



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

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

January 4, 2024

Connell Oil Inc
PO Box 3998,
Pasco, WA 99302

Re: No Further Action opinion for the following contaminated Site

Site name: Puregro Ritzville
Site address: 1302 W 1st Ave, Ritzville, WA 99169
Facility/Site ID: 565
Cleanup Site ID: 1599
County Assessor's Parcel Number(s): 1935230672414

Dear Property Owner:

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

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](#) WAC⁴ (collectively called "MTCA").

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.

¹ <https://apps.ecology.wa.gov/cleanupsearch/site/1599>

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

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

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

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 Ritzville Site Hazard Assessment, Science Applications International Corporation, June 28, 1991

The [Puregro Ritzville Site Hazard Assessment](#)⁵ can be found at the Ecology Site website. You can request these documents by filing a [records request](#).⁶ For help making a request, contact the Public Records Officer at 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 sixteen soil samples were collected at the Site at seven locations with two duplicates. Sampling depths ranged from 0.5 to 3.0 feet below ground surface. Several pesticides were detected in the soil samples, including aldrin, beta- and delta-BHC, chlordane, 4, 4-DDT, 4, 4-DDE, dieldrin, and endosulfan-II. The herbicides 2,4-D and dicamba were also detected in soil samples; however, all pesticides and herbicides concentrations were lower than the MTCA Method B Soil cleanup levels (CUL). Nitrate and TKN levels were detected in all samples, but at concentrations below applicable CULs. The table below shows the sampling values and their corresponding Method B CUL.

⁵ <https://apps.ecology.wa.gov/cleanupsearch/document/127659>

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

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
2,4-D	800	0.92							
4,4-DDE	2.9	0.035	0.032	0.023	0.016	0.0045			
4,4-DDT	2.9	0.026	0.014			0.0079			
Aldrin	0.059								
Beta-BHC	0.56			0.016					
Chlordane	2.9	0.092	0.036						
Delta-BHC					0.005	0.0084			
Dicamba	2400		0.04						
Dieldrin	0.063	0.0076		0.024	0.013				
Endosulfan II		0.011	0.0038	0.0059					
Nitrate	130000	0.28	0.32	0.11	0.083	0.063	0.12	0.16	0.01
TKN		4	4	1.1	2.4	1.6	2	1.3	1.5

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	SL-008-001	SL-008-002
2,4-D	800								
4,4-DDE	2.9								
4,4-DDT	2.9		0.016			0.021	0.011		
Aldrin	0.059					0.0029			
Beta-BHC	0.56								
Chlordane	2.9								
Delta-BHC									
Dicamba	2400		0.024					0.11	
Dieldrin	0.063								
Endosulfan II									
Nitrate	130000	0.00024	0.00092	0.36	0.45	0.34	0.29	0.3	0.1
TKN		2	1.5	2.5	2.6	1.7	1.3	1.7	1.3

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
2,4-D	800
4,4-DDE	2.9
4,4-DDT	2.9
Aldrin	0.059
Beta-BHC	0.56
Chlordane	2.9
Dicamba	2400
Dieldrin	0.063
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](#)(4).⁷

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](#)⁸ and WAC [173-340-545](#).⁹

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

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

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

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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\(6\)](#).¹⁰

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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kailey Schrum".

Kailey Schrum, P.E.

Site Manager

Toxic Cleanup Program, Eastern Regional Office

Enclosures (1):

A – Site Description, History, and Diagrams

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

Enclosure A

Site Description and History

The PureGro Company was a distributor of agricultural chemicals, with several locations throughout eastern Washington. The PureGro Ritzville Site is located southwest of the town of Ritzville, in the SE1/4, SE1/4, Section 22, T19N, R35E, W.M. in Adams County, Washington (Figure 1). The address is 1302 W 1st Ave, Ritzville, WA 99169. The facility lies between the Burlington-Northern tracks and the main road into Ritzville from the highway. The facility includes an office building, garage, spill cleaning shack, a set of six chemical storage tanks, and a rinse pad (Figure 2). The parking area and downslope area east of the tank pad is graveled.

