



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Eastern Region Office

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

January 4, 2024

Corp Production SVC Inc  
Attn: Environmental Manager  
3005 Rocky Mountain Ave  
Loveland, CO 80538

**Re: No Further Action opinion for the following contaminated Site**

Site name: Puregro Othello  
Site address: 511 S Bruce Rd, Othello, WA 99344  
Facility/Site ID: 564  
Cleanup Site ID: 1731  
County Assessor's Parcel Numbers(s): 2630330120301

Dear Property Owner:

The Washington State Department of Ecology (Ecology) independently reviewed the [Puregro Othello facility \(Site\)](#)<sup>1</sup>. This letter provides our opinion. We are providing this opinion under the authority of the [Model Toxics Control Act \(MTCA\)](#)<sup>2</sup>, [Revised Code of Washington \(RCW\) Chapter 70A.305](#)<sup>3</sup>.

## Opinion

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

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter [173-340](#) WAC<sup>4</sup> (collectively called "MTCA").

---

<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/1731>

<sup>2</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

<sup>3</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

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

It is presumed that if you meet the cleanup standards under MTCA, the Site will be protective of human health and the environment for current and future property use.

## Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Fertilizer and chemical rinsate into the soil

**Enclosure A** includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, Ecology has no information that the parcel(s) associated with this Site are affected by other sites.

## Basis for the Opinion

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

- Puregro Othello Site Hazard Assessment, Science Applications International Corporation, June 28, 1991

The [Puregro Othello Site Hazard Assessment](#)<sup>5</sup> can be found at the Ecology Site website. You can request these documents by filing a [records request](#).<sup>6</sup> For help making a request, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040.

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

## Reassessment of Site Hazard Assessment Samples

In May 1991, a total of fourteen soil samples were collected at the Site at six locations with two duplicates. Sampling depths ranged from 0.5 to 5.0 feet below ground surface. Several pesticide compounds were found in some of the soil samples, including aldrin, beta-BHC, lindane, delta-BHC, 4,4-DDT, 4,4-DDD, 4,4-DDE, dieldrin, and heptachlor. No herbicides were detected in any samples. Pesticides were detected at seven of the twelve sampling locations. Greatest pesticide contamination was detected in the shallow and deep soils on the north side of the tank farm (SL-002-00X).

---

<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/127652>

<sup>6</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

The shallow soil sample obtained from the tank farm between tanks (SL-001-001) showed the presence of 4,4-DDE and dieldrin. In each of sample's SL-004-001, SL-004-002, and SL-005-001, only one compound was detected (lindane, beta-BHC, and delta-BHC, respectively). Heptachlor was detected in sample No. SL-006-002.

All at pesticides concentrations were lower than the MTCA Method B Soil cleanup levels (CUL). Nitrate and total Kjeldahl nitrogen (TKN) levels were detected in all samples, but at concentrations below applicable CULs. The table below shows the sampling values and their corresponding CULs. See Figure 2 for sample location information.

Compound (mg/kg) dry	Method B CUL	SL-001-001	SL-001-002	SL-002-001	SL-002-002	SL-003-001	SL-003-002	SL-004-001	SL-004-002
4,4-DDD	4.2				0.0028				
4,4-DDE	2.9	0.0032		0.0069	0.016				
4,4-DDT	2.9				0.011				
Aldrin	0.059			0.0034					
Beta-BHC	0.56								0.0034
Delta-BHC									
Dieldrin	0.063	0.0032			0.0084				
Heptachlor	0.22								
Lindane	0.91			0.0061				0.0039	
Nitrate	130000	0.12	0.099	0.23	0.5	0.0061	0.3	0.0048	0.011
TKN		3.2	2.7	5.7	5.1	1.3	0.77	1.7	0.55

