



Electronic Copy

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 30, 2018

Greg Andrina  
Puget Sound Energy  
PO Box 98034  
PSE-09N  
Bellevue, Washington 98009

**Re: Ecology Comments on Proposed Test Piles**

- **Site Name:** Columbia Square Properties
- **Site Address:** 320 N Columbia Street, Olympia, WA 98501
- **Facility/Site No.:** 91682829
- **Cleanup Site No.:** 6851
- **VCP Project No.:** SW0984

Dear Mr. Andrina:

The Washington State Department of Ecology (Ecology) received a notification regarding your independent cleanup of the Columbia Square Properties facility (Site) via GeoEngineers, Inc.'s (GeoEngineers) letter entitled, *Test Pile Notification Letter – Geotechnical Evaluation*. The letter was received via email by Ecology on February 12, 2018.

This letter provides our comments. We are providing these comments under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D Revised Code of Washington (RCW). See Washington Administrative Code (WAC) 173-340-515(5) for details and limitations regarding technical consultations by Ecology for independent actions.

The Site, including the Property Specific No Further Action status (Site Further Action) and associated environmental covenant, is described in Ecology's opinion letter, *RE: No Further Action at a Property associated with a Site*, dated September 15, 2015. Furthermore, Site details and data are discussed in the reports referenced in that opinion letter. The Property is located at 320 N Columbia Street, Olympia, Washington and is identified as Thurston County tax parcel No. 78500200100 (Property).

In the letter dated February 12, 2018, GeoEngineers detailed three proposed test piles to be advanced at the Site. Advancement of these test piles (unnamed) is being overseen by a consultant and drilling company retained by The Rants Group (the current Property Owner). The purpose of the test piles are to facilitate geotechnical design for the foundation of the proposed

building to be constructed on the Property. GeoEngineers' letter is sufficient notification to Ecology of planned activities as required by the environmental covenant. A figure with the approximate proposed test piles location is included as Enclosure A.

Ecology provided approval and comments regarding the proposed activities per email on February 21, 2018. That email is attached as Enclosure B. No waste soil or groundwater is expected to be generated as part of the test piles project.

The City of Olympia Building Department contacted Ecology by phone on February 23, 2018, requesting if Ecology proposed any comments regarding the building permit under review. Ecology suggested a permit comment for the test piles permit from the City of Olympia to follow applicable Department of Ecology requirements as a general condition.

Also completed as part of the test piles notification process, and captured in the email dated February 21, 2018, is that all parties to the environmental covenant agree that electronic forms of communication are acceptable. Section 4d of the environmental covenant allows for in person and first class mail communication, but alternative methods of communication have to be approved by the affected parties. Based on email correspondence received (included in Enclosure B), email is acceptable to all parties.

Please provide written notification within 30 days of completion of the test piles project detailing any cap repair.

If you have any questions about these comments, please contact me by phone at (360) 407-6265 or e-mail at [tim.mullins@ecy.wa.gov](mailto:tim.mullins@ecy.wa.gov).

Sincerely,



Tim Mullin, LHG  
SWRO Toxics Cleanup Program

TCM: tam

Enclosures (2): A – Figure  
B – Email correspondence

By Certified Mail: 91 7199 9991 7037 7521 2783

cc: Nick Rohrbach, GeoEngineers, Inc.  
Stephen C. Woodward, GeoEngineers, Inc.  
Patrick Rants, The Rants Group  
Patrick Soderberg, Thurston County Health Department  
Nick Acklam, Ecology  
Stephanie Bussell, Ecology  
Carol Serdar, Ecology

# **Enclosure A**

## **Figure**

1. Figure – Proposed Test Pile Locations

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**Enclosure B**

**Email Correspondence**

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**From:** Mullin, Tim (ECY)  
**To:** "Nick Rohrbach"  
**Cc:** Pat Rants; Andrina, Greg J (Greg.Andrina@pse.com); Steve C. Woodward; Serdar, Carol (ECY); Acklam, Nicholas (ECY)  
**Subject:** Ecology Approval - Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)  
**Date:** Wednesday, February 21, 2018 5:08:00 PM

