



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300
Call 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 1, 2018

Electronic Copy

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

Re: Ecology Comments on Groundwater Monitoring Well Decommissioning Plan

- **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) report entitled, *Groundwater Monitoring Well Decommissioning Plan*. The report was received via email by Ecology on April 16, 2018, with two hard copies received on April 24, 2018. A request for opinion form was also received by Ecology on April 24, 2018. Ecology appreciates PSE's adherence to Washington Administrative Code (WAC) 173-340-840(2) and Voluntary Cleanup Program (VCP) submittal requirements.

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 WAC 173-340-515(5) for details and limitations regarding informal nonbinding advice and technical consultations provided 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).

Ecology has the following comments regarding GeoEngineers' *Groundwater Monitoring Well Decommissioning Plan*:

- 1) It is Ecology's opinion that the proposed well decommissioning plan can be implemented at the Site. Monitoring well locations proposed for decommissioning are shown on the enclosed figure (**Enclosure A**).
- 2) Ecology recognizes that decommissioning the monitoring wells is useful to eliminate them as conduits in order to prevent any potential impacts to groundwater during the construction.
- 3) Monitoring wells MW-6 and MW-10 should be overdrilled, as no well logs are available.
 - a. If utility conflicts make overdrilling of either MW-6 or MW-10 impossible, any variance request should be directed to John Pearch of Ecology's Southwest Regional Office, Water Resources Division at (360) 407-0297 or john.pearch@ecy.wa.gov.
- 4) Once available, Ecology would appreciate being made aware of the final building construction plans.
- 5) Once construction is complete, the future monitoring well network configuration should be restored as close as practicable to the current monitoring well network configuration.
- 6) The most recent groundwater monitoring event at the Site was in February 2018.¹
 - a. Per the *Groundwater Compliance Monitoring Plan* dated October 8, 2013, and the associated *Addendum #1* dated November 5, 2014, (Exhibit C in the environmental covenant), the current compliance groundwater monitoring schedule is once every 18 months, which means that August 2019 is the next scheduled groundwater monitoring event.
 - b. It is anticipated that a replacement monitoring well network would be installed by the end of August 2019, and wells could be sampled before the end of that month. However, the construction schedule (18 months estimated completion, starting from August 2018) may mean an August 2019 sampling event is not feasible. If it appears that the August 2019 sampling event is to be missed, an alternative timeline should be proposed and submitted to Ecology.
- 7) Please be aware that if a significant re-configuration in the monitoring well network is proposed, amendment² to the environmental covenant and/or the groundwater compliance monitoring plan³ may be necessary.
 - a. If an amendment to the recorded environmental covenant is deemed necessary, a determination will be made by Ecology at the time of proposal of the replacement monitoring well network.

¹ GeoEngineers, *Groundwater Monitoring Technical Memorandum February 2018 Monitoring Event*, dated April 5, 2018. Available at: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=6851>

² RCW 64.70.100.

³ *Groundwater Compliance Monitoring Plan* dated October 8, 2013, and associated *Addendum #1* dated November 5, 2014, as referenced in section 2d of the Covenant section of the Environmental Covenant.

Greg Andrina

June 1, 2018

Page 3

- b. In the unlikely event any proposed action is determined to be inconsistent with the environmental covenant,⁴ notify Ecology at least 60 days prior to taking said action. A public comment period regarding any proposed action inconsistent with the covenant is necessary.
- 8) Ecology concurred with the revised *Materials Management Plan* for SW0984 by email on May 17, 2018. Ecology received the *Materials Management Plan* hard copies on May 23, 2018.

If you have any questions about these comments, please contact me by phone at (360) 407-6265 or email at tim.mullin@ecy.wa.gov.

Sincerely,

Tim Mullin, LHG
Toxics Cleanup Program
Southwest Regional Office

TCM: tam

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

By certified mail: 9489 0090 0027 6019 1347 63

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
 John Pearch, Ecology
 Carol Serdar, Ecology
 Ecology Site File

⁴ See section 1e in the Covenant section. An example of an action inconsistent with the environmental covenant for SW0984 would be to cease groundwater monitoring at the Site without Ecology concurrence.

b. In the unlikely event any proposed action is determined to be inconsistent with the environmental covenant,⁴ notify Ecology at least 60 days prior to taking said action. A public comment period regarding any proposed action inconsistent with the covenant is necessary.

