



## **Second Periodic Review Walla Walla City Shop**

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**812 Rees Avenue, Walla Walla, Walla Walla County  
Facility Site ID: 88514759, Cleanup Site ID: 6812**

**Toxics Cleanup Program, Eastern Region**

Washington State Department of Ecology  
Spokane, Washington

October 2023

## Document Information

This document is available on the Department of Ecology's [Walla Walla City Shop cleanup site page](#).<sup>1</sup>

### Related Information

- Facility Site ID: 88514759
- Cleanup Site ID: 6812

## Contact Information

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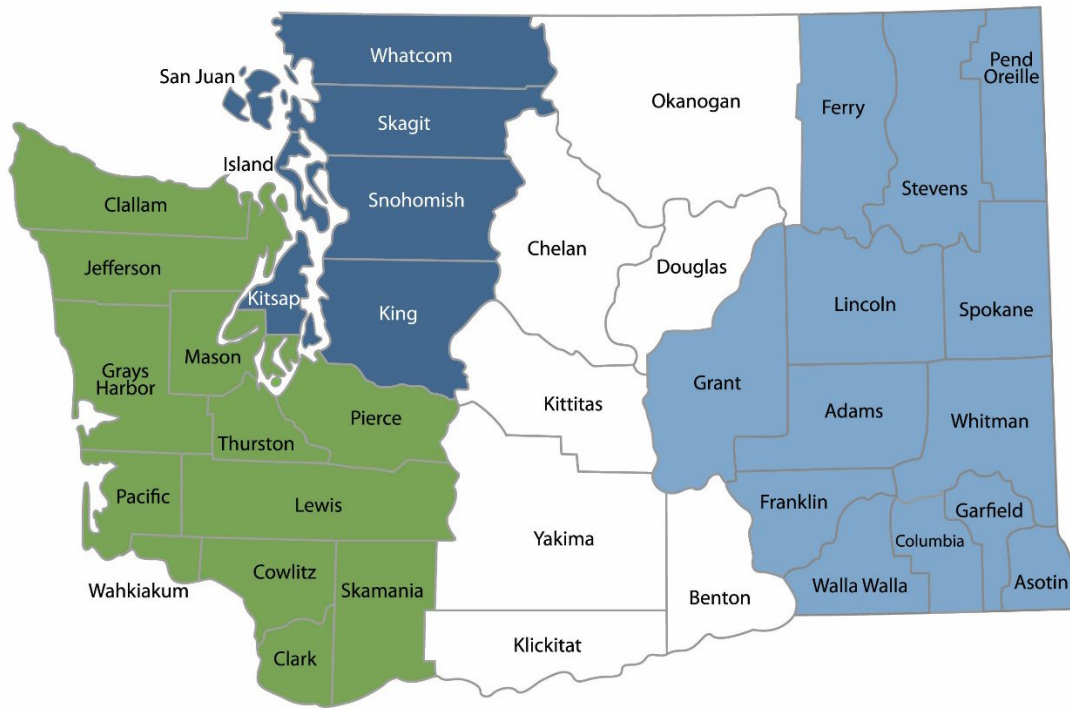
<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/6812>

<sup>2</sup> <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

<sup>3</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

# Department of Ecology's Regional Offices

## Map of Counties Served



**Southwest Region**  
360-407-6300

**Northwest Region**  
206-594-0000

**Central Region**  
509-575-2490

**Eastern Region**  
509-329-3400

Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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# Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Walla Walla City Shop cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the second periodic review conducted for this Site. Ecology completed the first periodic review in December 2016.

Cleanup activities at this Site were completed under Voluntary Cleanup Program (VCP) project number EA0222. Residual concentrations of petroleum hydrocarbons that exceeded MTCA cleanup levels remain on the property. The MTCA cleanup levels for soil and groundwater are established under [WAC 173-340-740](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740)<sup>4</sup> and [WAC 173-340-720](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720),<sup>5</sup> respectively.

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. [WAC 173-340-420\(2\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420(2))<sup>6</sup> requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because the department issued a no further action (NFA) opinion at the Site and institutional controls were required as part of the cleanup action.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

- a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site
- b) New scientific information for individual hazardous substances or mixtures present at the site
- c) New applicable state and federal laws for hazardous substances present at the site
- d) Current and projected site and resource uses
- e) The availability and practicability of more permanent remedies
- f) The availability of improved analytical techniques to evaluate compliance with cleanup levels

Ecology publishes a notice of all periodic reviews in the *Site Register* and provides an opportunity for public comment.

