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May 7, 2020

Ashley Smith, Capital Project Manager  
City of Lacey  
420 College St SE  
Lacey, WA 98503  
[acsmith@ci.lacey.wa.us](mailto:acsmith@ci.lacey.wa.us)

**Re: Further Action at the following Site:**

- **Site Name:** Depot District Building
- **Site Address:** 5700 Lacey Blvd SE, Lacey, Thurston County, WA 98503
- **Facility/Site ID:** 12610
- **Cleanup Site ID:** 13135
- **VCP Project ID:** SW1556

Dear Ashley Smith:

On February 12, 2020, the Washington State Department of Ecology (Ecology) received your request for an opinion on the proposed independent cleanup of the Depot District Building (Site). Your submittal, including acceptance of Site data to Ecology's Environmental Information Management (EIM) database, was complete on April 16, 2020. Ecology has decided to proceed with our review prior to acceptance of the Site data into EIM. This letter provides our opinion. We are providing this opinion under the authority of the [Model Toxics Control Act \(MTCA\)](#),<sup>1</sup> chapter 70.105D Revised Code of Washington (RCW).

## Issue Presented and Opinion

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Ecology has determined that further remedial action is necessary to clean up contamination at the Site.

**Ecology appreciates the Site investigation activities you have completed and supports your proposal to excavate remaining petroleum contaminated soils at the Site.<sup>2</sup>**

<sup>1</sup> <https://fortress.wa.gov/ecy/publications/SummaryPages/9406.html>

<sup>2</sup> Skillings, *Remedial Investigation Report*, April 9, 2019, Page 27.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, chapter 70.105D RCW, and its implementing regulations, Washington Administrative Code (WAC) chapter 173-340 (collectively “substantive requirements of MTCA”). The analysis is provided below.

## Description of the Site

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This opinion applies only to the Site described below. The Site is currently defined by the nature and extent of contamination associated with the following release:

- Total petroleum hydrocarbons (TPH) as gasoline (TPH-G), TPH as diesel (TPH-D), and TPH as heavy oil (TPH-O) into the soil, groundwater, and potentially air/vapor.
  - Also associated with the petroleum release appear to be:
    - Benzene, toluene, ethylbenzene, and total xylenes (BTEX), naphthalenes, polycyclic aromatic hydrocarbons (PAHs, including carcinogenic PAHs [cPAHs]), arsenic and lead into soil and/or groundwater.
    - Barium into the soil and groundwater.
    - Chromium into the soil.

A site description is included as **Enclosure A**. The Depot District warehouse building is located on Thurston County tax parcel 09950013000 (Property). Please note the parcel(s) of real property associated with this Site are also located within the projected boundaries of the Tacoma Smelter Plume facility (FSID #24971643).

At this time, Ecology has no information that those parcel(s) are actually affected. This opinion does not apply to any contamination associated with the Tacoma Smelter Plume facility. At this time, we have no information that the parcel(s) associated with this Site are affected by any other sites.

## Basis for the Opinion

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This opinion is based on the information contained in the documents listed in **Enclosure B**.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Information on obtaining those records can be found on [Ecology's public records requests web page](#).<sup>3</sup> Some site documents may be available on [Ecology's Cleanup Site Search web page](#).<sup>4</sup>

This opinion is void if any of the information contained in those documents is materially false or misleading.

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<sup>3</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>4</sup> <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=13135>

## Analysis of the Cleanup

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Ecology has concluded that **further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

### 1. Characterization of the Site.

Per Ecology's opinion dated August 19, 2019, certain areas of the Site appear to require no further action.

A vent pipe on the east side of the office portion of the warehouse building indicated the potential for an orphan underground storage tank (UST). GeoEngineers, Inc. (GeoEngineers) oversaw removal of a 500-gallon "light oil" UST in July 1992.<sup>5</sup> No release was detected at the time of the UST removal.

Because of the vent pipe, physical examination of the former UST location was completed on January 22, 2020, including removing soil to access the end of the vent pipe and confirming that the UST had been removed. Soil testing at nine feet below ground surface (bgs) near the former UST location at soil boring 9<sup>6</sup> did not detect any contamination, supporting the 1992 results that a release did not occur associated with the former UST.

Available data suggest that no further action is necessary in the former UST area. However, Ecology does recommend development of a soils management plan for the Property as a whole. This purpose of the plan is to provide a guide for managing contaminated soils, should those be encountered during construction activities.

### ***Remaining Area of Petroleum Contaminated Soils***

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Initially identified during the 2015 Phase II Environmental Site Assessment (ESA) at the Site, an area of petroleum contaminated soil was identified about 50 feet east of the southeast corner of the warehouse building, under the east parking lot. Well 1, the "source well," is located within the petroleum contaminated soils area. The highest heavy oil concentration in soil, 19,000 milligrams per kilogram (mg/kg), was collected at 8 feet bgs at BR8-7. Figure 3 in Skillings' 2020 *Remedial Investigation Report* depicts the extent of petroleum contaminated soils, as currently known, under the east parking lot (**Enclosure C**).

Cleanup options regarding the remaining area of petroleum contaminated soils are discussed further in section 3, the selection of cleanup action section below.

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<sup>5</sup> GeoEngineers' *Phase II Environmental Site Assessment report*, August 25, 1992.

<sup>6</sup> Skillings, *No Further Action Request* for soil borings 8 and 9, April 9, 2019.

## ***Soils Management Plan***

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Current tentative construction plans indicate that the structures at the Property are likely to be demolished and replaced. Though current data suggests that only one area of contamination remains at the Site, Ecology recommends drafting a soils management plan, in case additional contaminated soils are encountered during construction.

A soils management plan can be a relatively brief document, covering such items as (but not limited to):

- Site introduction and background.
- History of known contamination at the Property and potential sources of contamination. This section could include a brief history of Site investigations as well.
- Release reporting requirements if contaminated soils are encountered.
- Stockpile location on the Property, and how the stockpile will be managed to prevent rain infiltration and stormwater runoff. For instance, placing plastic sheeting beneath and over the contaminated stockpile. Additionally, if a permit is required, aspects of the construction general stormwater permit issued for any construction should be included in the plan.
- Analytical requirements and methods for soil sampled for the stockpile (composite samples) and excavation extents (discrete samples).
- Depending on whether the contamination found is petroleum based or not, how WAC 173-340-900, Table 830-1 sampling requirements would be met.
- The Site is mapped within the less than 20 mg/kg arsenic in soil zone for the Tacoma Smelter Plume (TSP). However, despite the low likelihood of encountering TSP soils, which exceed the MTCA Method A cleanup levels for arsenic and lead, consider what contingencies are necessary should soils high in lead and arsenic be encountered.<sup>7</sup> Additionally, consider contingencies in case contamination is present in association with the old rail line.
- Transportation methods and bill of lading requirements.
- Off-Site disposal location and specific requirements of the permitted disposal facility.
  - Note: The re-use criteria for any petroleum contaminated soils is provided in Section 12 and Table 12.1 of Ecology Publication No. 10-09-57, *Guidance for Remediation of Petroleum Contaminated Sites*, revised June 2016. Any contaminated soils, which do not meet the re-use criteria, must be disposed of at a permitted facility, which is typically a permitted landfill.
- Reporting of final cleanup and construction results to Ecology. This includes estimates of cubic yardage and tonnage disposed of at the permitted facility, supported by disposal facility receipt documentation and scale tickets.

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<sup>7</sup> For guidance on managing potential Tacoma Smelter Plume contamination, please see <https://fortress.wa.gov/ecy/publications/documents/1909101.pdf>

### ***Chromium in Soil***

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Current chromium concentrations in soil exceed the MTCA Method A screening level for hexavalent chromium, but are less than the MTCA Method A screening level for trivalent (total) chromium. Hexavalent chromium, based on soil testing in March 2019 at four locations, was not detected in Site soils. Trivalent (total) chromium and the 2,000 mg/kg MTCA Method A cleanup level appears to be appropriate to screen results. Additionally, Ecology concurs with the analysis presented that the chromium in soil concentrations are less than the 90<sup>th</sup> percentile values for background concentrations for the Puget Sound.<sup>8</sup>

**Additional testing of chromium in soil does not appear to necessary at this time, unless required based on unexpected field conditions, to satisfy sampling requirements under the soils management plan, required sampling to meet Table 830-1<sup>9</sup> sampling at highly contaminated location(s), or to provide additional data at the request of a permitted facility (landfill) for any potential contaminated soils disposal.**

### ***Groundwater Pathway/Monitoring Well Results***

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Four monitoring wells (1 through 4) have been installed at the Site. Well 1 is closest to the source area, and is considered to be the “source well.” Four consecutive quarters of groundwater data were collected in 2019. Groundwater could not be sampled from all monitoring wells for all events, suggesting groundwater at approximately 33-35 feet below top of casing (TOC) is likely perched and discontinuous.

