



## **Periodic Review Columbia Oil Sgt Bubs**

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**1345 Lee Blvd, Richland, Benton County  
Facility Site ID: 45583729, Cleanup Site ID: 6112**

**Toxics Cleanup Program, Central Region**

Washington State Department of Ecology  
Union Gap, Washington

July 2022

## Document Information

This document is available on the Department of Ecology's [Columbia Oil Sgt Bubs cleanup site page](#).<sup>1</sup>

### Related Information

- Facility Site ID: 45583729
- Cleanup Site ID: 6112

## Contact Information

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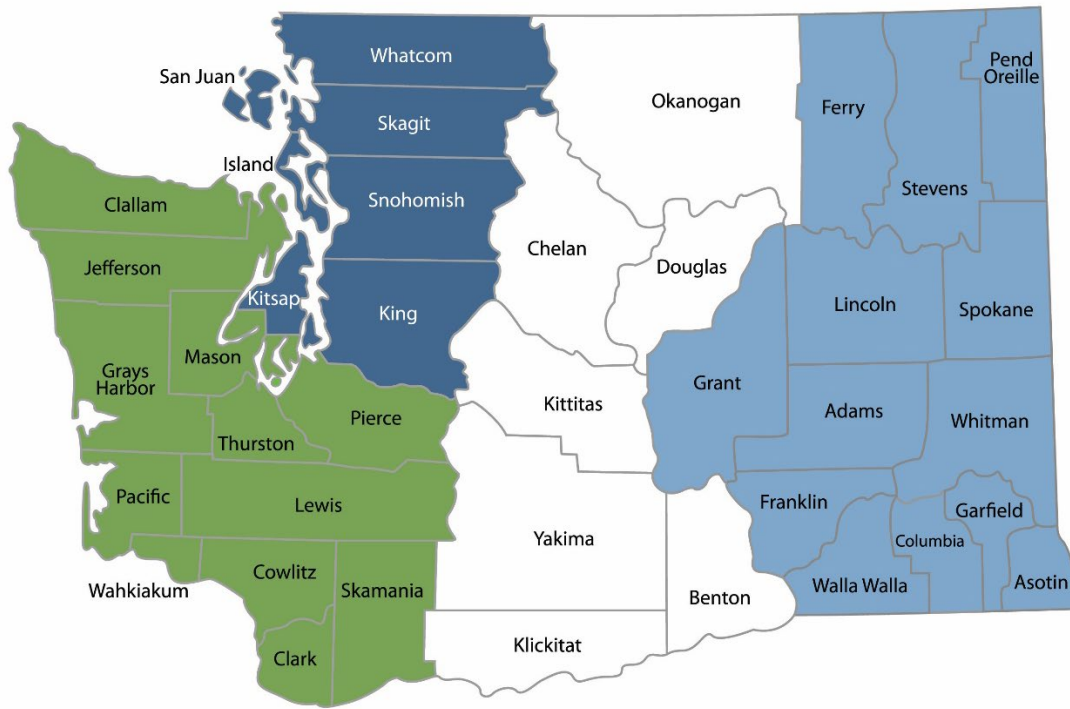
<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/6112>

<sup>2</sup> <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

<sup>3</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

# Department of Ecology's Regional Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 206-594-0000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	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 Columbia Oil Sgt Bubs cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). Residual concentrations of petroleum hydrocarbons that exceeded MTCA cleanup levels remain on the property. The MTCA cleanup levels for soil and groundwater are established under [WAC 173-340-740](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740)<sup>4</sup> and [WAC 173-340-720](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720),<sup>5</sup> 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\(2\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-420(2))<sup>6</sup> requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because an institutional control and/or financial assurance is 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

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<sup>4</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

<sup>5</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720>

<sup>6</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420>

# Summary of Site Conditions

## Site description and history

The Columbia Oil Sgt. Bubs property is located at 1345 Lee Boulevard in the City of Richland in Benton County, Washington. The Site is currently operated as Roberts Construction with a warehouse structure and produce stand. The property operated as Columbia Oil Company as a bulk fuel and service station facility from 1950 to about 1985. After 1985, the property operated as Sgt. Bubs and Ryder Sausage Haus.

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

## Site investigations

In 2000, seven underground storage tanks (USTs) were decommissioned, including four gasoline USTs, one diesel UST, one waste oil UST, and one heating oil UST. Petroleum was found in both soil and groundwater during the UST decommissioning. A portion of the petroleum-contaminated soil was excavated and disposed offsite.

