - Wildlife impacts and protection
 - Public safety concerns
- **Governance, Coordination, and Process**
 - Agency and intergovernmental coordination
 - Stormwater discharge and ERTS reporting
 - Potentially liable party (PLP) and compliance
 - Document accuracy and technical completeness
- **Public Trust and Engagement**
 - Public confidence and support for cleanup

Site Conditions and Contamination Overview

Site description and historical activities

There are concerns that the Sundberg site has not been fully or accurately characterized. There is also concern that historical activities are not accounted for, like accounts of unregulated dumping. Requests were made for Ecology to include more information and eyewitness accounts in the documents.

Response

The site's Remedial Investigation (RI) Report will contain a thorough description of the site's history.

The Phase 1 investigation gave us insights into the extent and types of contamination. This gives us a better idea of how contamination entered the site. Different types of practices leave behind different types of contaminants. After Phase 1, Ecology identified petroleum and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) at the site. These compounds are consistent with contamination caused by Underground Storage Tanks (USTs). Ecology has yet to identify widespread contamination that would support evidence of toxic dumping.

Ecology is aware there are many claims, reports, and eyewitness accounts of illegal dumping and other operations at the site. The investigations taking place now will provide the information required for Ecology to better understand the site's contamination. This information may or may not corroborate the claims made during this public comment period.

Characterization of hazardous substances, waste, and impacts

A community member asked how the Remedial Investigation (RI) will address the characteristics of hazardous substances, waste, and their impacts on contamination at the site.

Response

The RI will compile results from previous investigations as well as gather data from current site conditions to evaluate what, if any, contaminants are present on site. Ecology will direct the sampling of soil, groundwater, sediment, surface water, and soil gas on this site to define the presence, extent, and concentration of potentially hazardous substances.

Groundwater and aquifer protection

Commenters expressed concern about potential pathways for contaminants to reach deep aquifer. There were concerns that surface stormwater would enter deeper aquifers.

Possible pathways noted were geological faults, sulphur springs, and perched aquifers near the site.

Commenters shared concerns that if contaminated groundwater is present, it could impact neighboring wells used for drinking water.

Commenters referenced available reports, photographs, and observations as supporting information. They requested Ecology investigate potential groundwater pathways to make sure aquatic resources are protected. There was also interest in being informed on the results of site investigations.

Response

Ecology examined geological surveys of the area and cannot find a record of there being a fault within the site. However, Phase 1 of the investigation showed that shallow groundwater is contaminated in some areas of the site. Given this information, Phase 2 will involve sampling of deeper groundwater to ensure that groundwater contaminants are contained in the shallow, “perched” aquifer.

Ecology’s understanding of the hydrogeology of this site is that perched groundwater is present in a recessional outwash layer that typically extends from the surface to less than 25 feet below ground surface. Groundwater stays perched in this layer, above the regional water table, because the layer beneath it is till, which has low permeability. The layer of till is mapped at 100-150 feet thick and is considered a confining unit between the overlying recessional outwash and the underlying advance outwash deposits. The layer of advance outwash deposits is mapped to be more than 50 feet thick and is a significant potable aquifer for the region. It is this layer of advanced outwash deposits that will be a target of Phase 2 groundwater sampling to evaluate whether contamination is limited to the shallow aquifer.

Off-property impacts

Commenters requested that Ecology evaluate off-property impacts. They suggested installing offsite “sentinel” wells to assess any downstream groundwater contamination.

Response

Phase 1 of the investigation was focused on characterizing on-property contamination. This gave Ecology a better understanding of where and how contamination might be leaving the property. During Phase 1, areas of contamination were identified along the northern property edge. The installation of new monitoring wells also made it possible to begin mapping the groundwater gradient (the direction of groundwater flow). So far, data collected shows that the shallow groundwater flows to the north and west. Due to this

data, off property impacts downgradient (“downhill”) of the site’s northern border contamination will be investigated in Phase 2. With adjacent property owners’ approval, Ecology is requiring off-property soil and groundwater sampling. Ecology will also be evaluating the condition of adjacent properties' surface water.

These measures will help us determine if contamination is migrating beyond the site. Data collected now will help make sure future cleanup actions are protective of environmental and public health.

Investigation and Sampling

Sampling depth and locations

Commenters were concerned that soil sampling is not digging deep enough to reach below the level of fill. They requested testing of buried waste and areas identified by eyewitnesses and the Green Cove map.

Commenters requested extensive grid sampling over the entire site with special emphasis placed on sampling the eastern part of the site. The eastern section is located closer than the rest of the site to other nearby cleanup sites.

Response

Ecology is using a phased, targeted approach to study the site. During Phase 1, Ecology used multiple borings, monitoring wells, and test pits to gather information on the presence and level of contamination in soil and groundwater.

Ecology received information from the community about this site in multiple ways, such as through Environmental Reports Tracking System (ERTS), emails, phone calls, and written materials. A local community advocacy group, Green Cove Defense, provided Ecology with a map of potential spots with contamination based on eyewitness accounts. We referred to these materials and the map while laying out sampling locations. We added test pits, borings, soil and sediment samples, and groundwater monitoring locations based on them to help fill gaps in our understanding of the site, such as along the eastern and northern boundary and in areas where garbage and metals drums were reportedly buried. Ecology also used historical information about operations at the site, such as the location of fuel filling areas.

In Phase 1, 23 test pits were excavated to evaluate the thickness of fill materials, including seven test pits and boring locations along the eastern boundary that were intended to address site-specific concerns.

Of those 23 locations, 13 test pits showed no indication of fill material, as native soil was observed from the surface down to at least six feet below ground surface. Fill was

identified in eight locations at depths ranging from the surface to approximately 13 feet below ground surface. The remaining two locations were suspected to have fill present because the material observed in those test pits were not aligned with the materials observed in other test pits at the site. These two locations were explored to a depth of at least 35 feet and soil samples were analyzed according to the work plan.

This work is not completed. Phase 2 continues the work to develop a robust characterization of subsurface fill at the site.



Figure 2: Test pit at the site during Phase 1 of the investigation.

Groundwater and well sampling adequacy

Commenters expressed concern about potential contamination of neighbor's drinking water wells. They requested neighboring wells be tested. They also sought clarification on the timing and financing of well sampling.

Commenters requested clarification about the Work Plan and requested Ecology add sentinel wells around the site's borders.

Response

Ecology will require sampling of the deep aquifer and drinking water wells in Phase 2 of the investigation. Ecology's decision to pursue this sampling was influenced by the data findings and strong public concern. The potentially liable party will pay for sampling. Background and downgradient monitoring "sentinel" wells will be installed if it is shown that contaminated groundwater is moving off the site.

Stormwater, runoff, and surface features sampling

Commenters requested analysis of stormwater runoff before it enters Green Cove and Butler Creeks. There was concern that runoff from the site could potentially affect neighboring properties, federally protected waters, or threatened species.

Response

Ecology agrees that stormwater runoff likely leaves the site, but currently there is no evidence that stormwater is carrying contamination offsite. During Phase 1, some contaminated soil was identified that could potentially be carried offsite. To address this, Phase 2 will include an investigation to determine if stormwater runoff is contaminated and if it may be affecting nearby surface water or threatened species.

Contaminant-specific sampling

Commenters requested sampling of Agent Orange-type herbicides. These chemicals could be found in buried bark, pentachlorophenol (PCP; a prominent wood treatment chemical), creosote, dioxins, and other wood treatment chemicals. There were requests for testing for pesticides, herbicides, and fertilizers used in silviculture.

Commenters cited past activity at the site as the reason for this request. They shared that activity by the Port of Olympia and Weyerhaeuser could have brought these types of contaminants to the site.

Response

Agent Orange is an herbicide used to kill undergrowth in the timber industry or remove foliage from trees. This makes it more likely to be deposited in the soil where the chemicals were sprayed than being found in the bark of harvested trees.

PCP and certain polycyclic aromatic hydrocarbons (PAHs) were tested in Phase 1, as PAHs can indicate creosote contamination. Ecology also sampled for pesticides and other wood treatment chemicals, including silvicultural chemicals, in sediment present in the on-site wetlands, which is where runoff or deposits are likely. Ecology's sampling so far hasn't shown that pesticides, wood treatment chemicals, or silvicultural chemicals are present.

Dioxin testing was not included in Phase 1 but could be added in a future phase if Ecology determines there are indications of pesticides or other wood-treatment chemicals on the site.

Unknown or unidentified hazardous substances

Commenters indicated the site has a long, complicated history. They worried that Ecology may miss sampling certain hazardous substances. Commenters asked how Ecology will make sure all possible hazardous substances from past activities are accounted for.

Response

In preliminary sampling, like at this site, Ecology uses what is known about site history to decide which possible hazardous substances need to be analyzed in the samples collected. At this site, Ecology analyzes broad groups of chemicals in the samples. By casting a large net and analyzing many hazardous substances that might be in samples, this helps us make sure we account for all potential hazards at the site.

Sampling of biologically active zones

Commenters requested sampling of the biologically active zone (BAZ) in the RI/FS Work Plan.

Response

The biologically active zone (BAZ) refers to near-surface soils where plant roots and soil organisms are active and where direct-contact or ecological exposure may occur. Phase 1 of the investigation focused on groundwater and subsurface soil conditions and did not include systematic shallow soil sampling specifically targeting the BAZ.

Ecology will require shallow soil sampling if necessary to evaluate potential exposure pathways. Based on information currently available, contamination has primarily been identified in soil beneath the BAZ and groundwater. However, Ecology will determine

whether additional near-surface soil characterization is warranted as the investigation proceeds and as the conceptual site model is refined.

Exposure and Risk

Exposure pathways and risk assessment

Some commenters questioned why the Conceptual Site Model only addresses direct exposure pathways. They were concerned that it does not consider inhalation or ingestion pathways for humans or wildlife.

Commenters noted potential volatile chemicals, methane, airborne particles, and stormwater pollutants may exist at the site. They requested that the RI/FS Work Plan considers inhalation or ingestion pathways. They also requested consideration of chemical exposure to wildlife that uses the property and downstream areas.

Response

Right now, groundwater inhalation and dermal contact are not considered open exposure pathways at the site. This is because the groundwater is below the surface, and current site conditions do not allow for direct contact with it. In the future, if site use includes private wells instead of city-supplied water, more exposure pathways would be evaluated. These considerations would be incorporated as appropriate in ongoing assessments.

The vapor intrusion pathway is included in the Conceptual Site Model. The pathway for potential inhalation of airborne particles is also being considered.

Cleanup and Mitigation

Cleanup of dumped materials and refuse

A commenter expressed concern that illegal dumping occurs along Cooper Point Road. They noted that debris sometimes remains for extended periods and asked if there is a plan for cleaning up this debris, as well as clarifying who is responsible for cleaning it up.