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Good afternoon,

- **Ecology approves the request in GeoEngineers' letter dated February 12, 2018, regarding the test pile program for SW0984 – 320 N Columbia Street, Olympia.**
  - GeoEngineers' request for review and the project outlined complies with requirements detailed in the environmental covenant recorded for SW0984.
  - Ecology will draft and submit a letter to formally record this email approval, but this letter will not be submitted prior to the time frame requested for the test pile work. In the interim, this email shall suffice.
- Once the test piles are complete, please provide notice that any cap damage was repaired within 30 days of the event.
  - A brief letter and figure with the final locations of the test piles would be enough.
- No soil or groundwater investigation derived waste is anticipated to be generated.
  - If that changes, please follow previously agreed to procedures from Ecology's November 6, 2017 letter regarding the geotechnical drilling at the Site.
- Ecology's SWRO Water Quality Program has no concerns regarding the discharges off site for the test piles request dated February 12, 2018.
  - As a reminder, as the project progresses, storm water items from the October 2017 meeting for general construction should be reviewed and discussed with Ecology as appropriate.
- Action item from the October 2017 meeting:
  - Petroleum contamination across the street towards SW1582 (the parcel currently occupied by the Double Tree Hotel to the north of SW0984) does have contaminated soil exceeding the MTCA Method A cleanup levels. This soil contamination is present immediately to the north of the sidewalk along Thurston Avenue, at a depth greater than 5 feet below ground surface. It is unlikely that any electrical trenching from SW0984 to the north under Thurston Avenue at typical depths of 3 feet below ground surface would encounter any petroleum contaminated soils, but please be aware of this possibility once construction commences.
- Also, section 4d of the SW0984 environmental covenant states: "Any required written notice, approval, or communication shall be personally delivered or sent by first class mail to the following persons . . . As an alternative to providing written notice and change in contact information by mail, these documents may be provided electronically in an agreed upon format at the time of submittal."
  - Unless there are any objections, submitting requests electronically (both historical and current) is considered by Ecology sufficient to comply with provision 4d in the covenant.
  - Though a minor record keeping item, please reply that electronic submissions are also

acceptable to everyone else.

Please advise of any questions.

Thank you,  
Tim

Tim Mullin, LHG  
Voluntary Cleanup Program Site Manager  
Southwest Region – Toxics Cleanup Program  
Washington State Department of Ecology  
300 Desmond Drive Southeast  
Lacey, WA 98503  
360-407-6265  
tmul461@ecy.wa.gov

**From:** Nick Rohrbach [mailto:nrohrbach@geoengineers.com]  
**Sent:** Monday, February 12, 2018 5:00 PM  
**To:** Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>  
**Cc:** Pat Rants <pat@rants-group.com>; Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Steve C. Woodward <swoodward@geoengineers.com>  
**Subject:** RE: Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)

Tim,

You are welcome. As indicated in the letter I sent over, my understanding is that no soil be generated as part of the 3 test foundation piling installations. Also, the overall impact of the test foundation piling installation would likely be less than the geotechnical boring project from late 2017 already reviewed and approved by Ecology. The decreased impact is mainly related to not generating any waste during test pile installation work.

The work is likely to include mobilizing pile driving equipment onsite, driving the test piles into the ground and would roughly have a similar work area footprint (on the ground surface) as the geotechnical boring project from late 2017.

It is important to note that roughly 150 foundation piling are currently estimated to support the new building for the Rants Group (also mentioned in the letter). The final design of these 150 foundation pilings (including the final depth to drive each piling) will be based on the 3 test foundation piling planned to be installed March 2019.

Nick

**From:** Mullin, Tim (ECY) [<mailto:TMUL461@ECY.WA.GOV>]  
**Sent:** Monday, February 12, 2018 4:18 PM  
**To:** Nick Rohrbach <[nrohrbach@geoengineers.com](mailto:nrohrbach@geoengineers.com)>  
**Subject:** RE: Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)

Hi Nick:

Thanks for the submittal regarding SW0984. Will any soil be generated as part of the piling installation? Is the overall impact of the piling installation similar to the geotechnical boring project from late 2017 already reviewed and approved by Ecology?

Thanks,  
Tim

**From:** Nick Rohrbach [<mailto:nrohrbach@geoengineers.com>]  
**Sent:** Monday, February 12, 2018 3:00 PM  
**To:** Mullin, Tim (ECY) <[TMUL461@ECY.WA.GOV](mailto:TMUL461@ECY.WA.GOV)>  
**Cc:** Andrina, Greg J ([Greg.Andrina@pse.com](mailto:Greg.Andrina@pse.com)) <[Greg.Andrina@pse.com](mailto:Greg.Andrina@pse.com)>; Pat Rants <[pat@rants-group.com](mailto:pat@rants-group.com)>; Steve C. Woodward <[swoodward@geoengineers.com](mailto:swoodward@geoengineers.com)>; Lyn Wright <[lwright@geoengineers.com](mailto:lwright@geoengineers.com)>  
**Subject:** Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)  
**Importance:** High

Hello Tim,

Provided is an environmental covenant notification letter related to planned geotechnical activities at the 320 Columbia Street Site in Olympia, WA. The Rants Group is looking for Ecology's approval of the planned geotechnical activities, in order to proceed as early as mid-March 2019.

Please feel free to contact myself with further questions.

**Nick Rohrbach**  
**Senior Environmental Scientist | GeoEngineers**  
t: 253.383.4940  
f: 253.383.4923  
c: 509.899.9389  
e: [nrohrbach@geoengineers.com](mailto:nrohrbach@geoengineers.com)

**Disclaimer:** Any information, conclusions and recommendations in this email correspondence and/or attachments, for the subject project, are preliminary and subject to change until confirmed or revised, in a formal written document, which will be submitted under separate cover. The information, conclusions and recommendations contained in our forthcoming document will be covered as appropriate, by the seal of a registered professional who had the responsibility of overseeing and reviewing our evaluation for the subject project. The Principal or Associate in charge of our services for this project, or

an equally qualified Principal or Associate, has reviewed and approved the information contained in this e-mail correspondence. If a final document in any electronic form, facsimile or copy of the original document is attached to this email, it is provided for convenience; the original document is stored by GeoEngineers, Inc. electronically or in hard copy and will serve as the official document of record.

