February 13, 2023

Ted Uecker, LG
Toxics Cleanup Program
Washington State Department of Ecology
[sent electronically]

RE: **Site Name:** Othello Quick Stop 5
- **Site Address:** 1220 S 1st Street, Othello, WA
- **Facility/Site No.:** 15722357
- **VCP Project No.:** EA0247

Dear Ted,

Further to your email to me of February 8, 2023, I am confused by your statements: "Reviewing the EIM submittal I don't see any soil data, including both the site characterization and post-remediation compliance sampling data. Are you able to submit this data to our EIM database?"

First, since continually working with you and Kristen Carmak and Gaylen Sinclair, Nicole Masurat, the last three of the Environmental Management System over almost 2 years following the submission of my final report to you on March 30, 2021, the issue of soil data has never come up. Following are the significant records of soil data from the public record concerning the above site:

Historic Soil Contamination Records - Othello Quick Stop 5

Report 1

LUST Closure Report – White Shield, November 24, 1998 – Excerpt:

The analytical laboratory results from the soil samples collected from the sidewalls of the UST excavation revealed no contamination above Model Toxics Control Act Method A Cleanup Levels. However, the water sample that was collected and analyzed for NWTP-G/BTEX and NWTPH-Dx revealed contamination levels above the Model Toxic Control Act for Total Petroleum in groundwater.

The analytical laboratory results revealed petroleum contamination above the MTCA Method A Cleanup Levels in the stockpile generated during the UST excavation activities.

Field screening of a soil sample beneath the diesel fuel dispenser and one gasoline dispenser revealed contamination levels above the Model Toxics Control ACT. Additional petroleum contaminated soil was excavated and placed with the stockpile generated during the UST excavation activities. Test pits were excavated around the former dispenser islands to delineate the extent of the contamination.

Laboratory analysis from soil samples collected from the test pits revealed no contamination in the soil surrounding the dispenser islands or beneath the previous location of the dispenser.

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Report 2

Subsurface Investigation Report to Inland Oil – White Shield, September 10, 2002 – Excerpt:

5.0 LABORATORY ANALYTICAL RESULTS

OnSite Environmental was contracted by WSI to perform laboratory analysis of samples collected at the subject site. Table 1 and 2 provide a summary of soil and groundwater analytical results, respectively.

5.1 Soil Samples

All soil samples collected were analyzed for NWTPHGx/BTEX and NWTPH-Dx. Four soil samples were selected for analysis. Analytical results were compared with State of Washington, Model Toxics Control Act (MTCA) Method A cleanup levels for soil.

Analytical results for soil samples selected at BH1 through BH4 indicated no detected concentrations of TPH as gasoline with BTEX and TPH as diesel extended.

A summary of soil laboratory analytical results is included in Table 1. Soil analytical laboratory results and laboratory data quality assurance/quality control reports are provided in Appendix D.

Discussion:

In **Report 1**, 1998, the removal of the leaking tanks was documented as was the placing on plastic and the ultimate disposal of contaminated soil at the tanks, the dispensers, and surrounding the associated piping. At that time, groundwater contamination above cleanup level was detected and quantified.

Report 2 in 2002 was a follow-up intended to address the residual groundwater contamination, to locate four groundwater monitoring wells, and to update the original evaluation of the site, including looking at any remaining soil contamination. Four boreholes were dug, and no soil contamination was found. The monitoring wells were placed in these boreholes. The borings were located especially along the north and northwest sides of the former USTs to evaluate whether gasoline fuel contamination had extended from the former locations of the USTs to downgradient locations to the north-northwest. The direction of groundwater flow is to the north-northwest. Soil samples were selected from depths of 10 to 11.5 feet below ground surface at BH-1, from 11.5 to 13.0 feet bgs at BH-2, from depths of 15.0 to 16.5 feet bgs at BH-3 and BH-4.