Response

Ecology acknowledges this concern. Ecology does offer a variety of litter programs, including a roadside litter cleanup program. However, the most direct and effective way to address litter concerns is through local authorities.

The Washington State Patrol, local police departments, sheriff's offices, and health departments enforce litter laws. Many cities and counties have local ordinances that are stricter than the state law. Contact your local police department, sheriff's office, city, or county clerk for information on local litter enforcement and to find out what laws apply in your area.

To learn more about Ecology's litter programs and Washington litter laws, please visit Ecology's [litter webpage](#).⁶

Habitat protection and federal agencies involvement

Many commenters emphasized the importance of habitat protection. Special consideration was given to endangered and threatened species. Commenters noted that areas with these species are subject to federal laws and oversight. Commenters asked if Ecology would complete a NEPA (National Environmental Policy Act) and/or SEPA (State Environmental Policy Act, Washington) review for this cleanup. They suggested a full NEPA/SEPA Environmental Impact Statement (EIS) be conducted.

Response

NEPA (National Environmental Policy Act) and SEPA (State Environmental Policy Act, Washington) are similar environmental review laws. Both laws make sure government agencies consider environmental impacts before making decisions. They follow similar procedures, as Washington closely modeled SEPA after NEPA. The difference between the NEPA and SEPA process is scope. NEPA applies to federal actions, while SEPA applies to state and local actions.

This cleanup is a state-level action and is following Washington state cleanup laws. For that reason, this site will have a SEPA review instead of a NEPA review. If Ecology determines later that this site needs federal collaboration, we may conduct a NEPA review.

At this step of cleanup, the focus is on collecting data, studying the site, and determining the scope of contamination. Information gathered during this stage will be used to develop future cleanup decisions. Since no cleanup decisions are being made at this time, a SEPA review for this site is not yet required.

Ecology will conduct the SEPA review process when reviewing cleanup decisions. This takes place during the "plan the cleanup" step (figure 1). When Ecology is developing the Cleanup Action Plan for this site, a SEPA checklist will also be developed. The public will have the opportunity to review and comment on the SEPA checklist and determination before it's finalized.

Wildlife impacts and protection

Commenters expressed concern about wildlife, including beaver habitat and potential displacement of a coyote family.

⁶ <https://ecology.wa.gov/waste-toxics/solid-waste-litter/litter>

Response

Evaluation of ecological receptors, including wildlife, and of habitat is part of the remedial investigation process under the MTCA. The current phase of work is focused on data collection and evaluation to identify the contaminants at the site, the concentration of contaminants that need to be cleaned up, and where the contaminants are located at the site. This information is used to construct a conceptual site model that shows potential exposure pathways.

If cleanup actions are proposed that could affect habitat or wildlife, Ecology will evaluate those actions for compliance with applicable environmental regulations and will coordinate with appropriate resource agencies as needed. Ecology will require measures to avoid or minimize impacts on ecological receptors to the extent practicable during future investigation or cleanup activities.

Public safety concerns

Commenters expressed concern about safety at the site and when it will be safe for current and future stakeholders. Some noted that people who used the site illegally are not protected. Commenters also asked why warning signs have not been posted on a neighboring City of Olympia property to indicate the presence of hazardous waste.

Response

The PLP has signs posted at site entrances. These signs inform people that the area is private/no trespassing. Since these signs discourage entrance to the site, Ecology is not currently requiring extra signage. Ecology will reevaluate signage and site safety needs after each round of data collection. Once the MTCA cleanup is complete, the site will be protective of human health and the environment.

Ecology is not currently investigating the property owned by the City of Olympia. We have no authority over the property, since it is not a MTCA cleanup site. If you suspect toxic contamination is present at the property, you may file an [Environmental Report Tracking System \(ERTS\) complaint](https://ecology.wa.gov/footer-pages/report-an-environmental-issue/statewide-reporting-form-erts)⁷ to have the site investigated. If Ecology discovers contamination at unsafe levels, Ecology will begin the MTCA cleanup process.

⁷ <https://ecology.wa.gov/footer-pages/report-an-environmental-issue/statewide-reporting-form-erts>

Governance, Coordination, and Process

Agency and intergovernmental coordination

Many commenters noted that stormwater from the site may drain into waters with listed endangered species. They requested that Ecology coordinate with federal authorities and the Squaxin Island Tribe. They also asked for information on public updates about this coordination.

Concerns were also raised about long-standing unaddressed Washington State Department of Natural Resources (DNR) mine reclamation permit violations. Commenters requested information on enforcement actions for these permits. They also requested Ecology sample historical waste beneath fill.

Response

Ecology recognizes the importance of Tribal engagement. We follow the MTCA engagement process for coordination with the Squaxin Island Tribe, as well as other Tribes in the area.

Ecology's MTCA engagement with Tribes has additional obligations for Tribal outreach that aren't necessarily required for public outreach. These differences include advanced notice about news at the site, extended opportunities for comment, and long and sustained opportunities to hear about Tribal concerns and opportunities to consult. Ecology will be creating a Tribal Engagement Plan that outlines Ecology's plan on how Ecology should coordinate with Tribes on this project. Once the Tribal Engagement Plan is completed, it will be publicly available on Ecology's Sundberg Gravel Pit webpage.

Regarding reclamation permit compliance, the DNR administers mine reclamation permits and associated enforcement actions. Ecology coordinates with DNR as appropriate but does not enforce DNR's reclamation permit requirements.

Ecology communicated with and met with the DNR about Sundberg's Surface Mining and Reclamation permit in 2022 during the development of the investigation work plan. Ecology requested and reviewed DNR's records for this site. DNR's inspection reports confirm that mining took place outside of the permit boundaries and that DNR requested that Sundberg update the permit boundaries. It is unclear why the permit wasn't updated, but at this point, we are focused on moving forward with investigation and any necessary cleanup.

Ecology's role under MTCA is limited to characterizing and addressing the releases of hazardous substances. Our role at this site is to protect human health and the environment. Our authority does not include resolving past permitting or operational violations. Ecology recommends commentors contact the DNR with any queries they have on the mine reclamation permits.

Stormwater discharge and ERTS reporting

Many commenters raised concerns that Ecology omitted an Environmental Report Tracking System (ERTS) complaint about this site. This ERTS complaint, submitted on January 12, 2021, included photos of stormwater draining from the site into neighboring properties, and then into Budd Inlet.

Commenters requested that this complaint and its supporting evidence be formally included. Inclusion of this ERTS complaint is important, as it shows how stormwater from the site is moving off the property. They also questioned how Ecology ensures such reports are properly entered into and considered.

Additional concerns were raised about edits to Findings of Fact 5.9 during negotiations on the Agreed Order. Commenters noted the Agreed Order had limited descriptions of the site's alleged dumping and hazardous material storage.

Response

Ecology acknowledges that stormwater could leave the site and offers a thank you to the person who submitted an ERTS report with photos. The January 12, 2021, ERTS complaint was filed with Ecology's Water Quality Program rather than the Toxics Cleanup Program. This is because the ERTS reviewer identified that specific complaint being more associated with silt and stormwater runoff (typically a Water Quality issue) and didn't make specific reference to contamination (typically a Toxics Cleanup issue). It has now been added to the Toxics Cleanup Program files.

Ecology recognizes now that the language about stormwater not leaving the site didn't paint the whole picture of what's going on at the site. Phase 2 will investigate stormwater runoff leaving the site, and the RI report will include an update about our findings from the investigation.

Regarding the edits to Findings of Fact 5.9, Ecology notes that listing the ERTS reports was enough for the purposes of establishing this Agreed Order and starting the investigation work. The ERTS reports are part of the official record and summarizing the reports in detail within the Agreed Order was not necessary.

Potentially liable party (PLP) and compliance

Commenters had concerns about potential future development at the site. They asked if there are special privileges for housing developers on former toxic waste sites. They emphasized the PLP must follow all applicable federal, state, and local requirements before proceeding with development.

Commenters requested Ecology disregard past investigations by the PLP's consultants. They believe these past investigations have insufficient sampling and incomplete data.

Response

Ecology does not provide special privileges to private PLPs. Ecology does partner with the EPA to provide funding for the redevelopment of specific cleanup sites through the Brownfields Grant Program. For a site to qualify for a brownfields grant, it must meet very specific criteria, including: the PLP abandoned the site, the site is an under-utilized area with confirmed or suspected contamination, or redevelopment is done by a government or non-profit entity. Additionally, the purpose of redevelopment for brownfield sites is limited. Redevelopment activities at brownfields sites must be approved by Ecology and the EPA and benefit the community. Redevelopment activities can include providing low-income housing or creating more space for businesses.

In this case, the site is being cleaned up by the PLP, who is a private entity. For this reason, this site is currently ineligible for a brownfield grant.

Before any development can proceed at the site, the cleanup must meet all applicable federal, state, and local requirements. While overseeing this cleanup, Ecology will work with jurisdictional partners (like the Department of Health) to ensure compliance.

Ecology does not disregard previous investigations. However, we recognize their limitations and will not make conclusions based on insufficient, incomplete data, or poor-quality data.

Document accuracy and technical completeness

Commenters requested additional details on:

- Analytical methods and specific contaminants in the RI/FS Work Plan.
- Clarification on creosote and dioxin.
- Inclusion of prior submitted comments.
- The location of the methane investigation plan.

Response

Analytical methods for sample testing are provided in Table A-1 of the RI/FS Work Plan. Ecology will ensure future reports define all acronyms and chemical constituents.

Phase 1 of the investigation included testing for wood treatment chemicals. Subsequent phases may include additional testing as Ecology's understanding of the subsurface increases. With regards to creosote, Phase 1 of the investigation did not analyze for "creosote" as a single compound; however, samples were analyzed for polycyclic

aromatic hydrocarbons (PAHs), which are the primary constituents of creosote. PAH analysis is the standard method used to evaluate potential creosote contamination in environmental investigations. With regards to dioxins, dioxin testing is not currently planned; however, pentachlorophenol (PCP; a prominent wood treatment chemical) testing was included with Phase 1. Dioxins and furans are impurities created as a byproduct of PCP manufacturing and will typically be found in the environment as a contaminant from wood waste. If PCP contamination is detected, dioxin testing may be considered in a subsequent phase.

While it is not feasible to formally incorporate all prior comments by reference, relevant information from past submissions will be considered during the investigation.

The methane investigation plan is included on page 34 of the Remedial Investigation Work Plan.

Public Trust and Engagement

Public confidence and support for cleanup

Commenters asked how Ecology will assure the public it is serious about cleaning up the site. They questioned public confidence in the cleanup, citing their observations of long-term unregulated dumping and lax oversight. They requested that Ecology follow strict protocols and operate with maximum transparency. Some commenters emphasized the need to begin cleanup promptly. Others expressed support for efforts to characterize and remediate the site.