Only the concentration of total lead exceeded the MTCA Method A cleanup level at well 4 during the March 2019 sampling event and in well 3 during the third quarter 2019 sampling event. Where groundwater samples could be collected, no other Site hazardous substances exceeded the applicable MTCA cleanup (screening) level.

Concentrations of gasoline and diesel range organics in groundwater were less than their respective MTCA Method A cleanup levels, and heavy oil has not been detected in groundwater. As the Site is within the six-month travel time frame for at least three nearby domestic supply wells, we want to ensure that drinking water supplies are protected.

For reference, copies of the well logs for the supply water wells within ½ mile of the Site are included as **Enclosure D**. For these potential supply wells, the top of the intake screen ranges from 77 feet below TOC to 430 feet below TOC (the City of Lacey supply well), so contamination of any these wells from the current disposition of petroleum contaminated soils at the Site is low.

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<sup>8</sup> Ecology Publication #94-115, Natural Background Soil Metals Concentrations in Washington State, October 1994.

<sup>9</sup> WAC 173-340-900

### **Comments about Site Groundwater Monitoring:**

- 1) Thank you for your extensive groundwater testing. These results are critical to demonstrate that water supplies near the Site are protected. Only lead in groundwater has been detected in the shallow water-bearing zone, and no Site hazardous substances have been detected in deeper groundwater bearing zones.
  - **Temporarily, you could reduce quarterly groundwater monitoring to total and dissolved metals for barium and lead. This could be done until the original wells are decommissioned or construction begins.** For reference, Ecology includes supply well logs within ½ mile of the Site as Enclosure D.
- 2) For all data tables, Ecology requests using the laboratory reporting limit for a concentration that was not detected (e.g., <0.1), rather than “nd.”
- 3) Based on the newly available groundwater data, Ecology recommends that all future groundwater sampling should include total and dissolved metals (including arsenic, barium, and lead) at all sampling points (whether temporary or permanent monitoring wells).
- 4) Groundwater has only been present in well 4 in March 2019, and dry the other three quarters.
  - Well 4 would likely be destroyed by any construction plans (being the closest to the warehouse building). Therefore, Ecology suggests decommissioning well 4 in accordance with WAC 173-160. A licensed driller<sup>10</sup> must be used to decommission any monitoring well.
- 5) Confirm the groundwater flow direction and gradient for each sampling event in 2019. Calculate these items, and provide figures showing the results and groundwater elevation contours.
- 6) If excavation is chosen as the action/proposed cleanup action for the petroleum contaminated soil in the source area, well 1, the source monitoring well, should be decommissioned. Decommissioning would occur in the same manner as at well 4.
- 7) If it appears that construction plans may damage or destroy any of the remaining monitoring wells at the Site, then decommissioning these wells is appropriate.
- 8) Based on groundwater data collected, a longer screen interval for any future monitoring well appears appropriate. Based on the apparent discontinuous nature of Site groundwater, Ecology may accept longer screen lengths (e.g., up to 20 foot screens) for any future monitoring well at the Site to keep them from going dry, based on field conditions at time of installation.

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<sup>10</sup> Chapter 18.104 RCW and WAC 173-160-381.

However, boreholes cannot connect different aquifers per WAC 173-160. If connecting aquifers is a possibility, then two separate monitoring wells, screened in each aquifer, should be completed.

- 9) To the extent practicable, demonstrate that concentrations of Site hazardous substances are less than applicable cleanup levels at the appropriate proposed point of compliance. Once completed, sufficient post-remedial groundwater data will need to be collected to confirm that no residual lead contamination (or other Site hazardous substances in groundwater, if applicable) remains. Depending on the cleanup action selected, it may not be necessary to re-install all four groundwater monitoring wells.

### ***Air/Vapor Pathway***

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This pathway is potentially complete. In previous Ecology opinions, a Tier I evaluation has been recommended, as described in section 3.1 of Ecology Publication No. 09-09-047, *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action*.<sup>11</sup> Evaluation of the air/vapor pathway is required per WAC 173-340-740, given the diesel extended range organics (which is diesel and heavy oil range organics) concentration in soil at least at the B8-7 location is over 10,000 mg/kg.

Please confirm whether the warehouse building is currently vacant. Groundwater data shows that a vapor intrusion risk from available data is unlikely, though additional evaluation may be needed. If contamination is present or remains in soil after cleanup within 100 feet of any current or future building, please consider the following:

#### **Options for Addressing the Air/Vapor Pathway Process Going Forward:**

- 1) If an excavation to remove contaminated soils is completed and if concentrations of Site hazardous substances are less than the applicable cleanup levels in soil and groundwater, then the vapor pathway is more likely than not incomplete. Please see section 5.2 in Ecology Publication No. 17-09-043, *Petroleum Vapor Intrusion (PVI): Updated Screening Levels, and Assessing PVI Threats and Future Buildings*, revised January 2018.<sup>12</sup>
- 2) Collect sufficient soil vapor and indoor air samples to demonstrate that no risk is present. Analytical results could be screened against the MTCA Method B vapor intrusion and indoor air screening levels at:  
[https://www.ezview.wa.gov/Portals/\\_1987/Documents/Documents/CLARC\\_VI\\_MethodB.pdf](https://www.ezview.wa.gov/Portals/_1987/Documents/Documents/CLARC_VI_MethodB.pdf)
  - a. These data could be collected before or after any interim action at the Site.

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<sup>11</sup> Revised February 2016. Available at: <https://fortress.wa.gov/ecy/publications/SummaryPages/0909047.html>

<sup>12</sup> <https://fortress.wa.gov/ecy/publications/documents/1709043.pdf>

- 3) Rule out a vapor intrusion risk by distance from the residual contamination to an existing building or a new structure. Typically this a 100 foot exclusion zone of buildings from any contamination exceeding the MTCA cleanup levels, but the exclusion zone can be as little as 30 feet, should certain criteria be met.
  - a. See Ecology Publication No. 16-09-046, Implementation Memorandum No. 14: *Updated Process for Initially Assessing the Potential for Petroleum Vapor Intrusion*, March 31, 2016.
  - b. Currently, it is Ecology's opinion that an exclusion from the contamination to the existing warehouse building to rule out any vapor intrusion risk requires more evaluation.
  - c. Future renovation or building construction plans and/or removal of contaminated soils might alter the distance from any remaining contaminated soils and the Site structure (potentially structures if future building[s]).
  - d. After cleanup, any residual remaining concentrations of Site hazardous substances in soil may be far enough away from any building at the Property to no longer pose a risk. Soil sampling data collected from any excavation or other cleanup remedy implemented would be needed to determine whether a 30-foot or 100-foot exclusion zone is appropriate.

### ***Ecological Pathway***

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Ecology concurred with the proposed simplified TEE exemption from further terrestrial ecological evaluation (TEE) in our opinion dated August 19, 2019.

### ***Data Submittal***

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As required as part of a complete request for opinion,<sup>13</sup> Site data collected to date appear to have been uploaded to EIM. The most recent Site data were accepted by Ecology on April 16, 2020.

### ***Reporting and Licensed Professional Seal***

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Ecology appreciates the detailed report that is Skillings' *Remedial Investigation Report*.<sup>14</sup> However, it does not appear that the report was submitted under seal of a Washington State licensed professional. In accordance with chapters 18.43 and 18.220 RCW, please provide the sealed signature page for the *Remedial Investigation Report* and ensure that applicable future reports are submitted under appropriate seal. Ecology previously commented on the sealing of reports in section three, page 12 of our August 19, 2019, opinion.

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<sup>13</sup> <https://www.ecy.wa.gov/vcp>

<sup>14</sup> February 13, 2020.

## 2. Establishment of Cleanup Standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site likely meet the substantive requirements of MTCA. Though cleanup levels have been used as screening levels to date, the most stringent MTCA Method A and MTCA Method B cleanup levels will likely be the Site cleanup levels.

**Cleanup Standards:** Under MTCA, cleanup standards consist of three primary components; (a) points of compliance,<sup>15</sup> (b) cleanup levels,<sup>16</sup> and (c) applicable state and federal laws.<sup>17</sup> Ecology presents a table of cleanup levels of detected Site hazardous substances to screen analytical data to date.

