

October 12, 2004

Washington State Department of Ecology  
Toxics Cleanup Program  
4601 North Monroe Street  
Spokane, Washington 99205

Attention: Patti Carter

Subject: Request for Opinion Letter  
Convention Center Expansion  
Corrective Action Plan Amendment and Replacement  
Monitoring Well Locations  
Spokane, Washington  
File No. 0110-047-07

On behalf of the Spokane Public Facilities District (SPFD), we would like to request an opinion letter from the Washington State Department of Ecology (Ecology) through the existing VCP application regarding post-excavation sampling requirements defined in the Corrective Action Plan (CAP) for the Convention Center Expansion (CCX) site. In addition, we would like to obtain Ecology's concurrence on the location and number of replacement groundwater monitoring wells to be installed at the site.

### **POST-EXCAVATION SAMPLING**

In Section 4.3.1, Compliance Monitoring, the CAP specifies that compliance with soil cleanup levels will be demonstrated by systematic sampling and testing on 100-foot by 100-foot grid pattern where impacted soil is suspected to remain at the site, and along 100 feet of linear sidewall areas where soil has been removed to bedrock. We are revising the CAP to not include this sampling for the following reasons:

- As part of the cleanup action, contaminated soil is being contained under buildings and asphalt at the site, with the exception of areas near and above site utilities. This is consistent with Ecology's letter to GeoEngineers dated September 14, 2004. Consequently, institutional controls including a deed restriction will be in-place across most or all of the site following the cleanup action, which will manage future human exposure to site contaminants.
- The SPFD plans to perform systematic 50-foot by 50-foot grid pattern samples for areas of the site where the SPFD intends to show compliance with MTCA cleanup levels, should such areas be identified during implementation of the cleanup action.

### **REPLACEMENT GROUNDWATER MONITORING WELLS**

Five monitoring wells have been installed at the CCX site including MH-SH01, MW-SH02, MW-SH-19, MW-SH20, and MW-213. Groundwater from these five wells was monitored and sampled on May 20, 2004 and August 13, 2004. Groundwater analytical results indicated concentrations of contaminants of concern were less than the MTCA Method Groundwater Cleanup Levels and groundwater was calculated to flow northerly. Monitoring wells MW-SH02, MW-SH19, and MW-SH20 were appropriately

abandoned by a licensed resource protection well driller on August 16, 2004 in advance of CCX construction.

The SPFD intends to install two replacement monitoring wells at the following areas:

1. MW-214, near the southeast corner of the East-West Arbor Park (north of former monitoring well MW-SH02). This well will document groundwater conditions north of the new CCX facility and downgradient of the main remedial area.
2. MW-215, north of the existing Doubletree Hotel facility. This well will document groundwater conditions in the western portion of the new CCX facility and downgradient of the western remedial area.

Installation and maintenance of a third monitoring well north of former monitoring wells MW-SH19 and MW-SH20 will be difficult because the CCX facility is being built up to the SPFD northern property boundary in this location. A well located in this area might be damaged during construction if drilled before earthwork is completed, and it will be difficult to drill after construction is completed because of the presence of the CCX structure. Existing monitoring well MW-SH01 will continue to be used to document groundwater conditions in the western portion of the site. Existing monitoring well MW-213 will continue to be used to document groundwater conditions along the east property boundary. Figure 3 from the CAP, Historic Subsurface Exploration Map, is attached and has been revised to show abandoned and proposed monitoring well locations. Note that these locations might be moved slightly to accommodate site utilities.

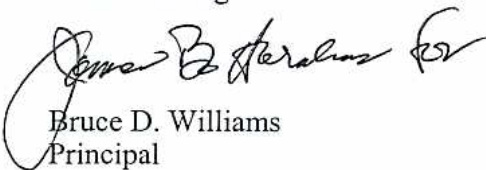
Please provide an opinion letter regarding these issues at your earliest convenience and do not hesitate to call if you have questions regarding this letter.

Respectfully submitted,

GeoEngineers, Inc.