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<sup>4</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

<sup>5</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720>

<sup>6</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420>

# Summary of Site Conditions

## Site description and history

The Site is bounded by Rees Avenue to the south and railroad tracks to the north. The Site is currently occupied by Mountain Hi Truck and Equipment; a company that specializes in fuel transport and the trucking industry. The Site is in a predominantly commercial and industrial area of Walla Walla. Adjacent Site uses include Rees Way Auto Body shop northeast of the Site, an empty tank storage area to the north, Mountain Oil Company bulk fuel storage and Cardlock facility to the northwest, residential areas to the west and east, Farmers' Co-op grain storage to the southwest, and an auto salvage yard to the south.

Historical uses of the Site included residential use from 1902 to 1934, and a concrete pipe and block manufacturing company from 1934 to 1958. The City of Walla Walla purchased the Site in 1958, and the City street department operated at the property until 1986. Primary operations at the street department shop included vehicle maintenance, sign and street painting, and asphalt mixing. A maintenance and fabrication shop (known as the “metal building”) was constructed in 1970 and was used by the City for the building maintenance department until 1990. A & G Auto leased the building from the City from 1993 to 1994 and operated an automobile repair shop at that location.

Three underground storage tanks (USTs) used for diesel, gasoline, and waste oil were located at the Site. Asphaltic cement was stored in above-ground storage tanks (ASTs) on a concrete slab surrounded by a concrete block wall. These tanks were removed from the Site in 1994.

Reportedly, paints and wash water were disposed of in a drywell north of the former shop building until 1970 when the street painting operations were moved to another location. A wash-down area was west of the former shop building. Reportedly, equipment and vehicle washing occurred on a 20- by 95-foot concrete apron next to the building.

A vicinity map is in Appendix A, and a Site plan is in Appendix B.

## Site investigations

### 1994 tank removals

Three USTs were removed from the Site in November 1994. The tanks had been used for storage of leaded gasoline (5,400-gallon), diesel fuel (3,600-gallon), and waste oil (225-gallon). The gasoline and diesel USTs were west of the former shop building, and the waste oil UST was north of the building. No evidence of contamination was found from the gasoline or diesel USTs. However, there was evidence of a release from the waste oil tank.

Approximately 130 cubic yards of petroleum-contaminated soil (PCS) were removed from below the former waste oil UST location. One soil sample from the bottom of the excavation at 17 feet belowground surface (bgs) had a total petroleum hydrocarbon (TPH) concentration of 940 milligrams per kilogram (mg/kg), exceeding the 1991 MTCA Method A soil cleanup level of

200 mg/kg. The contaminated soil was disposed of at the New Waste Landfill in Pasco, Washington. PCS at 17 feet bgs and below the shop building remained in place.

## 1999 Phase II ESA and excavation

Phase II Environmental Site Assessment (ESA) activities began in January 1999 with the removal of the old concrete building slabs from the Site. Soil and groundwater samples were collected and analyzed during the Phase II. Test pits (TP-1 through TP-7) were excavated at several locations where subsurface contamination was suspected. Petroleum contamination was not detected in test pits TP-1 through TP-5 using field screening techniques such as visual indicators and a photoionization detector (PID).

TP-6 was excavated in the asphalt mix area and was excavated as trenches oriented north-south and east-west to estimate the areal extent of the visibly stained soil. Two soil samples collected at 1.5 feet and 3 feet bgs were analyzed for TPH. The sample at 1.5 feet bgs contained diesel-range petroleum hydrocarbons (DRPH) at a concentration of 1,400 mg/kg and heavy oil-range petroleum hydrocarbons (ORPH) at 830 mg/kg. At 3 feet bgs, concentrations decreased to less than 5.4 mg/kg DRPH and less than 11 mg/kg ORPH.

TP-7 was excavated below the northwest corner of the former shop building where the hoist and oil-water separator had been located, and near the former location of the waste oil UST. A small quantity of dark-stained soil was observed at approximately 6 feet bgs. TP-7 was excavated to 13.5 feet bgs, and samples were collected at 6, 10, and 13.5 feet bgs. All three samples were analyzed for TPH, and the sample with the highest PID reading was also analyzed for polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and metals. ORPH was detected at concentrations up to 300 mg/kg.