The final cleanup levels may be adjusted depending on if new data determine this is necessary. Additionally, air/soil vapor cleanup levels may be necessary, depending on the interim action results and final construction details. Final cleanup levels will need to be proposed to Ecology, and we will have to concur with them,<sup>18</sup> before issuing any no further action determination.

Hazardous Substance	MTCA Cleanup Level	Soil Cleanup Level <sup>19</sup> (mg/kg)	Groundwater Cleanup Level (µg/L)
TPH as gasoline	A/A	30	800
TPH as diesel and heavy oil	A/A	2,000	500
Benzene	A/A	0.03	5
Toluene	A/A	7	1,000
Ethylbenzene	A/A	6	700
Total Xylenes	A/A	9	1,000
Naphthalenes	A/A	5	160
Arsenic	A	20	5
Barium	B/B	160	2,000
Chromium	A	2,000	50
Lead	A	250	15
cPAHs (Benzo[a]pyrene)	A	0.1	0.1

- a. **Points of Compliance.** Points of compliance are the specific locations at the Site where cleanup levels must be attained. Standard points of compliance are likely appropriate for your Site. If a conditional point of compliance is appropriate for your Site, it must be supported per the requirements under WAC 173-340-720(8) and WAC 173-340-740(6).

<sup>15</sup> WAC 173-340-200 "Point of Compliance."

<sup>16</sup> WAC 173-340-200 "Cleanup level."

<sup>17</sup> WAC 173-340-200 "Applicable state and federal laws," WAC 173-340-700(3)(c).

<sup>18</sup> WAC 173-340-515(3).

<sup>19</sup> More stringent of protection of groundwater or direct contact.

For clarity, Ecology provides the following table of standard points of compliance:

Media	Points of Compliance
Soil-Direct Contact	Based on human exposure via direct contact, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. <sup>20</sup>
Soil- Protection of Groundwater	Based on the protection of groundwater, the standard point of compliance is throughout the Site. <sup>21</sup>
Soil-Protection of Plants, Animals, and Soil Biota	Based on ecological protection, the standard point of compliance is throughout the Site from ground surface to fifteen feet below the ground surface. <sup>22</sup> <ul style="list-style-type: none"> <li>• <i>Not required at your Site. Ecological pathway evaluation exempt based on simplified TEE results.</i></li> </ul>
Groundwater	Based on the protection of groundwater quality, the standard point of compliance is throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site. <sup>23</sup>
Groundwater-Surface Water Protection	Based on the protection of surface water, the standard point of compliance is all locations where hazardous substances are released to surface water. <sup>24</sup> <ul style="list-style-type: none"> <li>• <i>Not present at your Site. This is an incomplete pathway and requires no additional evaluation.</i></li> </ul>
Air Quality	Based on the protection of air quality, the point of compliance is indoor and ambient air throughout the Site. <sup>25</sup>
Sediment	Based on the protection of sediment quality, compliance with the requirements of WAC 173-204. <sup>26</sup> <ul style="list-style-type: none"> <li>• <i>Not present at your Site. This is an incomplete pathway and requires no additional evaluation.</i></li> </ul>

**b. Cleanup Levels.** Cleanup levels are the concentrations of a hazardous substance in soil, water, air, or sediment that are determined to be protective of human health and the environment. Detections of cadmium and mercury during the third quarter 2019 sampling event were more likely than not the result of sample turbidity and low water levels in the monitoring wells that were sampled, as these analytes were not detected in either of the two previous sampling events. At this Site, MTCA Method A and Method B unrestricted cleanup screening levels have been used to screen analytical results at the Site.

The most stringent MTCA Method A and B cleanup levels will likely be appropriate as final cleanup for those hazardous substances detected at the Site. Where Site hazardous substances have been detected in groundwater, soil cleanup levels protective of the leaching to groundwater pathway, and not the direct contact pathway, are more likely to be appropriate. MTCA Method A cleanup levels are protective of the soil leaching to groundwater and the direct contact pathways.

<sup>20</sup> WAC 173-340-740 (6)(d).

<sup>21</sup> WAC 173-340-747.

<sup>22</sup> WAC 173-340-7490(4)(b).

<sup>23</sup> WAC 173-340-720(8)(b).

<sup>24</sup> WAC 173-340-730(6).

<sup>25</sup> WAC 173-340-750(6).

<sup>26</sup> WAC 173-340-760.

Cleanup levels for soil under MTCA Method B protective of the direct contact pathway should be considered for all Site hazardous substances, but will typically only be applicable for those substances that have not been detected in groundwater. For the MTCA Method B cleanup levels please see Ecology's [Cleanup Levels and Risk Calculation \(CLARC\) tables](#).<sup>27</sup>

- c. **Applicable Laws and Regulations.** For the remedial investigation, please identify all applicable local, state, and federal laws for the cleanup action.<sup>28</sup> This requirement may impact cleanup standards applicable to the Site. An example might be Safe Drinking Water Act<sup>29</sup> requirement for a maximum contaminant level (MCL) which is less than the calculated MTCA Method B cleanup value. For example, barium in groundwater has a MCL, which is less than the MTCA Method B non-cancer cleanup value in Ecology's CLARC tables.

### 3. Selection of Cleanup Action.

#### **Ecology Comments on Potential Cleanup Actions:**

- 1) **Option 1:** Excavation with off-Site disposal has been discussed as one way to address the petroleum contaminated soils under the east parking lot.<sup>30</sup> Based on experience at similar petroleum cleanup sites, excavation with off-Site disposal is likely the best option to clean up the Site and achieve a no further action determination.
- a. This cleanup action could be completed as an interim action<sup>31</sup> in lieu of completing a feasibility study<sup>32</sup> (FS) and disproportionate cost analysis (DCA). To meet construction timelines, completion of any environmentally related excavation should probably be completed as an interim action.
- b. Excavation and off-Site disposal had been historically scoped for the project by the previous Property owner.
- c. Ecology has previously discussed excavation to remove contamination down to 15 feet bgs, which is the direct contact point of compliance for soil. As Site hazardous substances have been detected in groundwater (including lead, which twice exceeded the MTCA Method A cleanup level), Ecology supports a more conservative cleanup protective of the leaching pathway from soil to groundwater.

**Contamination present in soil at deeper than 15 feet bgs should be removed to the maximum extent practicable. Based on the sampling results at BR7-16 (at 16 feet bgs), the maximum depth of excavation would likely be about 17 feet bgs, however, field conditions would determine the total anticipated depth.**

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<sup>27</sup> <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC/Data-tables>

<sup>28</sup> WAC 173-340-710(2).

<sup>29</sup> 40 CFR 141.

<sup>30</sup> Skillings, *Remedial Investigation Report*, April 9, 2019, Page 27.

<sup>31</sup> WAC 173-340-430.

<sup>32</sup> WAC 173-340-350.

- d. Ecology recommends use of a photoionization detector (PID) in the field to screen any soil sampling locations, and recording all values obtained.
- e. Excavation sampling would need to include sidewalls, bottom, and at any location with remaining contamination which is inaccessible and cannot be removed because of conflicts with utilities, structures, or other impediments. Taking pictures of all sampling locations and the excavation in general is recommended.
- f. By working with the laboratory in advance, 24-hour turn around soil sampling results should be possible to quickly provide data to guide any excavation, and reduce time that the excavation is open before backfilling.
- g. If some contamination remains after excavation, a polishing amendment (chemical, biological, or perhaps both) could be placed in the base of the excavation to help degrade contaminants over time. Questions about individual amendments and their use and benefits should be directed to the vendor who supplies the proposed amendment.
- h. Re-use of any apparently uncontaminated soils removed during the excavation should follow section 12 and Table 12.1 in Ecology Publication No. 10-09-57, *Guidance for Remediation of Petroleum Contaminated Sites*, revised June 2016. Please note that re-use of soils from an environmental perspective does not necessarily mean that the soils are sufficient or stable enough for re-use from a geotechnical perspective. Please review any geotechnical or other construction-specific requirements with experts within the City of Lacey, your consultant, and/or contractor(s) as appropriate.
- i. Details regarding the scoping of any excavation and off-Site soil disposal should be worked out with your consultant and contractor(s). Some specifications and requirements may be specific to the City of Lacey's construction procedures.
- j. Though this list is not meant to be exhaustive, and is technical assistance only, generally, some items to consider for any excavation are:
  - Utility locating and markouts.
  - Health and Safety requirements.<sup>33</sup>
  - Project area access control, security, and fencing.
  - Protecting any monitoring wells that have not been nor will be decommissioned.
  - Geotechnical evaluation for soil stability and shoring.
  - Traffic control.
  - Meeting backfill and compaction specifications (which may include nuclear gauge testing results).