R. David Enos, LG, LEG  
Senior Geologist



Bruce D. Williams  
Principal

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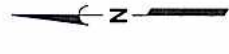
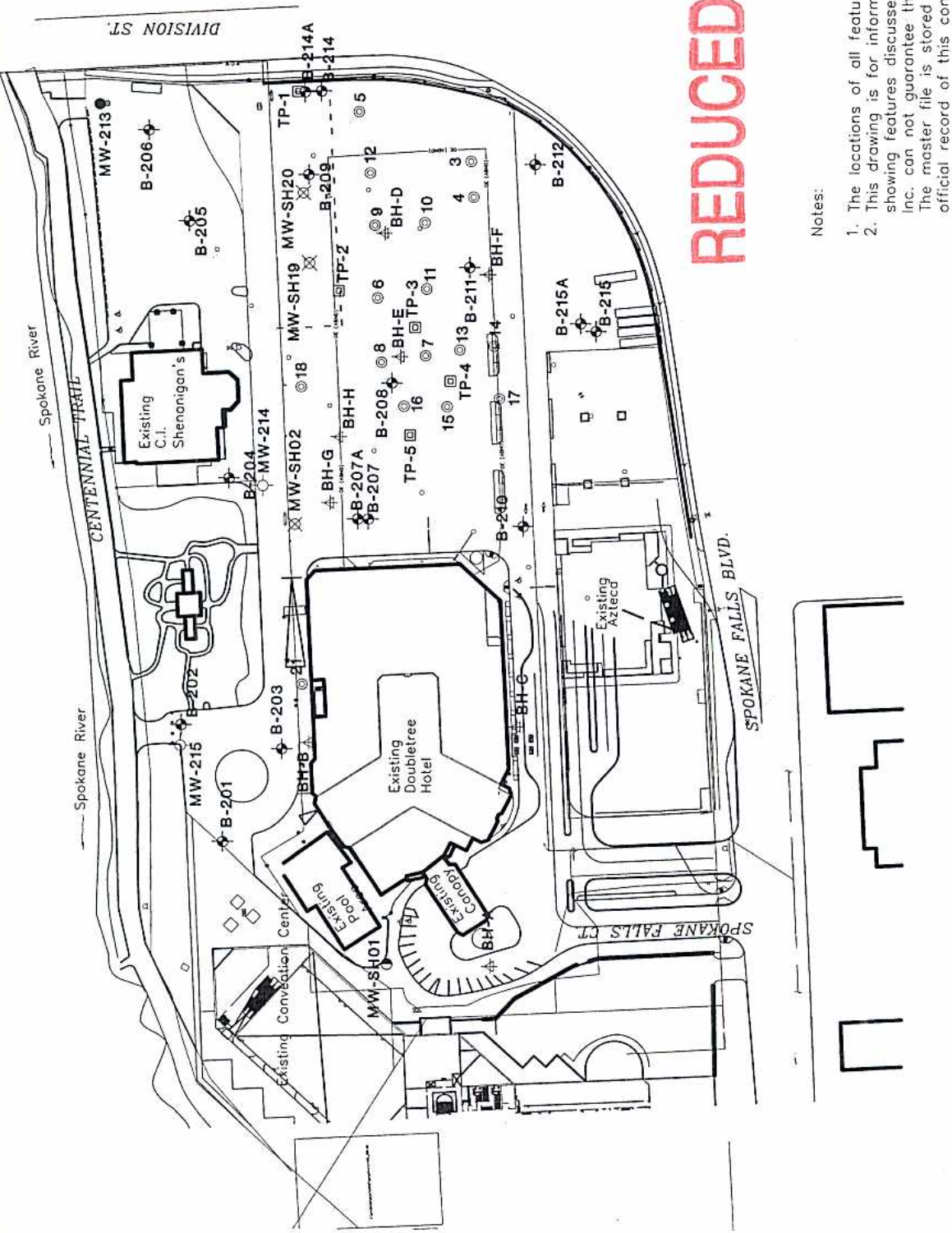
cc: Matt Walker, Spokane Public Facilities District

Attachments

Figure 3, Historic Subsurface Exploration Map, Revised

**EXPLANATION:**

- B-201** ⚡ GEOTECHNICAL OR ENVIRONMENTAL SOIL BORING NUMBER AND APPROXIMATE LOCATION (GEOENGINEERS, 2002)
- MW 213** ● ENVIRONMENTAL MONITORING WELL NUMBER AND APPROXIMATE LOCATION (GEOENGINEERS, 2002)
- BH-A** † PREVIOUS BORE HOLE NUMBER AND APPROXIMATE LOCATION (AGRA, 1995)
- 3** ⊙ PREVIOUS SOIL BORING NUMBER AND APPROXIMATE LOCATION (LAMBERT, 1993)
- MW-SH01** ○ EXISTING MONITORING WELL NUMBER AND APPROXIMATE LOCATION (LAMBERT, 1993)
- TP-1** □ PREVIOUS TEST PIT AND APPROXIMATE LOCATION (AGI, 1992)
- H-5-88** □ PREVIOUS TEST HOLE NUMBER AND APPROXIMATE LOCATION (WASHINGTON STATE DEPARTMENT OF TRANSPORTATION, 1988)
- MW-SH02** ⊗ ABANDONED MONITORING WELL NUMBER AND APPROXIMATE LOCATION
- MW-214** ⚡ PROPOSED MONITORING WELL NUMBER AND APPROXIMATE LOCATION



**Notes:**

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not 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.



**HISTORIC SUBSURFACE EXPLORATION MAP**

**FIGURE 3**

Reference:

Base drawing provided by LMN Architects titled "Spokane Convention Center Expansion" dated 02-02-04.