



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 10, 2017

Mr. Michael Stone
Assistant General Counsel
Blackstone Real Estate Advisors, L.P.
501 E. Camino Road
Boca Raton, FL 33432

Re: Request for Further Site Characterization

- **Site Name:** Phoenix Inn
- **Site Address:** 415 Capitol Way North, Olympia, WA
- **Cleanup Site ID:** 5257
- **VCP Project Number:** SW1111

Dear Mr. Stone:

The Department of Ecology (Ecology) appreciates your previous participation in the Voluntary Cleanup Program (VCP); however, Ecology terminated your previous VCP Agreement due to inactivity. The VCP has a high volume of work and sites must continue to show progress in regards to site cleanup to remain enrolled. Ecology is contacting you to express concerns over current concentrations of petroleum hydrocarbons in both soil and groundwater beneath the subject Site and whether these concentrations are protective of human health under Model Toxics Control Act (MTCA) Cleanup Regulations. In accordance with the regulations set forth under WAC 173-340-450, Ecology is requesting additional investigative and technical reporting actions, as described below. This information will enable Ecology to evaluate the nature and extent of petroleum hydrocarbon impacts beneath the Site, associative threats to human health and the environment, and whether additional cleanup and abatement actions will be needed to mitigate such threats, if present.

Request for Further Site Characterization

Recently, Ecology received a transmittal of groundwater monitoring data, collected from the Site monitoring well network on July 22, 2016. Analytical results associated with this recent sampling event revealed concentrations of dissolved-phase petroleum hydrocarbons above their associated MTCA Method A values at multiple locations immediately adjacent to the on-Site Doubletree Hotel. Maximum concentrations of TPH-GRO (950 µg/l), TPH-DRO (4,200 µg/l), and benzene (5.7 µg/l) were observed at PMW-10 during this monitoring event.

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It should be noted; however, that groundwater samples were not collected from monitoring locations PMW-6 and PMW-11, located adjacent to monitoring well PMW-10. According to the information provided to Ecology, these monitoring wells were last sampled on October 27, 2012. To evaluate the current nature and extent of dissolved-phase petroleum hydrocarbon impacts beneath this area of the Site, additional dissolved-phase petroleum hydrocarbon data should be obtained at monitoring locations PMW-6 and PMW-11.

Further, based on the previously discussed groundwater monitoring results, collection of additional dissolved- and vapor-phase data is warranted to evaluate the potential for migration of petroleum-based vapors into the current Doubletree Hotel facility and associated utility vaults, if present.

Additionally, under WAC 137-340-450 (3) (a) (i), current or past facility owners shall “*continue to monitor and mitigate any additional fire and safety hazards posed by vapors or free product that may have migrated from the UST into structures in the vicinity of the site, such as sewers or basements.*” It should be noted that Ecology considers the Doubletree Hotel facility a structure that falls under this requirement and, as such, warrants further evaluation for potential vapor intrusion related to residual hydrocarbon impacts beneath the Site.

Required Actions

To fulfill these minimum requirements, Ecology is **requiring a Work Plan, due within 60 days** from issuance of this letter, to perform additional subsurface investigation activities at the Site and subsequent preparation of a technical report communicating the results of this investigation. Please submit two hard copies of this document to the recipient listed below, along with an electronic version of this deliverable. **Failure to comply with the above requirements and regulations may result in the enforcement actions and financial penalties** as outlined in WAC 173-340-540 (MTCA) and/or RCW 70.105D.050 (MTCA). Additional guidance and details regarding these regulations can be found at Ecology’s website.

Compliance Options

At this time Ecology recommends that you re-enroll your project into the Voluntary Cleanup Program (VCP). VCP enables owners of contaminated sites to meet state cleanup standards independently and receive technical guidance from Ecology when requested throughout the cleanup process.

The VCP enables owners to work on a contractual basis rather than under an Ecology legal order. VCP participants pay fees to Ecology to cover the department’s costs for guidance and review throughout the cleanup process.

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Upon successful completion of a cleanup which meets the requirements of MTCA, Ecology will issue a No Further Action (NFA) opinion, which may be useful in obtaining loans or selling or redeveloping your property. For more information regarding this program, visit <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.

Please note that to continue to be provided services and enrolled within VCP you must continue to show progress on your Site cleanup.

Contact Information

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of contaminated sites, please contact me at (360) 407-6347 or Nicholas.Acklam@ecy.wa.gov.

Thank you for your cooperation.

Sincerely,



Nicholas Acklam
VCP/II-SHA/LUST Unit Supervisor
Toxics Cleanup Program, Southwest Regional Office
Washington State Department of Ecology

Enclosures [1]: Figure 1 - Select Groundwater Analytical Results Site Map

By certified mail: [91 7199 9991 7037 0278 3805]

cc: Robyn Neely, Esq., Ackerman LLP
Matthew Annis, Arcadis
Ecology Site File

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Enclosure A

Figure 1 - Select Groundwater Analytical Results Site Map