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<sup>33</sup> WAC 173-340-

- Asphalt removal and re-paving.
  - Excavation dewatering and water disposal.
  - On-Site stockpile management and sampling.
  - Transportation of contaminated soils.
  - Bills of lading and landfill selection and profile.
  - Final reporting.
- k. Ecology recommends, at the excavation sample location with the greatest concentration of heavy oil in soil, sampling for:
- Table 830-1,<sup>34</sup> all analytes in the waste oil/unknown oil column, phenols,<sup>35</sup> volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH), n-hexane, and naphthalenes.
- l. If an excavation is completed and contaminated soils remain in an inaccessible location, such as under a retaining wall or extend into a utility corridor or under Lacey Boulevard, these soils will have to be delineated and further characterized per WAC 173-340-350(7). Once any residual contamination is characterized and delineated, it may still be possible to close the Site using institutional controls,<sup>36</sup> an environmental covenant, and applicable long-term monitoring plans.
- m. Though it is possible that an excavation would not require as much soil to be removed if a conservative scope is used, it is also possible that more contamination than expected will be found. Any excavation plan should consider contingencies where more contaminated soils than expected are found.
- 2) **Option 2:** Complete an FS/DCA and select another cleanup option which may or may not include excavation as a component of that cleanup. Ecology generally recommended<sup>37</sup> against in-situ chemical injection treatment at the Site, based on concerns to mobilize additional contamination in soil down to the groundwater table. Given the close proximity of domestic supply wells, Ecology still maintains this opinion. Bioremediation options for cleanup of the petroleum contaminated soil, based on the data to date, may be acceptable.
- 3) **Option 3:** Propose another cleanup alternative, supported by sufficient Site data and regulation that will meet Site cleanup levels at standard points of compliance. Ecology would have to concur with the proposed alternative.<sup>38</sup>
- 4) As this is an independent cleanup at an unranked Site, a 30-day public notice and comment period for any no further action issued is not required.

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<sup>34</sup> WAC 173-340-900

<sup>35</sup> Phenols and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) are different compounds.

<sup>36</sup> WAC 173-340-440.

<sup>37</sup> See pp. 13-14 in Ecology opinion letter dated August 19, 2019.

<sup>38</sup> Per concurrence with WAC 173-340-515(3).

## Limitations of the Opinion

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### 1. Opinion Does Not Settle Liability with the State.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

### 2. Opinion Does Not Constitute a Determination of Substantial Equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination.

See RCW 70.105D.080 and WAC 173-340-545.

### 3. State is Immune from Liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

## Contact Information

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Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our [Voluntary Cleanup Program web site](#).<sup>39</sup> If you have any questions about this opinion, please contact me at (360) 407-6265 or [tim.mullin@ecy.wa.gov](mailto:tim.mullin@ecy.wa.gov).

Sincerely,



Tim Mullin, LHG  
Toxics Cleanup Program  
Southwest Regional Office

TCM: tam

Enclosure:   A – Site Description  
                  B – Documents List  
                  C – Skillings Figure 3  
                  D – Summary of Water Well Logs

cc by email:   Patrick Skillings, Skillings, Inc., [pskillings@skillings.com](mailto:pskillings@skillings.com)  
                  Frank Stevick, Skillings, Inc., [fstevick@skillings.com](mailto:fstevick@skillings.com)  
                  Nicholas Acklam, Ecology, [nicholas.acklam@ecy.wa.gov](mailto:nicholas.acklam@ecy.wa.gov)  
                  Ecology Site File

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<sup>39</sup> <https://www.ecy.wa.gov/vcp>

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# Enclosure A

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Site Description

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## Site Description

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The Depot District Building is located at 5700 Lacey Blvd SE, Lacey, Thurston County, Washington. The Property lot is approximately 1.01 acres in size, and assigned Thurston County tax parcel number 09950013000. The abbreviated legal description from the Thurston County Assessor's website is: Section 21 Township 18 Range 1W Donation Land Claim WOOD, ISAAC #39 DLC BLA-6230 TR B Document 013/121 (S PAC H/W & N LACEY BLVD) and the zoning is commercial business district.

The Property is currently occupied by a vacant warehouse with an attached office area. The warehouse was previously the operational office and finishing area for the former Lacey Plywood Company, and was more recently used as a carpet sales and distribution center. The former Lacey Plywood Company Site, located on the adjacent parcel (Thurston County tax parcel number 37520000200) is a separate cleanup Site (CSID: 4094). The former Lacey Plywood Company entered into VCP as SW0086, and received a status of No Further Action on December 9, 2002.

The Property elevation is approximately 175 feet above mean sea level and the Property topography is flat. Groundwater flow direction remains to be calculated, but regionally flows to approximately the east-northeast. Site lithology to the maximum depth explored of 90 feet bgs is sands, silts, and gravels, consistent with glacial outwash/till. Site depth to groundwater appears to occur in up to three separate water bearing units, at approximately 35 feet, 56 feet, and 90 feet bgs. Based on soils data collected to date, one area of petroleum contaminated soils remains at the Site, beneath the east parking lot.

The Property is believed to be currently serviced by public water and sewer. Woodland Creek is the nearest surface water, located approximately ½ mile northeast of the Site. The source of the release is unknown.

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# Enclosure B

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Documents List

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for double-sided copying.*

## Documents List

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This opinion is based on the information contained in the following documents:

1. Skillings, Inc. (Skillings), *Remedial Investigation Report*, February 13, 2020.
2. Skillings-Connolly, *Preliminary Monitoring Well Results and Terrestrial Ecological Evaluation*, Memo 3, April 19, 2019.
3. Skillings-Connolly, *No further Action Request for soil borings 8 and 9*, April 9, 2019.
4. Skillings-Connolly, *No further Action Request for Soil Borings 10, 11, 12, 13, and 14*, April 8, 2019.
5. Skillings-Connolly, *Work Plan for Additional Sub-surface Investigation Version 2.0*, November 2, 2018.
6. Skillings-Connolly, *Work Plan for Additional Sub-surface Investigation*, August 16, 2017.
7. Email correspondence between City of Lacey and Ecology, May 3, 2017.
8. Ecology, Re: Notes from meeting between City of Lacey, Skillings-Connolly, and Ecology on April 25, 2017.
9. Skillings-Connolly, *Re: 5700 Lacey Boulevard SE – Soil Analysis and Ground Water Analysis*, February 22, 2015.
10. Stemen Environmental, *Quarterly [sic] Groundwater Monitoring Report*, September 18, 2002. Includes data for September 3, 2002, groundwater monitoring event.<sup>40</sup>
11. Stemen Environmental, *Quarterly [sic] Groundwater Monitoring Report*, September 18, 2002. Includes data for June 18, 2002, groundwater monitoring event.
12. Letter from ACL EnviroManagement, LLC to Bradley B. Jones, Attorney at Law, Re: Conversation with Mr. Dave Pearsall, December 1, 1997.
13. Letter from ACL EnviroManagement, LLC to Bradley B. Jones, Attorney at Law, Re: Department of Ecology File Review, August 28, 1997.
14. Letter from Charles F. Pitz of Ecology to Michael Peterson, PCD Management & Consulting, Re: Former Lacey Plywood Site, June 23, 1997.
15. Letter from Michael Peterson, PCD Management & Consulting to Michael J. Spencer, Department of Ecology, No subject, May 27, 1997.
16. Letter from Jean Carr, City of Lacey to Charles Pitz of Ecology, Re: Former Lacey Plywood, April 17, 1997.

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<sup>40</sup> The reports listed covering the September 2002 and June 2002 groundwater monitoring events for SW0086 are separate monitoring events but the reports are dated with the same publication date, September 18, 2002.

17. Letter from Charles Pitz of Ecology to Stephen Dean, Prudential Cornerstone, Inc. Realtors, April 16, 1997.
18. City of Lacey internal communication, Re: Lacey Plywood Site Remediation Project, March 26, 1997.
19. Geotech Consultants (Geotech), *Environmental Cleanup One Acre Site*, December 31, 1992.
20. Geotech, *Phase 2 Subsurface Exploration One-Acre Site*, December 15, 1992.
21. Geotech, *Phase I Environmental Audit One-Acre Site*, October 26, 1992.
22. GeoEngineers, Inc., *Phase IIA Environmental Site Assessment*, August 25, 1992.
23. Parametrix, Inc., *Phase One Environmental Site Assessment Report*, October 1990.

