Periodic Review
Walla Walla Vineyard Inn

325 E Main Street, Walla Walla, Walla Walla County
Facility Site ID: 9675092, Cleanup Site ID: 5500

Toxics Cleanup Program, Eastern Region

Washington State Department of Ecology
Spokane, Washington

December 2023

Document Information

This document is available on the Department of Ecology's Walla Walla Vineyard Inn cleanup site page.[1]

Related Information

- Facility Site ID: 9675092
- Cleanup Site ID: 5500

Contact Information

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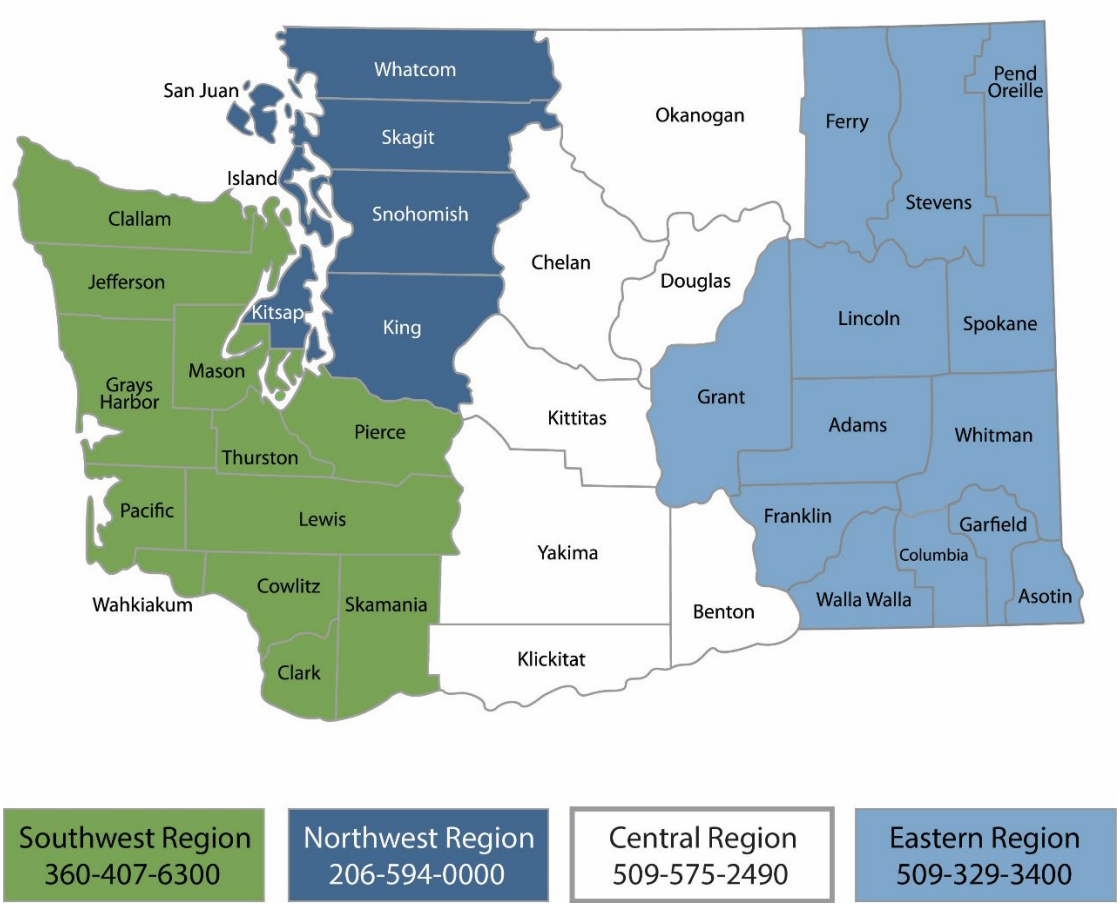
[1] https://apps.ecology.wa.gov/cleanupsearch/site/5500
[2] https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup
[3] https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Walla Walla Vineyard Inn cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the first periodic review conducted for this Site.

