



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

May 21, 2021

Bill Preston
City of Yakima
129 North Second Street
Yakima, WA 98901

RE: Comments on Site Management Plan for Tiger Oil Site at 24th Ave & W. Nob Hill

- **Site Name:** Tiger Oil 24th Ave & W. Nob Hill
- **Site Address:** 2312 West Nob Hill Boulevard, Yakima
- **Facility/Site ID No.:** 469
- **Cleanup Site ID No.:** 4919
- **Amended Consent Decree:** 02-2-00956-2

Dear Bill Preston:

Ecology has reviewed the Draft Site Management Plan, dated October 28, 2019, for the Former Tiger Oil Site at 2312 West Nob Hill Boulevard and has the following comments:

Section 1.1 – Purpose of Site Management Plan

Add any potentially harmful vapors that may be encountered during site activities

Section 1.2 – Site Description

The paragraph written describes the Property. Please add additional narrative discussing the Site boundaries or change the header to Property Description. Please emphasize the distinction between Property and Site (according to Model Toxics Control Act (MTCA). Please add newly discovered contaminants of concern.

Section 2.1 – Distribution and Extent of Indicator Hazardous Substances (IHS)

All soils to 15 feet below ground surface should be managed as impacted soils. Please replace the language in the underlined statement that says “Soil below 6 feet bgs....”



Section 3.1.1 – Excavation and Handling

Please change the second sentence to read: All soil excavated from this Site must be analyzed to determine the concentration of contaminants. Please note that all transportation of soils from the Site is also subject to WAC 173-350-300.

Section 3.1.2 – Stockpiling

Please replace 6 feet bgs with 15 feet bgs, and instead of referring to Figure 2-7, emphasize that this is true throughout the entire Site. Use Ecology’s Guidance for Remediation of Petroleum Contaminated Sites and other guidance as appropriate for specific guidance regarding stockpiling of soils on Site. It is not permissible to stockpile soils directly on asphalt or soil surfaces without use of a geotextile; not every plastic liner meets the specifications for stockpiling of soils. Temporary stockpiles must be removed within 90 days, unless Ecology gives written approval of an extension.

Section 3.1.3 – Off-site Disposal

All soils (not just those near the groundwater) should be assumed to contain contaminants above risk levels. Please change this in the text. All volumes of soil removed from the Site must be accounted for through trip tickets, weights, etc. All loads must be covered before they leave the Site, and the bed of the truck should remain covered until it has been thoroughly cleaned. Please refer to Ecology’s Petroleum Guidance for Remediation of Petroleum Contaminated Sites for stockpile and analytical requirements.

Section 4 – Vapor Intrusion

Please revise Section 4 to reflect that benzene is not the only indicator hazardous substance. Provide preliminary cleanup levels for both benzene and total petroleum hydrocarbons. Any new building at the entire Site will require vapor intrusion controls. Please emphasize that Ecology must approve any and all vapor mitigation systems before they are installed. All systems used for vapor mitigation must have empirical evidence and annual testing to verify their effectiveness.

Section 4.1 – Soil Vapor Mitigation Methodology

Soil (and groundwater) vapor mitigation must be implemented before any new buildings are constructed on the Property and the Site. Please strike the paragraph that begins with “MFAs recommendation...” as Ecology will provide guidance and oversight.

Section 6.5.1 – Groundwater Compliance Monitoring

Compliance monitoring will take place at both the Property and the Site. Please revise.

Section 6.7 – Use of Property

Five-year review at sites with Environmental Covenants will be conducted by Ecology. The City will provide any documentation required to complete the review. Please revise.

Section 7.1 – Notification and Reporting

Ecology is to be notified of any activities (not just substantial development) at the Site and Property as long as the Consent Decree is in place. Please revise.

Section 7.2 – Recordkeeping

Record keeping requirements are contained in the Consent Decree. Please revise.

FIGURES

Figure 2.1

Please note that although excavation took place in 2015, the potential for back-contamination at this property is high.

Figures 2-4 through 2-7

Replace with most recent figure of groundwater results.