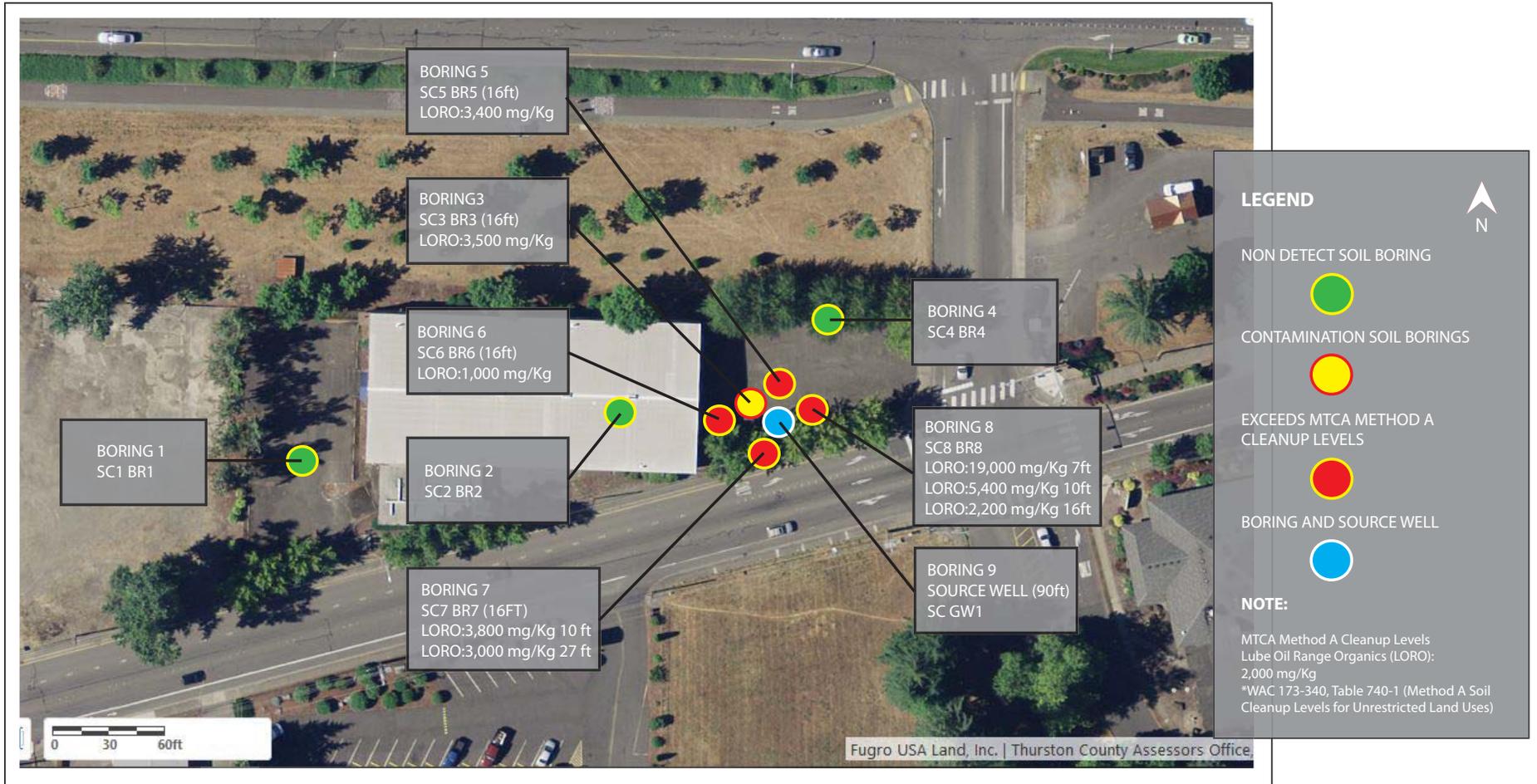
# Enclosure C

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Skillings Figure 3

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# Depot District Building



**NOTES:**

SCX AND BRX: LAB SAMPLE IDENTIFICATION CODES  
 FT: INDICATES FEET (FT) BELOW GROUND SURFACE  
 SC GW1: SOURCE WELL (SC) AND GROUNDWATER WELL (GW) NUMBER 1.  
 NO SOIL OR WATER CONTAMINATION WAS DETECTED IN BORING 9 OR GW1.



5700 LACEY BLVD SE, LACEY WA 98503  
 PARCEL #09950013000  
 LAT47.036402 N / LONG -122.809304 W

**FIGURE 3**  
**RESULTS OF 2015 SKILLINGS**  
**REMEDIAL INVESTIGATION**

JOB NUMBER  
18262  
 SHEET  
OF  
 SHEETS

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for double-sided copying.*

# Enclosure D

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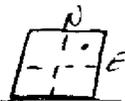
Summary of Water Well Logs

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# WATER WELL REPORT

## STATE OF WASHINGTON



Application No. \_\_\_\_\_

Permit No. \_\_\_\_\_

(1) OWNER: Name Dave Lindley Address 6106 16th Ave. Lacey, WA.

(2) LOCATION OF WELL: County Thurston - NE 1/4 NE 1/4 Sec. 21 T. 18 N. R. 1 W.M.

Bearing and distance from section or subdivision corner

(3) PROPOSED USE: Domestic  Industrial  Municipal   
 Irrigation  Test Well  Other

(4) TYPE OF WORK: Owner's number of well 4  
 (if more than one)  
 New well  Method: Dug  Bored   
 Deepened  Cable  Driven   
 Reconditioned  Rotary  Jetted

(5) DIMENSIONS: Diameter of well 8" inches  
 Drilled 339 ft. Depth of completed well 339.7/8 ft.

(6) CONSTRUCTION DETAILS:  
 Casing installed: 8" Diam. from 185' 7/4" to 324' 43/8"  
 Threaded  " Diam. from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 Welded  " Diam. from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Perforations: Yes  No   
 Type of perforator used \_\_\_\_\_  
 SIZE of perforations \_\_\_\_\_ in. by \_\_\_\_\_ in.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Screens: Yes  No   
 Manufacturer's Name Johnson  
 Type Stainless Model No. \_\_\_\_\_  
 Diam. 8 Slot size 50-60 from 324' 43/8" to 339' 7/8"  
 Diam. \_\_\_\_\_ Slot size \_\_\_\_\_ from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Gravel packed: Yes  No  Size of gravel: \_\_\_\_\_  
 Gravel placed from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Surface seal: Yes  No  To what depth? 18 ft.  
 Material used in seal Bentonite  
 Did any strata contain unusable water? Yes  No   
 Type of water? \_\_\_\_\_ Depth of strata \_\_\_\_\_  
 Method of sealing strata off \_\_\_\_\_

(7) PUMP: Manufacturer's Name \_\_\_\_\_  
 Type: \_\_\_\_\_ H.P. \_\_\_\_\_

(8) WATER LEVELS: Land-surface elevation \_\_\_\_\_ ft.  
 Static level 15 approx ft. below top of well Date \_\_\_\_\_  
 Artesian pressure \_\_\_\_\_ lbs. per square inch Date \_\_\_\_\_  
 Artesian water is controlled by \_\_\_\_\_ (Cap, valve, etc.)

(9) WELL TESTS: Drawdown is amount water level is lowered below static level.  
 Was a pump test made? Yes  No  If yes, by whom? Kincy  
 Yield: \_\_\_\_\_ gal./min. with \_\_\_\_\_ ft. drawdown after \_\_\_\_\_ hrs.  
 " 300 " to 40 " 4 "  
 " " " " " " "

Recovery data (time taken as zero when pump turned off) (water level measured from well top to water level)  

Time	Water Level	Time	Water Level	Time	Water Level
<u>None</u>					

 Date of test \_\_\_\_\_

Bailer test \_\_\_\_\_ gal./min. with \_\_\_\_\_ ft. drawdown after \_\_\_\_\_ hrs.  
 Artesian flow \_\_\_\_\_ g.p.m. Date \_\_\_\_\_  
 Temperature of water \_\_\_\_\_ Was a chemical analysis made? Yes  No

(10) WELL LOG:

Formation: Describe by color, character, size of material and structure, and show thickness of aquifers and the kind and nature of the material in each stratum penetrated, with at least one entry for each change of formation.

