

WAC 197-11-970 Determination of Nonsignificance (DNS).

DETERMINATION OF NONSIGNIFICANCE

Description of proposal: The purpose of the project is to conduct a Model Toxics Control Act (MTCA) interim action is to perform cleanup actions at two upland areas of the BMT Northwest Site (also known as Reliable Steel) that are contributing to groundwater contamination. These actions and locations are: 1) removal of a leaking heating-oil underground storage tank (UST) and associated contaminated soil adjacent to the southwest corner of the Tank Shop Building, and 2) removal of metals-contaminated soil beneath the former Maintenance Building.

Due to its location on Puget Sound, the site is designated as a Puget Sound Initiative cleanup site.

Proponent: Washington State Department of Ecology, Toxics Cleanup Program, Southwest Regional Office

Location of proposal, including street address, if any: The BMT Northwest Site (also known as Reliable Steel) is generally located at 1218 West Bay Drive NW in Olympia, Washington.

Lead agency: Washington State Department of Ecology

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

There is no comment period for this DNS.

This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. Comments must be submitted by July 21, 2014.

Comments should be directed to Steve Teel, Site Manager, at Steve.Teel@ecy.wa.gov or PO Box 47775, Olympia, WA 98504-7775.

Responsible official: Rebecca S. Lawson, P.E., LHG

Position/title: Section Manager, Toxics Cleanup Program/Southwest Regional Office, WA State Department of Ecology

Phone: (360) 407-6241

Address: P.O. Box 47775, Olympia, WA 98504-7775

Date 6/17/2014 Signature

Rebecca S. Lawson

SEPA ENVIRONMENTAL CHECKLIST

UPDATED 2014

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants: [\[help\]](#)

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [\[help\]](#)

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. BACKGROUND

1. Name of proposed project, if applicable:

BMT Northwest Site (also known as Reliable Steel) MTCA Interim Action

2. Name of applicant: [Toxics Cleanup Program, Southwest Regional Office, Washington State Department of Ecology](#)

3. Address and phone number of applicant and contact person:

Steve Teel
Washington State Department of Ecology
Toxics Cleanup Program
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775
(360) 407-6247

4. Date checklist prepared: June 12, 2014
5. Agency requesting checklist: Washington State Department of Ecology
6. Proposed timing or schedule (including phasing, if applicable): Cleanup work will begin in August or September, 2014.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The site may be redeveloped in the future and additional cleanup actions will occur in the future. A separate SEPA checklist will be completed when specific additional cleanup and/or redevelopment plans are proposed.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. The following list are the most applicable environmental reports that have been prepared. A Interim Action Report will also be prepared at the conclusion of the Interim Action.

Washington State Department of Ecology, 2014. *Interim Action Work Plan, BMT Northwest Site (also known as Reliable Steel), 1218 West Bay Drive, Olympia, Washington*, June 2014.

GeoEngineers, 2009, *Final Work Plan, Remedial Investigation/Feasibility Study, Reliable Steel Site, 1218 West Bay Drive NW, Olympia Washington*, August 21, 2009,
<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=4076>.

GeoEngineers, 2013a, *Draft Cleanup Action Plan, Former Reliable Steel Site, 1218 West Bay Drive NW, Olympia Washington*, July 18, 2013,
<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=4076>.

GeoEngineers, 2013b, *Ecology Draft Final Remedial Investigation/Feasibility Study Report, Former Reliable Steel Site, 1218 West Bay Drive NW, Olympia Washington*, July 18, 2013,
<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=4076>.

LSI ADaPT, Inc., 2001, *Phase I Environmental Site Assessment, Reliable Steel, Inc., 1218 West Bay Drive, Olympia, Washington*, July 31, 2001.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Ecology's Toxics Cleanup Program will prepare and submit a Notice of Intent for coverage under the National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges associated with construction activity (Construction Stormwater General Permit, CSWGP). This permit governs collection, handling, and discharge of storm water and construction water during construction activities. Responsibility for the CSWGP will be transferred from Ecology to the Contractor when the public works contract is established.

Also, a permit will be requested from the Assistant Fire Chief, City of Olympia Fire Department, for the removal of the heating oil underground storage tank.

10. List any government approvals or permits that will be needed for your proposal, if known.

Laws and regulations addressing permits or federal, state, or local requirements that Ecology believes may be applicable at the time are listed below. This list may not include all pertinent laws and regulations. Work performed shall be in accordance within the substantive requirements of any applicable law or regulation.

- Chapter 70.105D RCW (Model Toxics Control Act), and Chapter 173-340 WAC (MTCA Regulations).
- Chapter 70.105 RCW (Washington State Hazardous Waste Management Act), and
- Chapter 173-303 WAC (State Dangerous Waste Regulations).
- Chapter 173-160 RCW (Minimum Standards for Construction and Maintenance of Wells).
- Chapter 43.21C RCW (State Environmental Policy Act), and Chapter 197-11 WAC (State Environmental Policy Act Rules).
- Washington Industrial Safety and Health Act (WISHA).
- Applicable Thurston County Codes.
- Substantive requirements of applicable City of Olympia permits.

Also, a permit will be requested from the Assistant Fire Chief, City of Olympia Fire Department, for the removal of the heating oil underground storage tank. Because the tank was reportedly used for storing heating oil (LSI ADaPT, Inc., 2001), WAC 173-360-110(2)(h) exempts this type of tank from the requirements of WAC 173-360. However, it will be a requirement of the project that an on-site supervisor, providing tank closing services, must be licensed by passing an exam administered by the International Code Council (ICC). Also, a site assessment will be performed by a professionally qualified person certified by the ICC.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The purpose of the interim action is to perform hazardous waste cleanup actions at two upland areas of the Site that are contributing to groundwater contamination. These actions and locations are listed below:

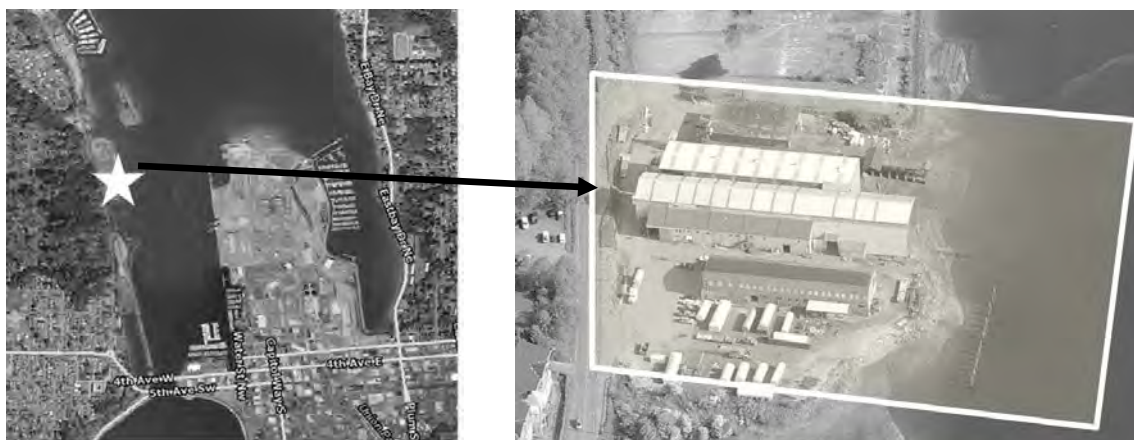
- Removal of a leaking heating-oil underground storage tank (UST) and associated contaminated soil adjacent to the southwest corner of the Tank Shop Building.
- Removal of metals-contaminated soil beneath the former Maintenance Building that are a source to groundwater contamination. A small area of gasoline-contaminated soil beneath the east end of the building associated with sample S-24 will also be removed.

The total area of the above excavation areas is approximately 0.5 acres.

Prior to development, the property comprising the Site was a portion of the Budd Inlet shoreline and the majority of the area consisted of intertidal aquatic lands. Site use has consisted of the placement of fill to create additional uplands followed by commercial and industrial activities. The Site was originally developed as a lumber mill. From 1941-2009, the site was used for boat building, steel fabrication, or welding. The Site has been vacant since 2009. Only two buildings are still present at the Site: the Structural Shop and the Paint Shop (Figure 2). In 2010, a fire badly damaged the Tank Shop and so it was demolished in 2011. Due to its structurally unsafe condition, the Maintenance Building was also demolished in 2011.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Site is located at 1218 West Bay Drive NW, on the western shoreline of Budd Inlet, in Olympia, Washington (see below text photos and Figure 1). Abbreviated legal description: Section 10 Township 18 Range 2W Quarter SW SE & SE SE FCT BLK 364 & 365.



B. ENVIRONMENTAL ELEMENTS

1. **Earth**

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other The Site is generally flat with a slight slope toward Budd Inlet. The area beneath the former Maintenance Building is lower in elevation (approximately 2 to 4 feet) than the surrounding land surface.

b. What is the steepest slope on the site (approximate percent slope)?

