



September 3, 2023

Kyle Parker
Washington Department of Ecology
Central Region
1250 Alder Street
Union Gap, Washington 99903

Re: Well Abandonment Report

Circle K Store #2706030
5301 West Canal Drive
Kennewick, Washington
Blaes Project #202-6030-10
WDOE Fac ID #41675165
Cleanup Site # 12198
VCP # CEO470

Dear Mr. Parker:

This report documents the activities associated with a well abandonment program conducted at Circle K Store #2706030 located at 5301 West Canal Drive in Kennewick, Washington (Figure 1). The well abandonment program was conducted following the completion of corrective action tasks at the former tank zone and following the Washington Department of Ecology (WDOE) no further action letter dated July 14, 2023 presented in Attachment A.

Well Abandonment

Blaes Environmental coordinated the abandonment of the one vapor well (VE-1) at the site with Cascade Drilling of Woodinville, Washington. The well location is shown in Figure 2.

On September 1, 2023, Cascade Drilling sealed the well casing utilizing a high-solids bentonite grout material from the bottom of the well to approximately one-foot below the ground surface. Once the well casing was sealed, the well location was resurfaced at the ground surface with concrete to match the existing grade. Photos of the site restoration are presented in Attachment B.

If you have any questions or comments relating to this report, please contact Blaes Environmental at (602) 728-0707.

Sincerely,

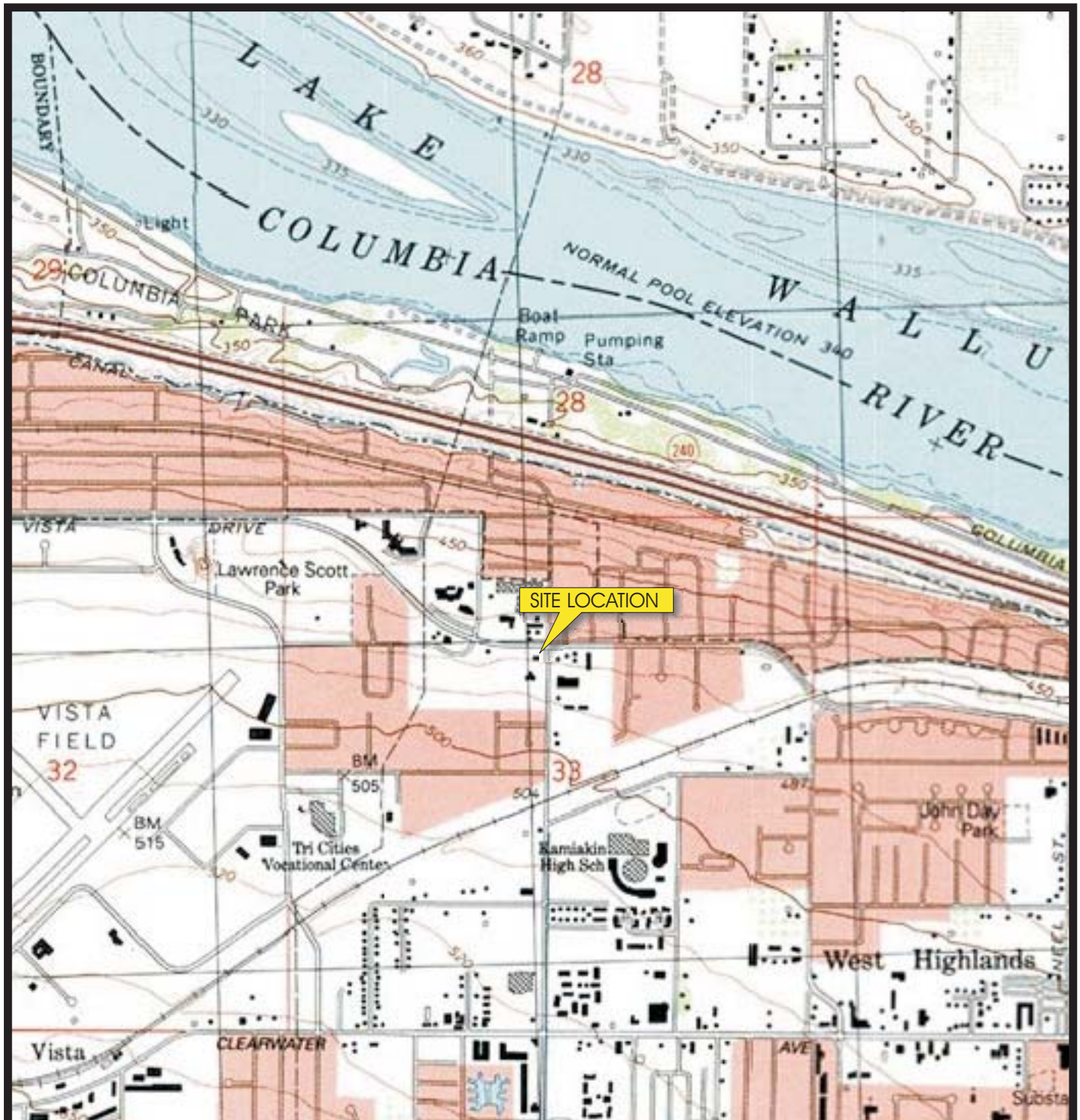
A handwritten signature in blue ink that reads 'Daniel Michael Blaes'.