Soil and groundwater samples were analyzed for total petroleum hydrocarbons (TPH) as gasoline with benzene, toluene, ethylbenzene, and total xylenes (BTEX) and as diesel extended. In addition, groundwater samples were analyzed for methyl tertiary-butyl ether (MTBE).

All results from this soil sampling effort turned up No Detect (ND). White Shield completed the four monitoring wells based on the locations of the four exploratory borings to facilitate future groundwater monitoring of any plume resulting from the LUST. (See Image A below for the initial round of lab results). These 4 monitoring wells placed in 2002 became the source location for subsequent quarterly sampling of the

groundwater of the site. The action plan anticipated that remedial action would eventually achieve concentration of the known contaminants below MTCA cleanup levels.

Since any contaminated soil resulting from the LUST and the tank removal of 1998 has been eliminated, and since there are no locations indicated in any report where contaminated soil is suspected, that the issue of soil contamination on this site is nonexistent.

I have been aware that Ecology's public database of cleanup sites searched a few days ago for inclusion in this response includes details about soil contamination as updated as far back as April 27, 2021. This cleanup report is reproduced below as **Image B**. In the section of the report covering "Affected Media & Contaminants," all identified soil and groundwater contaminants are shown as RB, which is "remediated below cleanup concentrations."

If there is a concern that soil contamination from past site activity may exist in pockets somewhere underground, I would contend that the diligent exploration of 2002 by White Shield turned up nothing. Assuming that there is still some yet undiscovered pocket above cleanup level that may be dislodged through say natural groundwater fluctuations, I feel that the risk of such a happening is almost nil. Groundwater levels in the monitoring wells were initially measured by White Shield in 2002 when the wells were placed.

Almost ten years later, PBS Engineering and Environment also measured the water elevations in the wells as part of their assessment of the site for a potential real estate sale. PBS found little change in the elevations of the groundwater compared with the White Shield study of 2002. The results of both inspections are shown in this chart:

Monitoring Well	White Shield Sept 10 2002	PBS Eng & Enviro June 18 2012
W-1	8.55' BGS	8.64' BGS
W-2	7.45' BGS	7.58' BGS
W-3	8.35' BGS	8.36' BGS
W-4	10.21' BGS	10.31' BGS

BGS = indicates water table below grade surface

Besides stable groundwater levels, the entire site and the surrounding streets are hard surfaced with regional stormwater management by the City of Othello. If any residual contamination remains underground on this site, between the paved impervious surface and the water table in any small pockets that may have been missed, it is my opinion that natural attenuation has already eliminated any risk that such unlikely contamination would transport into the water table or rise to the surface. I can see no reason why such

a risk would even be considered given that there is no evidence of soil contamination existing anywhere on or in the site, and that this issue was never brought up in my many discussions with Ecology officials over the years of my involvement with Ecology Site 15722357.

Please let me know how you want me to proceed. I believe that Eco-nomic, Ecology, other consultants, and my client have worked well together in managing this cleanup and addressing all of the issues concerning this site.

The completion of this effort should result in the receipt of a NFA letter. Am I wrong to think that this goal is getting further away with each new task rather than nearer?

Sincerely,

John Glassco
Eco-nomic

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Image

A

TABLE 1
SUMMARY OF SOIL DATA
INLAND OIL - FORMER OTHELLO QUICK STOP
1220 SOUTH FIRST AVE, OTHELLO, WASHINGTON

BOREHOLE	DATE SAMPLED	TPH-G (mg/Kg)	B (mg/Kg)	T (mg/Kg)	E (mg/Kg)	X (mg/Kg)	TPH-Dx (mg/Kg)
BH-1-10	06/24/02	ND	ND	ND	ND	ND	ND
BH-2-11.5	06/24/02	ND	ND	ND	ND	ND	ND
BH-3-15	06/24/02	ND	ND	ND	ND	ND	ND
BH-4-15	06/24/02	ND	ND	ND	ND	ND	ND
Laboratory Methods		NWTPH-Gx	8021B	8021B	8021B	8021B	NWTPH-Dx
MTCA Method A Cleanup Levels		100	0.03	7	6	9	2,000

