



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 11, 2017

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

**Re: Review of *Work Plan for Additional Site Characterization*, dated April 10, 2017**

- **Site Name:** Phoenix Inn
- **Site Address:** 415 Capitol Way North, Olympia, WA
- **Cleanup Site ID:** 5257
- **Facility Site ID:** 1571525
- **VCP Project Number:** SW1582

Dear Mr. Stone:

The Department of Ecology (Ecology) has reviewed the *Work Plan for Additional Site Characterization*, dated April 10, 2017 (Work Plan) and submitted by Arcadis U.S., Inc. (Arcadis) on behalf of PIH Olympia, LLC (PIH). Ecology conditionally concurs with the Work Plan and is requesting modifications to that document and additional Site information, as noted below, under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Request for Modifications to the April 10, 2017 Work Plan

During a call between Ecology and Arcadis personnel on June 13, 2017, the following items related to the Work Plan were discussed:

1. Performance of the groundwater sampling event, as presented in Section 5.5 of the Work Plan, prior to the proposed well installation activities. The current, proposed locations (Attachment 1 [Figure 9]) for the additional monitoring wells (PMW-19 through PMW-21) were based on data collected during the limited groundwater-monitoring event, conducted during July of 2016. As a result, a comprehensive monitoring event, using monitoring locations PMW-1 through PMW-3 and PMW-5 through PMW-21, will be performed to identify potential data gaps in the monitoring network and optimize final well installation locations.

2. Revisions to the placement of air monitoring locations such that:
  - i) Exterior, background air samples are positioned with attention paid to minimizing potential sources of exhaust and lubricant;
  - ii) Indoor sample IA-01 is re-located closer to the front of the building and roughly equidistant between PMW-11 and PMW-12;
  - iii) Indoor sample IA-02 is re-located north of the revised location of IA-01 and roughly equidistant between PMW-10 and PMW-11; and
  - iv) Indoor sample IA-03 is re-located to a position equidistant between the footprints of the former filling station and auto repair facilities.

Please note that Ecology will not consider one air monitoring event as representative of environmental conditions at the Site. As such, one additional indoor air monitoring event, at a minimum, is required to evaluate for seasonal (i.e. winter-period) variations in potential vapor-intrusion before a final determination of risk can be made. This additional monitoring is requested whether or not VOCs are observed during the currently scheduled air-monitoring event.

#### Request for Additional Site Information

In addition to the above items, Ecology is requesting the following additional Site information:

3. Well construction and lithologic logs for abandoned on-Site monitoring location MW1 through MW7 and sampling probe SP-1;
4. Rose diagrams depicting groundwater gradient directions through time for a representative number of historical monitoring events and Site monitoring locations. Such diagrams should also be provided for all subsequent groundwater monitoring events performed at the Site;
5. Depictions of plume geometry (i.e. isoconcentration contours) through time for gasoline and diesel for a representative number of historical sampling events and for all subsequent groundwater monitoring deliverables;
6. Inclusion of all abandoned and existing monitoring well locations associated with the Site on all Site figures where areas-of-coverage include those locations (ex. PMW-4).

Additionally, it does not appear that a Terrestrial Ecological Evaluation (TEE) has been performed for the Site. Please prepare a TEE for Ecology review, including any supporting documentation, as appropriate. Additional information on completing this TEE can be found at <http://www.ecy.wa.gov/biblio/ecy090300.html>.

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Closing

Please provide confirmation of the above items and resubmit Figure 9 of the Work Plan (Attachment 1), or similar representation (e.g. facility blueprint), depicting the above revisions to the proposed air-sampling locations prior to commencing the activities proposed in that document.

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) 407-0276 or [Jeremy.Hughes@ecy.wa.gov](mailto:Jeremy.Hughes@ecy.wa.gov).

Sincerely,



Jeremy Hughes, LG  
VCP Site Manager  
Toxics Cleanup Program, Southwest Regional Office  
Washington State Department of Ecology

Enclosures [1]: Figure 9 from the April 10, 2017 Work Plan for Additional Site Characterization

By certified mail: [91 7199 9991 7037 0291 6395]

cc: Robyn Neely, Esq., Ackerman LLP  
Paul McCullough, Arcadis  
Nicholas Acklam, Ecology  
Matthew Alexander, Ecology  
Ecology Site File