Daniel Blaes, R.G.
Principal Geologist
Blaes Environmental Management, Inc.
Washington Geologist/Hydrogeologist #2158



Daniel Michael Blaes

FIGURES



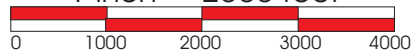
Source: MapTech Terrain Navigator Kennewick Quadrangle, 7.5 Minute Topographic Series, 1992

QUADRANGLE LOCATION



Approximate Scale
1:24,000

1 inch = 2000 feet



Contour Interval = 10 feet



Circle K #2706030
5301 W. Canal Drive
Kennewick, WA

**SITE
LOCATION
MAP**

SITE LOCATION: T9N, R29E, Section 33

46° 13' 22.39" North Latitude; 119° 11' 31.92" West Longitude

Sept 2013

Project #202-6030-03

Figure 1

P:\Technical\202Corona
Kennewick\Graphics\SLM.cdr

ATTACHMENT A
WDOE NFA LETTER



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

July 14, 2023

Alan Cubberley
Circle K Stores
1100 Situs Court, Suite 100
Raleigh, NC 27606

Re: No Further Action opinion for the following contaminated Site Through Petroleum Contaminated Soils Model Remedy 4:

- **Site name:** Circle K 2706030
- **Site address:** 5301 W. Canal Drive, Kennewick
- **Facility/Site ID:** 41675165
- **Cleanup Site ID:** 12198
- **VCP Project No.:** CE0470

Dear Alan Cubberley:

The Washington State Department of Ecology (Ecology) received your request on January 4, 2022 for an opinion regarding the sufficiency of your independent cleanup of the Circle K 2706030 (Site) under the Voluntary Cleanup Program (VCP).¹ To provide an opinion, we requested additional information from you in writing on February 9, 2023. We received the additional information on April 20, 2023. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.²

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC³ (collectively called "MTCA").

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Gasoline in soil.

The enclosure includes a Site description and diagram.

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcel(s) associated with this Site.

Basis for the Opinion

Ecology bases this opinion on the information contained in the following documents:

- Blaes Environmental, Confirmation Soil Boring Report, April 20, 2023.
- Blaes Environmental, Soil Remediation Test Report, December 27, 2021.
- Blaes Environmental, Site Assessment Report, October 29, 2013.
- Blaes Environmental, Underground Storage Tank Removal Report, September 9, 2013.

You can request these documents by filing a records request.⁴ For help making a request, contact the Public Records Officer at RecordsOfficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check if the documents are available on the Circle K 2706030 - (12198) (wa.gov).⁵

This opinion is void if information in any of the listed documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. The enclosure describes the Site.

The Site is defined by the release of gasoline to soil and the extent to which it came to be located. Five underground storage tanks (USTs) were removed from the Site in August 2013.