MATERIAL	FROM	TO
Loose gravel	185' 7/4"	204
Med. gray sand - 5% gravel	204	208
Fine dirty gray sand	208	222
Med. clean gray sand - loose	222	230
Med. sand - 1% small gravel	230	244
Medium gray sand	244	263
Fine gray sand - woody	263	288
Medium gray sand	288	295
Coarse Sand	295	313
Coarse Sand - 5% "loose"	313	327
Coarse Sand - 50% gravel	327	339
Medium Sand	339	

RECEIVED

JUL 15 1977

DEPARTMENT OF ECOLOGY  
 SOUTHWEST REGIONAL OFFICE

Work started \_\_\_\_\_ 19\_\_\_\_ Completed \_\_\_\_\_ 19\_\_\_\_

**WELL DRILLER'S STATEMENT:**

This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

NAME Kincy Hardware, Inc  
 (Person, firm, or corporation) (Type or print)

Address 512 E 4th Ave. Olympia

[Signed] Keith Kincy  
 (Well Driller)

License No. C65 Date June 13, 1977

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

# WATER WELL REPORT

STATE OF WASHINGTON

Application No. \_\_\_\_\_

Permit No. \_\_\_\_\_

(1) OWNER: Name MR JACK SPROUT Address PACIFIC AVE SE OLYMPIA  
 (2) LOCATION OF WELL: County THURSTON  $\frac{1}{4}$  NN  $\frac{1}{4}$  Sec 22 T. 18 N., R. 1W W.M.  
 Bearing and distance from section or subdivision corner \_\_\_\_\_

(3) PROPOSED USE: Domestic  Industrial  Municipal   
 Irrigation  Test Well  Other

(4) TYPE OF WORK: Owner's number of well (if more than one) \_\_\_\_\_  
 New well  Method: Dug  Bored   
 Deepened  Cable  Driven   
 Reconditioned  Rotary  Jetted

(5) DIMENSIONS: Diameter of well 6 inches.  
 Drilled 99 ft. Depth of completed well 99 ft.

(6) CONSTRUCTION DETAILS:  
 Casing installed: \_\_\_\_\_ " Diam. from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 Threaded  \_\_\_\_\_ " Diam. from 0 ft. to 95 ft.  
 Welded  6 " Diam. from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 Perforations: Yes  No   
 Type of perforator used \_\_\_\_\_  
 SIZE of perforations \_\_\_\_\_ in. by \_\_\_\_\_ in.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.  
 \_\_\_\_\_ perforations from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Screens: Yes  No   
 Manufacturer's Name JOHNSON  
 Type \_\_\_\_\_ Model No. \_\_\_\_\_  
 Diam. 6 Slot size 15 from 95 ft. to 99 ft.  
 Diam. \_\_\_\_\_ Slot size \_\_\_\_\_ from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Gravel packed: Yes  No  Size of gravel: \_\_\_\_\_  
 Gravel placed from \_\_\_\_\_ ft. to \_\_\_\_\_ ft.

Surface seal: Yes  No  To what depth? 18 ft.  
 Material used in seal BENTONITE  
 Did any strata contain unusable water? Yes  No   
 Type of water? \_\_\_\_\_ Depth of strata \_\_\_\_\_  
 Method of sealing strata off \_\_\_\_\_

(7) PUMP: Manufacturer's Name F&W  
 Type SUB HP 1 1/2

(8) WATER LEVELS: Land-surface elevation above mean sea level \_\_\_\_\_  
 Static level 10 ft. below top of well Date 4/85  
 Artesian pressure \_\_\_\_\_ lbs. per square inch Date \_\_\_\_\_  
 Artesian water is controlled by \_\_\_\_\_ (Cap, valve, etc.)

(9) WELL TESTS: Drawdown is amount water level is lowered below static level  
 Was a pump test made? Yes  No  If yes, by whom? TIMS  
 Yield: 38 gal./min. with \_\_\_\_\_ ft. drawdown after \_\_\_\_\_ hrs.  
 " 9pm " 10 " 68' "  
 " " " " " "

Recovery data (time taken as zero when pump turned off) (water level measured from well top to water level)  

Time	Water Level	Time	Water Level	Time	Water Level

 Date of test \_\_\_\_\_  
 Baller test \_\_\_\_\_ gal./min. with \_\_\_\_\_ ft. drawdown after \_\_\_\_\_ hrs.  
 Artesian flow \_\_\_\_\_ g.p.m. Date \_\_\_\_\_  
 Temperature of water \_\_\_\_\_ Was a chemical analysis made? Yes  No

(10) WELL LOG:  
 Formation: Describe by color, character, size of material and structure, and show thickness of aquifers and the kind and nature of the material in each stratum penetrated, with at least one entry for each change of formation.

MATERIAL	FROM	TO
Sandy loam - clay	0	4
Sandy clay	4	12
Sand - w/ clay	12	18
Soupy sand - Brown	18	28
Sand + clay	28	34
Sand - w/ clay	34	39
Soupy sand	39	51
Silty Heaving sand (FINE)	51	85
Wb Sand - clean 95-99	85	99

Work started 3 1985 Completed 3 1985

WELL DRILLER'S STATEMENT:  
 This well was drilled under my jurisdiction and this report is true to the best of my knowledge and belief.

NAME TIMS WELL DRILLING  
 (Person, firm, or corporation) (Type or print)  
 Address 6906 33RD AVE SE LAKEY  
 [Signed] Jim R. Mauf  
 (Well Driller)  
 License No. 0832 Date 4/15, 1985

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.



# Well Tagging Form

PWS ID #: 03007T Source #: S01  
Unique Well Tag No: AES 187

## RECORD VERIFICATION (check one)

- Well Report available (please attach this form to the well report and submit it to the Ecology Regional Office near you)
- Verification inconclusive
- Well Report not available

## PUBLIC WATER SYSTEM INFORMATION

Water System Name Sprouts Water System c/o Jack Sprout  
 Street Address 6415 Pacific Ave SE.  
 City Lacey State WA 98503

## LOCATION OF WELL, IF DIFFERENT FROM WELL REPORT

Well Address: \_\_\_\_\_  
 City \_\_\_\_\_ County \_\_\_\_\_  
 T 18 N R 01 W WM Sec 22 NE 1/4 of the NW

## FOR AGENCY USE ONLY

Latitude \_\_\_\_\_ "  GPS  
 Longitude \_\_\_\_\_ "  Topographic Map  
 Survey  
 Computer generated  
 Elevation at land surface \_\_\_\_\_ feet/meters (circle one)  
 Digital Altimeter  
 Topographic Map  
 Other \_\_\_\_\_

- Additional information, if available.
- Location marked on topographic map (please attach)
  - Location marked on air photo (please attach)

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

# FOR AGENCY USE ONLY

## WELL CHARACTERISTICS

Physical Description of well (size of casing type of well housing etc)

6" casing just out side of pump house

Location of Well identification Tag

Banded on well casing

Was supplemental tag needed for ease of identifying well?

Yes

No

If yes where was tag placed?

D	C	B	A
E	F	G	H
M	L	K	J
N	P	Q	R

Scale 1 24 000 (1 =2 000')

Indicate the location of the well within the Section by drawing a dot at that point

SECTION 22C

COMMENTS

# FOR ECOLOGY WATER RESOURCES PROGRAM ONLY

Water Right # \_\_\_\_\_

Date Issued \_\_\_\_\_

Circle One

Application

Permit

Certificate

Claim

Exempt



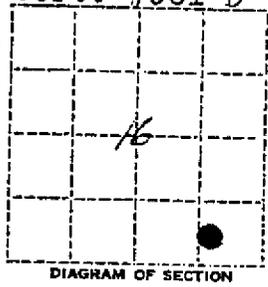
The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

STATE OF WASHINGTON  
DEPARTMENT OF CONSERVATION  
AND DEVELOPMENT

WELL LOG  
Date 1930, 19\_\_\_\_  
Record by Maxwell W. Oakes  
Source G. W. Decla. Claim

No. Decla. #1047  
Cert. #961-D

Location: State of WASHINGTON  
County Thurston  
Area \_\_\_\_\_  
Map \_\_\_\_\_  
SE 1/4 SE 1/4 sec. 16 T18 N., R. 1 E. W.