5%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soil texture beneath the Site generally consists of:

- Gravel fill from the surface to 2 feet below ground surface (bgs). Soil textures range from gravel with sand or silt to silty gravel.
- Silty to sandy fill from 2 feet bgs to depths between 3 feet bgs and 13 feet bgs. This unit is generally gray to olive to brown in color.
- Dredge fill occurs below the silty to sandy fill at depths ranging from 4 to 15 feet bgs. This fill material is gray colored and consists of sand or silty sand with shells.
- Native deposits are encountered below the dredge fill. These deposits are generally composed of gray silt. However, native deposits were also observed to sometimes consist of silty sand or sand with gravel.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed.

Indicate source of fill.

Depth of excavation in the Maintenance Building area will be generally 2 feet bgs. However, a smaller area within the Maintenance Building footprint will be excavated to a depth of 6 feet bgs. The depth of excavation for the heating oil underground storage tank removal is approximately 10 feet bgs. Following the removal of contaminated soil, the excavations will be backfilled to the original (pre-excavation) grade with clean imported fill or excavated soil that meet cleanup levels as shown by laboratory analyses. The total volume of soil that will be excavated for the project is estimated to be 1,520 cubic yards.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
Erosion control measures will be implemented by the Contractor to ensure compliance with local and state government regulations.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

No additional impervious surfaces will be added to the Site as a result of the project.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

The Contractor shall be required to plan, install, inspect, maintain, and monitor Temporary Erosion and Sediment Control (TESC) Best Management Practices (BMPs) to prevent pollution of air and water, and control, respond to, and dispose of eroded sediment and turbid water during the duration of the project. Additionally, the Contractor shall implement procedures to minimize stormwater flow damage to the site and equipment.

The Contractor shall designate a TESC Supervisor to be responsible for inspecting the TESC measures and for ensuring that the Contractor's operations are preventing sediment runoff. The minimum qualifications for the TESC-Supervisor include a certification as a Certified Erosion and Sediment Control Lead by a course approved by Ecology.

The Contractor shall prepare and implement an Ecology-approved Stormwater Pollution Prevention Plan (SWPPP) that describes the anticipated construction activities and Temporary Erosion and Sediment Control (TESC) measures, related pollution prevention measures, inspection/monitoring activities, and record keeping and reporting requirements. The Contractor is responsible for the implementation of the SWPPP and the TESC measures including monitoring, sampling, testing, and reporting required by the SWPPP and Construction Stormwater General Permit.

a. **Air**

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, and industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

At completion, the project will not result in result in emissions to the air. There is a potential for dust generation during excavation of soil and during placement of upland fill. Standard construction dust control practices will be implemented during these activities. Also, particulate matter may be generated from diesel engine non-road equipment during construction.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Dust will be controlled with water trucks if needed. Contractors will be required to use ultra low sulfur diesel fuel in off-road equipment and instructed to turn off construction equipment when not in use.

3. **Water**

a. Surface:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Site is located adjacent to the west bay of Budd Inlet. However, all project work for this proposal will occur in the upland area (above the tidal zone). Elevations at the Site range from sea level to about 100 feet above sea level.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

All project work for this proposal will occur in the upland area (above the tidal zone). However, work will occur within 200 feet of the shoreline. Excavation areas are shown in attached Figure 4.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material will be removed from surface water or wetlands. However, during the higher parts of the tidal cycle, tide water from Budd Inlet enters the 30-inch diameter stormwater pipe and discharges in the area beneath the former Maintenance Building where the contaminated soil excavation will occur. This water then flows back to the bay as the tide recedes. During construction, the west end of this pipe shall be plugged to prevent any tide water from entering the construction area.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
No.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

According to the Department of Ecology Coastal Atlas, <https://fortress.wa.gov/ecy/coastalatlantools/FloodMap.aspx>, the excavation areas for the project are not within a flood hazard area or a floodplain area. However, as mentioned above, during the higher parts of the tidal cycle, tide water from Budd Inlet enters the 30-inch diameter stormwater pipe at the east end of the former building and discharges in the area beneath the former Maintenance Building. This water then flows back to the bay as the tide recedes.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.
No.

b. Ground:

- 1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

Construction dewatering may be necessary in areas where the excavation depth will be below groundwater. Dewatering effluent will be contained and will either be treated on-site or will be transported off-site for treatment.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

None.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

As discussed in GeoEngineers (2013a), stormwater drainage features at the Site include catch basins, two drainage ditches, and four stormwater outfalls (designated SW-1 through -4 on Figure 5). As shown on Figures 2 and 5, one of the outfalls (SW-4) is a 30-inch diameter corrugated steel pipe that begins at the east end of the former Maintenance Building and extends to the shoreline. A 15-inch diameter stormwater pipe also daylights at the west end of the former building (*see* Figure 2).

- 2) Could waste materials enter ground or surface waters? If so, generally describe.
No. During construction, the west end of this pipe shall be plugged to prevent any tide water from entering the construction area.
- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
No.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

The Contractor shall be required to plan, install, inspect, maintain, and monitor Temporary Erosion and Sediment Control (TESC) Best Management Practices (BMPs) to prevent pollution of air and water, and control, respond to, and dispose of eroded sediment and turbid water during the duration of the project. Additionally, the Contractor shall implement procedures to minimize stormwater flow damage to the site and equipment.

The Contractor shall designate a Temporary Erosion and Sediment Control (TESC) Supervisor to be responsible for inspecting the TESC measures and for ensuring that the Contractor's operations are preventing sediment runoff. The minimum qualifications for the TESC-Supervisor include a certification as a Certified Erosion and Sediment Control Lead by a course approved by Ecology.

The Contractor shall prepare and implement an Ecology-approved Stormwater Pollution Prevention Plan (SWPPP) that describes the anticipated construction activities and Temporary Erosion and Sediment Control (TESC) measures, related pollution prevention measures, inspection/monitoring activities, and record keeping and reporting requirements. The Contractor is responsible for the

implementation of the SWPPP and the TESC measures including monitoring, sampling, testing, and reporting required by the SWPPP and Construction Stormwater General Permit.

4. Plants

a. Check or circle types of vegetation found on the project site:

_____ deciduous tree:

_____ evergreen tree:

X_____ shrubs: **Himalayan blackberry**

X_____ grass: **Various grass and weeds**

_____ pasture

_____ crop or grain

_____ wet soil plants:

_____ water plants:

_____ other types of vegetation:

b. What kind and amount of vegetation will be removed or altered?

Upland plants (mainly grass and weeds) will only be removed as needed to excavate contaminated soil areas. Most of the Site is covered with gravel or concrete. No trees will be removed.

c. List threatened or endangered species known to be on or near the site.

None.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None.

e. List all noxious weeds and invasive species known to be on or near the site.

Scotch broom and various weeds.

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [\[help\]](#)

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

Hawk, eagle, heron, salmon, trout, songbirds, and deer.

b. List any threatened or endangered species known to be on or near the site.

Chinook salmon, steelhead, and bull trout.

c. Is the site part of a migration route? If so, explain.

The project site is located within the Pacific Flyway but is not likely to have suitable habitat to support migratory birds.

- e. Proposed measures to preserve or enhance wildlife, if any:
Washington State Department of Fish and Wildlife recommendations will be followed for fill grain size that will be placed in the Maintenance Building excavation that will be in contact with tidal water that enters the area beneath the former Maintenance Building from the 30 inch diameter stormwater pipe.

6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

None.

- b. Would your project affect the potential use of solar energy by adjacent properties?
If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal?
List other proposed measures to reduce or control energy impacts, if any:

Equipment used in construction/excavation will meet applicable efficiency and emissions standards.

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?
If so, describe.

The purpose of the project is to remove and reduce exposure to toxic chemicals to acceptable levels.

1. Describe any known or possible contamination at the site from present or past uses.

Based on the RI/FS Report (GeoEngineers, 2013b), soil in the following areas contains soil contaminant concentrations greater than the applicable cleanup levels:

- Maintenance Building: The Maintenance Building was demolished in 2011 by the owner (West Bay Reliable). The area within the footprint of this former building contains arsenic, cadmium, and lead at concentrations greater than cleanup levels (*see* Figure 6). The vertical extent is estimated to be from the surface to a depth of approximately 2 feet below ground surface (bgs). Two small areas within and adjacent to the building footprint contain total petroleum hydrocarbons – gasoline range (TPH-G) contamination above soil cleanup levels. (*see* Figure 7) This TPH-G contamination is also assumed to contain benzene, toluene, ethylbenzene, and total xylenes (BTEX) above soil cleanup levels and at concentrations that would result in indoor air vapor intrusion. The vertical extent of TPH-G/BTEX contamination is estimated to be at depths ranging from

approximately 6 feet bgs (area within the building footprint) to approximately 13 feet bgs (adjacent to the north side of the building).