TABLE 2
SUMMARY OF GROUNDWATER DATA
INLAND OIL - FORMER OTHELLO QUICK STOP
1220 SOUTH FIRST AVE, OTHELLO, WASHINGTON

MONITORING WELL	DATE SAMPLED	TPH-G (ug/L)	B (ug/L)	T (ug/L)	E (ug/L)	X (ug/L)	MTBE (ug/L)	TPH-Dx (ug/L)	DEPTH TO WATER (ft)	GROUNDWATER ELEVATION (ft)	TOC (ft)
MW-1	06/26/02	ND	ND	ND	ND	ND	ND	ND	8.65	1037.18	1045.83
MW-2	06/26/02	2,500	430	83	5.8	280	12	ND	7.45	1037.28	1044.73
MW-3	06/26/02	690	6.0	ND	9.3	ND	430	ND	8.35	1036.95	1045.3
MW-4	06/26/02	ND	ND	ND	ND	ND	ND	ND	10.21	1037.51	1047.72
Laboratory Methods		NWTPH-Gx	8021B	8021B	8021B	8021B	8260B	NWTPH-Dx			
MTCA Method A Cleanup Levels		800	5	1,000	700	1,000	20	500			

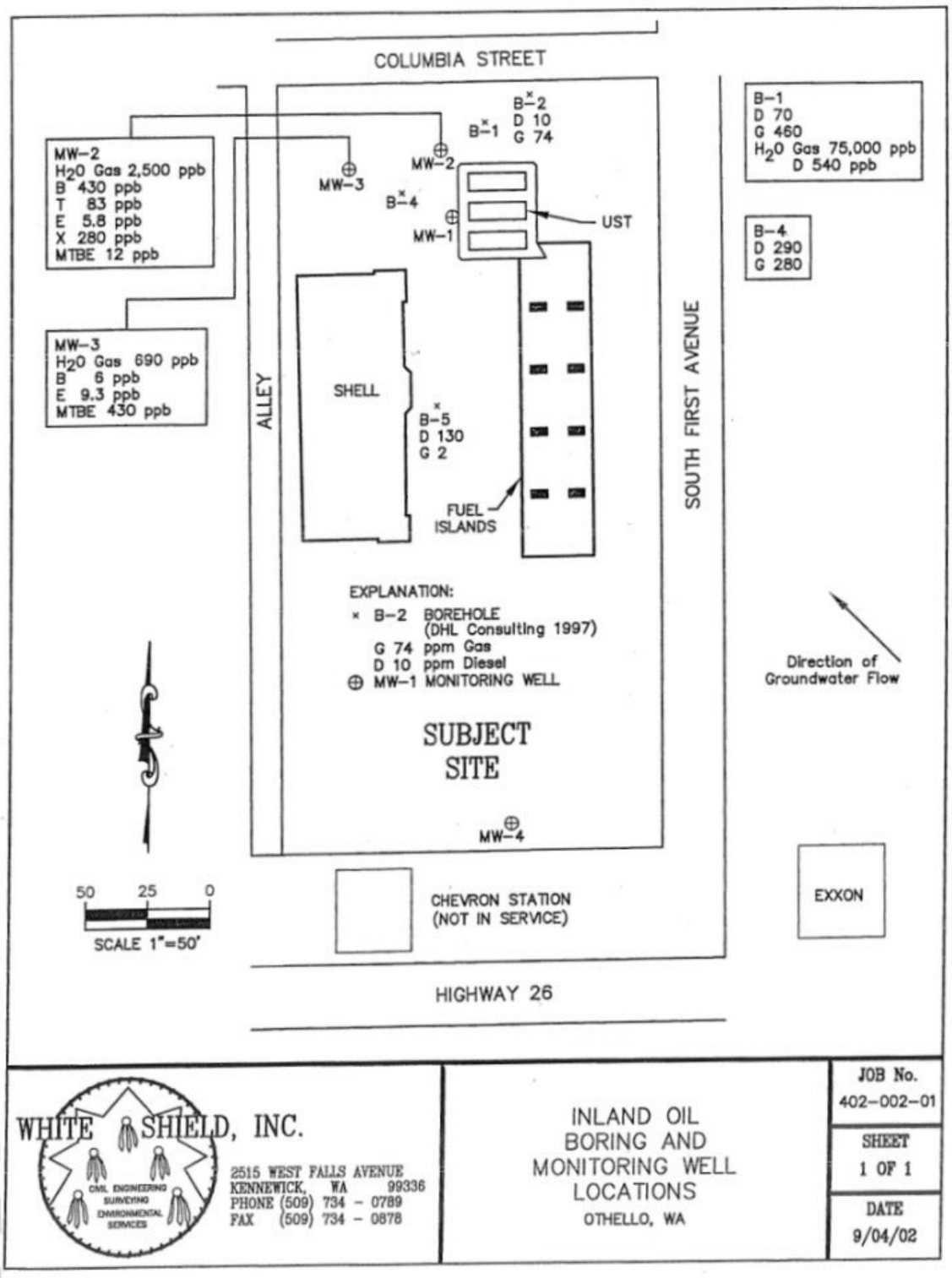

Image **B**

Cleanup Site Details

Cleanup Site ID: 8106

Cleanup Site ID: 8106 **Facility/Site ID:** 15722357 **UST ID:** 11101 Site Page | Site Documents | View Map

Cleanup Site Name: OTHELLO QUICK STOP 5 Glossary

Alternate Names: OTHELLO QUICK STOP, OTHELLO QUICK STOP 5, OTHELLO SHELL

LOCATION

Address: 1220 S 1ST **City:** OTHELLO **Zip Code:** 99344 **County:** Adams

Latitude: 46.81289 **Longitude:** -119.17462 **WRIA:** 36 **Legislative District:** 9 **Congressional District:** 4 **TRS:** 15N 29E 3

DETAIL

Status:	Cleanup Started	**NFA Received?**	No	**Is PSI site?**	No
Statute:	MTCA	**NFA Date:**	N/A	**Current VCP?**	Yes **Past VCP?** Yes