⁴ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/12198>

Samples from beneath these tanks indicated gasoline was released to soil. Samples from beneath the dispenser island and piping provides evidence that soils in these locations meet MTCA cleanup standards. These samples also indicate that Diesel and Heavy Oils were not present in concentrations above MTCA cleanup levels.

The 28 confirmational soil samples collected during UST removal, coupled with the 4 soil samples during from installation of a vapor extraction well, adequately bounds the horizontal and vertical extent of the gasoline release. Gasoline evidence was present in soils beneath the USTs to 15 feet below ground surface.

Setting cleanup standards

Ecology has determined the cleanup levels and points of compliance for Model Remedy 4 for Sites with Petroleum Contaminated Soils are appropriate and therefore meet the substantive requirements of MTCA.

Model Remedy 4 uses the generic Total Petroleum Hydrocarbon (TPH) of 1,500 mg/Kg. The other MTCA Method A cleanup standards for unrestricted land use selected for Benzene, Toluene, Ethylbenzene, and Xylenes are also appropriate. The site uses the standard points of compliance (POCs) for soil, based on direct contact for unrestricted land use, and is defined as throughout the Site from the ground surface to 15 feet below the ground surface.

Site soil cleanup standards for unrestricted land use:

| Contaminant | Soil Cleanup Levels (mg/Kg) |
|-----------------------------------|------------------------------------|
| Total Petroleum Hydrocarbon (TPH) | 1500 |
| Benzene | 0.03 |
| Toluene | 7 |
| Ethylbenzene | 6 |
| Xylenes | 9 |

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

Remedial efforts at the site included the removal and decommissioning of four gasoline tanks and one diesel fuel tank. Soil sampling of the excavation pit indicated a release of gasoline had occurred. Further excavation and confirmational soil sampling indicated that contaminated soil was removed.

Contaminated soil removal and appropriate disposal is a substantive MTCA cleanup action when remaining soils meet MTCA cleanup standards and the conditions outlined in Ecology's Model Remedy 4 for Model Remedies for Sites with Petroleum Contaminated Soils.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site.

As part of the underground storage tank (UST) removal, gasoline-contaminated soils were excavated and removed from the site. According to the UST removal report an area of 25 feet by 35 feet was excavated to approximately 15 feet deep. Confirmational soil samples indicate that this excavation sufficiently removed the gasoline-contaminated soil.

All but one of the initial samples from the extent of the excavation, 11 feet below ground surface, met the cleanup standards outlined here. Additional excavation occurred to address the area which exceeded the cleanup standards. Excavation samples EX-1, EX-2, and EX-3 taken at 15 feet below ground surface were taken to confirm that this new extent was sufficient to meet cleanup standards. A confirmational boring (CB-1) also demonstrates that remaining soils are below the generic TPH concentration.

Listing of the Site

Based on this opinion, Ecology will update the Site status on the Confirmed and Suspected Contaminated Sites List and the Leaking Underground Storage Tanks List.

Limitations of the Opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly, and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).⁶

⁶ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

Alan Cubberley
Circle K Stores
July 14, 2023
Page 5

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080⁷ and WAC 173-340-545.⁸

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).⁹

Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. CE0470.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 509-406-6959 or email at Kyle.Parker@ecy.wa.gov.

Sincerely,



Kyle Parker
Toxics Cleanup Program
Central Regional Office

Enclosure: Site Description and Diagram

cc: Dan Blaes, Blaes Environmental Inc.
Fiscal, VCP Fiscal Analyst
TCP, Operating Budget Analyst

