

October 29, 2019

Washington State Department of Ecology
Attn: Frank Winslow
1250 West Alder Street
Union Gap, Washington 98903-0009

**Re: VCP Project Number CE0422 – Request for No Further Action Site Designation
Pacific Pride Tanker Fire, State Highway 2 Milepost 116, Monitor, WA**

Dear Mr. Winslow,

In September 2014, Fulcrum Environmental Consulting, Inc. (Fulcrum) was retained by Whitley Fuel, LLC (Whitley) to conduct quarterly sampling of three (3) onsite monitoring wells located Highway 2, approximately one-half mile east of Monitor, Washington (site). The site is registered with the Washington State Department of Ecology (Ecology) as Facility/Site Number 357, Voluntary Cleanup Program (VCP) Project Number CEO422.

Background

The site is situated south of Highway 2 along the southern boundary of a Washington Department of Transportation Right-of-Way and northern boundary of a property owned by Washington State (Chelan County Parcel No. 231913625077). The southern property is currently known as the Wenatchee River County Park.

On July 24, 1991, a transporter tanker owned by Whitley Fuels Company of Okanogan, Washington, was involved in an accident, and released 10,000 gallons of gasoline along the south side of Highway 2. A resulting fire consumed an unknown amount of fuel.

In 1992, approximately 1,300 cubic yards of petroleum contaminated soil was removed under the supervision of DRT Environmental Consultants, Inc. (DRT). Two (2) soil samples collected along the edge of the highway were reported with gasoline concentrations above the Current Model Toxics Control Act (MTCA) Method A cleanup level. Contaminate soils located beneath the highway were not removed to avoid impacting the highway.

Three (3) groundwater monitoring wells were installed in 1994, to assess groundwater conditions. Wells were completed to the following depths:

- MW-01, Western Well: 8.31 feet below ground surface (bgs)
- MW-02, North-Central Well: 11.78 feet bgs
- MW-03, Eastern Well: 10.48 feet bgs

Since 1994, sampling had occurred on an about-annual schedule. However, MW-01 and MW-02 were “lost” during extensive flooding in 1996, and were not sampled. MW-03 remained accessible and continued to show elevated gasoline and benzene impact.

In 2016, Fulcrum located MW-01 and MW-02 through the utilization of metal-detecting equipment and was able to excavate the wells by hand.

Project Services

Fulcrum completed eight (8) quarters of groundwater monitoring starting in September of 2016, and concluding in June of 2018. Results document that site contaminants are below MTCA cleanup levels for all eight (8) quarters. See the attached June 2018 sampling report for a summary of groundwater sampling results. Documentation of the previous seven (7) sampling events should be in the project file with Ecology.

In August of 2019, Fulcrum conducted a limited soil investigation to evaluate whether gasoline impacted soils beneath the highway roadbed identified in 1992, were still present above applicable regulatory thresholds (please see the attached report). Fulcrum excavated a trench parallel to the roadbed as close as possible without risking impact to the road. Exposed soil was examined, and field screened for hydrocarbons with samples collected from representative soils and any locations exhibiting indications of hydrocarbon presence. Results of the investigation documented residual gasoline presence ranging from non-detect to a high of 841 ppm.

Request

Fulcrum is formally requesting a No Further Action determination for the site based on the following criteria:

Groundwater – The site has been shown to meet groundwater cleanup thresholds through eight (8) consecutive quarters of groundwater monitoring results.

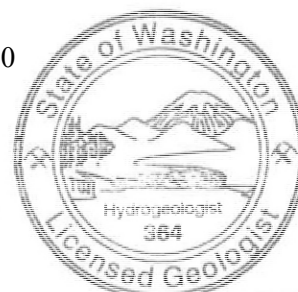
Soil – Fulcrum proposes that the site soils located beneath the roadbed are evidently protective of groundwater based on the results of quarterly groundwater monitoring, that they are protected from direct contact by presence of the overlying roadbed, and that they are below the Method B Direct Contact default TPH cleanup level of 1,500 mg/kg as established under Chapter 5: Additional Provisions for Addressing the Direct Contact Pathway and Vapor Intrusion Pathways as presented in Ecology’s *Model Remedies for Sites with Petroleum Contaminated Soils*, dated December 2017.

If you have any questions, feel free to contact me at 509.459.9220

Sincerely,



Travis Trent, LHG



Travis Lyle Trent