Drilling Co. \_\_\_\_\_  
Address \_\_\_\_\_  
Method of Drilling drilled Date \_\_\_\_\_ 19\_\_\_\_  
Owner Thurston County Water Dist. no. 1  
Address Lacey, Wash.  
Land surface, datum \_\_\_\_\_ ft. above  
below \_\_\_\_\_

CORRE- LATION	MATERIAL	THICKNESS (feet)	DEPTH (feet)
------------------	----------	---------------------	-----------------

(Transcribe driller's terminology literally but paraphrase as necessary, in parentheses. If material water-bearing, so state and record static level if reported. Give depths in feet below land-surface datum unless otherwise indicated. Correlate with stratigraphic column, if feasible. Following log of materials, list all casings, perforations, screens, etc.)

	no record		
Pump Test:			
	Dim: 135' x 6"		
	SWL: 20'		
	Dd: 30'		
	Yield: 90 g.p.m. (Claim)		
	Casing: 6" dia. from 0' to 134'.		
	Pump: Turbine		
	Motor: 5 hp		
	SWL R 38 3/12/56		

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

WATER WELL REPORT

Start Card No. W062075  
 Unique Well I.D. # ABY186  
 Water Right Permit No.

STATE OF WASHINGTON

(1) OWNER: Name **EVERGREEN DEVELOPMENT** Address **3730 SOUTH CENTRAL STREET OLYMPIA, WA 98501-**  
 (2) LOCATION OF WELL: County **THURSTON** - SW 1/4 NW 1/4 Sec 22 T 18N N., R 1W WM  
 (2a) STREET ADDRESS OF WELL (or nearest address) **DIAMOND & CARPENTER ROAD, OLYMPIA**

(3) PROPOSED USE: **DOMESTIC**

(10) WELL LOG

(4) TYPE OF WORK: Owner's Number of well  
 (If more than one)  
**NEW WELL** Method: **ROTARY**

Formation: Describe by color, character, size of material and structure, and show thickness of aquifers and the kind and nature of the material in each stratum penetrated, with at least one entry for each change in formation.

(5) DIMENSIONS: Diameter of well **6** inches  
 Drilled **239** ft. Depth of completed well **239** ft.

MATERIAL	FROM	TO
PACKED BROWN SAND SOME GRAVEL	0	19
PACKED BROWN SAND	19	66
PACKED FINE GRAY SAND MOIST	66	87
SANDY GRAY CLAY	87	89
FINE GRAY SAND WET	89	118
FINE BROWN SAND WET	118	149
FINE BROWN SAND BRN CLAY BINDER	149	175
HEAVING BROWN SAND	175	225
HEAVING COURSE SAND SOME GRAVEL	225	231
BLACK GRAVEL COURSE SAND WATER	231	239
COURSE SAND BLACK GRAVEL CLAY BINDER	239	

(6) CONSTRUCTION DETAILS:  
 Casing installed: **6** Dia. from **+1** ft. to **235.5** ft.  
**WELDED CASING** Dia. from ft. to ft.  
 Dia. from ft. to ft.

Perforations: **NO**

Type of perforator used  
 SIZE of perforations in. by in.  
 perforations from ft. to ft.  
 perforations from ft. to ft.  
 perforations from ft. to ft.

Screens: **YES**

Manufacturer's Name **WESCO**  
 Type **SLOTTED** Model No.  
 Diam. **5** slot size **.050** from **5.2** ft. to **3.7** ft.  
 Diam. slot size from ft. to ft.

Gravel packed: **NO**

Size of gravel  
 Gravel placed from ft. to ft.

Surface seal: **YES**

To what depth? **20** ft.  
 Material used in seal **BENTONITE**  
 Did any strata contain unusable water? **NO**  
 Type of water? Depth of strata ft.  
 Method of sealing strata off

(7) PUMP: Manufacturer's Name

Type H.P.

(8) WATER LEVELS:

Land-surface elevation

Static level **54** ft. below top of well Date **06/02/95**  
 Artesian Pressure lbs. per square inch Date  
 Artesian water controlled by

Work started **06/01/95** Completed **06/02/95**

(9) WELL TESTS: Drawdown is amount water level is lowered below static level.

Was a pump test made? **NO** If yes, by whom?  
 Yield: gal./min with ft. drawdown after hrs.

Recovery data

Time Water Level Time Water Level Time Water Level

Date of test / /  
 Bailer test gal./min. ft. drawdown after hrs.  
 Air test 20+ gal./min. w/ stem set at **230** ft. for 1 hrs.  
 Artesian flow g.p.m. Date  
 Temperature of water Was a chemical analysis made? **NO**

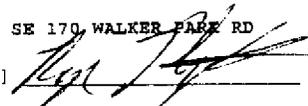
WELL CONSTRUCTOR CERTIFICATION:

I constructed and/or accept responsibility for construction of this well, and its compliance with all Washington well construction standards. Materials used and the information reported above are true to my best knowledge and belief.

NAME **ARCADIA DRILLING INC.**

(Person, firm, or corporation) (Type or print)

ADDRESS **SE 170 WALKER PARK RD**

[SIGNED]  License No. **2053**

Contractor's  
 Registration No. **ARCADDIO98K1** Date **06/05/95**

JUN 12 AM 9:12

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

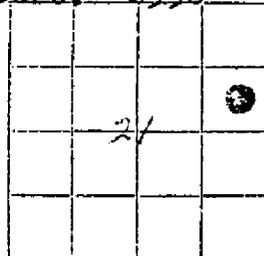
STATE OF WASHINGTON  
DEPARTMENT OF CONSERVATION  
AND DEVELOPMENT

WELL LOG

Date June 19, 1955 No. Appl. 3269  
Cart. 2358

Record by Mr. A. G. Homann  
Source Driller's Record

Location: State of WASHINGTON  
County Thurston  
Area  
Map



SE 1/4 NE 1/4 sec. 21 T. 15N., R. 1 W.  
Drilling Co. G. M. Patterson  
Address Rt. 10 Box 337; Olympia, Wn.  
Method of Drilling Drilled Date  
Owner A. G. Homann  
Address P.O. Box 37; Lacey, Wn.  
Land surface, datum ft. above below

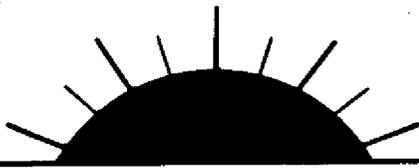
COORDINATION	MATERIAL	THICKNESS (feet)	DEPTH (feet)
--------------	----------	------------------	--------------

(Transcribe driller's terminology literally but paraphrase as necessary, in parentheses. If material water-bearing, so state and record static level if reported. Give depths in feet below land-surface datum unless otherwise indicated. Correlate with stratigraphic column, if feasible. Following log of materials, list all casings, perforations, screens, etc.)

	Sand & clay	20	20
	Gravel, Sand & Clay	2	22
	Sand & Clay	98	120
	Sand, Gravel & Clay	6	126
	Clay, Sand & Gravel	10	136
	Gravel, Clay & Sand	19	155
	Clay, Sand & Gravel	15	170
	Sand, clay & Gravel	15	185
	Clay, Sand & Gravel	10	195
	Pump Test:		
	Dia: 195' x 10"		
	SWL: --		
	DD: --		
	Yield: 200 g.p.m. (permit)		







# Hokkaido Drilling & Developing Corp.

24511 - 104th Avenue Court East • P.O. Box 100 • Graham, Washington 98338 • Phone (206) 847-3579

March 13, 1992

Dept. of Ecology  
S.W. Regional Office  
P.O. Box 47775  
Olympia, Wash. 98504-7775

attn: Vicky Windust

re: St. Martin's Abbey - well report for Production Well  
#3 and abandonment report for test well #2.

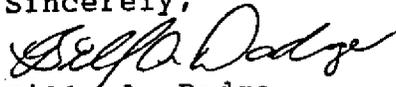
Dear Ms. Windust:  
Please find the attached documents pertaining to the wells  
we drilled for St. Martin's Abbey.

I have included the water well reports for well #3 and the  
well/abandonment report for test well #2 for formal sub-  
mittal.

The entire packet includes the above mentioned forms plus  
copies of the Well #1 report previously filed, copies of  
all three start cards, Robinson and Nobles #2 well log  
and Pacific Groundwater Groups #3 well logs for your infor-  
mation.

If you have any questions or need any additional information  
please call at anytime. Thank-you.

Sincerely,

  
Billy A. Dodge

The Department of Ecology does NOT Warranty the Data and/or the Information on this Well Report.