## Cleanup actions

Limited soil removal was conducted from below the location of the waste oil UST (from 17 feet to 25 feet bgs) and from the asphalt mixing area (from ground surface to approximately 3.5 feet bgs). Approximately 133 tons of soil were excavated from the former asphalt mixing area. Two confirmational soil samples were collected from the bottom of the excavation. DRPH and ORPH concentrations were <5.8 mg/kg and 18 mg/kg, respectively, from one sample; results for the other sample were non-detect.

Approximately 290 cubic yards of soil were excavated from the former waste oil tank location, north of the former shop building. The excavation was enlarged to the north in the vicinity of the former UST location. Clean fill was observed to a depth of 18 feet bgs, where dark-stained soil was encountered. The dark-stained soil appeared to spread outward at about 21 feet bgs. Groundwater was encountered at 24 feet. Additional soil was excavated until stained soil was no longer apparent in the south sidewall of the excavation. However, some pockets and layers of stained soil were observed in the excavation walls at about 21 feet bgs. A sample was collected at approximately 24 feet bgs at the north base of the excavation. Results indicated concentrations of 1,400 mg/kg DRPH and 5,600 mg/kg ORPH. Further soil excavation was not

feasible without compromising the structural integrity of the adjacent building. Ecology determined institutional controls would be sufficient to address the residual contaminated soil remaining onsite.

## Groundwater monitoring

Three groundwater monitoring wells were installed at the Site. Initial groundwater samples were collected in March, July, September, and December 1999 and analyzed for DRPH, ORPH, PCBs, VOCs, PAHs, and metals. Only chloroform concentrations exceeded cleanup levels, ranging from <1 to 9.2 micrograms per liter (µg/L). The MTCA Method B cleanup level for chloroform in groundwater is 7.17 µg/L. Groundwater sampling continued through June 2001, until chloroform concentrations in all wells were below the Method B cleanup level for four consecutive quarters.

## Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site.

[WAC 173-340-704](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704)<sup>7</sup> states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance. The 1991 MTCA Method A soil cleanup level for ORPH is 200 mg/kg, while the 2001 MTCA revision increased the Method A cleanup level to 2,000 mg/kg.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site. This is the standard point of compliance.

For groundwater, the point of compliance is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. This is the standard point of compliance.

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<sup>7</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>



## Environmental Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On June 27, 2011, institutional controls in the form of an [environmental covenant](#)<sup>8</sup> (Covenant) were recorded for the Site.

The Covenant recorded for the Site imposes the following limitations:

1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork.
2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.
4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
5. The Owner must restrict leases to uses and activities consistent with the Covenant and notify all lessees of the restrictions on the use of the Property.
6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.
7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.

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<sup>8</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/83113>

8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

## Periodic Review

### Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on August 9, 2023, there were no indications the integrity of the remedial action had been compromised. There was no evidence of undocumented Site excavation or disturbance activities, and no visual indications of disturbance of the Site surface. The Site continues to be occupied by a commercial trucking company, and is surrounded by a mix of commercial and industrial use properties. A photo log is in Appendix C.

### Direct contact

The cleanup actions were intended to eliminate exposure to contaminated soils at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by remedial excavation and by the presence of protective Site surfaces including asphalt, building foundations, and concrete. The cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time. The Site is also fenced and has restricted access, further reducing the possibility of public exposure to residual contamination.

### Protection of groundwater

Soils with ORPH concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. None of the petroleum constituents in soil were detected in groundwater at the Site. Chloroform was in groundwater at concentrations exceeding the MTCA Method B cleanup level but attenuated to below the cleanup level in all wells during monitoring from 1999 to 2001.

### Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2011. The Covenant remains active and discoverable through the Walla Walla County Auditor's Office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action will be protected.

## **New scientific information for individual hazardous substances or mixtures present at the Site**

There is no new relevant scientific information for the hazardous substances remaining at the Site.

## **New applicable state and federal laws for hazardous substances present at the Site**

The cleanup activities at the Site were governed by Chapter 173-340 WAC (1996 ed.). The 2001 update to MTCA provides that sites will not be subject to further cleanup actions due to amendments to cleanup levels unless the cleanup action is no longer protective of human health and the environment.

Cleanup levels changed for petroleum hydrocarbon compounds in the 2001 update, specifically the MTCA Method A soil ORPH cleanup level increased from 200 to 2,000 mg/kg. However, the cleanup actions remain protective.