Asbuilt figure

Please identify any underground utilities of note to be found at the property.

Appendices

Ecology appreciates the addition of the appendices, but cannot be seen to endorse any proprietary processes/designs. Please state these are examples of the current technology for vapor mitigation risk, and not Ecology recommendations.

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It may be appropriate to discuss the site management plan in terms of vadose zone and saturated zone, as the groundwater levels can be above 15 feet below ground surface (bgs). Please address the implication of the placement of quarry spalls and the potential for the plume to backflow into the previously excavated area.

The extent of the impacted groundwater is throughout the entire Site, including the property. Please make this clear on all of the figures included with this management plan. Please identify any manmade preferential pathways on the property, and show them in the figures.

Section 2.1.1 – Soil

All soils up to 15 feet bgs at the Property and the Site are considered impacted, and should be managed according to the MTCA and Ecology guidance. Please remove all references to 6 feet bgs within the boundary of the dissolved phase plume and replace with all soils up to 15 feet bgs throughout the Site.

Construction workers can potentially be exposed to soils up to 15 feet bgs. Please replace 6 with 15 in the first sentence.

Section 2.1.3 – Soil Gases

It has already been shown that gasoline and benzene are VI risks at this Site. Please amend this paragraph by including Total Petroleum Hydrocarbons with benzene. From Ecology's point of view, it is the conservative approach to assume vapor intrusion risk exists across the entire Site.

Section 3 – Introduction

Please replace 6 feet with 15 feet bgs. Please reiterate that this Site is under Consent Decree and subject to the Decree as well as MTCA in general, and any environmental covenants required for this Site. For example, the recorded Environmental Covenant requires Yakima to notify Ecology at least 60 days in advance of any proposed activity. The Consent Decree states that all work conducted by Yakima shall be done in accordance with WAC 173-340 (MTCA), unless agreed to by both Yakima and Ecology.

Section 3.1 – Potentially Contaminated Soil

All soil activities at the Property and the Site must be done under MTCA and Ecology guidance documents (Guidance for Petroleum-Contaminated Sites, Vapor Intrusion Guidance, etc.) to ensure compliance.

Section 4.1.1 – Vapor Barrier and Venting System

Please edit Sections 4, 4.1.1.1, 4.1.2, 4.1.3 and 4.1.4 to reflect Ecology oversight and approval.

Section 5.1 – Stormwater

Ecology has Eastern Washington Storm Water guidance that supersedes the Yakima County Regional Stormwater Manual.

Section 5.2 – Groundwater

Please remove the second sentence. Depending on the season, there is a possibility that groundwater could be encountered during any construction work at the site.

Please add a revised list of contaminants of concern and laboratory detection limits that are acceptable to Ecology. Recommendation of specific test methods is advised to avoid confusion.

Section 5.2.1 – Infiltration Gallery

It's premature to advocate for removal of infiltration galleries during redevelopment due to the placement of quarry spalls in the excavated area, and the potential for backflow of contaminated groundwater. Please revise.

Section 6.1 – Worker Health and Safety

Ecology must review all Health and Safety Plans for work conducted on the Property and Site. Please revise.

Section 6.4 – Soil Gas

Any vapor mitigation system will need at least annual inspections, with reports to Ecology. Please revise.

Section 6.5 – Groundwater Use Restrictions

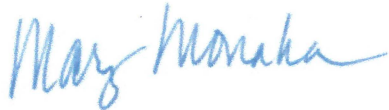
No new wells (not just potable) are allowed on the Property or Site without prior approval from Ecology. Please revise.

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Ecology appreciates the time and effort put into this document to make it user-friendly for future property owners. Ecology understands that this document will be updated to reflect any additional contaminants of concern detected in Site soils and/or groundwater.

Thank you for submitting this draft; Ecology look forward to reviewing the next draft of this Site Management Plan for the Tiger Oil 24th Ave & W. Nob Hill Site. Please contact me with any questions or concerns.

Regards,



Mary Monahan
Project Coordinator
Toxics Cleanup Program
Central Regional Office

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