Response

Ecology's Toxics Cleanup Program began working on this site in 2021 and is investigating the site using the MTCA process. Ecology agrees cleanup action is needed and are actively investigating the site. Thank you for your support in characterization and remediation efforts.

By consistently applying the MTCA cleanup process in the cleanup of this site and making information on the site's webpage available and transparent, we endeavor to restore public trust.

Appendix A:

Table of Commenters and Comments

The following table lists the commenters, the organizations they represent, and the page number where the complete comment can be found in this document.

Table 1: Commenters and their representing organizations, page numbers.

Commenter	Representing	Page Number
Bassett, Beverly	Self	22
Becker, Dennis	Self	23
Bishop, Madeline	Self	25
Bowman, Janie	Self	26
Branch, Harry	Self	27
Canny, Maureen	Self	28
Chambers, Brandon	Self	29
Chance, Robyn	Self	30
Cowan, Garth	Self	31
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Dierker, Jerry	Green Cove Defense Committee	34
Dreyfus, Chas	Self	39
Dreyfus, Margaret	Self	40
Farrell, Phyllis	Self	41
Gneiding, Laurie	Self	42
Gneiding, Laurie	Self	45
Grady, Elizabeth	Self	48
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Commenter	Representing	Page Number
Hubbard, Glen	Self	50
Jacobs, Bob	Self	51
Kaufman, Mark	Self	54
Kilmer, Joyce	Self	55
Kline, Gary	Clean Black Lake Alliance	56
Kronenberg, Esther	Self	58
Kronenberg, Esther	Self	59
Kronenberg, Esther	Self	67
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Larson Kramer, Ronda	Self	79
Malanchuk-Finnan, Linda	Self	80
Moore, Michael	Self	81
Murphy, John	Self	82
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Olmstead, Judy	Self	84
Ornstein, Lisa	Self	85
Pruitt, Kathy	Self	86
Riener, Lisa	Self	87
River, Devin	Self	88
Roundtree, Sara	Self	90
Tatsumi, Garrett	Self	91
Taylor, Gabriel	Olympia Ecosystems	92

Commenter	Representing	Page Number
Thomson, Anita	Self	93
Wilson, Eliane	Self	94

Bassett, Beverly

Sumit date: 9/16/2024

Submit method: Website

I have been hearing about this contaminated site for many many years now and the time has come to do something meaningful about it! I won't go on and on citing documents, but there absolutely is a ton of significant documentation and damning verbal history regarding this cesspool of toxins. Ordinary people like me are quite aware that it is a major and significant problem. Please please, for crying out loud, don't kick this ball down the road one more time again. DO SOMETHING!!! ACT NOW!!! WE'RE WATCHING AND EXPECTING YOU TO DO THE RIGHT THING!!!

Becker, Dennis

Submit date: 8/29/2024

Submit method: Website

Connie and Nancy; much appreciate your informative meeting on 26 August, after some reflection on the information provided, I have the following comments.

During future Sundberg Gravel Pit parcel/site investigations, should additional contamination in well water be found, will Green Cove Park LLC. be required to test home water wells for property directly adjacent to the Sundberg Gravel Pit? And should these tests find well water containments linked to the parcel/site will Green Cove Park LLC be financially responsible to remedy the situation to the property owner's satisfaction? The proposed Agreed Order No. DE 21913 paragraph 5.10 states 8 out of 10 monitoring wells exceeded MTCA cleanup levels. This indicates arsenic, iron and manganese to potentially leach to surrounding water well sources. This poses a direct on-going hazard to those families using well water in their households. Water in 'perched aquifers' that is contaminated over time would reach depths of water wells. How is this to be addressed?

Paragraph 5.2 of the proposed Agreed Order characterizes the Sundberg parcel as a 'log-storage yard and gravel pit' from 1960 through the 1990s. Extensive evidence has been provided by the community to Ecology the parcel was also a well know 'dumping' ground for many years before, during, and after these 30 years. The current characterization of the parcel is mis-leading as to the actual site conditions and illegal dumping activities that have taken place for many years. This mischaracterization will have a negative impact on effectively and correctly evaluating & testing current and future risks to the community and human health. This should be corrected/updated in paragraph 5.2.

How will the Remedial Investigation Work Plan specifically address hazardous substances 'Release Potential' into the environment, the characteristics of toxic waste, and its impact to the environment, people, plants and animals that live in the area?

During the public meeting held on 26 August, many in attendance were concerned as to the 'depth' of the soil investigations. What measures will be put in place to ensure the testing will be conducted at depths to ensure all contaminants/toxic debris, etc. will be discovered as there is evidence of trenches being as deep as 20 feet filled with these materials?

Kind Regards,
Dennis Becker

Bishop, Madeline

Submit Date: 09/03/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Bowman, Janie

Submit Date: 9/13/2024

Submit Method: Email attachment

I live just below this site, at 2411 28th Ave NW, 98502. I am concerned about building homes in the area. Within a time period, my dog, my neighbor's dog, and their neighbor's dog died from cancer. What are the odds?

Also, probably not relevant; however, there is a family of coyotes that live up there. I believe they shouldn't be displaced.

Thank you.

Janie Bowman

Branch, Harry

Submit Date: 08/28/2024

Submit Method: Website

There are repeated references elsewhere to the removal of contaminated soils around the Port Peninsula to a special site and the picking up of clean gravel from a site, sort of a back and forth, presumably to and from the same general locations. If so, the chemical of concern should be pentachlorophenyl. If this is a workable hypothesis this is what we should be doing:

https://www.epa.gov/sites/default/files/2015-06/documents/dnapl_issue_paper.pdf

Canny, Maureen

Submit Date: 09/03/2024

Submit Method: Website

The Work Plan from the Dept. of Ecology must correctly characterize the Sundberg site as an illegal solid and hazardous waste dump site that operated outside the law for decades. Ecology must test the below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site. They must also ensure that the high-pressure aquifer beneath the site (which is on a geologic fault) does not provide a pathway from the surface to the deeper aquifer.

Ecology must test for creosote and pentachlorophenol, highly toxic substances from the West Bay and Cascade Pole cleanups and found at the Port of Olympia. It must also test for chemicals like Agent Orange. In the 1970s, forests were routinely sprayed with these chemicals by Weyerhaeuser and were subsequently present in the logs that were deposited and debarked on site.

Ecology must test stormwater leaving the site and draining into nearby ponds, creeks and the Puget Sound. There is an ERTS complaint (1/12/21) containing clear video evidence that stormwater drains downhill to a pond and wetlands, and feeds Green Cove Creek. This drainage continues down to Butler Creek and to Budd Inlet. The Work Plan must include identification and remediation of this downstream flow. The flow passes into habitats for endangered and threatened species, and therefore the use of this land is subject to federal laws and oversight. Ecology needs to step up to that responsibility.

Thank you.

Chambers, Brandon

Submit Date: 09/16/2024

Submit Method: Website

In the late 80's or early 90's (I can't remember exactly) I watched 10 large dump trucks loaded with treated green logs from the West Bay and Cascade Pole at the Port of Olympia go past my house. It was quite obvious what it was and where it came from.

4 times these groups of 10 trucks went past my house on Elliott ave nw. I followed the trucks to the Sundberg Gravel Pit where a security guard turned me away.

Years later I walked my dog there and saw large puddles of strange colored water that never went away and nothing would grow in that area, not even a weed. It was like being on another planet.

Brandon Chambers

Chance, Robyn

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test storm water leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Cowan, Garth

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Dasilva, Judith

Submit Date: 09/08/2024

Submit Method: Website

We live near the site and have a private well. We are very concerned about contamination from this site and ask that Ecology include the following items in their investigation which to date have been missing:

1) Ecology identifies the site as a sand and gravel pit and log yard. The Work Plan's history of the property does not identify the site as an illegal unpermitted solid and hazardous waste dump site despite decades of photographic, eyewitness and documentary evidence.

ECOLOGY MUST CORRECTLY CHARACTERIZE THE SITE AS AN UNREGULATED DUMPSITE THAT OPERATED OUTSIDE THE LAW FOR DECADES. This illegal activity is what distinguishes this site as uniquely hazardous, with ample evidence in the record. An accurate history of this site is critical to a thorough cleanup. ECOLOGY CANNOT BE COMPLICIT IN THE COVER UP OF THIS ILLEGAL ACTIVITY IF IT WANTS TO GAIN THE PUBLIC TRUST.

Ecology has no mandate to protect those persons and entities who illegally used this site.

2) ECOLOGY MUST TEST THE BELOW THE LEVEL OF ALL FILL TO ENSURE CITY AND NEIGHBORING WELLS ARE NOT BEING CONTAMINATED FROM THE TOXIC WASTE BURIED ON THE SITE.

Presently, Ecology assumes that there is a deep layer of impervious till above the deeper aquifer based on the developer's geotechnical consultant and the general geology of the area. However, there are reports of waste buried 40' deep and more and then covered with impermeable native soil. There is also a documented high pressure aquifer beneath the site and a geological fault that could provide a pathway from the surface to the deeper aquifer.

3) CONSIDERING THE SITE WAS A SHORT DRIVE FROM THE PORT OF OLYMPIA DURING THE WEST BAY AND CASCADE POLE CLEANUPS, ECOLOGY MUST TEST FOR CREOSOTE AND PENTACHLOROPHENOL, highly toxic substances found at the Port. It must also test for Agent Orange-type chemicals which were routinely sprayed by Weyerhaeuser in the 1970's on its forests and present in the logs that were deposited and debarked on site.

4) ECOLOGY MUST TEST STORMWATER LEAVING THE SITE AND DRAINING TO NEARBY PONDS, CREEKS AND THE PUGET SOUND.

Ecology states that there is no discharge of stormwater to a surface water of Washington State. This is not correct. There is an ERTS (Environmental Report Tracking System) complaint from January 12, 2021 submitted to Ecology which was not included in the Work Plan. It contains clear video evidence that stormwater drains downhill to a pond and wetlands (that feed Green Cove Creek) and then continues down Butler Creek to Budd Inlet. These are habitats for endangered and threatened species subject to federal laws and oversight.

Please add these issues to your investigation and report.

Thank you

Dierker, Jerry on behalf of the Green Cove Defense Committee

Submit Date: 09/13/2024 6:04 PM

Submit Method: Website

Thank you for the opportunity to provide further comments on the Remedial Investigation Work Plan for the Sundberg site. We appreciate the public presentation Ecology gave on August 26 and the work it has so far done to clean up this decades old toxic site.

We would like to add these comments to inform Ecology of certain conditions and suggest that it consider these facts in the course of the Remedial investigation.

