



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

December 6, 2023

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

Re: Comments on VI Mitigation and Conceptual VI Assessment for Stillwater Holding Chevron, Marcus Whitman Hotel and 106 2nd Avenue Walla Walla, Washington

Dear Ben Kleban:

The Washington Department of Ecology (Ecology) Toxics Cleanup Program has reviewed Aspect Consulting's November 17, 2023, *VI Mitigation and Conceptual VI Assessment Plan– DRAFT (Work Plan)*. The *Work Plan* has been prepared to present the general approach for VI mitigation in the Marcus Whitman Hotel (MWH) and 106 Building.¹ We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.²

Comments and Recommendations

While Ecology generally concurs with the preliminary *Work Plan*, Ecology is providing the additional comments and recommendation in addition to those provided by Farallon Consulting via email on November 21, 2023, and TRC on December 1, 2023. These comments and recommendations may be addressed as part of the vapor intrusion mitigation plan or the Site interim action plan.

- Identify preferential pathways into adjacent buildings.
 - During the initial spill response, product was reportedly recovered from storm drains north of the MWH across the street from the post office. Free product may have migrated beneath the MWH via abandoned sewer lines. The product subsurface entry point under MWH may be further north along 2nd Street than MW-2. Consider completing an outdoor soil

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>

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gas survey along 2nd Street and Rose Avenue to evaluate preferential pathways that product may have migrated.


- Identify piping entering the sump and trace the extent of these drains entering the sump.
- Recommend cleaning out the vault in the basement of the MWH to ensure that the idle 700-ft-deep cooling water extraction well installed in the 1920s is not located in this vault before abandonment.

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

Sincerely,



Elizabeth Kercher
LUST Site Manager
ERO Toxics Cleanup Program

cc: Carla Brock, Aspect Consulting
Christer Loftenius, Ecology 
Ecology Site file