## **Current and projected Site and resource uses**

The Site is used for commercial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

## **Availability and practicability of more permanent remedies**

The remedy implemented included containing hazardous substances, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

## **Availability of improved analytical techniques to evaluate compliance with cleanup levels**

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

## **Conclusions**

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the

long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.

- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site to ensure the integrity of the cap is maintained.

## **Next review**

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

## References

Ecology. Site visit. August 2023.

Ecology. *Periodic Review*. December 2016.

Ecology. “No Further Action Determination.” July 6, 2011.

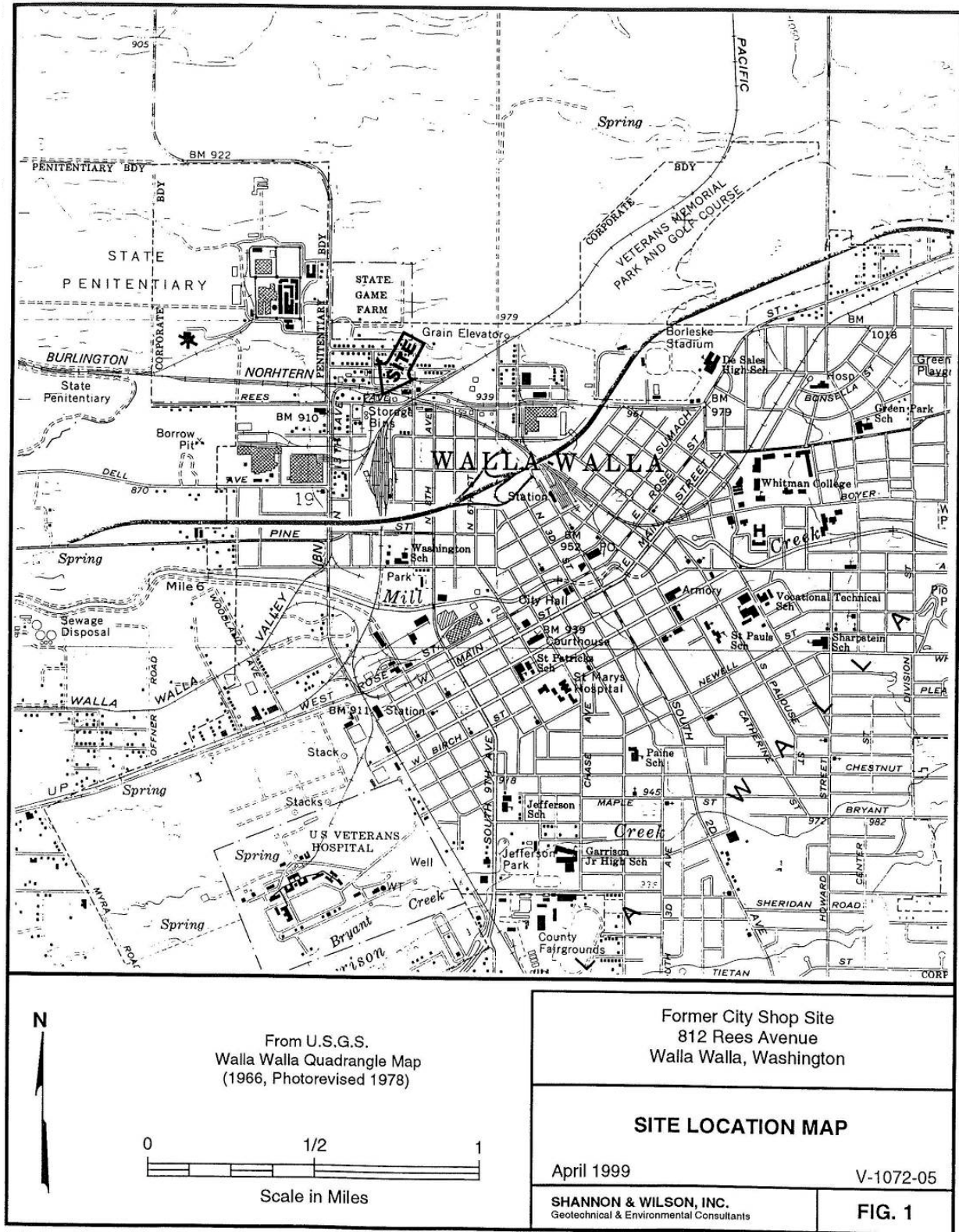
Ecology. *Environmental Covenant*. June 30, 2011.