- Tank Shop Leaking Heating-Oil UST: In 2010, a fire badly damaged the Tank Shop Building. As a result, the city of Olympia condemned the building and it was demolished in 2011. A leaking 300-gallon heating oil UST is apparently still located near the former office entrance, near the southwest corner of the building. Concentrations of total petroleum hydrocarbons – diesel range (TPH-D) exceed cleanup levels in the vicinity of this tank (*see* Figure 8). The depth of contamination is estimated to be from 4 to 10 feet bgs.
- Crane Shed: The Crane Shed was also demolished in 2011. This shed was formerly located at the southeast corner of the Maintenance Building. Shallow (surface to 2 feet bgs) TPH-D and total petroleum hydrocarbons – heavy oil range (TPH-O) soil contamination is present associated with an area of stained soil. (*see* Figure 8).
- Structural Shop: A relatively small area on the north side of the Structural Shop has TPH-O contamination from the surface to a depth of 4 feet bgs. (*see* Figure 8). A former shear machine in the Structural Shop is the likely source of this contamination.
- Paint Shop: An area to the east of the Paint Shop contains TPH-D contamination beginning at a depth of 1 foot bgs to approximately 9 feet bgs (*see* Figure 8). An area that contains concentrations of mercury and lead is also present on the east side of the Paint Shop (*see* Figure 6).
- Sitewide: Soil throughout most of the Site contains concentrations of carcinogenic polycyclic aromatic hydrocarbons (cPAHs) above cleanup levels (*see* Figure 9). The vertical extent is estimated to be from the surface to depths of between 2 to 7 feet bgs.
- Shoreline: Metals debris in soils at the shoreline of the Site have concentrations of arsenic, cadmium and lead greater than soil cleanup levels (*see* Figure 6). The vertical extent is estimated to be from the surface to a depth of approximately 3 feet bgs.

The Site has a total of nine groundwater monitoring wells, designated MW-1 through -9. Depth to groundwater is generally within 2.5 to 4.5 feet bgs and the flow direction is east or northeast (to Budd Inlet). Based on the RI/FS Report (GeoEngineers, 2013b), groundwater in the following areas of the Site contains contaminant concentrations greater than the applicable cleanup levels:

- Downgradient of the Maintenance Building: Dissolved metals samples from monitoring wells MW-6, -7, and -8 contained arsenic and copper concentrations above cleanup levels. These wells are located in the general area where metals debris are present in the soil and are also located hydraulically downgradient of the Maintenance Building.
- Heating Oil UST: Monitoring well MW-4 is located near the heating oil UST. A sample from this well collected in 2008 showed TPH-D and –O concentrations of 61,000 micrograms per liter ($\mu\text{g/L}$) and 3,300 $\mu\text{g/L}$, respectively; this is significantly above the cleanup level of 500 $\mu\text{g/L}$. A sample collected from this well in 2010 was below cleanup

levels. However, residual contaminated soil associated with the UST has the potential to continue to impact groundwater.

As discussed in GeoEngineers (2013a), stormwater drainage features at the Site include catch basins, two drainage ditches, and four stormwater outfalls. GeoEngineers (2013b) concluded that stormwater runoff from the four outfalls (designated SW-1 through -4 on Figure 5) contains lead, mercury, zinc, and/or copper concentrations greater than the screening levels. Stormwater runoff from SW-1 also contains polycyclic aromatic hydrocarbons (PAHs) at concentrations greater than screening levels (GeoEngineers, 2013a). As shown on Figures 2 and 5, one of the outfalls (SW-4) is a 30-inch diameter corrugated steel pipe that begins at the east end of the former Maintenance Building and extends to the shoreline. A 15-inch diameter stormwater pipe also daylights at the west end of the former building (*see* Figure 2).

Constituents that exceed sediment concentrations include mercury, TPH-D and -O, PAHs, and phthalates.

2. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The purpose of the project is to remove and reduce exposure to toxic chemicals to acceptable levels within a portion of the Site.

3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Standard chemicals that are associated with the use of construction excavation equipment. A Spill Prevention and Counter prevention Plan will be created and implemented to address any potential risk of spills of oil or other hazardous substances from construction equipment. For example, spill kits will be available to control any releases of these chemicals.

4. Describe special emergency services that might be required.

There are no unusual risks associated with this proposal. All personnel will be required to read and abide by the Site Safety Plan. Emergency medical contact numbers and directions to the nearest hospital will be listed in the plan and posted at the Site during construction.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

The purpose of the project is to remove and reduce exposure to toxic chemicals to acceptable levels. The Site Safety Plan will list requirements for worker protection during contaminated soil excavation and removal.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

There are no known sources of noise in the area that will affect the proposed project.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

There will be some noise during construction/excavation. Generally, noise will come from heavy equipment operation. Construction will be limited to hours between 7 a.m. and 7 p.m. five to six days a week.

3) Proposed measures to reduce or control noise impacts, if any:

Construction will take place between 7 a.m. and 7 p.m. five to six days a week. No unusual noise impacts are anticipated that would require further control measures.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe

The Site is currently vacant industrial land. Adjacent and/or nearby properties are vacant industrial land, office/professional, and residential. The project is not expected to adversely impact land uses on nearby or adjacent properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No.

c. Describe any structures on the site.

Only two buildings are still present at the Site: the Structural Shop and the Paint Shop (Figure 2). In 2010, a fire badly damaged the Tank Shop and so it was demolished in 2011. Due to its structurally unsafe condition, the Maintenance Building was also demolished in 2011.

d. Will any structures be demolished? If so, what?

No.

e. What is the current zoning classification of the site?

Currently the site is zoned industrial.

f. What is the current comprehensive plan designation of the site?

The Thurston County Comprehensive Plan deals mainly with rural areas of the County (land outside of urban growth areas that surround cities). The Site is located within the City of Olympia and is urban waterfront.

g. If applicable, what is the current shoreline master program designation of the site?

The Site is located within the City of Olympia and is urban waterfront.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. If so, specify.

The area of the Site from 150 feet to 200 feet from the ordinary high water mark is designated as Marine Riparian Area.

i. Approximately how many people would reside or work in the completed project?

None.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Not applicable.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

There will be no change to current land use.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

Not applicable.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None.

c. Proposed measures to reduce or control housing impacts, if any:

Not applicable.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No structures are being built.

b. What views in the immediate vicinity would be altered or obstructed?

None.

c. Proposed measures to reduce or control aesthetic impacts, if any:

Not applicable.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

None.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

The closest recreational area to the Site is West Bay Park, 700 West Bay Drive NW, 0.5 miles south of the Site. West Bay Park includes designated recreation opportunities including beach access areas, trails, hand boat launch, fishing, bird watching, picnicking, hiking, and walking.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Not applicable.

13. Historic and cultural preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe.

No.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation?

This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources

No.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

The Squaxin Island Tribe is aware of the proposed project and has not expressed any concern about the potential for cultural impacts from the proposed Interim Action.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Not applicable.

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Site access is via West Bay Drive NW.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

Not applicable.

- c. How many parking spaces would the completed project have? How many would the project eliminate?

No parking spaces will be added or eliminated.

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No new roads or streets, or improvements to existing roads or streets will be made.

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

None.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

- h. Proposed measures to reduce or control transportation impacts, if any:

None.

15. Public services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

The project will not result in an increased need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None.

16. Utilities

a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

The site was formerly used for steel fabrication but is currently vacant. Utilities may be present but are not currently active at the Site.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

C. SIGNATURE

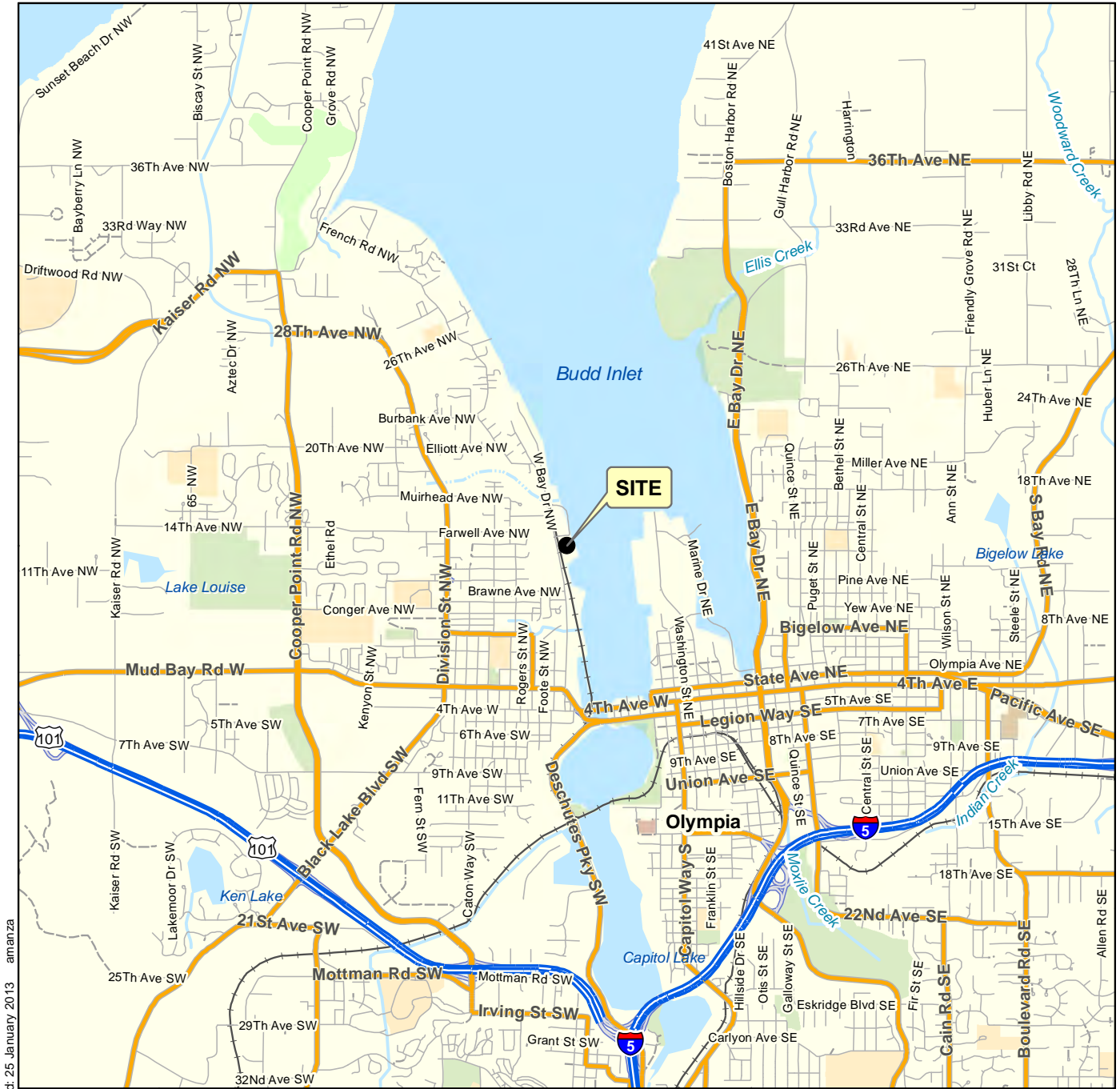
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: SS Teel