1. Findings of Fact 5.2 is not accurate. We feel the following cannot be said enough. Ecology has been sent dozens of official and unofficial documents and photos that prove the Sundberg site was an unregulated hazardous and solid waste dump site, including during the time that it was owned by Mr. Mahan. There never was a permit for dumping and the owners never paid taxes. We strongly urge Ecology to acknowledge the history of the site and conduct its investigation with this fact uppermost in mind.

2. We have read public comments submitted by Laurie Gneiding, a retired environmental toxicologist. We agree with her concerns that groundwater monitoring as planned is not sufficient. One of her suggestions recommended "the installation of monitoring wells greater than 15 feet to determine if contaminants have leached to groundwater as per Section 7.4.4 and Table 2 and the presence of highly mobile DRO and arsenic in shallow groundwater."

As we have previously said, no exploration below the level of the fill that Mr. Mahan brought onto the site has ever been done. There are decades of buried waste beneath this level that have yet to be sampled.

3. We have particular concerns because we are aware that there is a large open strike fault that runs along the north side of the property at the bottom of the hill along and just north of 28 Ave NW that lies below this site where the stormwater from this site drains into that open crack. We attach a 2016 report of a water main break at 2800 Cooper Point Rd at 28th Ave that shows a 12" water pipe

ruptured. In his conversation with the repair crew, Mr. Dierker learned that the break was a clean rupture across the diameter of this 12" pipe.

We also have a photo from Mr. Dierker's property which borders 28th Ave. and Cooper Point Rd. of a deep crack in the ground showing the fault, where the crack at this point is close to a foot and a half wide. Stormwater events during heavy rains from drainage from the Sundberg site overflow into this crack, as our photos from the January 12, 2021 ERTS complaint shows. The presence of the fault in this area would make contamination of the deeper aquifer foreseeably likely as stormwater from this site would lead into deeper groundwater aquifers in this area through this large crack at the base of the hill.

Along the base of the hillside where the waste enters Mr. Dierker's pond and the crack, there are also sulphur springs along the open crack of the fault line which indicate a hydraulic continuity between deep sulphur springs water-bearing aquifers, which are used by the City and others for their drinking water, and these and other springs in the area of the pond. The water in these springs eventually drain into Puget Sound through both subsurface movement, as well as via surface movement downstream through Butler Creek. Since the sulphur springs indicate a hydraulic continuity channel into deeper aquifers and these springs are along the creek, the pond and the fault line, and since these are receiving much of the stormwater from the toxic waste site which flows into those sulphur spring areas and that open fault that descends we don't know how far, we suggest the Department test the fault line and downstream from this area along Butler Creek, not only because it drains directly to Budd Inlet, but because people are drinking it, since this area is in the Allison Springs capture zone and the Strategic Groundwater Reserve of the State Capitol.

The pond on Mr. Dierker's property, which connects to Butler Creek, is not shown on Ecology's map. We suggest that Ecology correct this, as the pond, which is habitat for wildlife, directly receives stormwater runoff from the site across the street and uphill.

4. As we have requested in the past, Ms. Gneiding also recommended offsite "sentinel" wells to monitor the groundwater to determine if contaminants have migrated offsite.

Mr. Dierker's January 12, 2021 ERTS complaint was omitted from the Remedial Plan, and appears to not have been entered into Ecology's website and not been considered. We request that this ERTS complaint and its accompanying photo evidence be included in the Remedial Investigation. It includes photos of muddy water leaving the site, draining downhill into Mr. Dierker's pond, continuing down Butler Creek and emptying into Butler Cove of Budd Inlet. We request that Ecology ensure this ERTS complaint is properly included in its system. We will resend the photos and the email with the ERTS complaint to Ms. Groven's email.

We also attach the February 2021 guidelines from the National Marine Fisheries Service which states,

" Expect a formal consultation if your project discharges stormwater to surface waters draining to waters with ESA-listed species. "

We believe Ecology is required to coordinate with the NMFS and other federal entities, including the Squaxin Tribe, responsible for endangered marine life as it is clear that this site discharges stormwaters draining to waters with ESA-listed species, which is true here. However, there is no evidence in the record on this action to show that Ecology has been consulting with NMFS on this matter as required by law.

Further, as the Department administers the NPDES program and also supervises the MTCA program which is the State's implementation of the federal CERCLA program, the State is also acting in loco parentis for the federal agencies for cleanup of toxic waste in this State, and so it clearly appears there needs to be a full NEPA/SEPA EIS environmental review of this matter by an agency that has both federal and state jurisdiction over such toxic waste cleanup matters. We suggest that at the appropriate time, Ecology conduct that review, and not the City of Olympia which does not have the required expertise.

5. Weyerhaeuser used the site for a log storage yard from about 1960-1990.

Attached is a letter from neighbor Jim Elliot who lived there all his life who witnessed the logs drying and debarking.

We believe Ecology should conduct DNA testing of the chemicals found in the buried bark to determine if there are military grade Agent Orange-type chemicals. It is possible that Weyerhaeuser used military stores of these chemicals when the military discarded them after the end of the Vietnam War. Identification of these materials could result in Department of Defense aid in cleanup.

6. Findings of Fact 5.4-5.7 cite previous investigations done by Mr. Mahan's consultants. None of these investigations sampled from below the 20 feet of fill Mr. Mahan himself dumped there. They only went down 12 feet. The Ages 2015 Environmental Site Assessment states that it makes "no warranty...as to completeness or accuracy or suitability for any purpose whatsoever" and does not guarantee the site is free of hazardous or potentially hazardous materials or conditions, and admits it did not interview neighbors. We request Ecology disregard all of Mr. Mahan's consultant reports as inaccurate and improper, as they do not contain any real evidence to support Mr. Mahan's claims

about the lack of contamination on this site, and should therefore be considered irrelevant to Ecology's legal responsibility here.

7. We note for the record that the following information in Findings of Fact 5.9 was edited during the course of negotiations on the Agreed order with the PLP to state only

"Reports made to the Environmental Report Tracking System (ERTS) between January 2015 and February 2020 (ERTS #654104, #654938, #687561, and #696417) allege improper storage of hazardous materials and illegal dumping on the subject property"

Prior to negotiation, it read as follows:

"Reports made to the Environmental Report Tracking System (ERTS) between January 2015 and February 2020 (ERTS #654104, #654938, #687561, and #696417) Observations allege improper storage of hazardous materials and, reports of alleged illegal dumping on the subject property, and photographs provide additional evidence of potential releases. ERTS reports #654104, #654938, #687561 and #696417, submitted between January 2015 and February 2020, provide third-party complaints, observations, and photos of potential releases at the site. These reports contain allegations from citizens about hazardous and toxic waste contamination; treated wood storage; the presence of engines, barrels and "tiles...filled with creosote, acid, and other chemicals"; Styrofoam blocks with "...odorless/colorless toxic chemical gas..." boiling out of them; spraying and dumping of Agent Orange by the military; fill from unknown sources; illegal dumping; and, lack of stormwater controls and potentially contaminated stormwater runoff into wetlands. ERTS report #687561 documents results of an Initial Investigation conducted by Ecology, dated 3/28/2019, which concluded that there was no evidence of soil contamination, and no further actions were warranted; however, a second Initial Investigation, dated 3/05/2020, conducted by Ecology following ERTS report #696417 resulted in Ecology listing the site on the Confirmed and Suspected Contaminated Sites List."

Finally, because of the ample evidence that numerous local jurisdictions and agencies either used the site to dump hazardous materials or ignored the operations there, failing over the course of decades to properly regulate operations at the site, we suggest Ecology follow the strictest protocols and operate with maximum transparency to assure the public that all applicable laws and regulations are faithfully executed, and that Ecology require all parties who dumped waste on this site be found to be potentially liable parties who are also jointly and severally liable and responsible for the cleanup of the solid and/or hazardous waste that they dumped on this property historically, like that of the City of Olympia which dumped excavation material from the crosstown gas main. Clearly, people who dump litter are responsible for cleanup.

We incorporate by this reference all of our prior comments, concerns, questions, etc. concerning this project that we have submitted over the last several years, including the comments that the City of Olympia has on this project site from us and others.

Dreyfus, Chas

Submit Date: 09/10/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

- o Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.
- o Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.
- o Test for creosote and pentachlorophenol.
- o Test stormwater leaving the site and draining to nearby ponds, creeks, and the Puget Sound.

Dreyfus, Margaret

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Farrell, Phyllis

Submit Date: 09/08/2024

Submit Method: Website

Greetings, I attended the ECY public meeting at the Olympia Center on Aug. 26th to learn more about ECY's plan to address environmental concerns about the Sundberg/Green Cove site in West Olympia and a needed Clean Up Plan.

I appreciated the information and Q&A discussion with the public. I have reviewed some of the extensive information in the Sundberg Gravel Pit webpage and fact sheet. I offer the following comments:

- 1) Several members of the public want the site rightly characterized as a hazardous waste dump (instead of a gravel pit cleanup) due to a history of illegal and unregulated dumping. Future use of the site needs to be allowed only if users are fully aware of the history and recognize the risks.
- 2) Extensive testing for contaminants should be conducted throughout and below the site to protect current and future well and water supplies
- 3) Extensive testing for contaminants used in forest and logging operations must be done given the reports of log and port dumping.
- 4) Regular testing/monitoring of stormwater runoff from the site must be included in the Work Plan and Clean Up strategies.

Thank you!

Phyllis Farrell

Gneiding, Laurie

Submit Date: 08/28/2024

Submit Method: Website

Comments to the December 23, 2022 "Data Gap Report and Remedial Investigation Work Plan for Sundberg Gravel Pit". Submitted by Laurie R. Gneiding, CEP, CPPS

I have reviewed the aforementioned document and have tabulated in the attached document.

Comments to the December 23, 2022 “Data Gap Report and Remedial Investigation Work Plan for Sundberg Gravel Pit”. Submitted by Laurie R. Gneiding, CEP, CPPS¹

I have reviewed the aforementioned document and have tabulated my comments below.

