

## STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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September 22, 2023

Paula Sime 7Eleven, Inc PO Box 711 Dallas, TX 75221 paula.sime@7-11.com

## RE: UIC Site 37888 – Well Registration and Authorization with the Underground Injection Control (UIC) Program, Voluntary or Independent Cleanup Sites, 7Eleven Store 22866 (Site), 14207 Tukwila International Boulevard, Tukwila, WA

Paula Sime:

The Department of Ecology's (Ecology's) UIC Program has reviewed your UIC registration application for the above-mentioned Site. Based on the information provided in the registration and the additional information provided per Ecology's request, the UIC wells are **Conditionally Rule-Authorized**, and no State Waste Discharge Permit is required to operate the wells under WAC 17-218 authorities.

The UIC registration number is 37888. The Site is undergoing Voluntary Cleanup Program (VCP) technical reviews and assistance for in situ remedial cleanup activities (IRCA) of a leaking underground storage tank. The VCP Site Number is NW2802. The Facility Site Identification Number is 23544274.

The IRCA is described in *Updated Pilot Test - In-Situ Site Remediation using BOS 200<sup>®</sup>, 7-Eleven Store #22866, 14207 International Blvd./State Rt 99, Tukwila, WA (SOW),* dated June 6, 2023, as a pilot test. The event included direct-push borings to remediate gasoline-contaminated groundwater (GSGW) and soil. This underground injection is authorized as a one-time, in-situ remedial action. The injection area is of approximately 1,060-square feet in area. A total of 6,400-pounds of BOS-200<sup>®</sup> will be injected into 40 temporary injection probe holes. The

remedial injections will span from 5- feet to 20-feet below ground surface. The injections will be completed within a rectangular grid. The VCP Site manager has reviewed the work plan for the UIC injections and has provided comments to the consultant. The Ecology, Toxic Cleanup Program (TCP) will evaluate the ICRA work as required.

Please note that the above proposed action is the second pilot test event at this Site (the first event was described in *Pilot Test - In-Situ Site Remediation using BOS 200®, 7-Eleven Store #22866, 14207 International Blvd./State Rt 99, Tukwila, WA,* dated August 12, 2021) to treat the Site contaminants using the same process, chemicals, volumes, and injection locations. This first pilot test occurred in October 2021. The October 2021 event was registered under UIC registration number 37246, which was belatedly registered in July 2023. This original UIC injection event was not rule-authorized. As a reminder, all UIC registrations must be registered and Rule-Authorized prior to use.

## **Conditional Rule-Authorization - Conditions of Use**

There are inherent environmental risks associated with injecting compounds into groundwater. It is incumbent upon the owner and their representative to carefully characterize, manage, and monitor the Site surface and subsurface conditions to minimize risk and prevent unforeseen degradation of groundwater quality and other environmental risks.

Ecology will Rule-Authorize a UIC registration to operate when the two UIC Program requirements for Rule Authorization are met:

- 1. Registration of UIC wells (prior to use), and
- 2. The UIC well must meet the nonendangerment standard (WAC 173-218-080).

This Site does not meet the nonendangerment standard for Rule-Authorization. Additional conditions are needed to allow for Rule-Authorization and the IRCA work to proceed.

The following Site-specific UIC Program requirements for **Conditionally Rule-Authorization** include:

- The IRCA is a one-time event. Should additional injections be needed, the owner must seek approval from the VCP Site Cleanup Manager and notify Ecology UIC of proposed additional work.
- Onsite groundwater is not approved for use to mix with the remediation products for injection into the subsurface.
- The injection activities must follow the approved SOW. Any deviations from the SOW are not allowed unless the VCP Site Cleanup Manager has pre-approved those changes.

- The Site must be carefully characterized, managed, and monitored to minimize risk and prevent unforeseen degradation of groundwater quality. Please provide a workplan that describes mitigation measures that would be used to prevent mobilized substances from moving beyond the property boundaries.
- The injections must not cause a further degradation to groundwater quality criteria at the down-gradient monitoring points per state or federal applicable criteria. If such groundwater degradation occurs, the injection activities must discontinue; any environmental release must be reported no later than 24-hours from the release discovery at <a href="https://ecology.wa.gov/Footer/Report-an-environmental-issue or call 1-800-645-7911">https://ecology.wa.gov/Footer/Report-an-environmental-issue or call 1-800-645-7911</a>. Mobilized metals or other substances, injected chemicals or hazardous biproducts, are not allowed to migrate beyond the Site property boundary.
- Additionally, notification to Ecology's UIC Program of any change in UIC well status is a required element of this registration.
- The planned IRCA start date is for September 22, 2023.

The Site will be **Conditionally Rule-Authorized** for as long as the nonendangerment standard of WAC 173-218-080 will continue to be met and the above items have been completed. Failure to capture any of the performance data required or cause a violation of the applicable cleanup standards may result in a denial, modification, or termination of the UIC registration.

The VCP Site Cleanup Manager will have final authority to determine if the IRCA described in the SOW have met the substantive requirement of the Model Toxics Control Act (MTCA) if such an opinion is requested. Ecology's UIC Program will not make that determination.

The VCP Site Cleanup Manager may elect to provide technical advice on establishing *not to exceed limits* (NTEL) groundwater concentrations and sentry wells which would be established prior to injections. If NTELs are exceeded at the designated sentry wells, then injections would stop before the concentrations reach the point of compliance. Before injections could resume, they would need to be approved by the Site cleanup manager.

Based on future groundwater analytical results, Ecology may require you to apply for, and obtain, a State Waste Discharge Permit for the continued use of these compounds. You would need to obtain a formal waste discharge approval for this project through the Ecology's State Waste Discharge Permit Program or Toxics Cleanup Program.

The owner is responsible to keep the UIC registration information current and retain all registration documents, plans, modeling, monitoring results, interim, and final reports. Upon Ecology request, the owner shall provide these documents to the UIC Program.

This UIC registration was evaluated under the demonstrative approach, Ecology UIC has determined the conditions described in the UIC registration and other submitted documents

are sufficient and substantive to make a determination the injections, with attached conditions, will be protective of the Site groundwater quality and will meet the nonendangerment standard requirements of WAC 173-218-080.

Any material misrepresentations or omissions of fact supplied in this application may result in the denial or revocation of this registration authorization. Ecology's UIC Program has the authority to rescind a rule authorization if Ecology determines the system no longer meets the nonendangerment standard.

Please contact Eugene Radcliff at <u>UICwells@ecy.wa.gov</u> if you have any questions. You can find additional information on the UIC Program can at our website:

https://ecology.wa.gov/Regulations-Permits/Guidance-technicalassistance/Underground-injection-control-program

Sincerely,

Eugen Radelig

Eugene Radcliff, LG, LHG Statewide UIC Program Coordinator Water Quality Program

Cc:

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