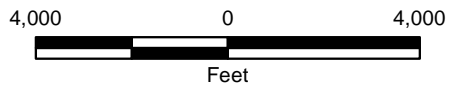
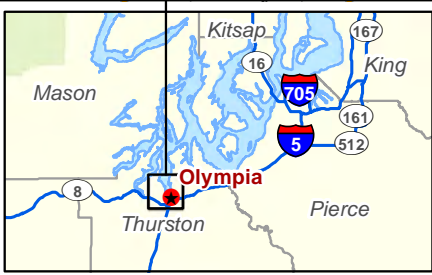
Name of signee Steve Teel

Position and Agency/Organization Department of Ecology, Toxics Cleanup Program, Southwest Regional Office

Date Submitted: 6/16/14



Path: \\aac\projects\010504085\GIS\050408500_VicinityMap.mxd Map Revised: 25 January 2013 amanza



Notes:

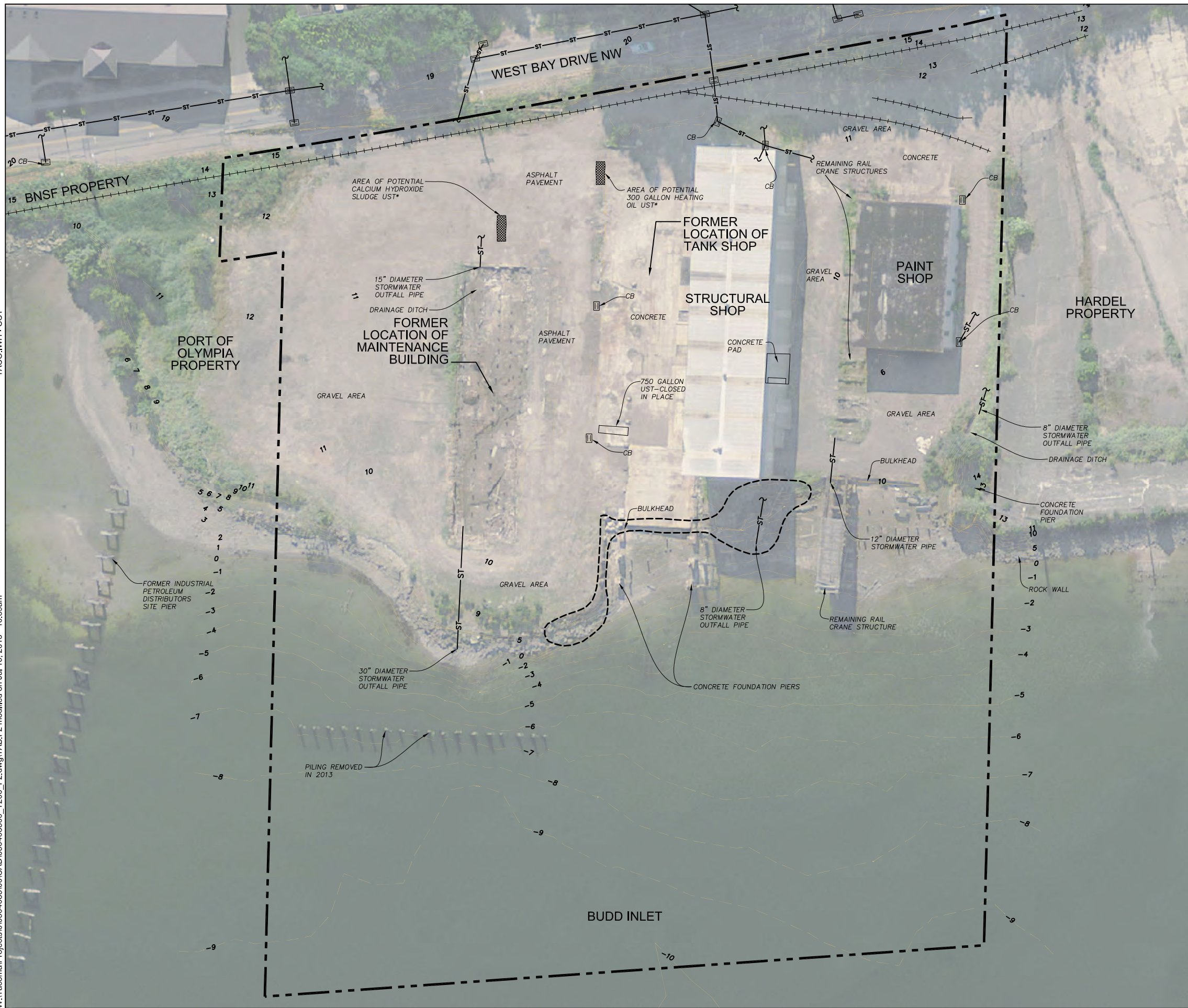
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Data Sources: ESRI Data & Maps
 Projection: NAD 1983 UTM Zone 10N

Vicinity Map	
Reliable Steel Site Olympia, Washington	
Figure from GeoEngineers (2013a)	Figure 1

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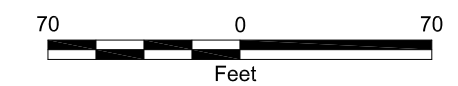
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Legend

Site Features

- Property Line
- Catch Basin
- Stormwater Pipe
- Railroad Track
- Approximate Area of Metal Debris Visible on Shoreline
- Topographic / Bathymetric Contour Line and Elevation (Feet NGVD 29)



Notes:

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3. * Areas of potential USTs identified by geophysical survey (GPR and EM) on 3/3/2008.