Comment No.	Page No.	Section	Paragraph	Comment
1	3	2.2		This section limits the historical operation to “Intermittent sand and gravel mining from 1960 through the 1990s”. It does not discuss other historical operations that occurred at the property. The following should be included in Section 2.2. • An email from Mr. Chuck Dower to Mr. Brett Bures, both of the City of Olympia, dated March 18, 2005 states that “construction material” from “the cross town gas main was dumped at Sundberg”. • A letter from Erica Marbet, Squaxin Island Tribe, Natural Resources Dept., dated August 1, 2019 stating the reading of “multiple reports detailing illegal dumping of fill material on this site”. • Investigations provided in Appendix C of the 2022 RI Workplan from Pacific Rim (2007) and Robinson Noble (2008) describing a soil investigation that observed “construction debris, large logs, and lumber”, “random fill”, “asphalt, concrete rebar, metal stirps, and cedar planks” and the results of a Phase II ESA describing “wood debris....and construction debris”
2	5	3.1	3	This statement is not correct. Mr. Jerry Dierker filed an ERTS complaint stating that soil runoff from the Sundberg Site enters a pond on his property and continuing downstream to the north under French Loop Rd NW and onto the Butler Cove of Budd Inlet.
3	24	5.2	2	Additional complete exposure pathways should be included in the CSM: • Potential direct exposure to groundwater through inhalation and dermal contact. • Potential exposure to VOCs in groundwater through vapor intrusion.

¹ Ms. Gneiding has an MSc. in Environmental Toxicology and is a Certified Environmental Professional. She has over 40 years of experience in hazardous waste investigations including the preparation, implementation, and submittal of Remedial Investigations and Human Health and Ecological Risk Assessments.

				Potential exposure to airborne particles (from soil) through inhalation
4	28ff	7.4.3	Bullet 1	Samples are to be collected for laboratory analysis, but the specific analyses are not provided or reference another location.
		7.4.4	7.4.4.2, Bullet 3 7.4.4.3/7.4.6	- Background soil samples should be collected for comparison to the Washington State background levels. Groundwater has not been sufficiently characterized upgradient, offsite, or onsite. Therefore, the following is suggested: - Installation of a background (upgradient) monitoring well (MW) if not already completed. - Installation of sentinel wells to determine if contaminants have migrated offsite. - Installation of monitoring wells greater than 15 feet to determine if contaminants have leached to groundwater as per Section 7.4.4 and Table 2 and the presence of highly mobile DRO and arsenic in shallow groundwater (Table 7).
	32	7.4.5	2	Sediment samples should be collected from the biologically active zone (BAZ) between 10-15 cm (3-5"), as per USEPA and WA Ecology.

REFERENCES

- Dierker, J. 2021. ERTs complaint to Garret Peck (SWROERTS) and ACOE, DFW, Thurston County Stormwater.
- Dower, C., 2005. Email from Chuck Dower, City of Olympia Engineering Lands Examiner to Brett Bures, Associate Planner, Community Planning & Development. Dated March 18, 2005.
- Marbet, E., 2019. Letter from Erica Marbet, Water Resources Biologist (Squaxin Island Tribe, Department of Natural Resources) to the City of Olympia (Cari Hornbein, Community Planning and Development Department and Steve Thompson, Public Works).

Gneiding, Laurie

Submit Date: 8/29/2024

Submit Method: Email attachment

Comments to the December 23, 2022 “Data Gap Report and Remedial Investigation Work Plan for Sundberg Gravel Pit”. Submitted by Laurie R. Gneiding, CEP, CPPS1

I have reviewed the aforementioned document and have tabulated my comments below.

Comment No.	Page No.	Section	Paragraph	Comment
1	3	2.2		This section limits the historical operation to “Intermittent sand and gravel mining from 1960 through the 1990s”. It does not discuss other historical operations that occurred at the property. The following should be included in Section 2.2. • An email from Mr. Chuck Dower to Mr. Brett Bures, both of the City of Olympia, dated March 18, 2005 states that “construction material” from “the cross town gas main was dumped at Sundberg”. • A letter from Erica Marbet, Squaxin Island Tribe, Natural Resources Dept., dated August 1, 2019 stating the reading of “multiple reports detailing illegal dumping of fill material on this site”. • Investigations provided in Appendix C of the 2022 RI Workplan from Pacific Rim (2007) and Robinson Noble (2008) describing a soil investigation that observed “construction debris, large logs, and lumber”, “random fill”, “asphalt, concrete rebar, metal stirps, and cedar planks” and the results of a Phase II ESA describing “wood debris....and construction debris”
2	5	3.1	3	This statement is not correct. Mr. Jerry Dierker filed an ERTS complaint stating that soil runoff from the Sundberg Site enters a pond on his property and continuing downstream to the north under French Loop Rd NW and onto the Butler Cove of Budd Inlet.

3	24	5.2	2	Additional complete exposure pathways should be included in the CSM: • Potential direct exposure to groundwater through inhalation and dermal contact. • Potential exposure to VOCs in groundwater through vapor intrusion.
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¹ Ms. Gneiding has an MSc. in Environmental Toxicology and is a Certified Environmental Professional. She has over 40 years of experience in hazardous waste investigations including the preparation, implementation, and submittal of Remedial Investigations and Human Health and Ecological Risk Assessments.

				Potential exposure to airborne particles (from soil) through inhalation
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		7.4.4	7.4.4.2, Bullet 3 7.4.4.3/7.4.6	• Background soil samples should be collected for comparison to the Washington State background levels. Groundwater has not been sufficiently characterized upgradient, offsite, or onsite. Therefore, the following is suggested: • Installation of a background (upgradient) monitoring well (MW) if not already completed. • Installation of sentinel wells to determine if contaminants have migrated offsite. • Installation of monitoring wells greater than 15 feet to determine if contaminants have leached to groundwater as per Section 7.4.4 and Table 2 and the presence of highly mobile DRO and arsenic in shallow groundwater (Table 7).
	32	7.4.5	2	Sediment samples should be collected from the biologically active zone (BAZ) between 10- 15 cm (3-5”), as per USEPA and WA Ecology.

REFERENCES

Dierker, J. 2021. ERTs complaint to Garret Peck (SWROERTS) and ACOE, DFW, Thurston County Stormwater.

Dower, C., 2005. Email from Chuck Dower, City of Olympia Engineering Lands Examiner to Brett Bures, Associate Planner, Community Planning & Development. Dated March 18, 2005.

Marbet, E., 2019. Letter from Erica Marbet, Water Resources Biologist (Squaxin Island Tribe, Department of Natural Resources) to the City of Olympia (Cari Hornbein, Community Planning and Development Department and Steve Thompson, Public Works).

Grady, Elizabeth

Submit Date: 09/13/2024

Submit Method: Website

The Work Plan from the Dept. of Ecology must correctly characterize the Sundberg site as an illegal solid and hazardous waste dump site that operated outside the law for decades. The current residents deserve to know what has been dumped there and what the ramifications for the current residents and potential residents are. If the city were to grant a work permit without all the needed information it would be the wrong thing to do. All the data is needed to correctly proceed. If there were a problem down the road it would be too late.

Ecology must test the below the level of all the fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site. They must also ensure that the high-pressure aquifer beneath the site (which is on a geologic fault) does not provide a pathway from the surface to the deeper aquifer.

Ecology must test for creosote and pentachlorophenol, highly toxic substances from the West Bay and Cascade Pole cleanups and found at the Port of Olympia. It must also test for all possible chemical. Ecology must test stormwater leaving the site and draining into nearby ponds, creeks and the Puget Sound. There is an ERTS complaint (1/12/21) containing clear video evidence that stormwater drains downhill to a pond and wetlands, and feeds Green Cove Creek. This drainage continues down to Butler Creek and to Budd Inlet. The Work Plan must include identification and remediation of this downstream flow. The flow passes into habitats for endangered and threatened species, and therefore the use of this land is subject to federal laws and oversight. Ecology needs to step up to that responsibility.

Graney, Colleen

Submit Date: 8/27/2024

Submit Method: Email attachment

Dear Nancy,

Hello, thank you for reviewing this email.

Our family has lived on Elliott avenue NW since 1984. We remain concerned about the development proposals being started in our neighborhood. Specifically the needed clean up for the Green Cove project. <https://apps.ecology.wa.gov/cleanupsearch/site/10635#site-documents>

I have reviewed the documents that you posted and fully support the needed cleanup efforts. I hope that the Dept of Ecology continues to work towards the needed clean up.

Sincerely,

Colleen Graney /Ken Saucke 1831 Elliott Avenue NW Olympia, WA 98502

Hubbard, Glen

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Jacobs, Bob

Submit Date: 09/12/2024

Submit Method: Website

Department of Ecology:

I have been following this issue from afar for a number of years. The way it has been handled by various state and local entities has led me to wonder about their motives.

This is a serious issue regarding the health and safety of both people and the environment, including threatened species. Please treat it as such. Please make no effort whatsoever to protect private parties who had anything to do with the use and operation of the property and please make no effort whatsoever to protect any public officials for their use of the site and regulatory duties/activities. Please apply firmly all related local, state, and federal laws.

I have received the following four points from people closer to this issue than I am. I agree fully with all of them, and hereby make them part of my public comments:

1) Ecology identifies the site as a sand and gravel pit and log yard. The Work Plan's history of the property does not identify the site as an illegal unpermitted solid and hazardous waste dump site despite decades of photographic, eyewitness and documentary evidence.

ECOLOGY MUST CORRECTLY CHARACTERIZE THE SITE AS AN UNREGULATED DUMPSITE THAT OPERATED OUTSIDE THE LAW FOR DECADES. This illegal activity is what distinguishes this site as uniquely hazardous, with ample evidence in the record. An accurate history of this site is critical to a thorough cleanup. ECOLOGY CANNOT BE COMPLICIT IN THE COVER UP OF THIS ILLEGAL ACTIVITY IF IT WANTS TO GAIN THE PUBLIC TRUST.

Ecology has no mandate to protect those persons and entities who illegally used this site.

2) ECOLOGY MUST TEST THE BELOW THE LEVEL OF ALL FILL TO ENSURE CITY AND NEIGHBORING WELLS ARE NOT BEING CONTAMINATED FROM THE TOXIC WASTE BURIED ON THE SITE.

Presently, Ecology assumes that there is a deep layer of impervious till above the deeper aquifer based on the developer's geotechnical consultant and the general geology of the area. However, there are reports of waste buried 40' deep and more and then covered with impermeable native soil. There is also a documented high pressure aquifer beneath the site and a geological fault that could provide a pathway from the surface to the deeper aquifer.

3) CONSIDERING THE SITE WAS A SHORT DRIVE FROM THE PORT OF OLYMPIA DURING THE WEST BAY AND CASCADE POLE CLEANUPS, ECOLOGY MUST TEST FOR CREOSOTE AND PENTACHLOROPHENOL, highly toxic substances found at the Port. It must also test for Agent Orange-type chemicals which were routinely sprayed by Weyerhaeuser in the 1970's on its forests and present in the logs that were deposited and debarked on site.

4) ECOLOGY MUST TEST STORMWATER LEAVING THE SITE AND DRAINING TO NEARBY PONDS, CREEKS AND THE PUGET SOUND.