**Confidentiality:** This message is confidential and intended solely for use of the individual or entity to whom it is addressed. If you are not the person for whom this message is intended, please delete it and notify me immediately, and please do not copy or send this message to anyone else.

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**From:** Pat Rants  
**To:** Mullin, Tim (ECY)  
**Cc:** Nick Rohrbach; Andrina, Greg J (Greg.Andrina@pse.com); Steve C. Woodward; Serdar, Carol (FCY); Acklam, Nicholas (ECY)  
**Subject:** Re: Ecology Approval - Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)  
**Date:** Wednesday, February 21, 2018 5:40:47 PM

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Tim,  
Electronic communications are acceptable to me for all communications.

Pat Rants

Sent from my iPhone

On Feb 21, 2018, at 5:08 PM, Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV> wrote:

Good afternoon,

<!--[if !supportLists]-->• <!--[endif]-->**Ecology approves the request in GeoEngineers' letter dated February 12, 2018, regarding the test pile program for SW0984 – 320 N Columbia Street, Olympia.**

<!--[if !supportLists]-->○ <!--[endif]-->GeoEngineers' request for review and the project outlined complies with requirements detailed in the environmental covenant recorded for SW0984.

<!--[if !supportLists]-->○ <!--[endif]-->Ecology will draft and submit a letter to formally record this email approval, but this letter will not be submitted prior to the time frame requested for the test pile work. In the interim, this email shall suffice.

<!--[if !supportLists]-->• <!--[endif]-->Once the test piles are complete, please provide notice that any cap damage was repaired within 30 days of the event.

<!--[if !supportLists]-->○ <!--[endif]-->A brief letter and figure with the final locations of the test piles would be enough.

<!--[if !supportLists]-->• <!--[endif]-->No soil or groundwater investigation derived waste is anticipated to be generated.

<!--[if !supportLists]-->○ <!--[endif]-->If that changes, please follow previously agreed to procedures from Ecology's November 6, 2017 letter regarding the geotechnical drilling at the Site.

<!--[if !supportLists]-->• <!--[endif]-->Ecology's SWRO Water Quality Program has no concerns regarding the discharges off site for the test piles request dated February 12, 2018.

<!--[if !supportLists]-->○ <!--[endif]-->As a reminder, as the project progresses, storm water items from the October 2017 meeting for general construction should be reviewed and discussed with Ecology as appropriate.

<!--[if !supportLists]-->• <!--[endif]-->Action item from the October 2017 meeting:

**From:** [Andrina, Greg](#)  
**To:** [Mullin, Tim \(ECY\)](#); [Nick Rohrbach](#)  
**Cc:** [Pat Rants](#); [Steve C. Woodward](#); [Serdar, Carol \(ECY\)](#); [Acklam, Nicholas \(ECY\)](#)  
**Subject:** RE: Ecology Approval - Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)  
**Date:** Thursday, February 22, 2018 7:18:08 AM

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Thanks Tim. Electronic submissions are acceptable to me.

Greg J Andrina  
PSE

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From: Mullin, Tim (ECY) [TMUL461@ECY.WA.GOV]  
Sent: Wednesday, February 21, 2018 5:08 PM  
To: Nick Rohrbach  
Cc: Pat Rants; Andrina, Greg; Steve C. Woodward; Serdar, Carol (ECY); Acklam, Nicholas (ECY)  
Subject: Ecology Approval - Test Pile Notification Letter – Geotechnical Evaluation (Former Olympia Manufactured Gas Plant (MGP) Property)

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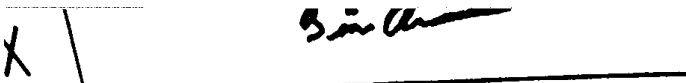
Action item from the October 2017 meeting:

- o Petroleum contamination across the street towards SW1582 (the parcel currently occupied by the Double Tree Hotel to the north of SW0984) does have contaminated soil exceeding the MTCA Method A cleanup levels. This soil contamination is present immediately to the north of the sidewalk along Thurston Avenue, at a depth greater than 5 feet below ground surface. It is unlikely that any electrical trenching from SW0984 to the north under Thurston Avenue at typical depths of 3 feet below ground surface would encounter any petroleum contaminated soils, but please be aware of this possibility once construction commences.

Date: May 2, 2018

T M:

The following is in response to your May 2, 2018 request for delivery information on your Certified Mail™ item number 9171999991703775212783. The delivery record shows that this item was delivered on April 5, 2018 at 6:01 am in BELLEVUE, WA 98009. The scanned image of the recipient information is provided below.

Signature of Recipient : 

Printed Name	Tim Anderson
Delivery	20180405 0601

Address of Recipient :

Delivery Address	98009
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Thank you for selecting the Postal Service for your mailing needs.

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Sincerely,  
United States Postal Service