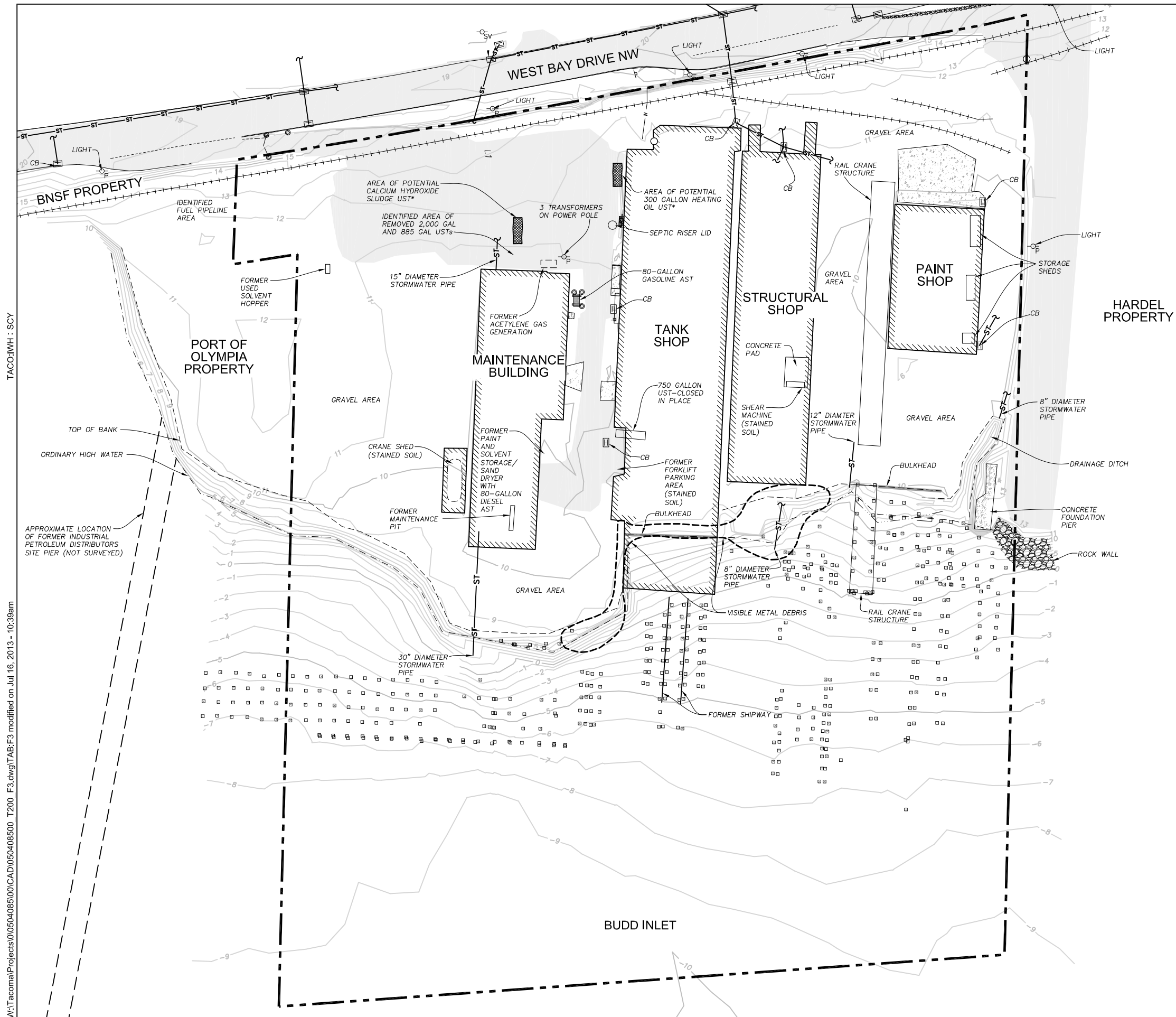
Reference: Survey drawing provided by Hatton Godat Pantier Engineers and Surveyors, Inc. (11-17-08 survey) and aerial photo provided by Thurston County (2012 aerial). The aerial photo is oblique, and the features shown on the aerial do not exactly match those shown on the survey drawing.

Existing Site Conditions

Reliable Steel Site
Olympia, Washington

Figure from GeoEngineers (2013a)

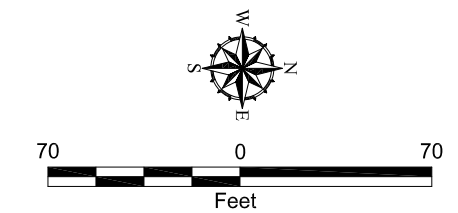
Figure 2



Legend

Site Features

- Property Line
- Catch Basin
- Stormwater Pipe
- Railroad Track
- Asphalt Pavement
- Concrete
- Approximate Area of Metal Debris Visible on Shoreline
- Piling
- Bollard
- Topographic / Bathymetric Contour Line and Elevation (Feet NGVD 29)



- Notes:
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 3. * Areas of potential USTs identified by geophysical survey (GPR and EM) on 3/3/2008.

Reference: Survey drawing provided by Hatton Godat Pantier Engineers and Surveyors, Inc. (11-17-08 survey).

Previous Site Conditions	
Reliable Steel Site Olympia, Washington	
Figure from GeoEngineers (2013a)	Figure 3

TACO:IMH - SCY

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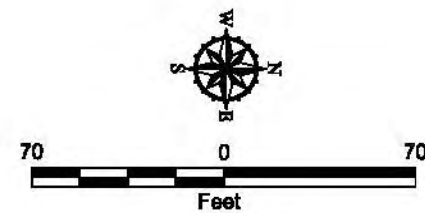
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Legend

- Site Features**
- Property Line
 - CB Catch Basin
 - ST — Stormwater Pipe
 - ++++ Railroad Track
 - Approximate Area of Metal Debris Visible on Shoreline
 - s— Topographic / Bathymetric Contour Line and Elevation (Feet NGVD 29)

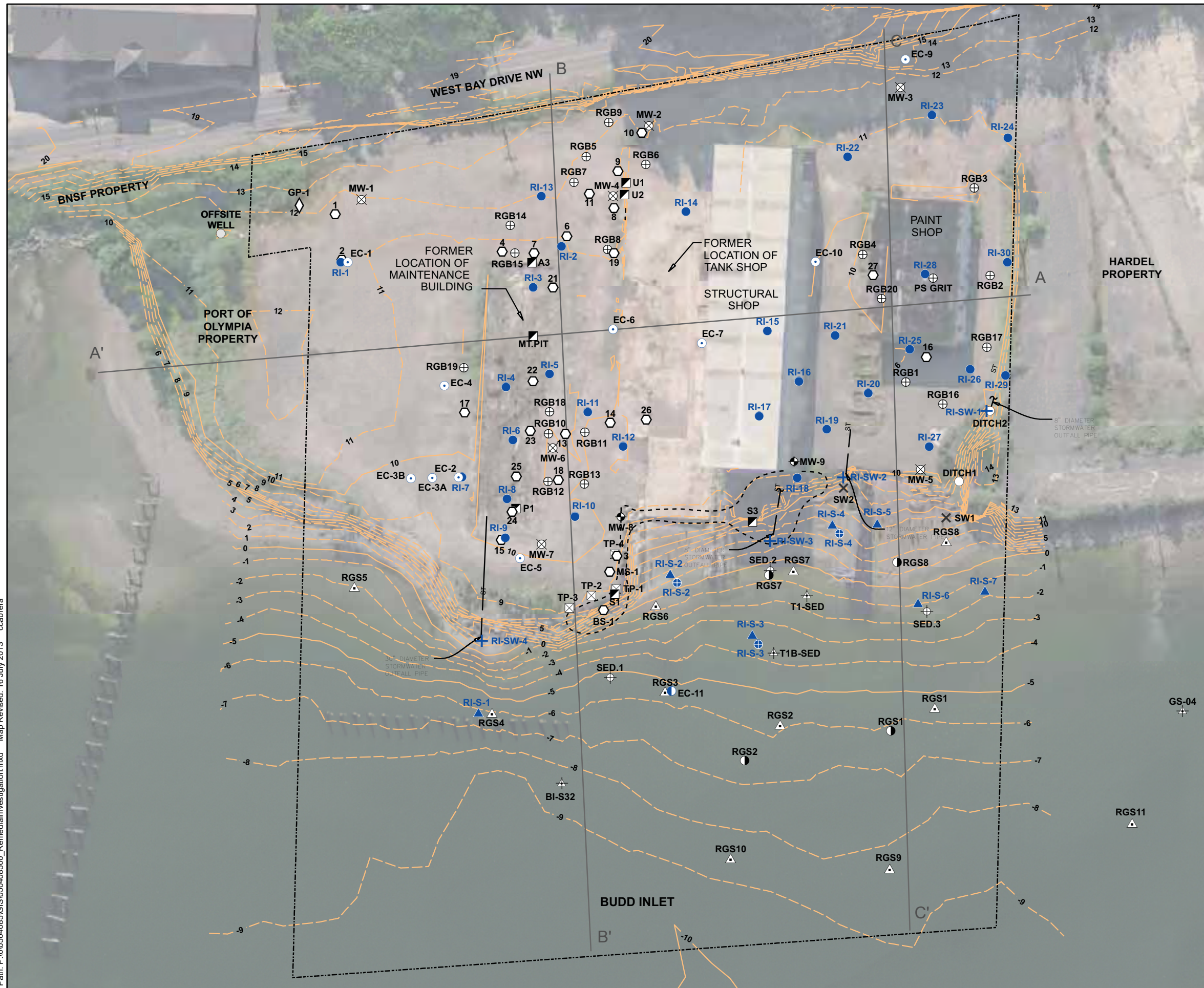


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Interim Action Excavation Areas	
Reliable Steel Site Olympia, Washington	
Figure from GeoEngineers (2013a)	Figure 4



Legend

Remedial Investigation Locations-LEGEND

- Remedial Investigation Soil Boring Location (Greylock 2010)
- ⊕ Remedial Investigation Sediment Core Sample Location (Greylock 2010)
- ⊗ Remedial Investigation Stormwater Sample Location (Greylock 2010)
- ▲ Remedial Investigation Surface Sediment Sample Location (Greylock 2010)
- Supplemental Investigation Soil Boring Location (Ecology 2013)
- Supplemental Investigation Sediment Core Location (Ecology 2013)

Previous Investigation Locations-LEGEND

- DOF Soil Sample Location (2007)
- ⊕ DOF Sediment Sample Location (2007)
- ⊗ DOF Test Pit Sample Location (2007)
- ▲ Ecology Surface Sediment Sample Location(2008)
- Greylock Ditch Sample Location
- ⊕ Greylock Monitoring Well (2008)
- ⊕ Greylock Soil Sample Location (2008)
- Greylock Sediment Core Sample Location (2008)
- ▲ Greylock Surface Sediment Sample Location (2007, 2008)
- ⊗ Greylock Stormwater Sample Location (2008)
- ⊗ Stemen Monitoring Well (2007)
- ⊕ Stemen Sample Location (2005, 2006)
- ◇ ARCADIS Sample Location (2013)
- Unknown

Site Features

- ST- Stormwater Pipe
- - - Property Line
- - - Approximate Area of Metal Debris Visible on Shoreline
- - - Topographic/Bathymetric Contour Line and Elevation (feet NGVD29)
- - - Cross Section Locations

70 0 70
Feet

Data Source: Drawing provided by HATTON GODAT PANTIER. Aerial image from Thurston County, 2012.

