



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4601 N Monroe Street • Spokane, WA 99205-1295 • 509-329-3400

June 3, 2021

Moshghan Mansoori
Senior Project Manager – GHD
20818 44th Avenue West, Suite 190
Lynwood, WA 98036

Dear Moshghan Mansoori:

The Washington Department of Ecology (Ecology) has received your request to decommission the remedial systems at the North Market Street Site (Site) located at 3225 East Lincoln Road in Spokane, Washington. In addition to responding to your request, Ecology would also like to take this opportunity to clarify the following apparent misconceptions regarding the Site.

1. The total petroleum hydrocarbon groundwater cleanup level (CUL) is 1 part per million, or 1,000 micrograms per liter. This CUL is the summation of the petroleum ranges and should not be applied to an individual range, such as gasoline.
2. GHD appears to have previously made changes in implementing the compliance monitoring plan without notifying or consulting with Ecology. It appears GHD is currently following the compliance monitoring plan, and any future deviation or change should be discussed with and approved by Ecology before changes are made.

Regarding your request to decommission the remedial systems at the Site: Ecology approves the proposed decommissioning of the Site bioventing and air sparging systems and associated wells (NM-2, NM-12, NM-14, NM-19 through NM-21, NM-23, and NM-26 through NM-30).

Ecology believes the petroleum vapor concentrations at the Site have been reduced to levels that no longer represent a threat to groundwater, and although groundwater contamination greater than CULs is present upgradient of the air sparging system, the contamination appears to be stable on site and the groundwater contaminant plume does not appear to be increasing in size or migrating. In light of these conditions, and the fact that the remedial systems have not been operated in several years, Ecology is in general agreement that bioventing and air sparging system operations are no longer needed at the Site.

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Ecology also supports the change from quarterly to semi-annual groundwater monitoring at the Site, and requests that sampling be performed during the second and fourth quarters in order to capture the seasonality at the Site.

Please contact me at (509) 329-3589 or wfee461@ecy.wa.gov if you have questions or comments.

Sincerely,

A handwritten signature in black ink that reads "William J. Fees". The signature is written in a cursive, flowing style.

William J. Fees, P.E.
Environmental Engineer
Toxics Cleanup Program

cc: Katie Larimer, Ecology
Rich Solomon, Phillips 66