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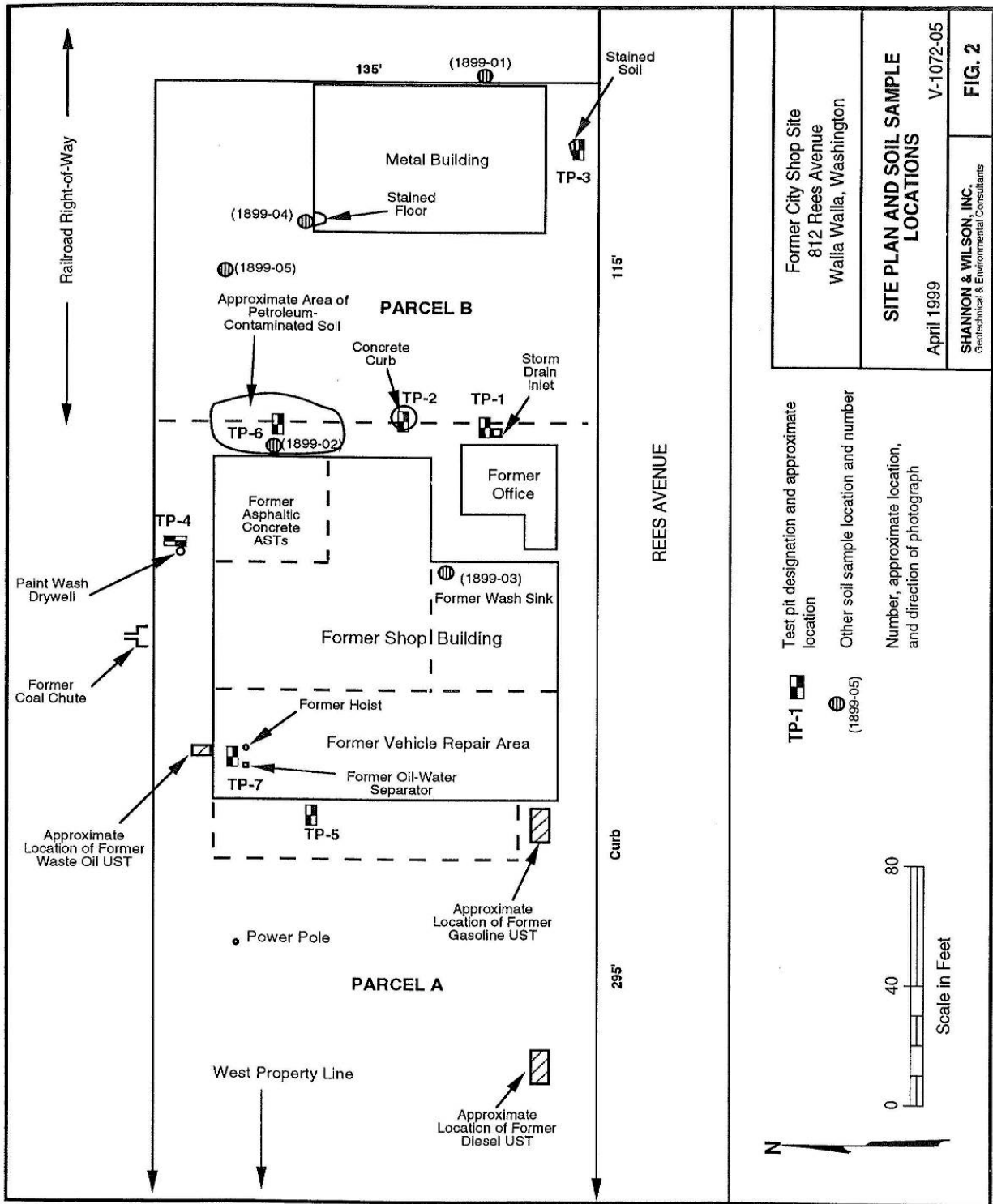
Shannon and Wilson, Inc. *Phase 2 Environmental Site Assessment*. April 1999.

# Appendix A. Vicinity Map





# Appendix B. Site Plan



## Appendix C. Photo Log

**Photo 1: Maintenance and fabrication shop (“metal building”) – from the east**



**Photo 2: Former asphalt mixing area (TP-6) – from the southwest**





**Photo 3: Former shop building/vehicle repair area – from the south**



**Photo 4: Full Site – from the west**