Cleanup activities at this Site were completed under Voluntary Cleanup Program (VCP) project number EA0257. Residual concentrations of gasoline-range petroleum hydrocarbons (GRPH) that exceeded MTCA cleanup levels remain on the property. The MTCA cleanup levels for soil and groundwater are established under WAC 173-340-740[4] and WAC 173-340-720,[5] respectively.

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. WAC 173-340-420(2)[6] requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because Ecology issued a no further action (NFA) opinion at the Site and institutional controls were required as part of the cleanup action.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site

b) New scientific information for individual hazardous substances or mixtures present at the site

c) New applicable state and federal laws for hazardous substances present at the site

d) Current and projected site and resource uses

e) The availability and practicability of more permanent remedies

f) The availability of improved analytical techniques to evaluate compliance with cleanup levels

Ecology publishes a notice of all periodic reviews in the *Site Register* and provides an opportunity for public comment.

[4] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740
[5] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720
[6] https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420

Summary of Site Conditions

Site description and history

The Site is in downtown Walla Walla and is comprised of Walla Walla County parcels 36-07-20-57-0301, 36-07-20-57-0303, 36-07-20-57-0366, and 36-07-20-57-1805. The Site was developed with 11 single-family residences in approximately 1890, which were used through approximately 1969. An automobile service and retail fuel station also occupied the eastern portion of the Site from 1950 to 1969.

In 1969, the Site was developed into the Royal Motor Inn with apartment units constructed on the northern portion. These apartments were demolished in the 1970s to construct additional hotel parking. Current Site development includes the Finch, a two-story hotel with 80 rooms in five separate buildings, an in-ground pool, paved parking lot, and landscaped areas. An alley bisects the property from east to west connecting Tukanon and Palouse streets and accesses onsite parking on the east side of Building B. Surrounding properties are commercial and residential.

A vicinity map is in Appendix A, and a Site plan is in Appendix B.

Site investigations

A Phase I Environmental Site Assessment (ESA) conducted in February 2007 identified the former automobile station on the eastern portion of the Site where the current hotel lobby is located.

In February 2007, a Phase II ESA was conducted consisting of a geophysical survey and subsurface investigation. Two geophysical anomalies were detected under the northeastern portion of the Site, and three underground storage tanks (USTs) were identified east of the hotel building along East Main Street. Two 500-gallon and one 550-gallon gasoline USTs were located, which had been decommissioned in place by filling with sand. Two of the USTs were observed with corrosion holes.

Five direct-push soil borings were installed to 15 feet below ground surface (bgs) to investigate potential impacts from the decommissioned USTs. Soil and groundwater samples were collected from each boring and analyzed for gasoline-range petroleum hydrocarbons (GRPH), volatile organic compounds (VOCs), and lead. GRPH were detected in two soil samples at approximately 14 feet bgs at a concentration of 140 milligrams per kilogram (mg/kg), exceeding the MTCA Method A cleanup level of 100 mg/kg. GRPH were also detected in groundwater at a concentration of 2,600 micrograms per liter (µg/L), exceeding the MTCA Method A cleanup level of 1,000 µg/L. All other results were below cleanup levels.

Cleanup actions

In April 2007, the three USTs and approximately three tons of soil were excavated and transported offsite for disposal. Eight confirmation soil samples were collected from the excavation and analyzed for GRPH, VOCs, and lead, with all results below cleanup levels. The excavation was backfilled with clean material.

Four soil borings/groundwater monitoring wells were installed from May to August 2007 (MW-1 through MW-4) and two additional wells were installed in November 2008 (MW-5 and MW-6). One soil sample result from boring MW-1 (at approximately 15.5 feet bgs) exceeded the GRPH cleanup level at 190 mg/kg.

Further soil excavation was not feasible due to the proximity to the hotel building. Since the USTs and most of the contaminated soil were removed, Ecology determined the residual contaminated material could stay in place as long as the Site remained capped with hardscape, groundwater monitoring results indicated no impacts to groundwater, and institutional controls were implemented.

