



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

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

February 21, 2024

Ben Kleban
Stillwater Holdings, LLC.
7 East Rose Street
Walla Walla, Washington 99362

Re: Comments on Marcus Whitman Hotel Vapor Intrusion Evaluation Workplan for Stillwater Holding Chevron, Walla Walla, Washington

Dear Ben Kleban:

The Washington Department of Ecology (Ecology) Toxics Cleanup Program has reviewed Aspect Consulting's February 7, 2024, *Marcus Whitman Hotel Vapor Intrusion Evaluation Workplan (Work Plan)*. The work plan has been prepared to present the general approach to evaluate vapor intrusion in the Marcus Whitman Hotel (MWH).¹ We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.²

Comments and Recommendations

While Ecology generally concurs with the *Work Plan*, Ecology is providing the additional comments and recommendation in addition to those provided by McCullough Hill via email on February 16, 2024.

- Identity preferential pathways.
 - Ecology recommended identifying preferential pathways into buildings adjoined to the Stillwater Holdings Chevron Site in response to Aspect Consulting's November 17, 2023, *VI Mitigation and Conceptual VI Assessment Plan– DRAFT*. Initial investigations including groundwater sampling have identified gasoline range total petroleum hydrocarbons (TPH-g) and benzene, toluene, ethylbenzene, and xylenes (BTEX) exceeding cleanup levels along 2nd Avenue from the intersection with

¹ Aspect Consulting, *Marcus Whitman Hotel Vapor Intrusion Evaluation Workplan*, February 7, 2024.

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

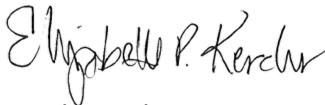
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Rose Street down to monitoring well MW-2. At this point in the investigation attempting to locate additional entry points into the hotel is likely redundant and it would be beneficial to focus efforts within the hotel.


- The investigation should consider sub-slab sampling under the Ballroom extension to the north since sheen was observed in storm drains to the north of the hotel, and elevated BTEX and other gasoline compounds were detected in well MW-3 east of the ballroom.
- Identify and address potential entry points of free product into MWH.

Should you have any questions regarding this project, please contact the site manager Beth Kercher either by phone (509) 385-5443 or email at Beth.Kercher@ecy.wa.gov.

Sincerely,



Beth Kercher
LUST Site Manager
ERO Toxics Cleanup Program

cc: Carla Brock, Aspect Consulting
Christer Loftenius, Ecology 
Ecology Site file