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NOTICE INTENT TO BEGIN WELL CONSTRUCTION 021927

Owner: St. Martin's Abbey Well Address: Lacey, WA 98504
Proposed use: Consumption
Location of well by legal description: County THURSTON, S.W. 1/4, S.E. 1/4, Section 16 T18 N R 01 W
Approx. Start Date: 7-31-90 Approximate End Date: 8-14-90
Driller: Billy A. Dodge License No. 1146
Company name: Hokkaido Drilling & Developing Phone No. 847-3579
Contractor Registration Number: HOKKADD178D3

Send to the regional office, listed below, where the well is to be constructed:

- Southwest Regional Office, Central Regional Office, Northwest Regional Office, Eastern Regional Office

NOTICE OF INTENT TO BEGIN WELL CONSTRUCTION 014173

Well #2
Owner: St. Martin's Abbey Well Address: Lacey, WA 98504
Proposed use: Consumption
Location of well by legal description: County Thurston, SW 1/4, SE 1/4, Section 16 T18 N R 01 W
Approx. Start Date: 10-3-90 Approximate End Date: 10-24-90
Driller: Bob Carper License No. 1239
Company name: Hokkaido Drilling & Developing Phone No. 206-847-3579
Contractor Registration Number: HOKKADD 178 D3

Send to the regional office, listed below, where the well is to be constructed:

- Southwest Regional Office, Central Regional Office, Northwest Regional Office, Eastern Regional Office

well #3

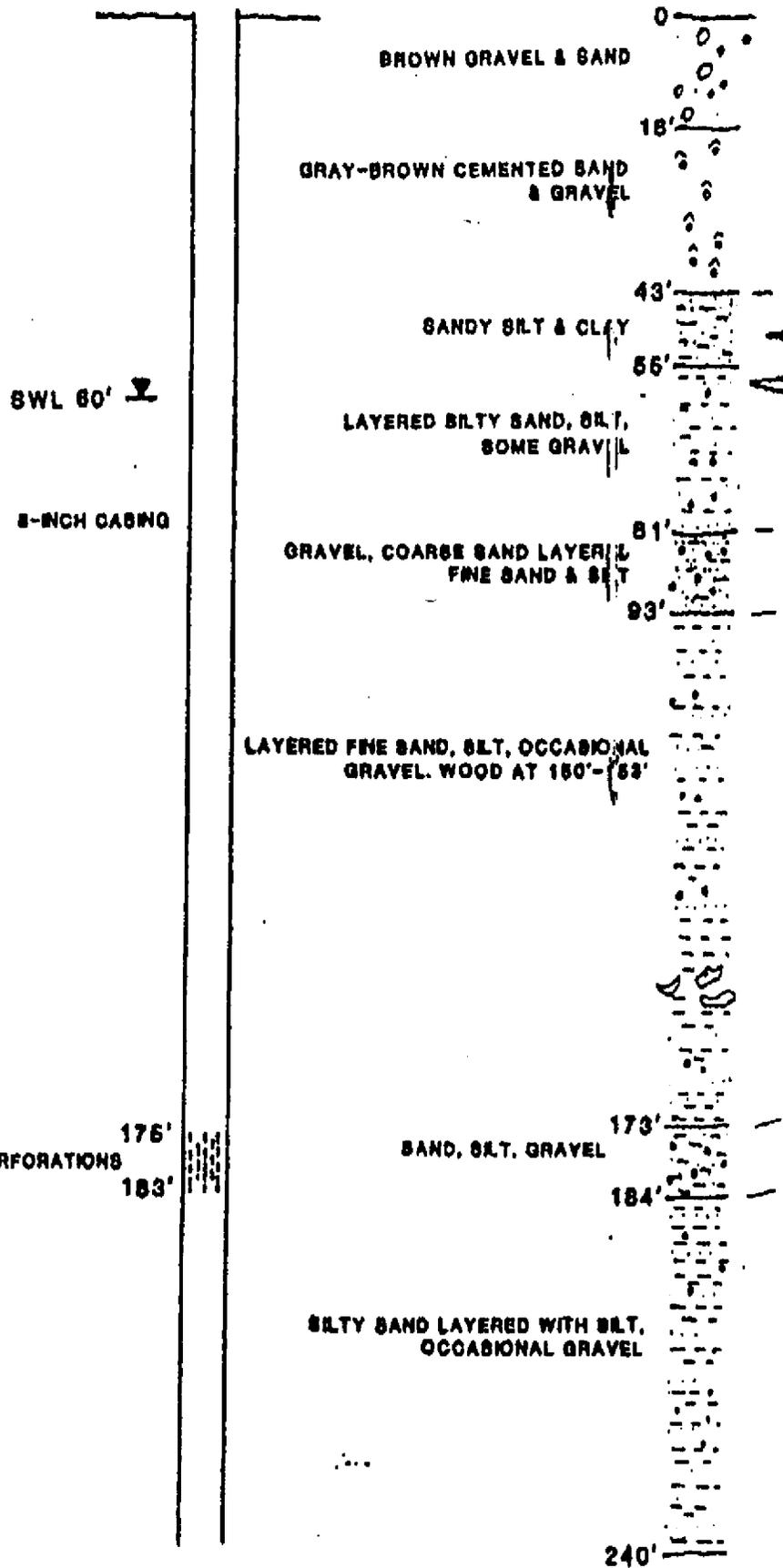
NOTICE OF INTENT TO BEGIN WELL CONSTRUCTION 068103

Owner: St. Martin's Abbey Well Address: 700 College St. Lacey, Wa. 98503
Proposed use: Well #3 is replacing well #2 (dry hole)
Location of well by legal description: County Thurston, SE 1/4, SW 1/4, Section 16 T18N R01W
Approx. Start Date: 4-9-91 Approximate End Date: 6-91
Driller: Billy A. Dodge License No. 1146
Company name: Hokkaido Drilling & Developing Phone No. 206-847-3579
Contractor Registration Number: HOKKADD178D3

Send to the regional office, listed below, where the well is to be constructed:

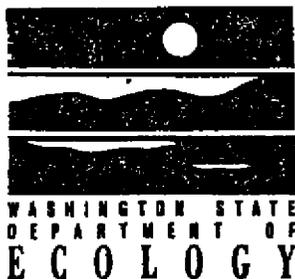
- Southwest Regional Office, Central Regional Office, Northwest Regional Office, Eastern Regional Office

WELL 2



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UNIQUE WELL I.D. NUMBER A B S 2 7 6  
X Y Z 1 2 3

### WELL TAGGING FORM

Date of Field Visit 7/13/95 By J. Kuest

ADDITIONAL WELL IDENTIFIERS Lake Lois Water System

Department of Health System ID Number 08251K Source Number SO 1

USGS Site Identification \_\_\_\_\_

#### RECORD VERIFICATION

- Well Report available (please attach)
- Well Report not available
- Verification inconclusive

#### WELL OWNERSHIP, IF DIFFERENT FROM WELL REPORT

Name George Lemellen

Street address 40 Margaret Johnson - SE131 Blackwelder Rd.

City Shelton State Wa. 98584

#### LOCATION OF WELL, IF DIFFERENT FROM WELL REPORT

Well Address 6338 6th Ave SE

City Lacey County Thurston

T. 18 N. R. 1W W.M. Sec. 15 SW 1/4 of the SW 1/4

Latitude 47 ° 02 ' 586 "

Longitude 122 ° 47 ' 822 "

Elevation at land surface \_\_\_\_\_ feet/meters (circle one)

- GPS (raw data)
- GPS (corrected)
- Topographic Map
- Survey
- Computer generated
- Other \_\_\_\_\_
- Digital Altimeter
- Topographic Map
- Other \_\_\_\_\_

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**Additional information, if available:**

- Location marked on topographic map (please attach)
- Location marked on air photo (please attach)

Water Right # G 2-24303C Priority Date Sept. 23, 1976

Circle one: Application Permit **Certificate** Claim Exempt

**WELL CHARACTERISTICS**

Physical Description of Well (size of casing, type of well, housing, etc.): 6" drilled well  
a few feet south of pump house

Location of Well Identification Tag: on pipe coming out of the well

Was Supplemental Tag needed for ease of identifying well?  
 NO  YES

If yes, where was tag placed? \_\_\_\_\_

Scale 1:24,000 (1"=2,000')

D	C	B	A
E	F	G	H
M	L	K	J
N	P	Q	R

Indicate the location of the well within the Section by drawing a dot at that point.

SECTION 15

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