Groundwater monitoring

Groundwater samples were collected following well installation in 2007 and 2008 and analyzed for GRPH, VOCs, and lead. Samples from MW-1 and MW-4 exceeded the GRPH cleanup level in May and August 2007, respectively. Sampling was conducted quarterly beginning in January 2009, and all results were below cleanup levels for all four monitoring events. Ecology determined further groundwater monitoring was not necessary and the residual soil contamination did not impact groundwater quality.

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site. WAC 173-340-704[7] states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

Ecology determined MTCA Method A cleanup levels for unrestricted land use were appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be

[7] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704

routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site (standard point of compliance).

For groundwater, the point of compliance is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by the Site. This is the standard point of compliance.

Environmental Covenant

Ecology determined institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On September 10, 2014, institutional controls in the form of an environmental covenant[8] (Covenant) were recorded for the Site.

The Covenant recorded for the Site imposes the following limitations:

1. Interference with Remedial Action. The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of that remedial action without prior written approval from Ecology.
2. Protection of Human Health and the Environment. The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.
3. Continued Compliance Required. Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance and monitoring of remedial actions and continued compliance with this Covenant.
4. Leases. Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.
5. Amendment to the Covenant. Grantor must notify and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property in a manner that is inconsistent with this Covenant. Before approving any proposal, Ecology must issue a public notice and provide an opportunity for the public to comment on the

[8] https://apps.ecology.wa.gov/cleanupsearch/document/83106

proposal. If Ecology approves the proposal, the Covenant will be amended to reflect the change.

6. Containment of Soil/Waste Materials. The remedial action at the Property is based on containing contaminated soil under a cap consisting of over five feet of clean soil overlain by hardscape (asphalt, concrete and building structure). The location of the cap is depicted on Exhibit B. The improvements situated on the Property are depicted on Exhibit C. The primary purpose of this cap is to prevent direct contact to residual impacted media and to prevent infiltration and mobilization of contaminated soil. As such, the following restrictions shall apply within the area illustrated in Exhibit B. The maintenance of the cap and management/handling requirements of residual impacted media (soil and shallow ground water) are outlined in the Contaminated Media Management Plan. Any activity on the Property that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology, The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs. The Grantor covenants and agrees that it shall annually, or at another time as approved in writing by Ecology, inspect the cap and report within thirty (30) days of the inspection the condition of the cap and any changes to the cap that would impair its performance.

Periodic Review

Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on August 9, 2023, Ecology observed the Site use was protective of the cleanup actions and consistent with the limitations of the Covenant. The Site is operating as a two-story hotel and parking lot. A photo log is in Appendix C.

Direct contact

The cleanup actions were intended to eliminate exposure to contaminated soil at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by an engineered asphalt and concrete cap covering the residual contaminated soil near the hotel lobby. The cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time.

Protection of groundwater

Soils with GRPH at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed. Groundwater monitoring conducted quarterly between 2009–2010 demonstrated residual GRPH concentrations in soil did not impact groundwater quality. No further groundwater monitoring is required.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2014. The Covenant remains active and discoverable through the Walla Walla County Auditor's Office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action will be protected. As required in the Covenant, EVREN Northwest has conducted cap inspections and submitted an inspection report with photographs to Ecology on an annual basis.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected Site and resource uses

The Site is used for commercial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included containing hazardous substances, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site to ensure the integrity of the cleanup action and surface cap are maintained.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

References

Ecology. Site Visit. April 12, 2023.

Ecology. “No Further Action, Walla Walla Vineyard Inn.” September 17, 2014.

EVREN Northwest. *Contaminated Media Management Plan*. June 17, 2014.

EVREN Northwest. Independent Cleanup Report, Walla Walla Vineyard Inn. April 1, 2010.

EVREN Northwest. Groundwater Monitoring Report, Fourth Quarter 2009. December 22, 2009.

EVREN Northwest. Monitoring Well Installation and Groundwater Monitoring Report. September 4, 2007.

Blue Mountain Environmental. Groundwater Monitoring Well Installation and Sampling Report. May 31, 2007.