Ecology states that there is no discharge of stormwater to a surface water of Washington State. This is not correct. There is an ERTS (Environmental Report Tracking System) complaint from January 12, 2021 submitted to Ecology which was not included in the Work Plan. It contains clear video evidence that stormwater drains downhill to a pond and wetlands (that feed Green Cove Creek) and then continues down Butler Creek to Budd Inlet. These are habitats for endangered and threatened species subject to federal laws and oversight.

Sincerely,

Bob Jacobs

Former Olympia Mayor, 1993-99

360-352-1346

Kaufman, Mark

Submit Date: 09/03/2024 12:57 PM

Submit Method: Website

I read the information about the August 26 meeting and want to reinforce several issues that have been raised by the Green Cove Defense Committee.

The Department of Ecology should:

- correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.
- test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.
- test for creosote and pentachlorophenol.
- test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Kilmer, Joyce

Submit Date: 09/09/2024 12:30 PM

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Kline, Gary on behalf of the Clean Black Lake Alliance

Submit Date: 09/12/2024

Submit Method: Website

Thank you for this opportunity to comment on the Remedial Investigation Work Plan for the Sundberg Gravel Pit.

The Clean Black Alliance is a citizens group that formed to advocate for ecosystem based solutions in Black Lake and other lakes in Thurston County. We believe that the current routine use of herbicides and alum are short-sighted methods to remove what boaters referred to as nuisance plants and to prevent harmful algae blooms. We promote other methods such as aeration or adequate nuisance plant removal to appease boaters and remove phosphorus.

In reading the proposed RI Work Plan proposed for the Sundberg mine, we see parallels with our advocacy for lakes. We believe that the Sundberg mine has been used to unlawfully deposit wood waste, bark and construction debris and that poses a risk to the environment and public health.

One of our members is Laurie Gneiding, a retired environmental toxicologist who has submitted comments of her own on your webpage. We second her recommendations which are based on her 40 years of experience in hazardous waste investigations. As a group devoted to water quality, her suggestions for groundwater testing are especially critical.

The Sundberg site, more than a gravel pit and log yard, was an illegal hazardous and solid waste dumpsite for many decades. It was used by various entities, including the City of Olympia and the Port of Olympia, to dispose of construction and other waste. Because some of the waste dumped at the site came from the Port of Olympia and a large portion of the property was used by Weyerhaeuser as an export log yard where logs were debarked, we suggest that Ecology include chemical analyses of pentachlorophenol and other chemicals associated with wood treatment, as well as those chemicals commonly used in silviculture practices at the time the export log yard was operating.

We believe the dump site operated without oversight or regulation just minutes away from the Port of Olympia during the cleanup of the West Bay industrial area and the Cascade Pole site.

We request that Ecology include the history of the site which includes documentation from DNR and the City of Olympia, eyewitnesses and photographic evidence.

We have video footage that demonstrates that runoff from this site flows to Puget Sound. We believe it is possible that contaminants from this site reach federally protected waters for endangered species at concentrations that could potentially affect them. We suggest that Ecology analyze stormwater from the site prior to entry to the nearby Green Cove Creek and Butler Creek, which we believe are habitat for threatened species, and coordinate with federal agencies who have authority over these matters.

Thank you for your consideration and your good work.

Kronenberg, Esther

Submit Date: 09/02/2024

Submit Method: Website

<https://olywip.org/real-hope-for-green-cove-cleanup/>

Link to article in Works in Progress September 1, 2024

Kronenberg, Esther

Submit Date: 9/14/2024

Submit Method: Email attachment

[Comment begins on next page.]

From: [Esther Grace Kronenberg](#)
To: [Groven, Connie \(ECY\)](#)
Subject: 1/12/2021 ERTS complaint photos
Date: Saturday, September 14, 2024 2:15:27 PM
Attachments: [11221 ERTS complaint.docx](#)

External Email

Hello Connie,
I'm not sure why I can't find this ERTS complaint in your system, so I'm resending the photos here with the email we sent to Garrett Peck.
Can you please check if it was ever entered?

Please include these photos and a copy of the email in the comments for the Remedial Investigation.



#7Butler creek crossing French Rd..pdf



#8creek from south side of French Rd jpeg.jpeg



#11 muddy water continuing to Butler Cove.jpeg



#12 muddy water reaches Butler Cove.jpeg

Thank you so much.
Esther



#1 Pond on Mr. Dierker's property 28 Ave & Cooper Point.



#2 Channel leading from pond.



#3 Channel leading from pond.



#4 Muddy sediment downstream from channel.



#5 Heading downstream.



#6 Sediment heading towards Butler Creek.



#7 Butler Creek crossing French Rd. (1)



#8 Creek from south side of French Rd.



#9 Creek from north side of French Rd.



#10 Muddy water nearing Butler Cove.



#11 Muddy water continuing to Butler Cove.



#12 Muddy water reaches Butler Cove.

Wed, Jan 13, 6:38 PM (18 hours ago)

to SWROERTS, marian.abbett, sthompso, jgraham, Cari, Tye,

also sent to Matthew Bennett - ACOE
Gabriel Madel and Allison Cook - DFW
Ryan Langan - Thurston County stormwater

Dear Garret Peck,

As per my phone conversation with you today, attached please find photos of muddy waters running under 28th Ave NW at Cooper Point Rd. in West Olympia, entering a pond on my property on the northeast corner of the intersection, and continuing downstream to the north under French Loop Rd. NW and on into Butler Cove of Budd Inlet.

The photos were taken on 1/12/2021 around noon when the water was already less muddied than in the morning hours. Still, it is evident there is significant silt being carried into the pond on my property which is usually clear, and on into Budd Inlet.

Also, please note that the silt deposits seen in photos #4-8 were not previously present. These photos were taken south of 28th Ave along the east side of Cooper Point Rd., site of the Sundberg Gravel Pit and uphill from the pond. This is another of a series of runoffs from this site over the years that has threatened water quality and the federally protected waters of Butler Cove and Budd Inlet.

Please include this ERTS complaint and these photos in Ecology's files on the Green Cove Sundberg Gravel Pit, a MTCA site listed on Ecology's Confirmed or Suspected Contaminated Site List, Facility Site ID Number: 82016954.

Thank you for your attention to this ongoing and long standing environmental threat.

I have sent another email with more photos.

Jerry Dierker

cc: Thurston County Stormwater

7 Attachments

+ 2nd email with 8 attachments of French Loop RD and Butler Cove

Kronenberg, Esther

Submit Date: 9/15/2024

Submit Method: Email attachment

Hello Connie,

Here are the videos showing stormwater leaving the Sundberg site and going downhill both into Green Cove Creek and Butler Creek. I would appreciate it if you could include this in the comments of the Green Cove Defense Committee. I couldn't load them on Ecology's comment page.

The video shows stormwater crossing Cooper Point Rd to the west via a culvert, continuing downhill to 28th Ave and then crossing back under Cooper Point to the southeast corner of 28th and Cooper Point, then flowing north under 28th to Mr. Dierker's pond. The ERTS complaint of 1/12/21 shows how muddy sediment from his pond finds its way to Butler Cove on Budd Inlet.

We also took videos of a sinkhole on the Sundberg site and flooding at 28 Ave where Green Cove crosses it west of Cooper Point.

Please include these videos and photos as part of your consideration for cleaning up the site and the environs around it.

Thank you!

Esther Kronenberg for the Green Cove Defense Committee

<https://drive.google.com/drive/folders/18Q9-lF9DwN6jU7QsF9oHhQYH07kXPh5C?usp=sharing>

Kronenberg, Esther

Submit Date: 9/15/2024

Submit Method: Email attachment

[Comment begins on next page.]

From: [Esther Grace Kronenberg](#)
To: [Groven, Connie \(ECY\)](#); [Groven, Connie \(ECY\)](#)
Subject: Pond with beaver and strike fault north of 28 Ave NW @ Cooper Pt.
Date: Saturday, September 14, 2024 7:30:24 PM
Attachments: [Pond on the NE corner of 28 Ave & Cooper Point Rd NW.HEIC](#)
[Beaver damage at pond.HEIC](#)
[More beaver damage.HEIC](#)
[Channel leading east from pond.HEIC](#)
[heading further east from pond.HEIC](#)
[Channel continues.HEIC](#)
[Strike fault.HEIC](#)
[strike fault continues.HEIC](#)
[Area of strike fault.HEIC](#)

External Email

Hello Connie,

As stated in Jerry's comments, here are some more photos of the strike fault and of Jerry's pond just to show there are beavers living there, as you can tell from the plum trees (#@*!!) they just chewed off in the last 2 weeks.

Also, we followed another outlet from the pond heading east. You can see the channel and then it opens up to what appears to be a strike fault that continues in the opposite direction onto the Sundberg site.

You might want to take a look at the pond and fault yourself at some point. It's the closest surface water body to the Sundberg site.

Thanks for including these photos in the Remedial Investigation

All the best,
Esther



Area of strike fault.



Beaver damage at pond.



Channel continues.



Channel leading east from pond.



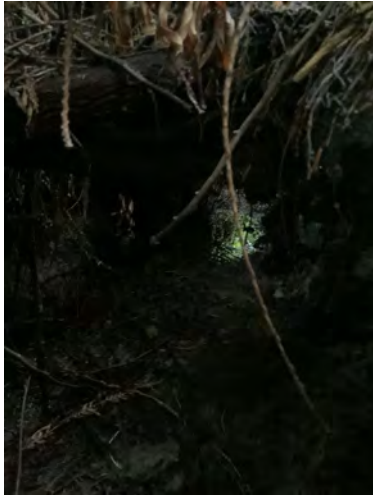
Heading further east from pond.



More beaver damage.



Pond on the NE corner of 28 Ave & Cooper Point Road NW.



Strike fault continues.



Strike fault.

Kronenberg, Esther on behalf of the Green Cove Defense Committee

Submit Date: 09/02/2024

Submit Method: Website

QUESTIONS FOR ECOLOGY

1. Why does Ecology state that the site was only a sand and gravel mine and log yard when it was also an unpermitted and illegal hazardous and solid waste dump from the 1940's until 2015, when the current owner was told by Ecology to not dump any more materials on the site. What assurance does the public have that Ecology is not continuing to cover up what happened at this site?

2. There is ample photographic and documentary evidence from DNR and Ecology reports and eyewitness testimony of materials being brought on the site. Why does Ecology now characterize this known fact by stating "Some areas were likely backfilled with soil, garbage, construction and woody debris and large logs."

Why doesn't Ecology tell it like it is?

3. What plans does Ecology have to look for unconfirmed hazardous substances at the site. At present, Ecology is only confirming hazardous substances brought to the site by its current owner, who dumped 400-500 10 yard dump loads there in 2015, as can clearly be seen on a 2015 aerial photo, and who also was using it for mining materials and refilling the mined excavations with other toxic waste from the Port since 2005 .