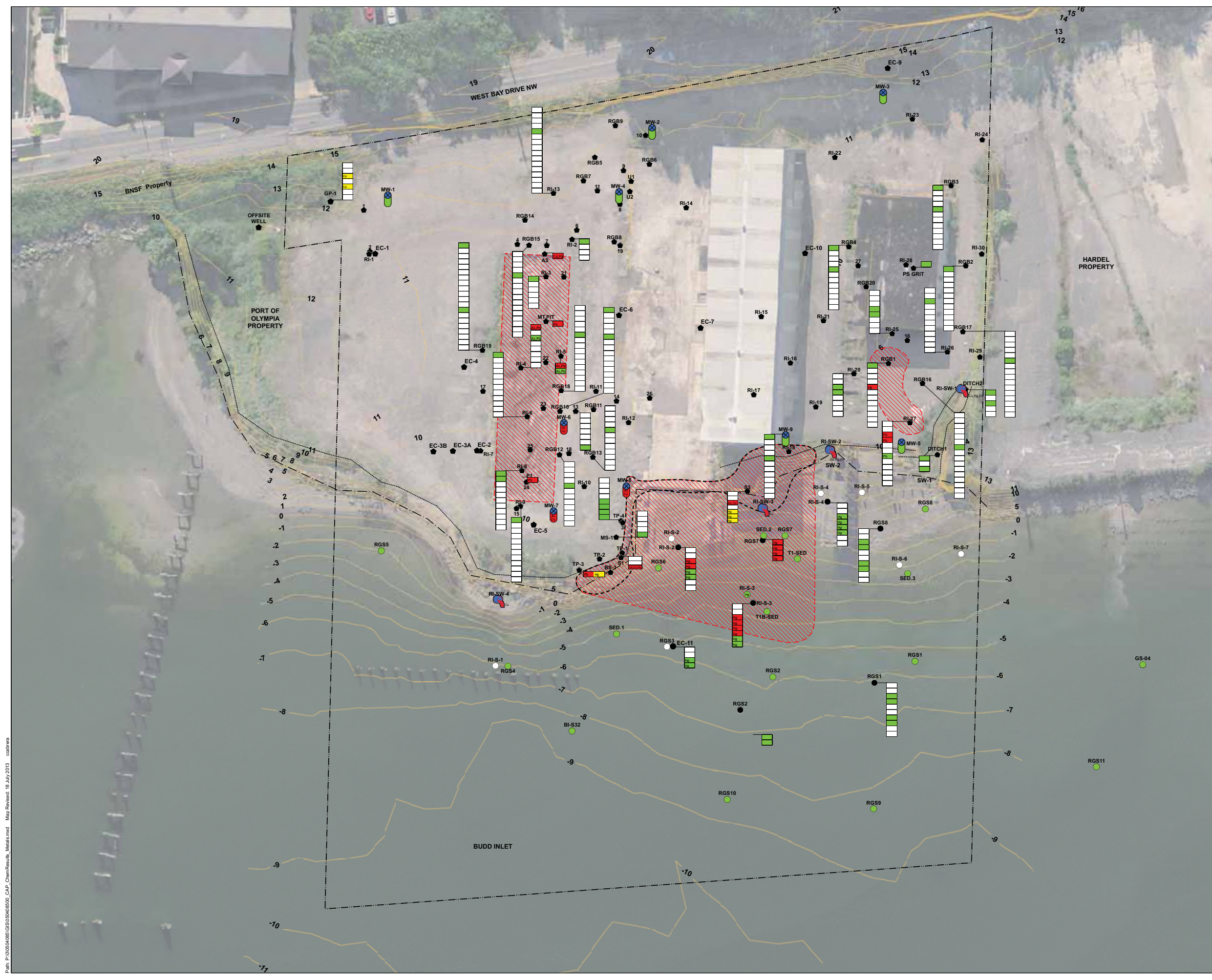
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Remedial Investigation Locations

Reliable Steel Site
Olympia, Washington

Figure from
GeoEngineers (2013b)

Figure 5



Legend

- Property Line
- Top of Bank
- - - Ordinary High Water
- - - - - Approximate Area of Metal Debris Visible on Shoreline
- - - Topographic/Bathymetric Contour Line and Elevation (feet NGVD29)

Sampling Location Type

- Soil Sampling Location ¹
- Groundwater Monitoring Well Location
- Stormwater Sampling Location
- Surface Sediment Sampling Location ²
- Subsurface Sediment Sampling Location ¹

Sample Depth Interval ¹

Each box represents a 1-foot sample depth interval. The total number of boxes indicates the total depth ³ of subsurface exploration.

Analyte

- As Arsenic
- Cd Cadmium
- Cu Copper
- Pb Lead
- Hg Mercury

Nature and Extent of Contamination

- No shading ⁴ of the sampling location/depth interval indicates a sample was either not obtained or not analyzed for metals.
- Red shading ⁴ of the sampling location/depth interval indicates that the identified analyte was detected at a concentration greater than the proposed cleanup/screening level.
- Green shading ⁴ of the sampling location/depth interval indicates that the identified analyte was detected at a concentration less than the proposed cleanup/screening level. If no analyte is identified within the shading, As, Cd, Cu, Pb and Hg were either not detected or detected at concentrations less than the proposed cleanup/screening levels.
- Yellow shading ⁴ of sampling location/interval indicates that the metals detection limit for one or more analytes was above the proposed cleanup/screening levels.
- Red hatching represents estimated area of soil/sediment exceeding proposed cleanup levels for metals.

Notes:

- 1 Sample depth intervals are shown for soil sampling locations and subsurface sediment sampling locations for which metals analysis was performed.
- 2 Surface sediment samples were generally collected from 0 to 10 cm below the mud line.
- 3 At locations for which the total depth of subsurface exploration is not known, the depth of the deepest sample obtained at the location represents the total depth of exploration.
- 4 Color shading of sampling locations/intervals presented in this figure is based on comparison of chemical analytical results of:
 - *Soil samples (obtained landward of OHW line) to proposed soil cleanup levels.
 - *Sediment samples (obtained waterward of OHW line) to proposed sediment cleanup levels.
 - *Samples obtained along the shoreline of metal debris to proposed soil and sediment cleanup levels.
 - *Groundwater samples (most recent samples analyzed at the sampling locations) to proposed groundwater cleanup levels.
 - *Stormwater samples (most recent samples analyzed at the sampling locations) to proposed screening levels.
- 5 Cadmium analysis was not performed on soil, groundwater, stormwater and sediment samples collected by Greylock Consulting in 2011.
- 6 Copper analysis was not performed at sampling locations S-13, BS-1, MS-1 and Sand Grit.
- 7 Proposed cleanup and screening levels are presented in Tables 2 through 5. The chemical analytical results for metals are presented in Tables 6, 13, 14, 19, 23, and 25.



Data Source: Aerial image from Thurston County, 2012.