Blue Mountain Environmental. USTs Site Closure, Former Howard Johnson Inn. April 25, 2007.

EVREN Northwest. “Technical Memorandum, Underground Storage Tank Removal, Former Howard Johnson Inn.” April 16, 2007.

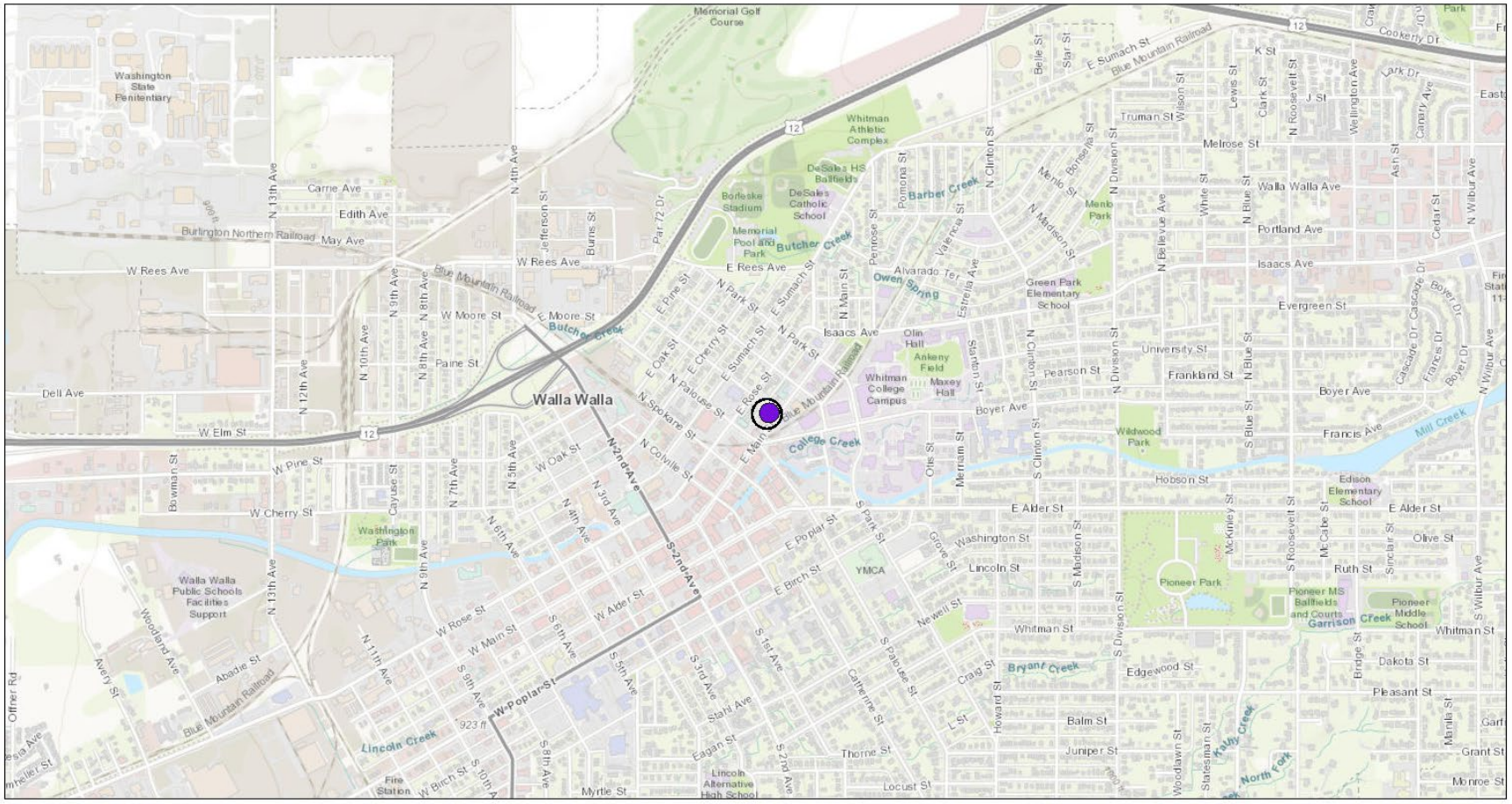
EVREN Northwest. Phase II Environmental Site Assessment, Former Howard Johnson Inn. February 16, 2007.