How will Ecology look for the materials present on the site from the previous 65 years of dumping that took place under Ted Sundberg's ownership?

4. Why is there not a sign posted at the site that identifies it as being on the Confirmed and Suspected Contaminated Site List (CSCSL) list to warn people from coming on the site, since Mr. Dierker, who lives nearby, has reported health issues from being on the site and it is known to have hazardous substances that threaten the public health? Who is responsible for posting these signs and why haven't they been notified?

5. Mr. Mahan, one of the principals who owns Green Cove, signed a quit claim deed in 2005 which included the reclamation permit. Mr. Mahan is also the principal behind the previous LLC's that were registered as owners of the site. Documents verify that Mr. Mahan's responsibility for this site extends back more than 20 years. For Ecology to state that the properties were purchased in 2014

minimizes Mr. Mahan's culpability for the site. As stated above, the quit claim deed included the reclamation permit. We do appreciate that Ecology has identified Mr. Mahan as the PLP, and not some legal fiction, but believe his ownership since 2005 should be clarified.

Why does Ecology say Green Cove purchased the properties in 2014?

Is the misstatement on dates of purchase an oversight or deliberate?

6. The site is actually larger than 53 acres. Besides the main pit area, waste was also dumped on the 5 acres recently bought by the City of Olympia for a future "park." Neighbor Mike Gwinn who lives adjacent to this property has testified that extensive dumping occurred there while Ted Sundberg owned the property. Why haven't signs been posted on this public property to warn people that hazardous waste was dumped there? Who is responsible for posting signs and why haven't they been notified?

There is also a large amount of debris that was moved onto the neighboring property to the north where an illegal stormwater ditch was made to drain contaminated stormwater off the main pit site for the last 20 years. There is now a house and family living on this land.

What plans does Ecology have to ensure that the materials that were dumped on this family's property and on the City property is removed?

What are Ecology's plans to clean up these areas where the illegal stormwater ditch drains contaminated stormwater outside the 53 acres?

7. In 2020, Ecology met with the Green Cove Defense Committee and other neighbors who have lived next to the site for 20 years and who have documented years of dumping with photos of rusting metal drums, concrete, solidified resin and asphalt. We gave you a map with areas marked where these materials had been found. The map of proposed explorations that is part of this plan does not include many of these known areas with waste. WHY?

Does Ecology plan to test ALL the areas identified where waste has been deposited?

On what basis did Ecology select the few areas on the site that it does plan to test?

8. No testing has ever been done below 15' bgs. DNR documents report the gravel mine extended to a depth of at least 35' and eyewitnesses report the mine was dug much deeper to obtain the #2 pit run material used to build roadbeds. This material is found 50' below the level of Mike Gwinn's house on 28th Ave, according to well logs, and the house stands about 70' below the top of the hill. A 1995 DNR inspection reports an eastern face of 100'. We also know that Mr. Mahan is responsible

for dumping up to 15' of fill at the site, which DNR has directed him to remove under the reclamation permit.

Why have no enforcement actions been taken for violations of the reclamation permit?

What plans does Ecology have to test below the level of this fill to sample the waste from 65 years of dumping under Ted Sundberg?

9. DNR has issued dozens of violations for this site. How is Ecology working with DNR to clear the mountain of violations that have never been corrected which require at least the removal of all non-native materials, and to fulfill the purpose of the reclamation permit that has been outstanding since 1972?

10. The runoff from this site is documented as draining into federal tidal waters. What steps has Ecology taken to coordinate this cleanup with the relevant federal authorities, including the Squaxin Island Tribe, NOAA and the National Marine Fisheries who are responsible for the survival of endangered orcas and salmon in Puget Sound?

Will Ecology be completing a NEPA for this site since Ecology is acting in loco parentis for the federal agencies and since this project will impact federal resources, endangered species and tribal treaty rights that are under federal authority?

11. This site is in an extremely sensitive aquifer recharge area in hydraulic continuity with the Strategic Groundwater Reserve of the State Capitol and several neighboring and city drinking water wells. The Green Cove Comprehensive Plan was created to protect this most sensitive area and Olympia's best salmon bearing stream in 1998. DNR has documented that there is an exposed water table on the 1972 reclamation plan. There are currently several exposed ponds in the old pit area created by Mr. Mahan's excavations. A 2002 DNR report states there is a pierced aquifer which would allow contamination to flow down into deeper layers that are used as drinking water aquifers.

How will Ecology ensure that contamination from this site is prevented from reaching our critical drinking water resources, including neighboring wells and the Strategic Reserve?

Who at Ecology is responsible for overseeing the integrity of the Strategic Reserve?

12. Considering that this site has been draining contaminated water for decades, how will Ecology ensure that neighboring wells, streams and surface waters downstream of this site all the way to Puget Sound have not been contaminated, and if so, will be cleaned up to protect public and environmental health?

Water flows downhill and waterborne contaminants flow downstream. Ecology's plan to only test from the source is not sufficient to determine downstream harm caused by waterborne pollutants coming from this site on the highest point on the Cooper Point peninsula. Ecology must test the full extent of the drainage, which is less than 2 miles to Green Cove on Eld Inlet and less than 1 mile to Butler Cove on Budd Inlet. This is only a short span of discharge, not a long river watershed that needs to be evaluated.

13. Ecology omitted certain findings of fact regarding evidence of dumping found at the site at the request of Mr. Mahan's attorney. Ecology also omitted an ERTS complaint filed in January of 2021 that included video evidence of stormwater draining into neighboring properties and ultimately to Budd Inlet at Butler Cove. Why?

How can Ecology, as a government department funded by taxpayers, assure the public that it is working for the public and is not being influenced to do less of a cleanup than what is required to safeguard the public health?

14. Considering the complicity of DNR, the City of Olympia, Thurston County, Ecology and any others who turned a blind eye to the illegal activities that were occurring on this site for over 78 years or used the site themselves, how will Ecology assure the public that THIS TIME, it really is serious about cleaning up this toxic site?

How is Ecology coordinating with these jurisdictions to accomplish the clean-up as required by law? Will Ecology provide ongoing communications with the public about their coordination with other responsible jurisdictions?

15. We believe Aspect Consulting's June 2023 draft RI/WP did not list pentachlorophenol or dioxins among the semi-volatile organic compounds that should be required to be analyzed to ensure levels below the Department of Health drinking water criteria. Considering this site was a short drive to the Port of Olympia during cleanups in 1949 and the early 2000's, what plans does Ecology have to test for these chemicals known to be present at the Port and deposited at the site.

16. Weyerhaeuser used this site as a log yard for 37 years without a permit that we know of. During that time, Agent Orange type chemicals, 2-4-T and 2-4-5-D were routinely used in silviculture (See *Silvicultural use of Herbicides in Pacific Northwest Forests* by H. Gratkowski in 1975). Pesticides, herbicides, chemical fertilizers and deer repellants were also used that have inert ingredients which have been found to be toxic material and hazardous waste, and which the EPA has allowed to be recycled into pesticide formulations and other commodities which are picked up by the cambium

layer in the bark of the tree. Canyons on the east side of the property were filled with this contaminated bark which was taken off the export logs by Weyerhaeuser and buried.

Weyerhaeuser is also responsible for the methane on the site that comes from decomposing bark. Will Ecology assure the public it will be testing for these dangerous chemicals in log yard waste areas that are amply identified on DNR reports? If so, what is the plan and when will it be implemented? If not, why?

Will Weyerhaeuser also be held responsible as a PLP for their illegal use of this property at the peril of the public health? If so, what is the plan and when will it be implemented? If not, why?

17. The Wild Fish Conservancy documents the presence of threatened Olympic mudminnow in the vicinity of the site from which runoff enters mudminnow habitat. It states "untreated and undefined road runoff is a potential threat to the Olympic mudminnow." There is also creosote buried which has been found to be toxic to aquatic life. See this link for effects of creosote on aquatic life. <https://corpora.tika.apache.org/base/docs/govdocs1/318/318199.pdf>

How will Ecology ensure that contaminants are not reaching critical habitat, including that of threatened salmon, steelhead, shellfish and orcas, etc which inhabit or feed in areas downstream?

18. The Conceptual Site model on Page 97 of the Remedial Investigation only mentions direct exposure as an exposure pathway.

Considering the volatile chemicals, methane and air pollutants as well as stormwater pollutants flowing offset, why aren't inhalation and ingestion being considered as exposure pathways?

19. There is also a wildlife corridor that runs through the property.

How will Ecology protect the wildlife on the property and those using the ponds from direct, inhalation and ingestion exposure pathways, as well as wildlife downstream and downwind of this toxic site?

20. Does the Department of Ecology give special privileges and immunities to housing developers such as Mr. Mahan who build on toxic waste sites, since there is an Ecology program to promote such developments on former toxic waste sites?

We expect Ecology with its jurisdictional partners to uphold and enforce all applicable federal, state and local laws, rules and policies. We expect Mr. Mahan to comply with instructions of

applicable jurisdictions before being granted the right to proceed with his proposed development. To date, this has not happened. Why?

21. A fence, padlocked gate, and concrete barriers were placed between Cooper Point Rd and the property a few years ago. People who bring their refuse, garbage, asphalt and "whatever" to dump in the gravel pit no longer have access. They now use the area between Cooper Point Rd and the fence as a dumping ground. Cooper Point Rd is a high traffic street. The dumped refuse sits there for weeks, sometimes months. The City of Olympia and Mr. Mahan are responsible for cleanup. Is there a plan to remove the dumped refuse on a regular basis?

IN CONCLUSION- How can the public be confident that Ecology is properly acting in this proposed Remedial Investigation Plan when it does not acknowledge the history of this site as an illegal toxic and solid waste dump site without paying taxes, without permits and without any legitimate approvals which operated while numerous jurisdictions with authority looked the other way, and when it does not properly consider and investigate the legacy of this illegal solid and hazardous waste dump which actually operated for more than 70 years, as clearly shown by the actual history of this site.

These are preliminary questions that do not assess the technical aspects of the Remedial Investigation. There will be follow-up questions.

SUBMITTED BY:

The Green Cove Defense Committee

Larson Kramer, Ronda

Submit Date: 09/16/2024

Submit Method: Website

Please do an extensive grid of soil sampling for the entire site. The current data is far too sparse to allow informed decision-making. It does not reflect eye-witness statements regarding past dumping. Also, there is a special need for extensive sampling of the east side of the site.

Malanchuk-Finnan, Linda

Submit Date: 08/25/2024

Submit Method: Website

What will Ecology and Green Cove do to protect the safety of this site that has arsenic, heavy metals and numerous toxins demonstrated in its reports but which there is no current written plan to ameliorate despite the words of the bodies concerned? If prior reports indicate the presence of severe contaminants, how will Ecology, current stakeholders and future homeowners know when it is "safe" when the party concerned does not include or allude to these conditions?

