



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

Allison Geiselbrecht
Floyd Snider
601 Union Street, Suite 600
Seattle, WA 98101

Alex Meza
Shell Oil Products US
20945 S. Wilmington Avenue
Carson, CA 90810

RE: Approval of Financial Assurance O&M Cost Estimate, dated January 5, 2024:

- **Site Name:** Smith Kem Ellensburg Inc
- **Site Address:** 200 S. Railroad Avenue, Ellensburg
- **CSID:** 4257
- **FSID:** 12832256
- **Consent Decree:** 23-2-00247-19

Dear Allison Geiselbrecht and Alex Meza:

The Department of Ecology approves as final the above-referenced deliverable.

Thank you for your collaborative effort in moving the remedial process forward.

Sincerely,

John Mefford, LHG
Ecology Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

Enclosure (1): Financial Assurance O&M Cost Estimate Table, dated January 2024

cc: Joanna Seymour, Ecology

Enclosure

Financial Assurance O&M Cost Estimate Table

Financial Assurance Cost Summary

January 2024

Remedial Action Operation & Maintenance Elements	Projected Cost ^(1,2)	Assumptions
Post-Remedy GWM Implementation ^(3,4)	\$110,100	
Year 1: Semi-annual GW Monitoring and Analysis	\$19,800	Semi-annual monitoring at CPOC wells and source area wells for all COCs ^(5,6,7)
Year 2: Quarterly GW Monitoring and Analysis	\$34,300	Quarterly monitoring at CPOC wells for all COCs ^(5,6)
Years 3–5: Semi-Annual GW Monitoring and Analysis	\$24,000	Semi-annual monitoring at focused CPOC wells for all COCs ^(5,6,8)
Years 6–9: Annual GW Monitoring and Analysis	\$16,000	Annual monitoring at focused CPOC wells for targeted COCs based on previous monitoring results ^(5,6,8,9)
Year 10: Quarterly GW Monitoring and Analysis	\$16,000	Quarterly monitoring at focused CPOC wells for targeted COCs ^(5,6,8,9)
Post-Remedy O&M Costs	\$15,000	
Annual Inspection and Maintenance Costs, Years 1–10	\$15,000	Assumes up to \$1,500/year for inspection and maintenance of cap, drainage system, and monitoring well network
Post-Remedy Deliverables	\$73,800	
Compliance Monitoring Annual Reports and Project Management, Years 1–10	\$73,800	Includes data validation and loading, data summary table and figure updates, and preparation of annual report
TOTAL	\$198,900	

Notes:

- 1 All costs are rounded to the nearest hundred.
- 2 All costs include applicable taxes and contingency.
- 3 Post-remedy monitoring program is subject to change pending preparation, submittal, and Ecology approval of a long-term compliance monitoring plan.
- 4 Includes analytical costs, field preparation, and field staff and equipment for each event.
- 5 CPOC monitoring wells are presumed to include MW-2, MW-3, MW-10, MW-12, and MW-14.
- 6 Groundwater COCs established in the RI include nitrate, nitrite, pesticides (HCH-beta, aldrin, chlordane, dieldrin, toxaphene, 2,4-D, MCPA, atrazine), diesel-range TPH, and oil-range TPH.
- 7 Source area wells for performance monitoring are presumed to include MW-4 and one additional well to be determined.
- 8 Assumes 3 wells achieve attainment of CULs after quarterly monitoring during year 2 and will be removed from routine monitoring.
- 9 The targeted season for annual monitoring will be based on the season with the highest observed seasonal concentrations for conservatism using the seasonal trend data collected during years 1-5.

Abbreviations:

- COC Chemical of concern
- CPOC Conditional point of compliance
- GW Groundwater
- GWM Groundwater monitoring
- HCH Hexachlorocyclohexane
- MCPA 2-Methyl-4-chlorophenoxyacetic acid
- O&M Operations and maintenance
- RI Remedial investigation
- TPH Total petroleum hydrocarbons