EVREN Northwest. Phase I Environmental Site Assessment, Former Howard Johnson Inn. January 15, 2007.

Environmental Associates, Inc. Phase II Environmental Investigation, Pony Soldier Motor Inn. March 21, 1997.

Environmental Associates, Inc. Phase I Environmental Audit, Pony Soldier Motor Inn. February 10, 1997.

Appendix A. Vicinity Map



December 26, 2023

1:18,056

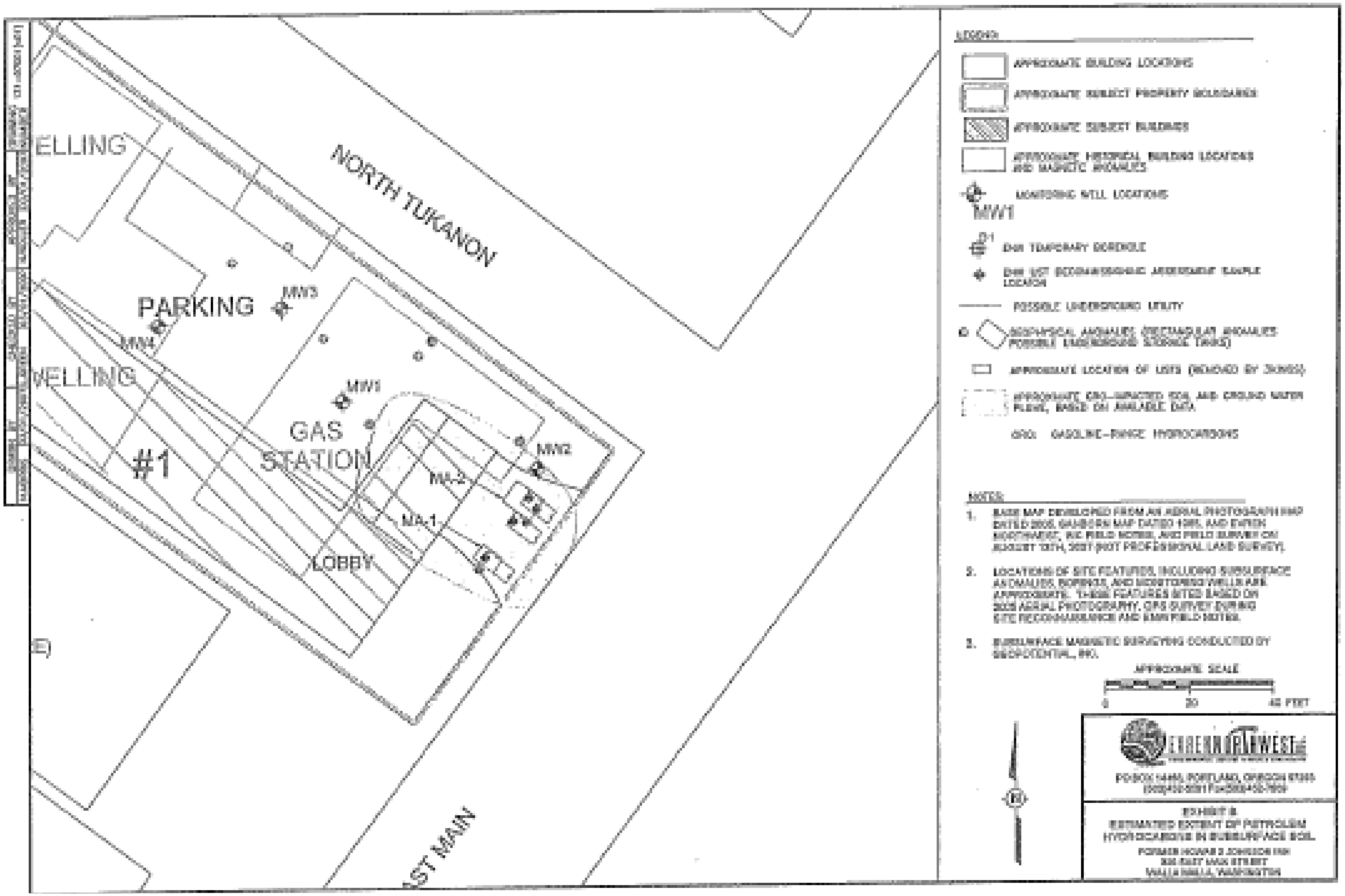
0 0.1 0.2 0.4 mi

0 0.15 0.3 0.6 km

N

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Appendix B. Site Plan


NORTH TUKANON
ELLING
PARKING
MW3
MW4
WELLING
#1
GAS
STATION
MW1
