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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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August 6, 2019

Greg Andrina
PO Box 98034
Bellevue, WA 98004

Re: Response to Groundwater Compliance Monitoring Modification Request

- **Site Name:** Columbia Square Properties
- **Site Address:** 320 N Columbia St., Olympia, Thurston County, WA 98501
- **Cleanup Site ID:** 6851
- **Facility Site ID:** 91682829
- **VCP Project Number:** SW0984

Dear Greg Andrina:

On May 15, 2019, the Department of Ecology (Ecology) received a letter¹ from GeoEngineers, Inc. (GeoEngineers) regarding a request to modify the groundwater compliance monitoring schedule as part of the cleanup at the Site listed above. The request is to skip the August 2019 groundwater sampling event due to delays in construction at the Property (Thurston County parcel number 78500200100). The compliance groundwater monitoring schedule was set as part of a Property-Specific No Further Action² and environmental covenant with a groundwater compliance monitoring plan. In preparation for re-development starting in summer 2018, Site monitoring wells were decommissioned in June 2018.

Concentrations of hazardous substances in Site groundwater have been less than the MTCA cleanup levels for several years. Skipping the August 2019 compliance groundwater monitoring event at this Site by not installing temporary boreholes or monitoring wells during construction:

- Protects shallow groundwater from potential impacts should surface runoff be generated during construction.
- Does not present an unacceptable risk to human health and the environment.
- Does not modify the environmental covenant.
- Ensures the cleanup remedy remains protective.

¹ GeoEngineers, Groundwater Compliance Monitoring Modification Request, May 13, 2019.

² Ecology, Re: *No Further Action at a Property associated with a Site*, dated September 15, 2015. A copy of the environmental covenant is attached to the No Further Action letter which is available at: <https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=6851>.

Ecology requests that the current 18 month groundwater compliance monitoring schedule for this Site be maintained. Based on that schedule, the next groundwater compliance monitoring event would need to be completed by the end of February 2021. If construction delays persist such that the February 2021 groundwater compliance monitoring event may be at risk of postponement, Ecology may:

- Re-evaluate the compliance groundwater monitoring schedule during the periodic review process.³
- Modify the schedule for compliance groundwater monitoring in accordance with the requirements in the environmental covenant.
- Request one or more special groundwater monitoring events after completion of construction and installation of replacement monitoring wells.
- Continue to provide informal advice and technical assistance.
- Rescind the Property-Specific No Further Action if Ecology determines that the implemented cleanup remedy is no longer protective of human health and the environment.

All determinations in this letter are Site-specific and should not necessarily be applied to any other cleanup.

Contact Information

For more information about the Voluntary Cleanup Program (VCP) and the cleanup process, please visit our VCP [website](#).⁴ If you have any questions about this transmittal, please contact me by phone at (360) 407-6265 or by email at tmul461@ecy.wa.gov.

Sincerely,



Tim Mullin, LHG
Toxics Cleanup Program
Southwest Regional Office

TCM: tam

cc: Nick Rohrbach, GeoEngineers, Inc.
Stephen C. Woodward, GeoEngineers, Inc.
Patrick Rants, The Rants Group
Patrick Soderberg, Thurston County Public Health and Social Services Department
Nicholas Acklam, Ecology (by email)
Panjini Balaraju, Ecology (by email)
John Pearch, Ecology (by email)
Carol Serdar, Ecology (by email)
Ecology Site File

³ WAC 173-340-420.

⁴ <https://ecy.wa.gov/vcp>