8) Ecology concurred with the revised *Materials Management Plan* for SW0984 by email on May 17, 2018. Ecology received the *Materials Management Plan* hard copies on May 23, 2018.

If you have any questions about these comments, please contact me by phone at (360) 407-6265 or email at tim.mullin@ecy.wa.gov.

Sincerely,



Tim Mullin, LHG
Toxics Cleanup Program
Southwest Regional Office

TCM: tam

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

By certified mail: 9489 0090 0027 6019 1347 63

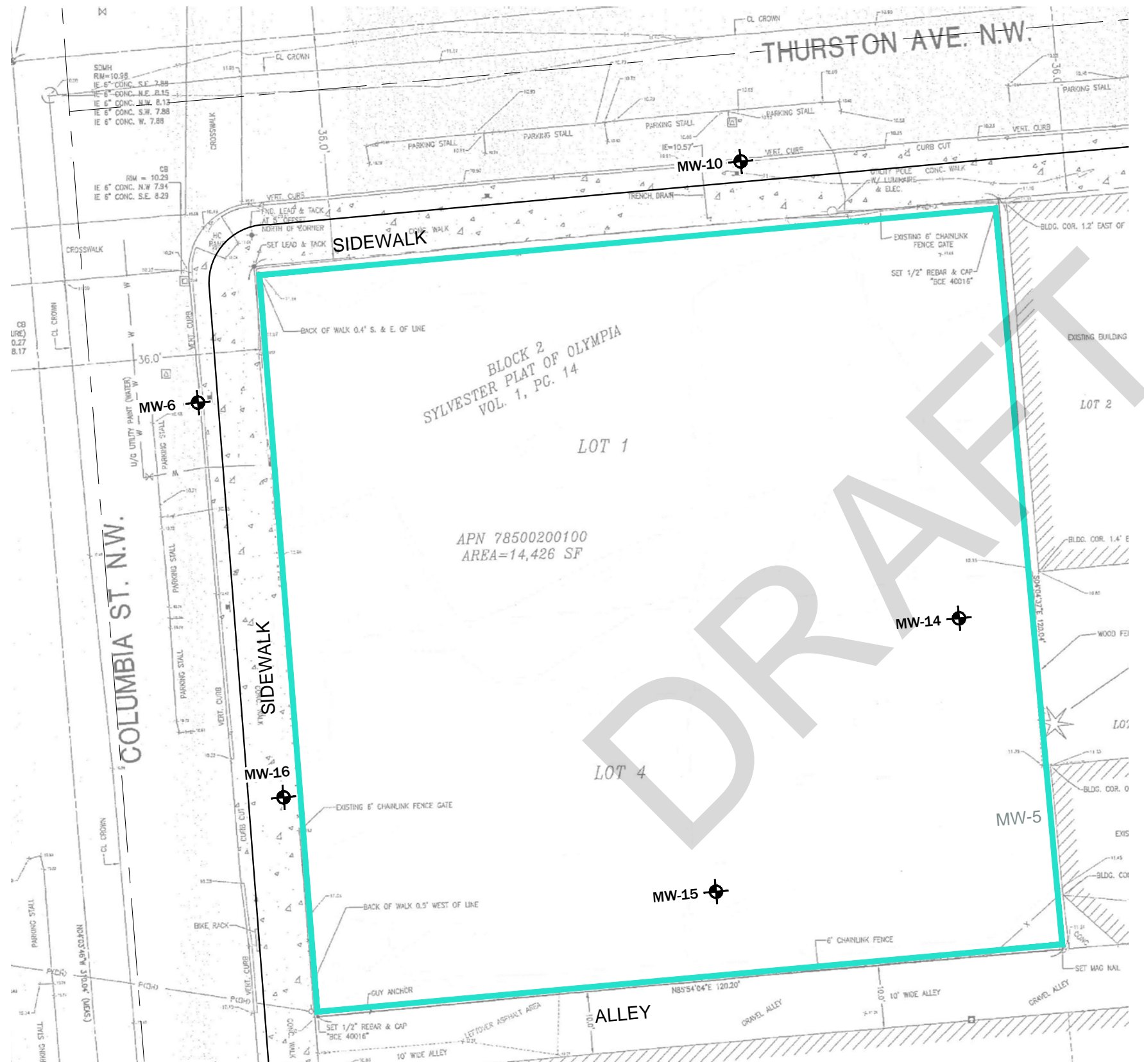
cc: Nick Rohrbach, GeoEngineers, Inc.
 Stephen C. Woodward, GeoEngineers, Inc.
 Patrick Rants, The Rants Group
 Patrick Soderberg, Thurston County Health Department
 Nick Acklam, Ecology
 Stephanie Bussell, Ecology
 John Pearch, Ecology
 Carol Serdar, Ecology
 Ecology Site File

⁴ See section 1e in the Covenant section. An example of an action inconsistent with the environmental covenant for SW0984 would be to cease groundwater monitoring at the Site without Ecology concurrence.