MW2
MA-2
MA-1
LOBBY
AST MAIN
APPROXIMATE BUILDING LOCATIONS
MONITORING WELL LOCATIONS
MW1
POSSIBLE UNDERGROUND UTILITY
GRO: GASOLINE-RANGE HYDROCARBONS
APPROXIMATE SCALE
0
20
40 FEET
ESTIMATED EXTENT OF PETROLEUM
HYDROCARBONS IN SUBSURFACE SOIL

Appendix C. Photo Log

Photo 1: Hotel lobby/former UST excavation area, from the east

Photo 2: Hotel lobby area with asphalt, concrete, and landscaped cap, from the northwest

Photo 3: Gravel courtyard between buildings B and C, from the northeast

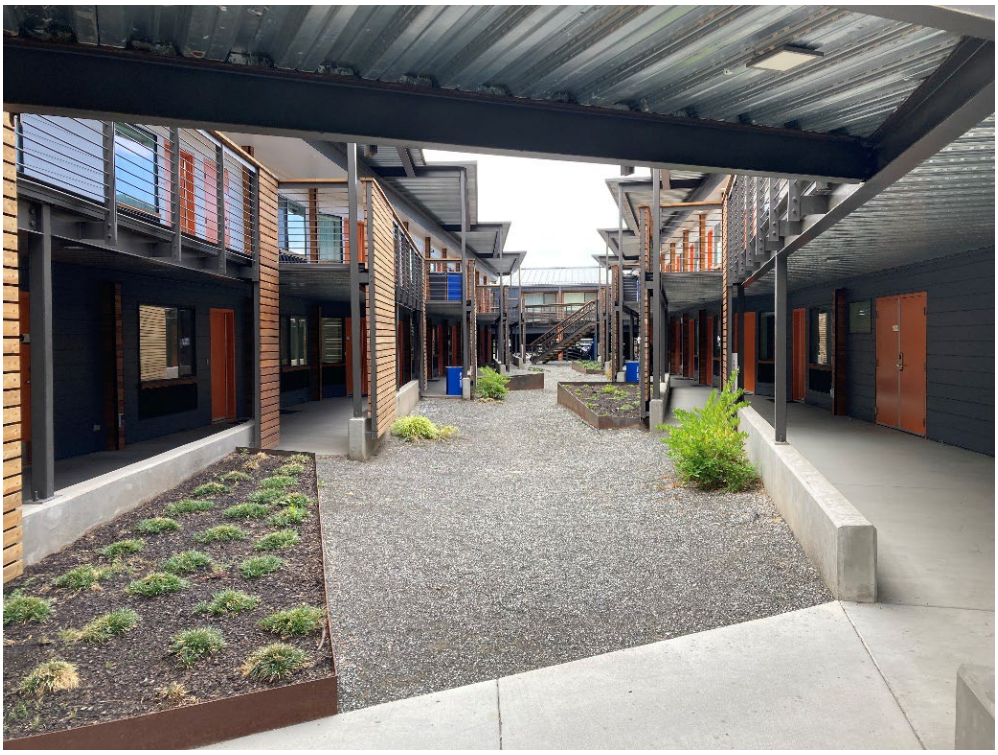


Photo 4: Hotel entrance and patio area, from the southeast