Site Rank:	N/A	**NFA Reason:**	N/A	**Brownfield?**	No
Site Manager:	Uecker, Ted	**Responsible Unit:**	Eastern	**Active Institutional Control?**	No

CLEANUP UNITS

Cleanup Unit Name	Unit Type	Unit Status	Resp Unit	Unit Manager	Current Process
OTHELLO QUICK STOP # 5	Upland	Cleanup Started	EA	Uecker, Ted	Standard Voluntary Cleanup

ACTIVE INSTITUTIONAL CONTROLS

Instrument Type	Restriction Media	Restrictions/Requirements	Date	Recording Number	Recording County	Tax Parcel
There are no current Institutional Controls in effect for this site.						

AFFECTED MEDIA & CONTAMINANTS

	MEDIA					
Contaminant	**Soil**	**Groundwater**	**Surface Water**	**Sediment**	**Air**	**Bedrock**
Benzene	RB	RB				
Methyl tertiary-butyl ether		RB				
Petroleum-Diesel	RB					
Petroleum-Gasoline	RB	RB				

Key:
B - Below Cleanup Level
S - Suspected
C - Confirmed Above Cleanup Level
R - Remediated
RA - Remediated-Above
RB - Remediated-Below

SITE ACTIVITIES

Activity	Status	Start Date	End Date/ Completion Date
LUST - Notification	Completed		9/30/1997
LUST - Report Received	Completed		9/30/1997
LUST - Report Received	Completed		12/21/1998
LUST - Report Received	Completed		9/17/2002
VCP Receipt of Plan or Report	Completed		11/16/2012
VCP Opinion on Site Cleanup Plan	Completed	11/16/2012	12/11/2012
VCP Opinion on Site Cleanup	In Process	2/12/2021	