



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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September 20, 2019

Donna Buxton, P.E.
City of Olympia
PO Box 1967
Olympia WA 98507-1967

Re: Review of Interim Action Plan for Marketing the West Olympia Commercial Property

- **Site Name:** Former West Olympia Landfill
- **Site Address:** 1305 Cooper Point Rd SW, Olympia, WA 98502
- **Facility/Site No.:** 1425
- **Cleanup Site No.:** 4807

Donna Buxton,

The Department of Ecology (Ecology) has reviewed the *Interim Action Plan (IA) for Marketing the West Olympia Commercial Property*. It is Ecology's understanding that this document will be presented to the potential purchaser (s) by the City of Olympia so the purchaser will know the requirements they have to meet to comply with WAC 173-340 of Model Toxics Control Act (MTCA). As stated in Page 1-3 of the report, before development can be completed, the following documents should be reviewed and approved by Ecology:

- An Engineering Design Report for a landfill cap with landfill gas control and surface water control elements as stated in the IA (WAC 173-340-400[4][a]).
- Construction plans and specifications for landfill cap, landfill gas control, and surface water control elements as stated in the IA (WAC 173-340-400[4][b]).
- An Operation and Maintenance Plan for landfill cap, landfill gas collection and surface water control elements as stated in the IA (WAC 173-340-400[4][c]).
- Construction documentation, such as as-built plans (WAC 173-340-400[6]) (after the construction completion).
- A Compliance Monitoring Plan (WAC 173-340-410).
- A Sampling and Analysis Plan (WAC 173-340-820).
- A Quality Assurance Project Plan (WAC 173-340 and current Ecology guidelines).
- A Health and Safety Plan (WAC 173-340-810[2]).

In addition to the above reports and plans, WAC 173-340-440 (11) (a) requires a financial assurance mechanism at sites where the cleanup action selected includes engineered and/or institutional controls. Financial assurance shall be a sufficient amount to cover costs with the operation and maintenance of the cleanup action, including institutional controls, compliance monitoring, and corrective measures.

Since all the work outlined in IA plan is a final action, the future owner of the site, will present a cleanup action plan (CAP) to Ecology for review and approval. It is important to state that the cap is an Ecology document. At that time, a regulatory document such as agreed order (AO), consent decree (CD) and or perspective purchaser consent decree (PPCD) options will be presented to the future owner. Ecology approved cap will be attached to the agreed upon AO, CD or PPCD to implement cap.

If you have any questions, please contact me @ (360) 407-6256 or mohsen.kourehdar@ecy.wa.gov.



Mohsen Kourehdar, P.E.
Toxics Cleanup Program
Southwest Regional Office