Further investigations were conducted in 2005, and groundwater monitoring was conducted between 2010 and 2012.

## Cleanup actions

Seven USTs were removed in 2000. Approximately 425 tons of petroleum-contaminated soil was excavated and disposed offsite at a facility in Mabton, Washington. After conclusion of three excavations, soil contaminated with gasoline (including benzene) and diesel remained in both soil and groundwater.

The three excavations were located southeast, northeast, and west of the Sgt. Bubs structure. No petroleum-contaminated soil remained in excavation number one except for exceedances of the Method A cleanup level for diesel in sidewall samples collected at a depth of 5 feet on the north and west sidewalls. Gasoline (including benzene) exceedances were found in sidewall samples from excavation two, including at 8-10 feet depth at the north, south, and northeast sidewalls. Gasoline cleanup exceedances were also observed in two dispenser island test pits at depth of 6 and 13 feet. No cleanup level exceedances were noted at excavation 3 where the diesel UST was located. Groundwater contamination was also noted at excavations 1 and 2.

Ecology issued a no further action determination on October 31, 2014.

## Groundwater monitoring

Direct push soil and groundwater sampling was conducted in 2005. Three soil samples and two groundwater samples were collected. The 2005 report recommended the installation and monitoring of three monitoring wells.

Four monitoring wells were installed in 2010 and monitored for seven rounds between 2010 and 2012. Sporadic detections of petroleum compounds were observed in groundwater samples from the Site monitoring wells. No Site contaminants were detected at concentrations above Method A cleanup levels in the four monitoring wells, and all contaminants were below detection limits during the last two monitoring rounds in all monitoring wells except for MW-1.

## 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](https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704)<sup>7</sup> 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.

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

Use of a conditional point of compliance for groundwater was approved by Ecology. Some residual soil contamination near MW-1 at a depth of approximately 11-13 feet has served as continuing source of contamination to groundwater at MW-1. However, the extent of this contamination appears to be limited to the immediate vicinity of MW-1. The other three monitoring wells have had contaminant concentrations well below cleanup levels.

The Site has a conditional point of compliance for groundwater, which was established at monitoring wells other than MW-1 located throughout the Site from the uppermost level of the saturated zone to the lowest depth that could possibly be affected by the Site.

## Environmental Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human

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<sup>7</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704>

health and the environment. On September 25, 2014, institutional controls in the form of an [environmental covenant](#)<sup>8</sup> (Covenant) were recorded for the Site.

The Covenant recorded for the Site imposes the following limitations:

1. A portion of the property contains TPH-gasoline, benzene, toluene, ethylbenzene, and xylene-contaminated soil located at a depth of approximately 11 to 13 feet in the central northeast portion of the site, which is the paved area for entering the parking lot where monitoring well MW-1 is located. The owner shall not alter, modify, or remove the existing structure[s] in any manner that may result in the release or exposure to the environment of any possible contaminated soil or create a new exposure pathway without prior written approval from Ecology.
2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway is prohibited without prior written approval from Ecology.
4. The owner of the property must give thirty-(30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.
6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Covenant. Ecology may approve any inconsistent use only after public notice and comment.
7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action, to take samples, to inspect remedial actions conducted at the property, to determine compliance with this Covenant, and to inspect records that are related to the Remedial Action.
8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Covenant shall no longer limit use of the Property or

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<sup>8</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/40917>

be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

## Periodic Review

### Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on June 22, 2022, the Site continues to operate as a construction warehouse and produce stand. The store structure appears as it did during the NFA issuance. The portion of the Site containing residual contaminated soils is covered by an asphalt parking area and building foundations. The paved surface area in the vicinity of the residual contaminated soils appears cracked but undisturbed. 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 surface cover. The portion of the Site containing residual contaminated soils is covered by an asphalt parking area and building foundations. The paved surface area in the vicinity of the residual contaminated soils appears cracked but undisturbed.

### Protection of groundwater

Soils with petroleum hydrocarbons at concentrations exceeding MTCA Method A cleanup levels remain at the Site; however, most of the contaminated soil source material has been removed.

### 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 Benton County Auditor 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.