Moore, Michael

Submit Date: 08/28/2024

Submit Method: Website

Dear Connie, Nancy and the Crew,

Thank you for the very informative meeting at the Community Center on Monday night. I learned a great deal about the process for cleanup of the Sundberg site. I live on Grove Road across from the 53 acres of the old unpermitted gravel mine and waste dump. I spoke to you Connie about what I have seen on the east side of Grove road behind my property and wanted to detail it for you here as you requested.

The property to the north of mine is at 2224 Grove St NW parcel # 12809140200 and was once owned or used by the Sundbergs for equipment storage and repairs. It is on this property that I have seen what looked like oil sheens on standing water in the drainage that flows south to the dip in 20th Ave NW. I have seen and pulled out old equipment parts, tires, garbage of all sorts under a foot of soils on my own property as well. I have found brake parts, bicycle parts, carpeting and one fiberglass boat hull also on my property. One of my greatest concerns is that of our well water. You mentioned that the aquifer underneath the glacial till is virtually impervious to penetration from the surface. As much as I would like to believe that, I am going to need some scientific analysis to prove this to be true. My thought is that there are a number of wells on 20th Ave NW and north of 20th Ave NW on Grove and on the disputed property that have access to water at the 150-180 foot depth that would be readily available for sampling and testing. Do we need to wait another year or years to get to this stage or could this be tested sooner? I am not opposed to doing it myself but there might be more beneficial information with the testing done in aggregate.

In the end, I do have more confidence after your presentation that a full accounting of potential contaminants will be investigated and look forward to the process. Thank you and the full staff for your work.

Michael H. Moore

360-762-5039

olylumber@gmail.com

Murphy, John

Submit Date: 09/09/2024

Submit Method: Website

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Newman, John

Submit Date: 09/16/2024

Submit Method: Website

There needs to be extensive sampling on the east side of the sight. There is very little data there. The neighbors have testified extensively about dumping at the whole site when the Port was hauling contaminated sediments and soils from the Port site. A scientific sampling should include an extensive grid of sampling for the entire site.

Olmstead, Judy

Submit Date: 09/08/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Ornstein, Lisa

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Pruitt, Kathy

Submit Date: 09/09/2024

Submit Method: Website

Additional attention is needed to protect our environment at the Sunberg Gravel Pit Site.

Key concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Thank you for your attention to this.

Riener, Lisa

Submit Date: 8/27/2024

Submit Method: Email attachment

AUG 27

THANKS CONNIE;

We appreciate your knowledge and work with the WA Dept of Ecology, Toxics. The Sunberg mining site, on Cooper Pt RD NW had a good map.

Question;

1. IS PCP. CREOSOTE??
2. What is the acronym for creosote?
3. What is the acronym for dioxin?
4. What chemicals make up dioxin?
5. In the remediation book of Aspect; there is no mention of dioxin. Why?
6. In that Aspect book, it talks about pg 34, for Methane investigation. I cannot find pg 34.

I cannot find the discussion of methane. What page is it on?

7. Many of us think that not enough test pits have been sited on this 54 acres. What will persuade your staff (Ecology) to push for more test pits of 10 feet and deeper?

There are only 12 test pits designated so far?

Thanks for your answers; Lisa R.

360-338-5237

River, Devin

Submit Date: 09/16/2024

Submit Method: Website

Do better, Ecology. The water quality of the entire area rests on this decision. Choose to be on the right side of history.

1) Ecology identifies the site as a sand and gravel pit and log yard. The Work Plan's history of the property does not identify the site as an illegal unpermitted solid and hazardous waste dump site despite decades of photographic, eyewitness and documentary evidence.

ECOLOGY MUST CORRECTLY CHARACTERIZE THE SITE AS AN UNREGULATED DUMPSITE THAT OPERATED OUTSIDE THE LAW FOR DECADES. This illegal activity is what distinguishes this site as uniquely hazardous, with ample evidence in the record. An accurate history of this site is critical to a thorough cleanup. ECOLOGY CANNOT BE COMPLICIT IN THE COVER UP OF THIS ILLEGAL ACTIVITY IF IT WANTS TO GAIN THE PUBLIC TRUST.

Ecology has no mandate to protect those persons and entities who illegally used this site.

2) ECOLOGY MUST TEST THE BELOW THE LEVEL OF ALL FILL TO ENSURE CITY AND NEIGHBORING WELLS ARE NOT BEING CONTAMINATED FROM THE TOXIC WASTE BURIED ON THE SITE.

Presently, Ecology assumes that there is a deep layer of impervious till above the deeper aquifer based on the developer's geotechnical consultant and the general geology of the area. However, there are reports of waste buried 40' deep and more and then covered with impermeable native soil. There is also a documented high pressure aquifer beneath the site and a geological fault that could provide a pathway from the surface to the deeper aquifer.

3) CONSIDERING THE SITE WAS A SHORT DRIVE FROM THE PORT OF OLYMPIA DURING THE WEST BAY AND CASCADE POLE CLEANUPS, ECOLOGY MUST TEST FOR CREOSOTE AND PENTACHLOROPHENOL, highly toxic substances found at the Port. It must also test for Agent Orange-type chemicals which were routinely sprayed by Weyerhaeuser in the 1970's on its forests and present in the logs that were deposited and debarked on site.

4) ECOLOGY MUST TEST STORMWATER LEAVING THE SITE AND DRAINING TO NEARBY PONDS, CREEKS AND THE PUGET SOUND.

Ecology states that there is no discharge of stormwater to a surface water of Washington State. This is not correct. There is an ERTS (Environmental Report Tracking System) complaint from January 12, 2021 submitted to Ecology which was not included in the Work Plan. It contains clear video evidence that stormwater drains downhill to a pond and wetlands (that feed Green Cove Creek) and then continues down Butler Creek to Budd Inlet. These are habitats for endangered and threatened species subject to federal laws and oversight.

Roundtree, Sara

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Tatsumi, Garrett

Submit Date: 09/09/2024

Submit Method: Website

Please fill in the gaps of the proposed "Remedial Investigation of the Sundberg Gravel Pit Site".

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Taylor, Gabriel on behalf of Olympia Ecosystems

Submit Date: 09/15/2024

Submit Method: Website

Olympia Ecosystems owns and is actively restoring the Cooper Crest Preserve, located on the west side of Cooper Point Drive, across from the subject property. The Cooper Crest Preserve is a restoration area that allows for public access and includes wetlands and seasonal streams that drain to Green Cove Creek. As the immediate downslope property owner and an organization dedicated to protecting ecosystems, we support the proposed effort to characterize and remediate the environmental damage at this location.

Olympia Ecosystems has reviewed the Data Gap Report. Based on our review of the Data Gap Report, hydrocarbon contaminants have likely transported from their original source area, down gradient via groundwater, and are accumulating and affecting the wetlands. Based on our review of the proposed Remedial Investigation, this concern and others will be investigated. We remain interested in the results of this investigation. We remain hopeful that this property, the Cooper Crest Preserve, and Green Cove Creek can be restored and protected.

Thomson, Anita

Submit Date: 09/01/2024

Submit Method: Website

In regard to the Sundberg Gravel Pit Site, the public information involved and the investigation of soil at the site, I would appreciate the addition of the words "and Toxic Dump" in the title of the site. I don't feel like unregulated dumping at the site is stressed sufficiently. It isn't the gravel mining that presents difficulty, it is the unknown materials on the site that are causing concern.

I would also like to know that soil samples deeper than 15 feet are being taken. As far as I know, we have no idea who put what in the ground and where.

Otherwise I appreciate the work that the Department of Ecology is doing to assess the toxics on the site and the sharing of the findings with the public.

Wilson, Eliane

Submit Date: 09/09/2024

Submit Method: Website

My major concerns are:

Correctly characterize the site as an unregulated dumpsite that operated outside the law for decades.

Test below the level of all fill to ensure city and neighboring wells are not being contaminated from the toxic waste buried on the site.

Test for creosote and pentachlorophenol.

Test stormwater leaving the site and draining to nearby ponds, creeks and the Puget Sound.

Appendix B:

Summary of Outreach

Ecology's public involvement activities related to this comment period (August 16 – September 16, 2024) included:

Fact Sheet

- **Mailed Notices:** Ecology sent a multi-page fact sheet mailer to roughly 430 nearby addresses, including homes and businesses. This mailer summarized the cleanup, documents available for comment, and how to submit comments.
- **Email Updates:** Ecology emailed the fact sheet to 333 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
- **Online Access:** The fact sheet was also posted on Ecology's [Sundberg Gravel Pit webpage](#).⁸

Legal Notice

- Publication of one paid display ad in *The Olympian (Olympia)* Print Publication dated Friday, August 16, 2024.

Site Register

- Ecology published **three notices** in its *Contaminated Site Register*.
 - **Comment Period Notices:**
 - Contaminated Site Register for – August 22, 2024
 - Contaminated Site Register for – September 5, 2024
 - **Responsiveness Summary Notice:**
 - Contaminated Site Register for – April 2, 2026
- Visit [Ecology's Site Register website](#)⁹ to download PDFs.

Media Coverage

- Kronenberg, Esther. "[Real Hope for Green Cove Cleanup](#)." ¹⁰ Works in Progress, 1 Sept. 2024.

⁸ <https://go.ecology.wa.gov/10635>

⁹ <https://apps.ecology.wa.gov/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

¹⁰ <https://olywip.org/real-hope-for-green-cove-cleanup/>

Public Meeting and Open House

- Ecology hosted an in-person meeting and open house on Wednesday, August 26, 2024, at 6:00 p.m.
- Ecology staff presented details on the Agreed Order and answered questions about the site.



Figure 3: Ecology staff meeting with community members during the public meeting and open house event.

Websites

- Ecology updated its Sundberg Gravel Pit cleanup website. This update included:
 - Information about the public comment period.
 - Information about the public meeting event.
 - Posting the fact sheet and documents available for public review.
- These materials were also listed on Ecology’s [Public Inputs & Events webpage](https://ecology.wa.gov/PublicInputs/Events/Search/Listing).¹¹

¹¹ <https://ecology.wa.gov/Events/Search/Listing>

Document Repositories

- Printed documents were available for public review at two document repositories:
 - **Olympia Timberland Regional Library:** 313 8th Ave SE Olympia, WA 98501.
 - **Ecology Lacey Office** (by appointment only): 300 Desmond Drive SE Lacey, WA 98503; PublicDisclosureSWRO@ecy.wa.gov or 360-407-6365.
- Documents are available online on Ecology's [Sundberg Gravel Pit webpage](#).¹²

¹² <https://go.ecology.wa.gov/10635>