Comments to the December 23, 2022 "Data Gap Report and Remedial Investigation Work Plan for Sundberg Gravel Pit". Submitted by Laurie R. Gneiding, CEP, CPPS[1]

I have reviewed the aforementioned document and have tabulated my comments below.

Comment No.	Page No.	Section	Paragraph	Comment
1	3	2.2		This section limits the historical operation to "Intermittent sand and gravel mining from 1960 through the 1990s". It does not discuss other historical operations that occurred at the property. The following should be included in Section 2.2. • An email from Mr. Chuck Dower to Mr. Brett Bures, both of the City of Olympia, dated March 18, 2005 states that "construction material" from "the cross town gas main was dumped at Sundberg". • A letter from Erica Marbet, Squaxin Island Tribe, Natural Resources Dept., dated August 1, 2019 stating the reading of "multiple reports detailing illegal dumping of fill material on this site". • Investigations provided in Appendix C of the 2022 RI Workplan from Pacific Rim (2007) and Robinson Noble (2008) describing a soil investigation that observed "construction debris, large logs, and lumber", "random fill", "asphalt, concrete rebar, metal stirps, and cedar planks" and the results of a Phase II ESA describing "wood debris….and construction debris"
2	5	3.1	3	This statement is not correct. Mr. Jerry Dierker filed an ERTS complaint stating that soil runoff from the Sundberg Site enters a pond on his property and continuing downstream to the north under French Loop Rd NW and onto the Butler Cove of Budd Inlet.
3	24	5.2	2	Additional complete exposure pathways should be included in the CSM: • Potential direct exposure to groundwater through inhalation and dermal contact. • Potential exposure to VOCs in groundwater through vapor intrusion.

[1] Ms. Gneiding has an MSc. in Environmental Toxicology and is a Certified Environmental Professional. She has over 40 years of experience in hazardous waste investigations including the preparation, implementation, and submittal of Remedial Investigations and Human Health and Ecological Risk Assessments.

				Potential exposure to airborne particles (from soil) through inhalation
4	28ff	7.4.3	Bullet 1	Samples are to be collected for laboratory analysis, but the specific analyses are not provided or reference another location.
		7.4.4	7.4.4.2, Bullet 3 7.4.4.3/7.4.6	• Background soil samples should be collected for comparison to the Washington State background levels. Groundwater has not been sufficiently characterized upgradient, offsite, or onsite. Therefore, the following is suggested: • Installation of a background (upgradient) monitoring well (MW) if not already completed. • Installation of sentinel wells to determine if contaminants have migrated offsite. • Installation of monitoring wells greater than 15 feet to determine if contaminants have leached to groundwater as per Section 7.4.4 and Table 2 and the presence of highly mobile DRO and arsenic in shallow groundwater (Table 7).
	32	7.4.5	2	Sediment samples should be collected from the biologically active zone (BAZ) between 10-15 cm (3-5”), as per USEPA and WA Ecology.

REFERENCES

Dierker, J. 2021. ERTs complaint to Garret Peck (SWROERTS) and ACOE, DFW, Thurston County Stormwater.

Dower, C., 2005. Email from Chuck Dower, City of Olympia Engineering Lands Examiner to Brett Bures, Associate Planner, Community Planning & Development. Dated March 18, 2005.

Marbet, E., 2019. Letter from Erica Marbet, Water Resources Biologist (Squaxin Island Tribe, Department of Natural Resources) to the City of Olympia (Cari Hornbein, Community Planning and Development Department and Steve Thompson, Public Works).