Spills reported at this site include an unknown quantity of fertilizer and chemical rinsate (containing Aqua and herbicides) from 1960 to 1984. In August 1990, some minor surface staining, white in color, was found near the rinse pad. Below the pad to the east about 60 feet, a light green and white powder was found staining an old, abandoned asphalt road and low lying areas in a field. Some weeds were growing in the field. Many of the low-lying areas are barren of weeds or other plants.

Prior to 1984, rinsate was spread on the bare ground. A new rinse pad was poured in April 1984, with a concrete rinsate evaporation tank. At the time the new pad was poured, some of the contaminated soil was removed and spread on the ground next to the new pad. A new concrete tank pad was also poured in June 1990.

Site Diagrams

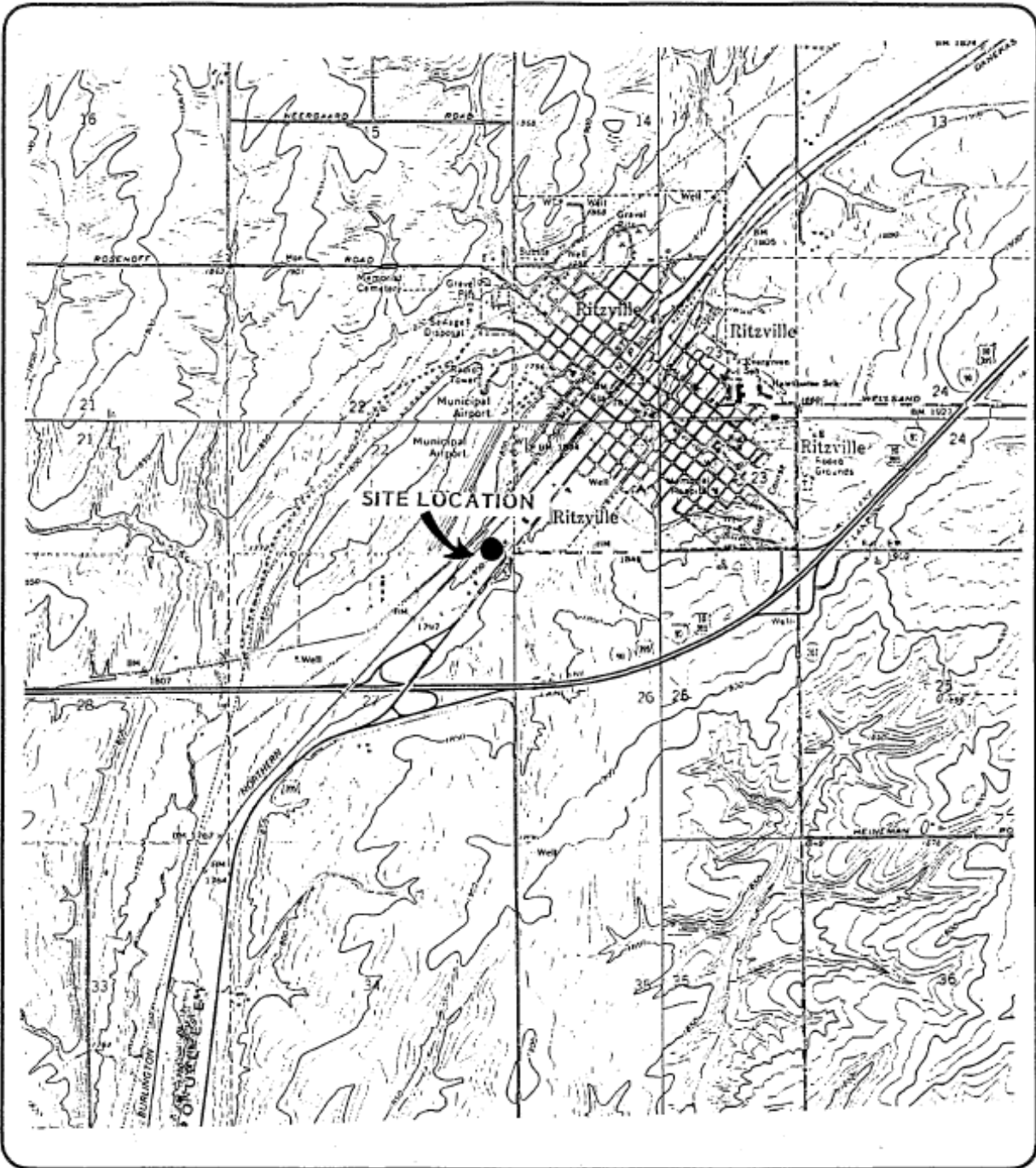


Figure 1
PUREGRO RITZVILLE SITE LOCATION
RITZVILLE NE & NW 7 1/2 MIN QUADRANGLES

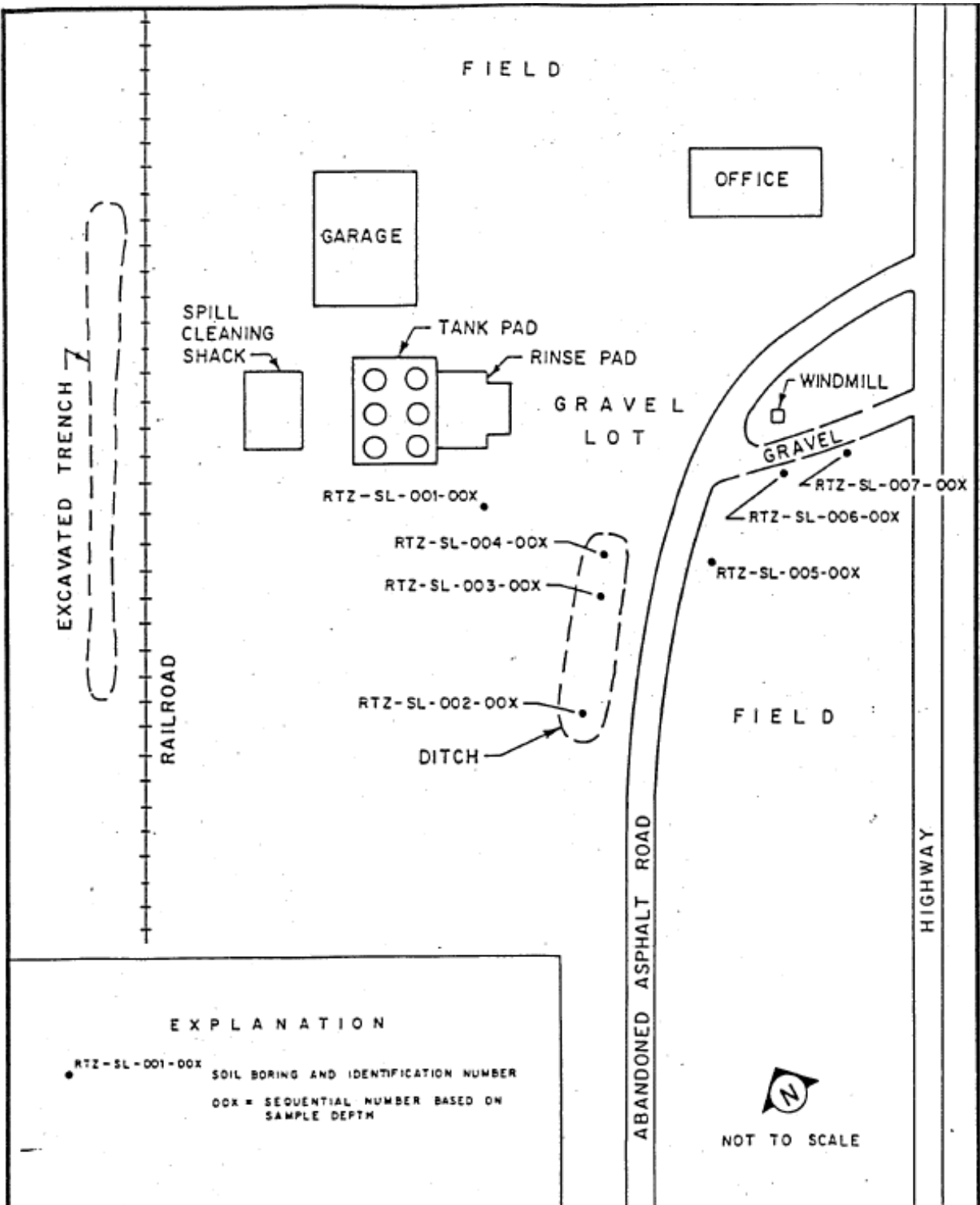


Figure 2

SOIL SAMPLING LOCATIONS, PUREGRO RITZVILLE SITE