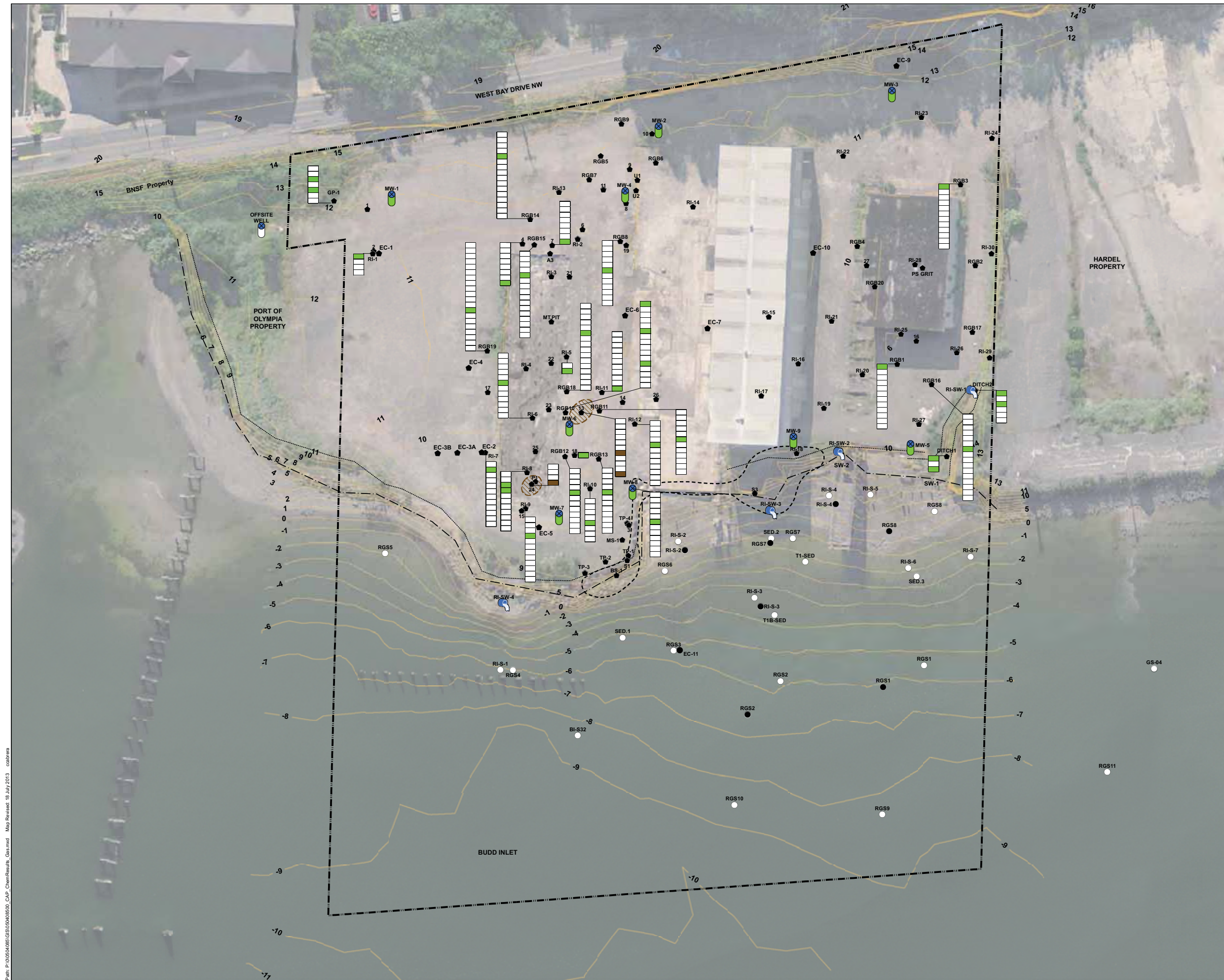
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Extent of Metals Contamination

**Reliable Steel Site
Olympia, Washington**

Figure from
GeoEngineers (2013a) Figure 6



Legend

- Property Line
- Top of Bank
- - - Ordinary High Water
- - - Approximate Area of Metal Debris Visible on Shoreline
- - - Topographic/Bathymetric Contour Line and Elevation (feet NGVD29)

Sampling Location

- Soil Sampling Location¹
- Groundwater Monitoring Well Location
- Stormwater Sampling Location
- Surface Sediment Sampling Location²
- Subsurface Sediment Sampling Location¹

Sampling Interval¹

Each box represents 1-foot sampling interval. Total number of boxes indicates the total depth³ of subsurface exploration.

Nature and Extent of Contamination

- No shading⁴ of sampling location/interval indicates sample was either not obtained or not analyzed for gasoline-range petroleum hydrocarbons.
- Brown shading⁴ of sampling location/interval indicates that the gasoline-range petroleum hydrocarbons were detected at a concentration greater than the proposed cleanup/screening level.
- Green shading⁴ of sampling location/interval indicates that gasoline-range petroleum hydrocarbons were detected at a concentration less than the proposed cleanup/screening level.
- Brown hatching represents estimated area of soil/sediment exceeding proposed cleanup level for gasoline-range petroleum hydrocarbons.

- Notes:**
- 1 Sampling intervals are shown for soil sampling locations and subsurface sediment sampling locations for which gasoline-range petroleum hydrocarbons analysis was performed.
 - 2 Surface sediment samples were generally collected from 0 to 10 cm below the mud line.
 - 3 Locations for which total depth of subsurface exploration is unknown, depth of the deepest sample obtained at such location represents total depth.
 - 4 Color shading of sampling locations/intervals presented in this figure is based on comparison of chemical analytical results of:
 - *Soil samples (obtained landward of OHW line) to proposed soil cleanup levels.
 - *Sediment samples (obtained seaward of OHW line) to proposed sediment cleanup levels.
 - *Samples obtained along the shoreline of metal debris to proposed soil and sediment cleanup levels.
 - *Groundwater samples (most recent samples analyzed at the sampling locations) to proposed groundwater cleanup levels.
 - *Stormwater samples (most recent samples analyzed at the sampling locations) to proposed screening levels.
 - 5 Proposed cleanup and screening levels are presented in Tables 2 through 5. Chemical analytical results for gasoline-range petroleum hydrocarbons are presented in Tables 8, 15, 20 and 23.



Data Source: Aerial image from Thurston County, 2012.

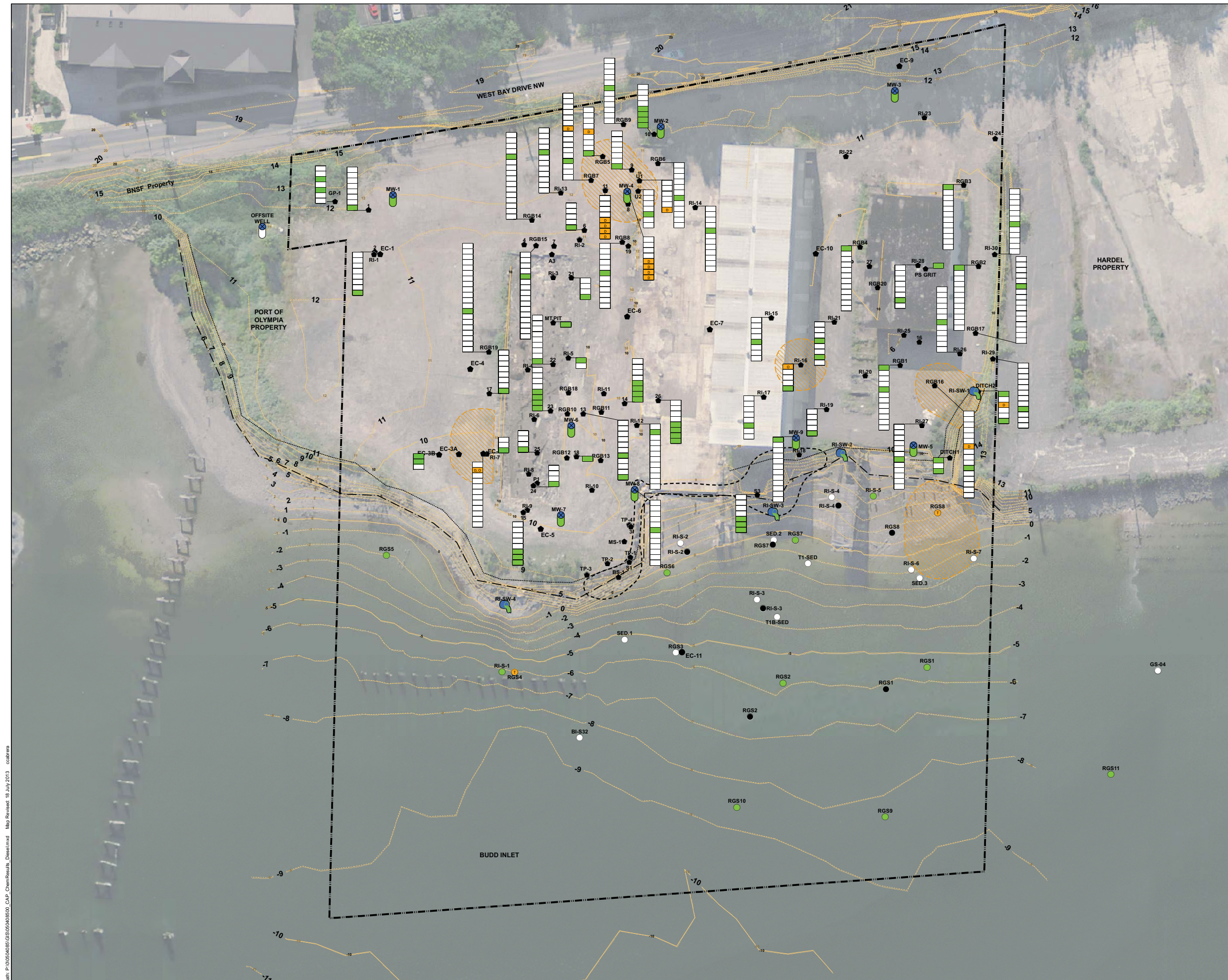
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Extent of Gasoline Contamination

Reliable Steel Site
Olympia, Washington

Figure from
GeoEngineers (2013a) **Figure 7**



Legend

- Property Line
- Top of Bank
- Ordinary High Water
- Approximate Area of Shoreline Metal Debris Visible on Shoreline
- Topographic/Bathymetric Contour Line and Elevation (feet NGVD29)

Sampling Location

- Soil Sampling Location¹
- Groundwater Monitoring Well Location
- Stormwater Sampling Location
- Surface Sediment Sampling Location²
- Subsurface Sediment Sampling Location¹

Sampling Interval¹

Each box represents 1-foot sampling interval. Total number of boxes indicates the total depth³ of subsurface exploration.