### 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 Site surface is 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

Blue Mountain Environmental Consulting. *Phase II Environmental Site Assessment, Columbia Oil Company-Sgt. Bubs Site*. April 19, 2005.

Ecology. "Letter re Further Action at the Following Site." April 7, 2011.

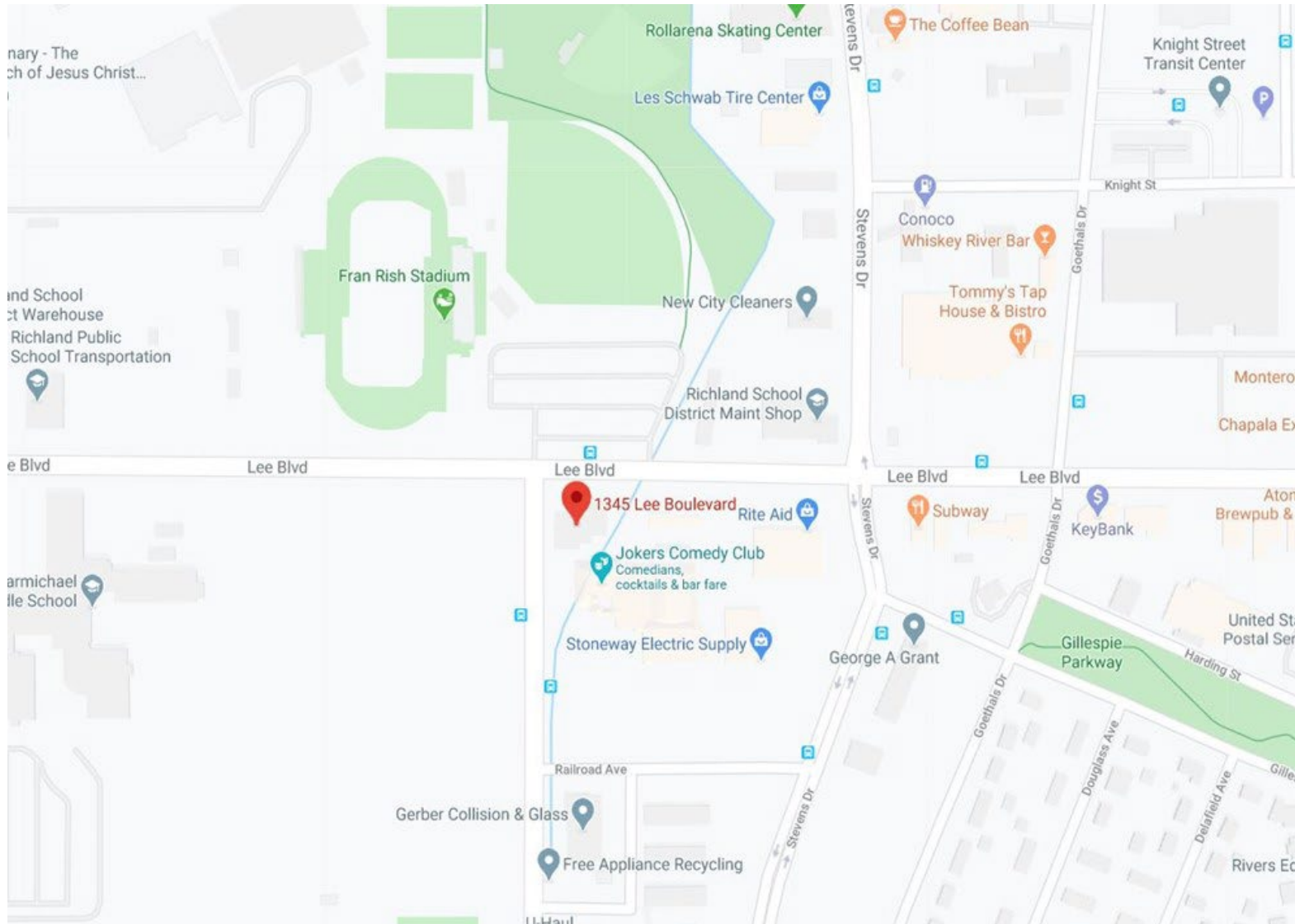
White Shield, Inc. *Groundwater Monitoring Well Sampling Report, Former Columbia Oil/Sgt. Bubs Site*. January 15, 2013.

Ecology. *Environmental Covenant*. September 25, 2014.

