



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

November 27, 2023

Doug Edler
Mobile Fleet Service
1210 Weikel Road
Yakima, WA 98908

Re: No Further Action Opinion for the Following Contaminated Site:

- **Site name:** Mobile Fleet Service
- **Site address:** 2003 East Viola Avenue, Yakima
- **Facility/Site ID:** 2126113
- **Cleanup Site ID:** 5274

Dear Doug Edler:

The Washington State Department of Ecology (Ecology) recently sampled your property as part of our Central Regional Office (CRO) Assessment Program. We are providing an opinion on the work that was done under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.¹

Site Description

The Mobile Fleet Service site (Site) is located at 2003 East Viola Avenue in Yakima. The Site is located on a 4.08-acre parcel. The Site has historically and is currently operated as a semi-truck sales and maintenance shop. The Site is developed with an approximately 21,450-square-foot garage, maintenance, sales and office building, and paved asphalt parking lot. A bulk fuel above-ground storage tank (AST) farm was historically located on the property, although it was removed prior to 2003.

Site History

In 1989, Hart Crowser Earth and Environmental Technologies (Hart Crowser) completed a property-wide environmental assessment to identify areas of environmental concern on the property.

¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

In July 1990, remedial excavation was used to address areas of surficial soil staining throughout the property that were identified during the 1989 site assessment. Remedial excavation was used to remove petroleum-contaminated soil around the concrete pad of the AST farm.

The most contaminated soil samples contained diesel Range Petroleum Hydrocarbon (DRPH) between 6,475 and 12,120 mg/kg. Although most soil contamination was less than 2 feet below ground surface (bgs), portions of the excavation were as deep as 12 feet bgs, and some soil with contaminant concentrations greater than MTCA Method A cleanup levels may have been left in place. Groundwater was observed at 11.5 feet bgs in the excavation; however, groundwater samples were not collected.

The excavated soil was stockpiled on site and later removed by Ken Leingang Excavating, Inc. and disposed of at Anderson Landfill in Yakima.

CRO Assessment

In September 2023, environmental samples were collected to confirm whether the 1990 cleanup was sufficient to meet the substantive requirements of MTCA. Because a building was constructed on top of the previous AST Farm area, we used groundwater data to determine if contamination above MTCA Method A cleanup levels was left at the Site. Boring locations were placed both cross-gradient and downgradient of the source of release.

BTEX were not detected above the Method Detection Limit. Gasoline range petroleum hydrocarbons (GRPH) were detected at concentrations <52 µg/L. However, GRPH were also detected in the trip blank. The MTCA Method A cleanup level of GRPH in groundwater when benzene is not present is 1,000 µg/L. Diesel and oil range petroleum hydrocarbons (DRPH and ORPH) were detected in one boring at 200 µg/L and 120 µg/L, respectively, less than the combined MTCA Method A cleanup level of 500 µg/L. However, ORPH were also detected in the trip blank. After a second sample analysis using a comparison method to help distinguish between diesel contamination in groundwater and products of diesel biodegradation, DRPH, and ORPH were not detected at concentrations greater than the laboratory Method Detection Limit.

Based on the results of this assessment, Ecology has determined that contamination greater than the MTCA Method A cleanup levels related to the historic release of petroleum products from the ASTs is not present in groundwater at the Site.

Opinion

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

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

- Hart Crowser Earth and Environmental Technologies (Hart Crowser). 1989. "Preliminary Environmental Assessment and Underground Storage Tank Removal, 2003 East Viola Avenue and 66 West Mead Avenue, Yakima, Washington." December 29, 1989.
- PLSA. 1990. "Letter to Mark Needham summarizing field activities". August 8, 1990.
- Ken Leingang Excavating, Inc (KLE). 2023. "Letter addressing 1989/1990 soil disposal." May 9, 2023.
- GeoEngineers, Inc. 2023. "Site Assessment Mobile Fleet Services 2003 East Viola Avenue Yakima, Washington". October 20, 2023.

You can request these documents by filing a records request.² 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 Ecology's Cleanup and Tank Search website.³

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

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

Limitations of the Opinion

1.) 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).⁴

² <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

³ <http://apps.ecology.wa.gov/cleanupsearch/site/5274>

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

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2.) Opinion does not constitute a determination of substantial equivalence.

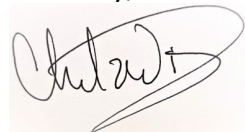
To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080⁵ and WAC 173-340-545.⁶

3.) 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).⁷

If you have any questions about this opinion, please contact me by phone at 509-571-4708 or email at Chelsea.Wisotzkey@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chelsea Wisotzkey', is written over a light pink rectangular background.

Chelsea Wisotzkey
Toxics Cleanup Program
Central Regional Office

⁵ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

⁶ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

⁷ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>