Analyte

- D Diesel-range petroleum hydrocarbons
- O Heavy oil-range petroleum hydrocarbons
- T Total petroleum hydrocarbons (sum of diesel-range and heavy oil-range petroleum hydrocarbons)

Nature and Extent of Contamination

- No shading⁴ of sampling location/interval indicates sample was either not obtained or not analyzed for diesel-range and oil-range petroleum hydrocarbons.
- Orange shading⁴ of sampling location/interval indicates that the identified analyte was detected at a concentration greater than the proposed cleanup/screening level.
- Green shading⁴ of sampling location/interval indicates that the diesel-range and oil-range petroleum hydrocarbons were detected at concentrations less than the proposed cleanup/screening levels.
- Orange hatching represents estimated area of soil/sediment exceeding proposed cleanup levels for diesel-range and oil-range petroleum hydrocarbons.

Notes:

- Sampling intervals are shown for soil sampling locations and subsurface sediment sampling locations for which diesel-range and oil-range petroleum hydrocarbon analysis was performed.
- Surface sediment samples were generally collected from 0 to 10 cm below the mud line.
- Locations for which total depth of subsurface exploration is unknown, depth of the deepest sample obtained at such location represents total depth.
- Color shading of sampling locations/intervals presented in this figure is based on comparison of chemical analytical results of:
 - *Soil samples (obtained landward of OHW line) to proposed soil cleanup levels.
 - *Sediment samples (obtained waterward of OHW line) to proposed sediment cleanup levels.
 - *Samples obtained along the shoreline of metal debris to proposed soil and sediment cleanup levels.
 - *Groundwater samples (most recent samples analyzed at the sampling locations) to proposed groundwater cleanup levels.
 - *Stormwater samples (most recent samples analyzed at the sampling locations) to proposed screening levels.

5 Proposed cleanup and screening levels are presented in Tables 2 through 5. Chemical analytical results for diesel-range and oil-range petroleum hydrocarbons are presented in Tables 8, 13, 15, 20, 23 and 25 through 24.

70 35 0 70
Feet

Data Source: Aerial image from Thurston County, 2012.

General Notes:

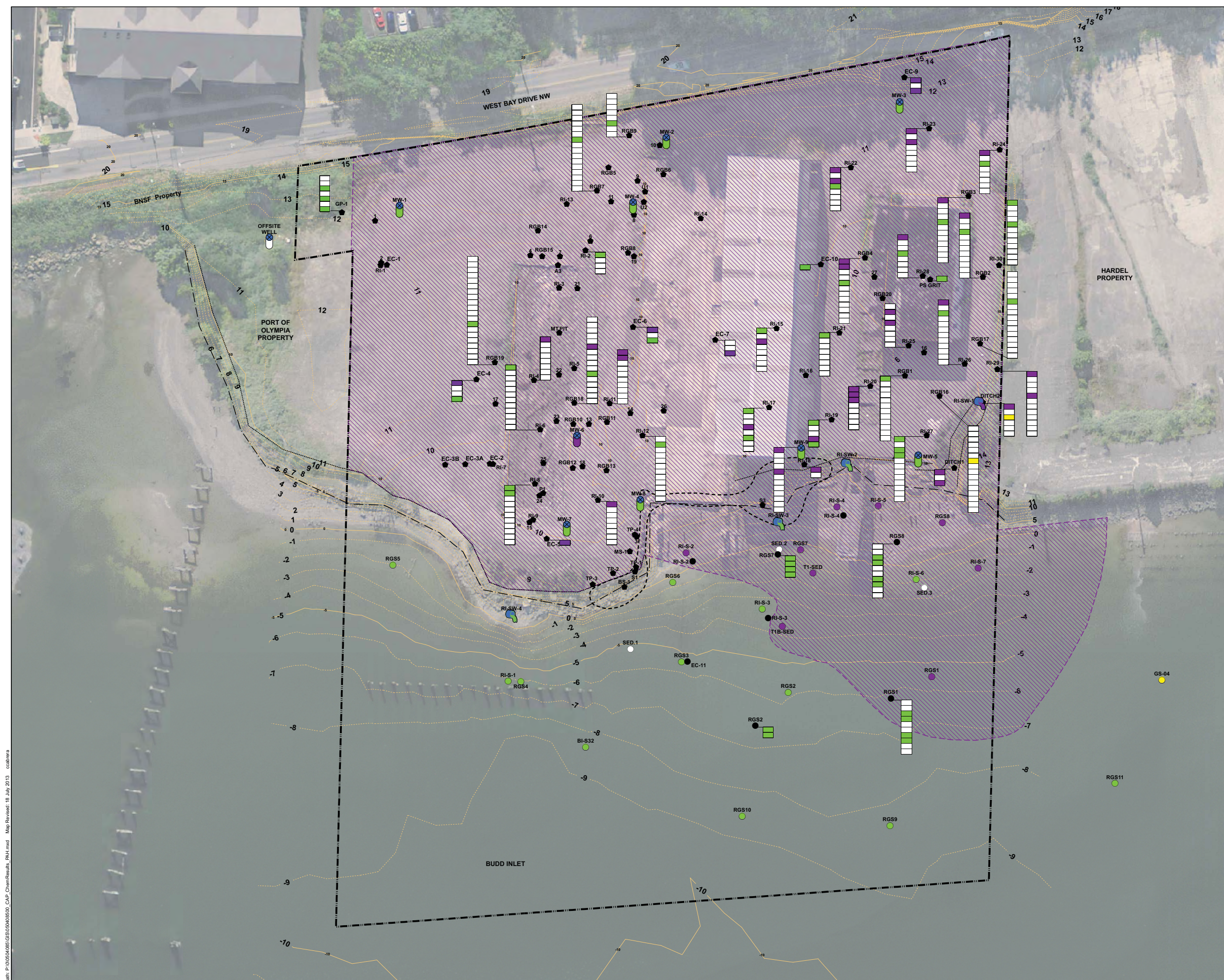
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Extent of Diesel and Heavy Oil Contamination

Reliable Steel Site
Olympia, Washington

Figure from
GeoEngineers (2013a)

Figure 8



Legend

- Property Line
- Top of Bank
- - - Ordinary High Water
- - - Approximate Area of Metal Debris Visible on Shoreline
- - - Topographic/Bathymetric Contour Line and Elevation (feet NGVD29)

Sampling Location

- Soil Sampling Location¹
- Groundwater Monitoring Well Location
- Stormwater Sampling Location
- Surface Sediment Sampling Location²
- Subsurface Sediment Sampling Location¹

Sampling Interval

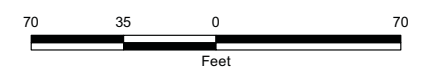
Each box represents 1-foot sampling interval. Total number of boxes indicates the total depth³ of subsurface exploration.

Nature and Extent of Contamination

- No shading⁴ of sampling location/interval indicates sample was either not obtained or not analyzed for Polycyclic Aromatic Hydrocarbons (PAHs).
- Purple shading⁴ of sampling location/interval indicates that the PAHs were detected at concentrations greater than the proposed cleanup/screening levels.
- Green shading⁴ of sampling location/interval indicates that the PAHs were detected at concentrations less than the proposed cleanup/screening levels.
- Yellow shading⁴ of sampling location/interval indicates that the PAH detection limit for one or more analytes was above the proposed cleanup/screening levels.
- Purple hatching represents estimated area of soil/sediment exceeding proposed cleanup level for PAHs.

Notes:

- 1 Sampling intervals are shown for soil sampling locations and subsurface sediment sampling locations for which PAH analysis was performed.
- 2 Surface sediment samples were generally collected from 0 to 10 cm below the mud line.
- 3 Locations for which total depth of subsurface exploration is unknown, depth of the deepest sample obtained at such location represents total depth.
- 4 Color shading of sampling locations/intervals presented in this figure is based on comparison of chemical analytical results of:
 - *Soil samples (obtained landward of OHW line) to proposed soil cleanup levels.
 - *Sediment samples (obtained seaward of OHW line) to proposed sediment cleanup levels.
 - *Samples obtained along the shoreline of metal debris to proposed soil and sediment cleanup levels.
 - *Groundwater samples (most recent samples analyzed at the sampling locations) to proposed groundwater cleanup levels.
 - *Stormwater samples (most recent samples analyzed at the sampling locations) to proposed screening levels.
- 5 Proposed cleanup/screening levels are presented in Tables 2 through 5. Chemical analytical results for PAHs are presented in Tables 9, 16, 21, 23 and 24.



Data Source: Aerial image from Thurston County, 2012.

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Extent of PAHs Contamination

Reliable Steel Site
Olympia, Washington

Figure from
GeoEngineers (2013a)

Figure 9