Compound (mg/kg) dry	Method B CUL	SL-005-001	SL-005-002	SL-006-001	SL-006-002	SL-007-001	SL-007-002
4,4-DDD	4.2						
4,4-DDE	2.9					0.0052	
4,4-DDT	2.9						
Aldrin	0.059						
Beta-BHC	0.56						
Delta-BHC		0.022					
Dieldrin	0.063					0.0038	
Heptachlor	0.22				0.0053		
Lindane	0.91						
Nitrate	130000	0.0075	0.2	0.0036	0.045	0.14	0.26
TKN		2.6	1.5	4.3	1.2	4.4	2.5

Since all the sample concentrations were lower than the MTCA Method B Soil CULs, Ecology has concluded that no future action is necessary to clean up contamination at the Site.

## Establishment of cleanup standards

Ecology has determined the following CUL for the Site meet the substantive requirements of MTCA. These levels are based on the standard Method B Soil CUL for unrestricted land use. The Method B CUL are as follows:

Compound (mg/kg) dry	Method B CUL
4,4-DDD	4.2
4,4-DDE	2.9
4,4-DDT	2.9
Aldrin	0.059
Beta-BHC	0.56
Dieldrin	0.063
Heptachlor	0.22
Lindane	0.91
Nitrate	130000

## Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from the Hazardous Sites List.

## Limitations of the Opinion

### 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](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040)(4).<sup>7</sup>

---

<sup>7</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

### **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.305.080](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080)<sup>8</sup> and WAC [173-340-545](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545).<sup>9</sup>

### **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](https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170)(6).<sup>10</sup>

### **Questions**

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of contaminated sites, please call me at (509) 723-5399 or [Kailey.Schrum@ecy.wa.gov](mailto:Kailey.Schrum@ecy.wa.gov).

Sincerely,



Kailey Schrum, P.E.

Site Manager

Toxic Cleanup Program, Eastern Regional Office

Enclosures (1): A – Site Description, History, and Diagrams

---

<sup>8</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>9</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>10</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

## Enclosure A

---

### Site Description and History

The PureGro Company is a distributor of agricultural chemicals, with several locations throughout eastern Washington. The PureGro Othello Site is located at Bruce, Washington, near the intersection of the Burlington-Northern tracks with Lee Road, in the NE/4, NE/4, Section 33, T16N, R30E, W.M. in Adams County, Washington (Figure 1). The address is 511 S Bruce Rd, Othello, Washington 99344. The facility lies on a nearly rectangular property along the railroad track and includes a shop/office/chemical storage building, dry fertilizer storage, several tanks, a rinse pad, and holding pond (Figure 2).

Spills reported at this Site include an unknown quantity of chemical rinsate (herbicides, 2,4-D, eptam) in 1983 and 1984; an unknown amount of phosphate in 1984; approximately 1,000 gallons of ammonium poly phosphate fertilizer in 1990; and other spills described below. In the winter of 1984, a green acid (phosphate) tank broke, releasing an unknown volume of liquid. The soil was spread and the liquid was pumped up. No soil was removed from the Site. In 1989, about 750 gallons of urea solution were spilled. Following the spill, PureGro drilled to hard pan and found contamination below that level. Deeper drilling revealed that contamination is still in place.

In December 1990, a valve problem allowed approximately 1,000 gallons of ammonium poly phosphate fertilizer to flow south and west of the aboveground tank, along the railroad siding to a depression where it pooled on the frozen ground. The company had retrieved about 600 gallons at the time it notified Ecology. The product that was pumped up was placed in a separate tank. An area approximately 10 yards wide by 150 yards long was reportedly contaminated. When an Ecology inspector visited the site in March 1991, there were no visible signs of contamination related to the spill. Some quartz sand was noted spread on the ground near the trees along the back fence. Elemental sulfur was noted in the area.