Enclosure A

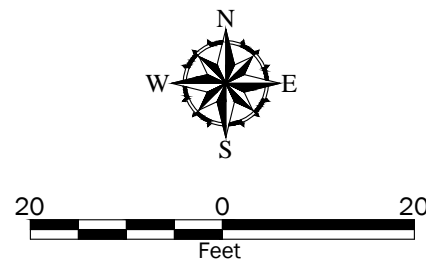
Figures

1. Figure 1 – Existing Monitoring Well Locations to be Decommissioned



Legend

- Property boundary
- Existing building
- Existing fence
- MW-10 Monitoring well to be decommissioned



Notes:

- The locations of all features shown are approximate.
- This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document.

GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication

Data Source:
Background from Barghausen Consulting Engineers, dated 3/28/2012.

Existing Monitoring Well Locations to be Decommissioned	
Former Olympia MGP Site Olympia, Washington	
	Figure 1

Enclosure B

Email Correspondence

From: [Nick Rohrbach](#)
To: [Mullin, Tim \(ECY\)](#)
Cc: [Andrina, Greg J \(Greg.Andrina@pse.com\)](#); [Pat Rants](#); [Steve C. Woodward](#); [Sydney J. Bronson](#); [Brandon Brayfield](#); [Lyn Wright](#)
Subject: RE: Draft Well Decommissioning Plan - Columbia Square Properties (320 Columbia Street, Olympia WA)
Date: Thursday, May 24, 2018 8:42:22 AM

Thank you Tim. We appreciate the early comments to the well decommissioning plan for the 320 Columbia Street project. We will review your comments below and be in touch with potential followup questions. We'll also be on the look out for the final letter with these comments, which may vary slightly.

Nick

From: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Sent: Thursday, May 24, 2018 8:31 AM
To: Nick Rohrbach <nrohrbach@geoengineers.com>
Cc: Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Pat Rants <pat@rants-group.com>; Steve C. Woodward <swoodward@geoengineers.com>; Sydney J. Bronson <sbronson@geoengineers.com>; Brandon Brayfield <bbrayfield@geoengineers.com>; Lyn Wright <lwright@geoengineers.com>
Subject: RE: Draft Well Decommissioning Plan - Columbia Square Properties (320 Columbia Street, Olympia WA)

Regarding the SW0984 Draft *Groundwater Monitoring Well Decommissioning Plan*, dated April 13, 2018, Ecology has the comments below. These comments are from the draft text of Ecology's letter. The draft letter is under Ecology management review, and the final text of the comments in the letter may vary slightly. This email is the record of Ecology's comments on the Draft *Groundwater Monitoring Well Decommissioning Plan* until replaced by the final letter.

1. It is Ecology's opinion that the proposed well decommissioning plan can be implemented at the Site. Monitoring well locations proposed for decommissioning are shown on the enclosed figure (**Enclosure A**).
2. Ecology recognizes that decommissioning the monitoring wells is useful to eliminate them as conduits in order to prevent any potential impacts to groundwater during the construction.
3. Monitoring wells MW-6 and MW-10 should be overdrilled, as no well logs are available.
4. Once available, Ecology would appreciate being made aware of the final building construction plans.
5. Once construction is complete, the future monitoring well network configuration should be restored as close as practicable to the current monitoring well network configuration.
6. The most recent groundwater monitoring event at the Site was in February 2018^[1].
 - a. Per the *Groundwater Compliance Monitoring Plan* dated October 8, 2013 and the associated *Addendum #1* dated November 5, 2014 (Exhibit C in the environmental covenant), the current compliance groundwater monitoring schedule is once every