⁷ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

⁸ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

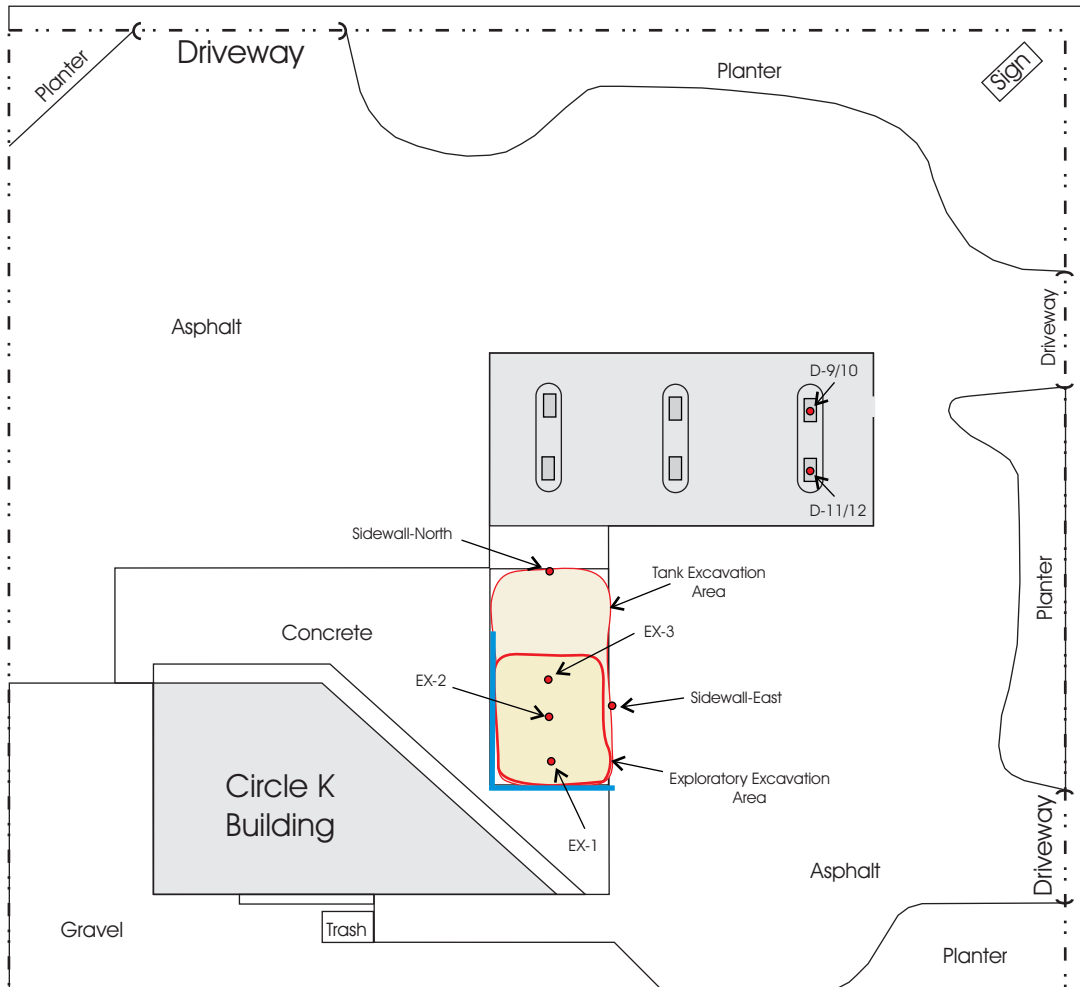
⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

Site Description

The Site is contained within the property located on the southwest corner of the intersection between Canal Drive and Edison Street in Kennewick, Washington. The surrounding area has been developed with a mixture of commercial businesses and residential developments. The gasoline released did not reach groundwater and was found only in the soils contained within the property, within the tank basin, and along the underground piping. Soil excavation and confirmational samples indicate that the contamination did not extend below 15 feet of the ground surface. All potential exposure pathways were addressed during the remedial action as all the potentially contaminated soils were excavated and removed. The Site remains a gas station.

Site Diagram

← Canal Dr →



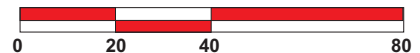
↑ Edison St ↓

Legend

- Approximate Location of Soil Samples
- EX-1



Approximate Scale
1 inch = 40 feet



Circle K #2706030
5301 West Canal Drive
Kennewick, Washington

**ADDITIONAL
SOIL SAMPLE
LOCATIONS**

September 2013

Project #202-6030-03

P:\Technical\201CKOtherProjects\202-6030-03.cdr

Figure
4

ATTACHMENT B

SITE PHOTOS