## Site Diagrams

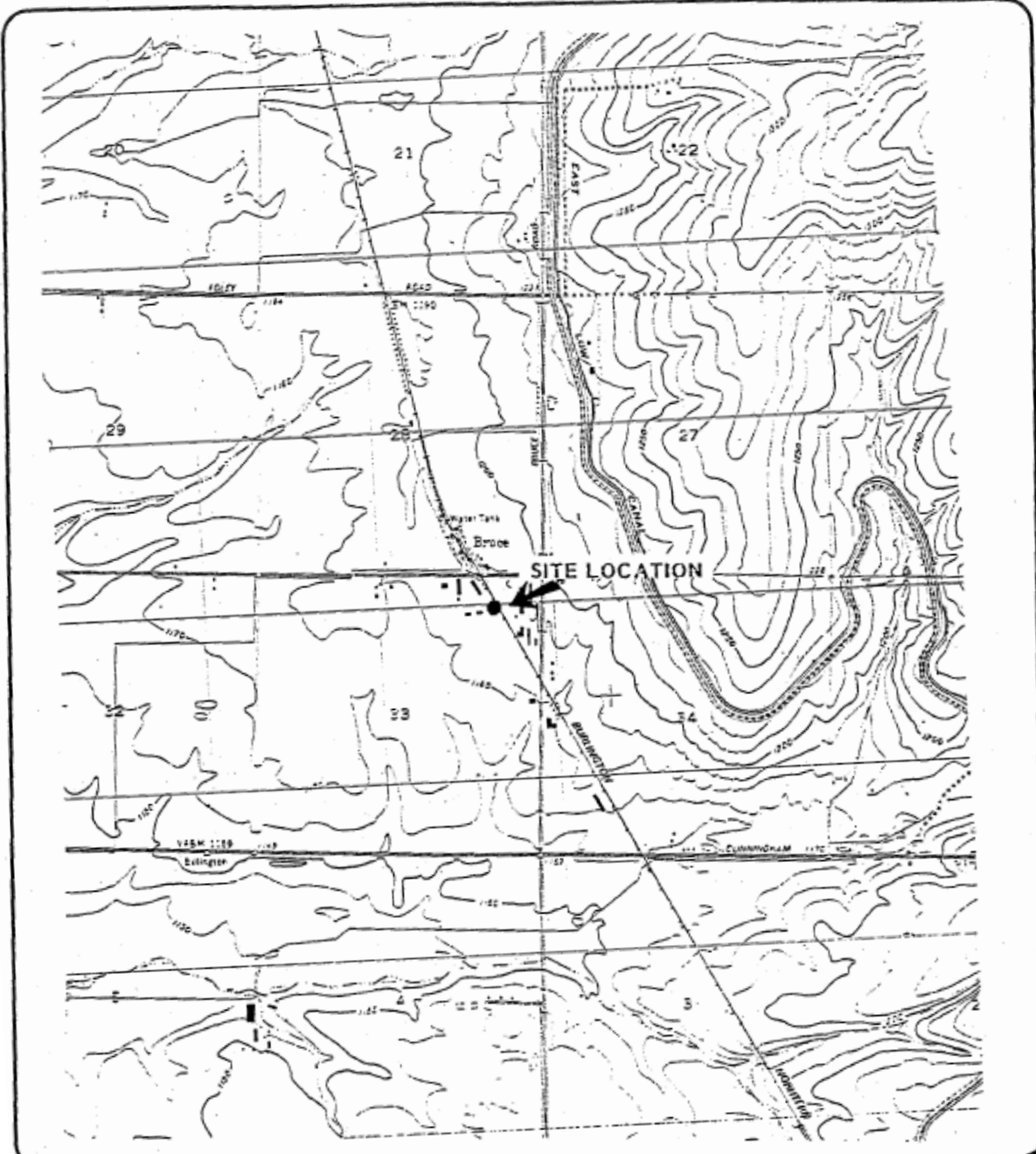


Figure 1

PUREGRO OTHELLO SITE LOCATION  
BRUCE, WA 7 1/2 MIN. QUADRANGLE