- 18 months, which means that August 2019 is the next scheduled groundwater monitoring event.
- b. It is anticipated that a replacement monitoring well network would be installed by the end of August 2019, and wells could be sampled before the end of that month. However, the construction schedule (18 months estimated completion, starting from August 2018) may mean an August 2019 sampling event is not feasible. If it appears that the August 2019 sampling event is to be missed, an alternative timeline should be proposed and submitted to Ecology.
7. Please be aware that if a significant re-configuration in the monitoring well network is proposed, amendment^[2] to the environmental covenant and/or the groundwater compliance monitoring plan^[3] may be necessary.
- a. If an amendment to the recorded environmental covenant is deemed necessary, a determination will be made by Ecology at the time of proposal of the replacement monitoring well network.
 - b. In the unlikely event any proposed action is determined to be inconsistent with the environmental covenant^[4], notify Ecology at least 60 days prior to taking said action. A public comment period regarding any proposed action inconsistent with the covenant is necessary.
8. Ecology concurred with the revised *Materials Management Plan* for SW0984 by email on May 17, 2018. Ecology received the *Materials Management Plan* hard copies on May 23, 2018.

¹GeoEngineers, *Groundwater Monitoring Technical Memorandum February 2018 Monitoring Event*, dated April 5, 2018. Available at: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=6851>

² RCW 64.70.100.

³ *Groundwater Compliance Monitoring Plan* dated October 8, 2013 and associated *Addendum #1* dated November 5, 2014, as referenced in section 2d of the Covenant section of the Environmental Covenant.

⁴ See section 1e in the Covenant section. An example of an action inconsistent with the environmental covenant for SW0984 would be to cease groundwater monitoring at the Site without Ecology concurrence.

From: Nick Rohrbach [<mailto:nrohrbach@geoengineers.com>]

Sent: Monday, April 16, 2018 11:36 AM

To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>

Cc: Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Pat Rants <pat@rants-group.com>; Steve C. Woodward <swoodward@geoengineers.com>; Sydney J. Bronson <sbronson@geoengineers.com>; Brandon Brayfield <bbrayfield@geoengineers.com>; Lyn Wright <lwright@geoengineers.com>

Subject: Draft Well Decommissioning Plan - Columbia Square Properties (320 Columbia Street, Olympia WA)

Importance: High

Hi Tim,

Attached is another document for your review and comment regarding the Columbia Square Properties (320 Columbia Street, Olympia WA). This is in addition to the draft material management plan already in your queue for review/comment.

This submittal describes PSE's plan to decommission all existing monitoring wells, prior to planned redevelopment construction activities. There is also some information related to the re-installation of monitoring wells, once development is completed.

We are formally requesting that you review/comment this document by June 1, 2018, in order for our team to be able to complete these activities ahead of The Rants Group construction schedule.

Thanks much,

Nick Rohrbach

Senior Environmental Scientist | GeoEngineers

t: 253.383.4940

f: 253.383.4923

c: 509.899.9389

e: 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.

^[1] GeoEngineers, *Groundwater Monitoring Technical Memorandum February 2018 Monitoring Event*, dated April 5, 2018. Available at: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=6851>

^[2] RCW 64.70.100.

^[3] *Groundwater Compliance Monitoring Plan* dated October 8, 2013 and associated *Addendum #1* dated November 5, 2014, as referenced in section 2d of the Covenant section of the Environmental Covenant.

^[4] See section 1e in the Covenant section. An example of an action inconsistent with the environmental covenant for SW0984 would be to cease groundwater monitoring at the Site without Ecology concurrence.

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From: Mullin, Tim (ECY)
To: ["Nick Rohrbach"](#)
Cc: [Andrina, Greg J \(Greg.Andrina@pse.com\)](#); [Steve C. Woodward](#); [Pat Rants](#); [Sydney J. Bronson](#); [Lyn Wright](#); [Brandon Brayfield](#)
Subject: RE: SW0984 - draft MMP comments update
Date: Thursday, May 17, 2018 4:46:00 PM

Hi Nick,

Based on review of the revised MMP below, it appears that Ecology's comments in its letter, RE: Ecology Comments on Draft Materials Management Plan dated May 7, 2018, have been sufficiently addressed. Please submit the two hard copies of the final MMP.