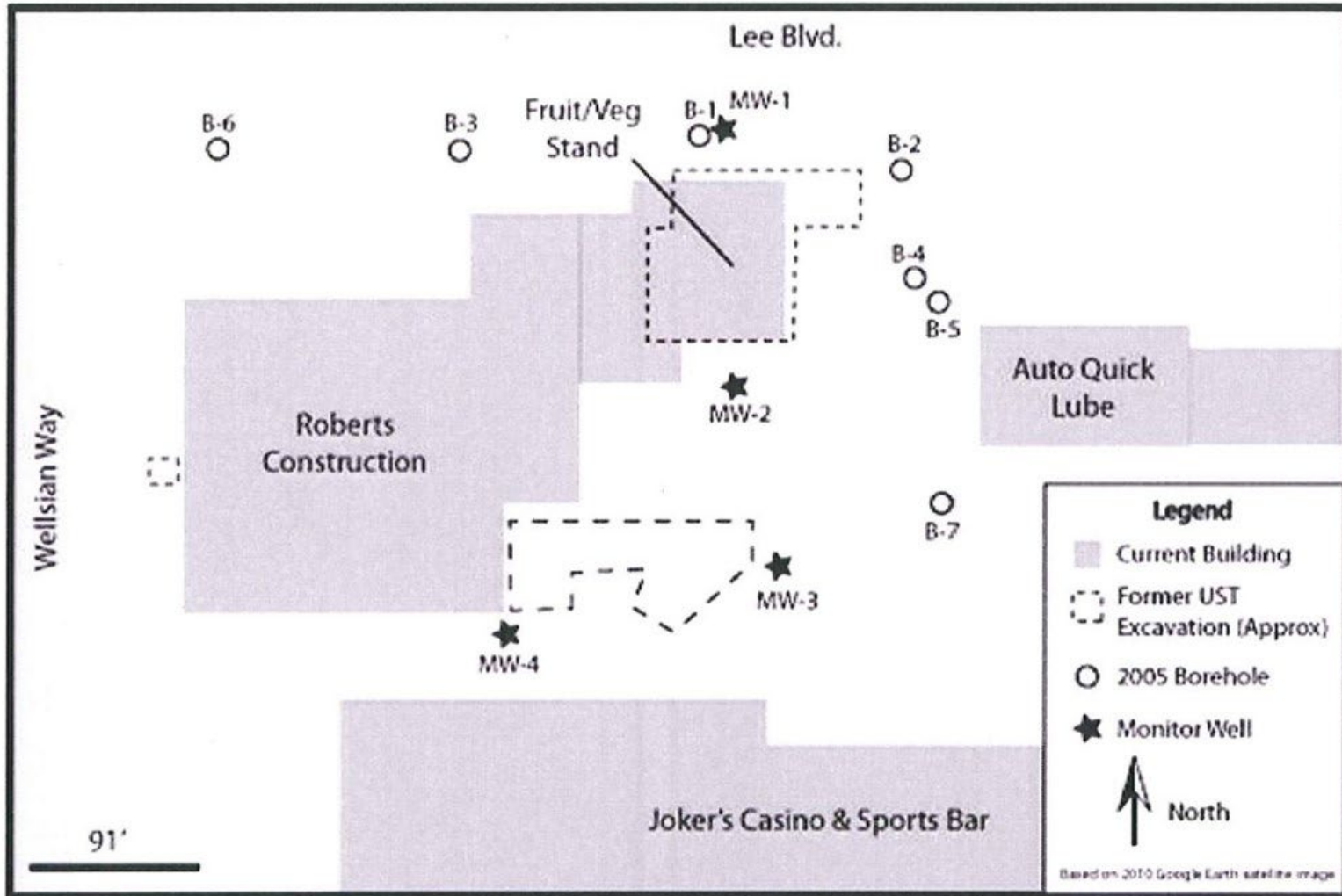
Ecology. "No Further Action Determination." October 31, 2014

Ecology. Site visit. June 22, 2022.

# Appendix A. Vicinity Map



## Appendix B. Site Plan



## Appendix C. Photo Log

**Photo 1: Paved area north of produce stand (view to southeast)**



**Photo 2: Paved area north of produce stand (view to southwest)**



**Photo 3: Northeast part of the Property (view to east)**



**Photo 4: Fenced area on east side of structure (view to southwest)**

