STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Eastern Region Office
4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

November 21, 2023

Ben Kleban
Stillwater Holdings, LLC.
7 East Rose Street
Walla Walla, Washington 99362

Re: Comments on Proposed Cleanup of the following Site:

- **Site Name:** Stillwater Holdings Chevron
- **Site Address:** 7 East Rose Street, Walla Walla, WA
- **County Assessor's Parcel Number(s):** 360720574707
- **Facility Site ID number:** 70525886
- **Cleanup Site ID number:** 16913
- **UST ID number:** 005073

Dear Ben Kleban:

The Washington Department of Ecology (Ecology) Toxics Cleanup Program has reviewed Aspect Consulting's November 10, 2023, *Work Plan for Additional Subject Property Investigation – DRAFT (Work Plan)*. The stated objectives of the *Work Plan* are to 1) identify if a release occurred from the UST system; and 2) collect data to further characterize the nature and extent of hazardous substances in soil and groundwater at concentrations exceeding applicable cleanup levels on the Subject Property. [1] We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.[2]

Comments

Based on the initial investigation completed in October 2023 and historical investigations completed at the site, Ecology has the following comments:

- Based on the data collected and presented, Ecology has determined that a release of product has occurred at the Stillwater Holdings Chevron from the UST system

[1] Aspect Consulting, *Work Plan for Additional Subject Property Investigation – DRAFT,* November 10, 2023.
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

that has significantly impacted multiple parcels of property, including at least the Marcus Whitman Hotel and the property at 106 N 2nd Avenue. The full extent of impact has yet to be determined in any media (i.e., air, groundwater, soil)

- The proposed plan as presented is not likely to identify the release point(s) from the UST system. Fingerprint analysis and a helium leak test have been completed and verified the UNLEAD tank lines as the most likely source, but the exact location of the release has not been identified to date. Ecology requests that a service provider conduct a noninvasive interior tank inspection utilizing a camera scope of your entire UST system to determine the source(s) of the leak.
- Based on the age of the tanks, (single wall fiberglass USTs installed in November 1981) they may have exceeded the manufacturers life expectancy of 30 to 40 years.
- Soil and groundwater analytical results, as well as elevated PID readings identified contamination in soil and groundwater at all monitoring wells installed at the site in October 2023 indicating contamination is widespread and currently undefined.
- The highest PID reading at the site was identified at AMW-4 at approximately 10 to 12 feet (ft) below ground surface (bgs). Historical information identifies a hydraulic lift at this location associated with a former auto repair shop. Additional characterization is required in this area.
- Comments on Aspect Consulting's November 17, 2023 *VI Mitigation and Conceptual VI Assessment Plan* will be provided under separate cover.

Recommendations

- **Ecology's immediate concern is the integrity of the UST system and protecting human health and the environment**. Ecology strongly suggests removing the UNLEAD tank system to fully check for leaks and to allow for removal of contamination to applicable MTCA cleanup levels to the maximum extent practicable.
- In addition to the proposed boring locations, Ecology requires completing test pitting activities as soon as possible in the immediate areas of all tanks and lines, particularly by the UNLEAD line where the helium test results indicated a potential release point. This data will better inform source removal actions and allow for remediation to maximum extent practicable, reduce threats to human health and the environment, and help meet MTCA cleanup levels as soon as possible.
- During test pitting activities the UNLEAD line where the helium test indicated a release, should be removed, the line examined, and soil excavated to applicable MTCA cleanup levels to the maximum extent practicable.

- Identify the source(s) of the release and evaluate the integrity of the **entire UST** system by conducting a noninvasive interior tank inspection utilizing a camera scope.
- Continue to further investigate the full nature and extent of contamination at the Site in all potentially impacted media. Additional investigation is needed near AMW-4 to determine the source of contamination in this area, presumed to be located upgradient of the UST system.

The emergency response actions of the City of Walla Walla Fire Department, Department of Ecology's Spills Prevention, Preparedness, and Response Team (Spills) and Clean Harbors helped reduce the extent of a catastrophic release to historic downtown Walla Walla. Stillwater Holdings, LLC should take every measure to avoid the possibility of such release to happen again and work to remove contamination in the environment as expeditiously as possible to reduce any further impacts to the community.

Should you have any questions regarding this project, please contact the Site Manager Beth Kercher either by phone (509) 385-5443 or email at Beth.Kercher@ecy.wa.gov.

Sincerely,

Nicolas M. Acklam
Section Manager
ERO Toxics Cleanup Program

cc: Carla Brock, Aspect Consulting
Beth Kercher, Ecology
Ecology site file