



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

February 12, 2024

Sent via email and hard copy

Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

Re: Ecology Comments on Preliminary Version of the Draft Cleanup Action Plan for the Following Site:

- **Site Name:** Coleman Oil Yakima Bulk Plant
- **Site Address:** 1 E. 1st Street, Yakima
- **Facility/Site ID:** 4233
- **Cleanup Site ID:** 13200
- **Agreed Order No.:** DE 15639

Dear Jim Cach:

Thank you for the submittal of the preliminary version of the draft cleanup action plan (DCAP). This deliverable is required under Agreed Order DE 15639. Below are the Department of Ecology's (Ecology) comments on the DCAP. Please review and respond to these comments.

Comments

- Comment 1. **Title page:** I changed the title to state that the Department of Ecology will issue the final Cleanup Action Plan. This is a document whose final version is issued by Ecology though often the initial draft is prepared by the Potentially Liable Person's consultant.
- Comment 2. **Executive Summary:** In the first paragraph under the subheading, Background, page v, the referenced figure should be Figure 4 instead of Figure 2.
- Comment 3. **Executive Summary:** In the second paragraph under the subheading, Cleanup Action Overview, page v, the text refers to supplemental cleanup technologies.



Supplemental cleanup technologies were not evaluated as components of the remedy alternative proposed in the Feasibility Study (FS). The selection criteria were not applied for these proposed supplemental technologies nor were the criteria for these supplemental technologies together with their cost evaluated under the Disproportionate Cost Analysis (DCA). Ecology does see the utility of using bioventing to address shallow soil contamination in the vadose zone as a contingent remedy component. However, Ecology rejects biosparging as an additional component to the combined remedy under the selected cleanup alternative.

- Comment 4. Section 1.1, Purpose: The Cleanup Action Plan is a decision document that will be issued by Ecology. Please revise the first sentence to state that the DCAP was prepared for the Department of Ecology on the behalf of Coleman Oil Company.
- Comment 5. **Section 1.2, Previous Studies:** In the sixth paragraph, the text refers to Figure 4 for distribution of NAPL. This should be revised to state Figures 5 through 7 if referring to NAPL distribution.
- Comment 6. **Section 2.2, Human Health and Environmental Concerns:** In the second paragraph, the text states that no other exposure pathways for human and/or ecological receptors were identified. This is incorrect. Contamination above MTCA Method A cleanup levels based on the protection of groundwater for drinking water purposes still impacts the groundwater. The default condition under MTCA is that groundwater is potable since it has not been demonstrated that the groundwater is non-potable. Therefore, this impacted medium remains as a potential future exposure pathway until the MTCA cleanup standards have been met at the site.
- Comment 7a. **Section 3.1, Cleanup Alternatives:** Under the subheading, Supplemental Remedial Technologies, strike the text that refers to a passive or permeable reactive barrier (PRB). This component as part of the combined remedy, Alternative No. 4, was evaluated and rejected under the remedy selection process in the FS. As such, information about financial costs is not factored into the cost estimate for the selected cleanup action, Alternative No. 2. This information is needed to determine financial assurances for implementation of the cleanup action which will be required under the agreed order that implements the cleanup action.

Ecology disapproves of the introduction of supplemental remedial technologies that bypass the FS apart from bioventing which may be a viable option to deal with vadose zone contamination versus allowing otherwise accessible soil contamination to remain in place (e.g., using institutional controls). Also, bioventing is referred to as a contingent remedy rather than a supplemental remedy, and subject to the evaluation of this potential component.

Comment 7b. **Section 3.1, Cleanup Alternatives:** Move the last paragraph that refers to pilot testing to the more appropriate location at the end of the description for Alternative No. 2.

Comment 8a. **Section 4.2, Description of the Cleanup Action:** In the fifth through eighth paragraphs, revise the text to refer to bioventing only. Strike the language that refers to a passive reactive barrier since it was rejected under the combined remedy, Alternative No. 4. The Feasibility Study provided a formal process for proper evaluation of proposed cleanup alternatives. Thus, Ecology does not approve of supplemental technologies except under a contingent basis if the selected combined remedy does not sufficiently address the remediation of the vadose zone contamination.