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: Wednesday, May 16, 2018 4:35 PM
To: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Cc: Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Steve C. Woodward <swoodward@geoengineers.com>; Pat Rants <pat@rants-group.com>; Sydney J. Bronson <sbronson@geoengineers.com>; Lyn Wright <lwright@geoengineers.com>; Brandon Brayfield <bbrayfield@geoengineers.com>
Subject: RE: SW0984 - draft MMP comments update
Importance: High

Hi Tim,

We have addressed the revisions to the Columbia Street MMP, based on Ecology's comments dated May 7, 2018. Since the revisions have been incorporated, our understanding is the MMP document is considered a final document for use during property redevelopment construction.

Can you please confirm whether we have addressed your comments to the MMP and is ready for use during property redevelopment construction? You will have to download a PDF copy from the attached Sharefile link.

If the MMP looks acceptable, we will provide you with the two hard copies via mail for your records.

As the start of the construction approaches (which is still planned for this upcoming summer 2018), we (including Pat Rants) will keep you posted on those activities.

Nick

From: Mullin, Tim (ECY) <TMUL461@ECY.WA.GOV>
Sent: Monday, May 7, 2018 11:48 AM
To: Nick Rohrbach <nrohrbach@geoengineers.com>
Cc: Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Steve C. Woodward <swoodward@geoengineers.com>; Pat Rants <pat@rants-group.com>; Sydney J. Bronson <sbronson@geoengineers.com>; Lyn Wright <lwright@geoengineers.com>
Subject: RE: SW0984 - draft MMP comments update

The SW0984 letter finalizing the below is available here (scroll to bottom of the page):

<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=6851>

Letter hard copies anticipated to go out today, 5/7/18. Thank you.

Sincerely,

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: Mullin, Tim (ECY)
Sent: Monday, April 30, 2018 8:48 AM
To: 'Nick Rohrbach' <nrohrbach@geoengineers.com>
Cc: Andrina, Greg J (Greg.Andrina@pse.com) <Greg.Andrina@pse.com>; Steve C. Woodward <swoodward@geoengineers.com>; Pat Rants <pat@rants-group.com>; Sydney J. Bronson <sbronson@geoengineers.com>; Lyn Wright <lwright@geoengineers.com>; Tim Mullin (TMUL461@ecy.wa.gov) <TMUL461@ecy.wa.gov>
Subject: SW0984 - draft MMP comments update

Good morning Nick,

Ecology has nearly completed a letter providing comments on GeoEngineers' *Draft Materials Management Plan*. As the signed version of the letter is still being finalized, this email provides Ecology's comments until the SW0984 comments letter is submitted. Please note, that the draft MMP comments below are from Ecology's draft letter, completed on April 5-6th, which predates the draft *Groundwater Monitoring Well Decommissioning Plan* received by Ecology via email on 4/16/18 and in hard copy on 4/24/18 (e.g., comment #4). A few more generic comments are included in the draft MMP comments letter and are not provided below. As Ecology's draft MMP comments letter is already through internal management review, the draft letter will not be modified to reflect the receipt of the well decommissioning plan. Ecology is drafting a separate letter for comments on that document.

Also of note, I have not yet seen a request for SEPA comments from the City of Olympia. Though typically Ecology Toxics Cleanup Program's SEPA comments are relatively quick, to be up front, I currently have nine opinions in my queue. Thus, my review availability is limited.

- 1) It is Ecology's opinion that the final version of GeoEngineers' *Materials Management Plan* should be used at this time as the primary document for guiding contaminated media management during the construction process. The final version of the *Materials Management Plan* should be on file with Ecology prior to starting the activities described therein.
- 2) Section 2.2.2. Suggest referencing the most recent groundwater monitoring report.
- 3) Truck track out of Site soils onto adjacent surface streets should be managed as prescribed in applicable permits from the City of Olympia.
- 4) Please clarify if the building construction will modify the current monitoring well network.
 - a. Specifically, will construction destroy monitoring well locations MW-14 and MW-15?
 - b. Currently, monitoring wells within the Property boundary are required to be sampled as per section 2d of the environmental covenant and the therein referenced groundwater compliance monitoring plan [\[1\]](#) and related Addendum #1 [\[2\]](#).
- 5) In order to ensure a complete soil disposal profile, Ecology recommends at least one additional boring location along the southern Property boundary (southeastern trench area).
 - a. As currently presented, one boring appears to be proposed adjacent to historical heavy oil, mercury, and carcinogenic polycyclic aromatic hydrocarbon (cPAH) contamination. Ecology concurs with the proposed location.

