



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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January 27, 2023

Sent via email and hard copy

Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

RE: Review of Draft Remedial Investigation and Interim Action Report

- **Site name:** Coleman Oil Yakima Bulk Plant
- **Site address:** 1 E. I Street, Yakima
- **Facility/Site ID:** 4233
- **Cleanup Site ID:** 13200

Dear Jim Cach:

The Department of Ecology (Ecology) has reviewed the draft report titled "*Remedial Investigation and Interim Action Report, Coleman Oil Yakima Bulk Fuel*," prepared by PBS Engineering and Environmental Inc., and dated November 18, 2022.

Ecology previously provided comments on the initial draft version in an email dated January 21, 2021, and this revised Remedial Investigation (RI) report is largely responsive to these earlier comments. However, Ecology did note that the comments constituted a preliminary review, and that we intended to perform a more detailed review. Additional comments are below:

1. Text in the last paragraph of **Section 5.1.1** states that S39 is in the southwest corner of the property. Correct this to state southeast.
2. The third paragraph of **Section 5.1.1** notes that significant disturbance of the surface soils occurred in the northern portion of the property and that results from near surface soil samples are not relied upon for site characterization. Does this explain why other sections, e.g., **Section 6.2.2**, describe shallow soil contamination in the northeast and the northwest corners of the site yet **Figure 4** does not depict these areas of soil contamination? In any case, the extent of soil contamination may not have been effectively addressed under MTCA.

As explained in **Section 6.2.3**, contaminated soil in the northeastern portion of the site may be accessible for removal by excavation while that same section states that removal of contaminated soil in the northwestern portion of the site is not feasible due to structural impediments. Resolve the contradictions in the report regarding whether soil contamination exists in areas of the site. There are other remedies that may apply in areas where excavation cannot be performed.

3. **Section 5.2.2** discusses groundwater contamination but does not refer to any depiction of the contaminated groundwater footprint. That section directs one to **Figures 5** and **6** which show the lateral distribution of the separate phase contamination but do not depict the dissolved phase footprint. In contrast, **Figures 8** and **9** are cross sections that do exhibit the distribution of the aqueous phase contamination. Modify both **Figures 5** and **6** to show the dissolved phase footprints for gasoline and diesel.
4. In **Section 5.3.1**, change the text from “...*the practical cutoff for active recoverability of product*” to “*the practical cutoff for hydraulic recoverability of product*”.
5. **Section 5.5.2** states that concentrations of **benzene** and **naphthalene** exceeded the indoor air CULs. This section then refers to OSHA’s Permissible Exposure Limit (PEL) and NIOSH’s Recommended Exposure Limit (REL).

Regarding the appropriate action levels, add text that pertains to the following:

For most VOCs, the human health-based indoor air cleanup levels required under MTCA are much lower than the PELs. Ecology’s Vapor Intrusion guidance applies to any building where subsurface contamination poses a potential threat to indoor air quality from VI, including buildings where the primary receptors of concern are workers. Typically, Ecology does not recommend conducting indoor air sampling as part of the VI evaluation under the three different scenarios listed in the guidance (Section 1.2.2, page 4). Ecology recommends deferring a VI evaluation for buildings until a time when the conditions outlined in the scenarios no longer apply.

Ecology will not provide tacit approval of the use of OSHA or NIOSH action levels in lieu of MTCA VI compliance levels.

6. In **Section 6.2.2**, the table titled **Soil Points of Compliance** does not make sense. The text states that the analytical results for the boring and well locations listed in that table do not show contamination above the applicable CULs. Per MTCA, the soil point of compliance is throughout the site and from the surface down to a depth of 15 feet below ground surface.

The soil point of compliance should be met at all locations that do not meet the cleanup standard. Note that in contrast to what is stated in this section the soil point of compliance is not met at the location of MW3.

7. In the last paragraph of Section **6.2.2**, correct the citation for the figures that depict the vertical extent of soil contamination. The updated citations are **Figures 9** and **10**.
8. The last paragraph of **Section 6.2.3** states that vapor intrusion is not considered a concern at the site as detailed by the findings of **Sections 4.4** and **5.2**. However, **Section 4.4** does not exist while **Section 5.2** refers to groundwater. Is this a typo? In any case, this conclusion about vapor intrusion is not fully supported even if **Section 5.5** is a correct citation.
9. The text in **Section 6.3.2** states "*As contaminated groundwater extends laterally and vertically beyond the extent of the NAPL, extents of NAPL are not considered Site boundaries (extents of contamination).*" Ecology concurs and expects to see the dissolved phase footprint depicted in the relevant figures rather than relying on just the table in that section to convey this information. As stated in that section, the west extent remains undefined so that the boundary in the figures should be dashed in that area.
10. In **Section 6.4.1**, in the bullet point, list TPH as gasoline range organics and diesel range organics.
11. **Section 6.4.2** has a table titled **Groundwater Conditional Points of Compliance**. Per Ecology's comments dated January 21, 2021, it is premature to discuss groundwater conditional points of compliance in the RI. The appropriate stage to discuss CPOCs is in the Feasibility Study together with discussion of the Disproportionate Cost Analysis (DCA). Remove the reference to groundwater conditional points of compliance. Ecology will decide if groundwater conditional points of compliance are justified.
12. In **Section 6.5** and consistent with Comment #5 above, Ecology regulates vapor intrusion based on MTCA criteria and not by sole reliance on OSHA PELs or NIOSH RELs. A subsurface source of mixed weathered and fresh fuel exists in that area that can potentially contribute to petroleum vapor intrusion.

The text also states "*...a vapor probe (VB1) was installed to the east and immediately outside of the onsite office...*". Change this wording to state that the vapor probe was installed within the soil contaminated area as shown on **Figure 4** and approximately within 20 feet of the onsite office.

13. In **Section 7.1**, add reference to WAC 173-340-747 in the paragraphs that discuss the soil cleanup criteria and the groundwater cleanup criteria.

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14. In **Section 8**, for the third bullet point, note that leaving contamination in place within the soil point of compliance may require an environmental covenant.
15. In **Table 5**, correct the notation that identifies the sub-slab soil gas sampling location. The correct designation is VB1.
16. Text in **Figure 10** states that contamination may be migrating from off-property sources, presumably Nakano Foods or another unknown source. In the sixth bullet of **Section 8**, add reference to the Nakano Foods Site since that site was characterized by the presence of separate phase product.

Thank you for your work on this project. Ecology looks forward to receiving the updated Remedial Investigation. Please contact me if you have any questions at (509) 731-9613 or John.Mefford@ecy.wa.gov.

Sincerely,



John Mefford, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Central Region Office

cc: Ken Nogeire, PBS Engineering and Environmental, Inc.