Comment 8b. **Section 4.2, Description of the Cleanup Action:** A remediation level (REL) of 0.05 feet is first mentioned in the Remedial Investigation (RI) report, however, the derivation of that value is not provided in that report. Previously, NAPL transmissivity was discussed as a metric for recoverability. However, an attempt in 2019 to accurately calculate NAPL transmissivity was unsuccessful. The proposed REL is equivalent to about half an inch, but it may not have a relevant basis in recoverability which is a useful criterion more reliably measured by other metrics. Ecology suggests the use of a decline curve or other qualitative/semi-quantitative information in demonstrating the attainment of performance standards related to hydraulic recovery of NAPL.

We understand also that we may see an increase in the apparent NAPL thickness in some wells during implementation of the selected remedy. However, over the performance period of that remedy, we should see a decrease in the apparent NAPL thickness in certain wells in the network.

Comment 9. **Section 4.3.2, Groundwater Cleanup Standards and Points of Compliance:** Revised the text in this section consistent with Ecology's comment. The groundwater is still considered potable and thus should be protected for its highest beneficial use as drinking water.

- Comment 10. **Section 4.3.2, Groundwater Cleanup Standards and Points of Compliance:** Ecology will not consider using conditional points of compliance for groundwater at this time and thus will not include it in this DCAP. See our explanation in the comment box.
- Comment 11. **Section 4.3.2, Groundwater Cleanup Standards and Points of Compliance:** Further data should be collected to evaluate the issue of whether contamination remains at the Nakano Foods Site and whether that contamination impacts the Coleman Oil Yakima Bulk Plant Site. This will require coordination with the BNSF Railway Company and may involve the reopening of the Nakano Foods Site.
- Comment 12. **Section 4.3.2, Groundwater Cleanup Standards and Points of Compliance:** As we stated earlier, Ecology rejects the proposal to designate conditional points of compliance for groundwater at this time.
- Comment 13. **Section 4.6, Compliance Monitoring:** Revise the text per our comments. Method A cleanup levels are established for soil and groundwater. We do not accept the use of Method B cleanup levels.
- Comment 14. **Section 4.6, Compliance Monitoring:** Monitored natural attenuation was not included in the remedy evaluation under the Feasibility Study. At a minimum, further discussion is required to evaluate it more fully. For instance, criteria that may be affected include restoration time frame and cost considerations for extended groundwater monitoring.
- Comment 15. **Section 4.7, Schedule for Implementation:** Revise the schedule consistent with Ecology's comment. We do not accept implementing other technologies before the combined remedy of the selected cleanup action. Bioventing can be implemented as on a contingent basis but concurrent with the implementation of the SEB recirculation system.
- Comment 16. **New Section: Likely Vulnerable Populations and Overburdened Communities:** Ecology intends to add a section that will address whether the site intersects likely vulnerable populations and overburdened communities. The addition of this section is consistent with the recent rule amendments to the Model Toxics Control Act in 2023, some of which sought to strengthen the state's commitments to prioritize the cleanup of contaminated sites that may impact likely vulnerable populations or overburdened communities.

Jim Cach
Coleman Oil Company
February 12, 2024
Page 5

See further explanation in Ecology's Concise Explanatory Statement, 2023 and Ecology TCP's Implementation Memorandum No. 25: Identifying Likely Vulnerable Populations and Overburdened Communities under the Cleanup Regulation (January 2024).

Comment 17. Revise Figure 7 by labeling MW-14 on the diagram and by removing reference to biosparging and permeable reactive barriers (PRBs). Note that this is the only comment on the Adobe PDF version of the draft DCAP. Other changes mentioned on the WORD version will be incorporated when the document is converted to a PDF version.

You can reach me at (509) 731-9613 or John.Mefford@ecy.wa.gov. I look forward to hearing from you.

Sincerely,



John Mefford
Hydrogeologist
Toxics Cleanup Program
Central Region Office

Enclosure (1): Ecology comments on DCAP

cc: Tom Mergy, PBS Engineering and Environmental, Inc.