- b. Diesel appears to be present in soil at concentrations at approximately 4,500 milligrams per kilogram (mg/kg).
- 6) Section 5.1.1: Ecology strongly recommends submitting additional soil sample volume on hold to the laboratory in the event that Toxicity Characteristic Leaching Procedure (TCLP) analysis is needed.
 - a. To date Site soils have not designated as dangerous waste; however, total concentrations of mercury, lead, etc. in soils at proposed boring locations may exceed the “20 times rule”^[3] and require TCLP in order to determine compliance with WAC 173-303-090 (Table 1).
 - b. For instance, the concentration of total lead in soil sampled in the vicinity of SS-B6(S)-3 may potentially exceed the “20 times rule” guideline for toxicity for lead and require TCLP analysis.
 - c. Please revise the draft materials management plan to consider this possibility.
- 7) Section 5.1.2: Please add the proposed test pit locations to Figure 2 or a separate figure.
- 8) Section 5.2: This section references section 5.4.2, which is not present in the text. Please revise and update throughout the text as appropriate.
- 9) Section 5.3.2: This section references section 5.4.1, which is not present in the text. Please revise and update throughout the text as appropriate.
- 10) Section 6.1: Based on the concentrations of metals in soil, wind moving over stockpiles may represent a dust (or blowing dust) hazard.
 - a. Ecology concurs with the proposed covering of stockpiled soils to prevent wind or precipitation from contacting the stockpile.
 - b. Wetting of soils or other dust/dirt suppression best management practices may also be necessary.
 - c. If applicable, air or dust monitoring may need to be considered in the health and safety plan.
- 11) Section 6.2: It is Ecology’s opinion that Site soils excavated for the purposes of utility installation or construction along the property boundaries are unlikely to meet the Category 1 soils requirements for re-use^[4]. Ecology concurs that soil disposal should occur at a permitted facility (landfill).
 - a. For the purposes of soil re-use, Ecology considers any heavy oil in Site soils as waste/unknown oil, and oil containing soils should be disposed of at a permitted facility.
 - b. Clean fill disturbed by construction, currently used as part of the six foot cap at the Site, can be re-used.

12) Though current concentrations of Site contaminants of concern (COCs) are less than the laboratory practical quantitation limit^[5], Ecology recommends off-Site disposal of any groundwater encountered at an approved facility.

- a. Though arsenic is not a Site COC, it is present in Site groundwater. Please verify with the disposal facility if any additional requirements are necessary above those already determined by any previous disposal profiles.

13) It is Ecology's opinion that the areas designated for utility trenches^[6] are an opportunity to collect additional soils data in order to delineate the Site.

- a. Boring locations proposed are likely to intercept contamination for the purposes soil disposal profiling.
- b. Thus, soil sampled and analyzed for Site COCs on the far sidewall of the utility trenches (away from the Property) are recommended to attempt to areally delineate the Site.
- c. Examples where Site delineation might be achieved by sidewall sampling are the northwestern utility trench and the southeastern utility trench.
- d. Ecology recommends sampling at locations of obvious soil staining or odorous soils, whether along trench sidewalls or bases.
- e. Site delineation approach and plans could be considered under separate cover and not necessarily a part of the *Draft Materials Management Plan*.

14) Based on a 3-6 foot depth of trenching under Thurston Ave Northwest, it is unlikely that contamination in soils from VCP cleanup Site SW1582 would be encountered. However, it is a possibility. Selected reports related to the cleanup for SW1582 can be accessed at this link:

- a. <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=5257>
- b. The historical operations and release at SW1582 was related to a former petroleum bulk fuel facility.

Sincerely,

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

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[1] GeoEngineers, *Groundwater Compliance Monitoring Plan*, dated October 8, 2013. Included as Exhibit C in Ecology's, *Re: No Further Action at a Property associated with a Site* (letter and environmental covenant), dated September 15, 2015.

[2] Dated November 5, 2014.

[3] <https://waste.zendesk.com/hc/en-us/articles/217452377-Can-totals-analysis-be-used-in-lieu-of-the-TCLP-for-determining-the-toxicity-characteristic->

[4] Table 12.2, Ecology Publication No. 10-09-057, *Guidance for Remediation of Petroleum Contaminated Sites*, Revised June 2016.

[5] GeoEngineers, *Groundwater Monitoring Technical Memorandum*, February 2018 Monitoring Event, dated April 5, 2018.

[6] Figure 2, *Draft Materials Management Plan*.