



February 26, 2024

Stillwater Holdings, LLC  
1948 Stillwater Drive  
Walla Walla, WA 99362

Re: Industrial Pretreatment Program – Application for Wastewater Discharge Permit

- Site Name: Stillwater Holdings Chevron
- Site Address: 7 East Rose Street. Walla Walla, WA 99362

Dear Mr. Kleban:

A wastewater discharge permit application was submitted to the City of Walla Walla on January 29, 2024, for the discharge of treated groundwater from the initial treatment system, currently operated by Clean Harbors, as a result of the gasoline leak from the Stillwater Holdings Chevron.

The application was missing the following items or additional information is needed. Please submit this information to the City by **March 29, 2024**.

- Updated schematics showing the exact discharge point. Include the GPS points for the discharge location, the location of where the samples are collected, and the rate of discharges from these points (meter readings and duration of discharges taken since October 2023). Please include the maximum daily wastewater discharge flow per day in gallons, the average gallons per day that are discharged, and an estimated time of discharge. Please list if this is a continuous or a batch discharge.
- Model and type of flow meter being used.
- Any signatory authorization forms, included in attachment B of the agreement dated February 7, 2024, for persons signing reports submitted by the responsible party of the permit.
- Any environmental permits that are anticipated for the operation of the remedial action at this site.
- Sample and submit the results for groundwater characterization including priority pollutant testing and local limits testing [Chapter 13.30.080 of the Walla Walla Municipal Code (WWMC)].
- Question 12 of the permit application notes that if the concertation of the chemicals is not

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known, the wastewater must be analyzed for them. Please sample and submit the results for the parameters listed in question 12 of the permit application, both pre and post treatment. Please also sample and submit results for MTBE and TBA.

- Please provide any lab testing results to support the “suspected absent” statement in question 28 of the application. BTEX related chemical compounds are known present and should be identified correctly on this table.
- Provide “post treatment results” for TPH-D, TPH-G, FOG, HCFOG, TSS, pH, BTEX, and Benzene. Preliminary results are available in the report, but “post results” is just a cover page and the results are not included with the application and the application is therefore incomplete.
- Provide clarification as to why the benzene results listed in the application in question 12 do not match the results specified on pages 24-32 in the permit application, section titled “Pre-Treatment Analytical Results”? The 0.29 mg/L Benzene value listed in question 12 is significantly lower than those specified in the analytical result section (i.e., 0.42 – 2.6 mg/L). Why the discrepancy?
- Provide clarification if any other business categories apply for the location besides gas station (i.e., car wash, auto/garage repair, radiator shop, etc.)
- Is there any pretreatment for the grease or oil separation? The response provided in question 27 of the permit application was that the treatment system was originally installed for a release associated with oil and grease, and free product was present. Please provide proof of the statement that there is no free product present in the treatment system.
- Remediation is pollution prevention. Is there water conservation, recycling or other types of pollution prevention occurring?
- Why was gasoline not listed as recovered product in the table following question 27 on the application and how it is disposed of? Please provide details of off-site disposal site.
- Are any of the wastes classified as dangerous waste per Chapter 17-303 WAC?
- Where do solids, sediments and removed product go when they are removed? Provide associated manifest forms.
- Please specify if the facility is required to have a spill prevention, control, and countermeasure plan as per 40 CFR 122.
- Please specify if the facility is required to have an oil spill contingency plan per Chapter 173-182 WAC.
- Please specify if the facility is required to have an emergency response plan per WAC 173-303-350.
- Please specify if the facility is required to have a runoff, spillage, or leak control plan per WAC 173-216-110 (f).
- Please specify if the facility is required to have a spill or pollution prevention plan as required

by Chapter 13.30.100 or 13.30.210 of the WWMC.

- Please specify if the facility is required to have a slug discharge control plan as required by Chapter 13.30.150 of the WWMC.
- Please specify if the facility is required to have a solid waste control plan.
- Please specify the process control plan for the initial treatment system.
- It is unclear of the name on the signature page of the application. Please include the printed name as well. It should be Ben Kleban. If it is different, make sure the person signing the application fits the definition for the signing of applications in Chapter 13.30.230 of the WWMC.

If you should have any further questions concerning this matter, please feel free to contact Milton Saffry, Industrial Pretreatment Program Coordinator, at 509.527.4509.

Sincerely,

Leah Rohan, P.E.  
Environmental Engineer

cc: Milton Saffry, Jacobs  
Industry file