



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

March 15, 2024

Sent via email and hard copy

Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

RE: Ecology Comments on Agency Review Draft Report titled “Additional Interim Action Addendum #4 Remedial Excavation DRAFT Report Near MW-14” for the following Site:

- **Site Name:** Coleman Oil Biodiesel Spill
- **Site Address:** 3 E. Chehalis, Wenatchee
- **Facility/Site ID:** 83844381
- **Cleanup Site ID:** 13215

Dear Jim Cach:

Please revise the draft report as described in the comments below and as indicated in the text additions or revisions shown on the MS WORD document. These revisions will have to be completed to receive approval from Ecology. Failure to revise the draft report to Ecology’s satisfaction will result in a lack of regulatory approval of the report.

Comment 1. **Title Pages:** Add the official site name to the first two pages (title pages). Also, add a more appropriate site address on these two pages.

Comment 2. **Section 1.0, Introduction:** Strike the following text: *This AIA was selected in the Focused Feasibility Study as one of the remedies to achieve regulatory closure at the Site.* The specific interim action described in this draft report was not selected nor was it described in the FFS. Each interim action requires a decision process that reviews the proposed action and, if satisfactory to Ecology, results in a written approval. In general, the Cleanup Action Plan is the proper decision document to outline the final cleanup actions.

Comment 3. **Section 1.0, Introduction:** Add a paragraph that describes the origin of the official site name, as shown.



- Comment 4. **Section 1.0, Introduction:** Delete the following sentence: *The Agreed Order is a continuation of the previous and ongoing significant oil spill response activities and removal actions conducted under the Administrative Order on Consent for Removal Activities issued by the U.S. Environmental Protection Agency (EPA) on May 5, 2017 (EPA Docket No. CWA-10-2017 0114).*

Ecology does not possess any evidence that this EPA Administrative Order was finalized, signed, and filed. The existing Agreed Order for which this work was performed is an agreement between the State of Washington and the PLP. This agreed order is not governed by the EPA. Any actions performed to comply with the federal regulations such as the Clean Water Act are included in the existing agreed order which incorporates all applicable state and federal laws as described in WAC 173-340-710.

The Cleanup Action Plan (CAP) is the proper decision document to list all the identified legally applicable requirements and all relevant and appropriate requirements (ARARs) that are currently known.

- Comment 5. **Section 2.4, Remedial Measures:** Revise the text in the fourth bullet point. Add a fifth bullet point and the text indicated in Ecology's comments on the WORD version of the draft report. Revise the language in the sixth bullet point.

List the correct number of 4-inch diameter wells that were installed in 2018.

- Comment 6. **Section 2.5, Geologic & Hydrogeologic Setting:** In the third paragraph, add reference to Figures 11 and 22 of the Supplemental Remediation Investigation report, as stated in the revised text.

- Comment 7. **Section 2.5, Geologic & Hydrogeologic Setting:** In the fourth paragraph, state that the aquifer testing demonstrated little or no hydraulic connectivity between the monitoring wells used in the pumping test, as stated in the text revision.

- Comment 8. **Section 2.5, Geologic & Hydrogeologic Setting:** Add a paragraph that refers to the groundwater to surface water pathway, as stated in the text revision.

- Comment 9. **Section 2.6, Groundwater Monitoring at the Site:** The text states, "*Coleman Oil has decided to take over the O&M and Columbia River level monitoring and boom management.*" Please state how this decision was communicated to Ecology and if this change received written concurrence from Ecology. Add the concurrence to the references page of this report.

For instance, if the concurrence was an email refer to its date, who issued the email approval, and the subject line of that email.

- Comment 10. **Section 2.6.1, Revised Frequency of Groundwater Monitoring at the Site:** Please explain the written approval that you received from Ecology regarding modification of the groundwater monitoring. For example, when was the request submitted to Ecology and by what means (e.g., email)? Likewise, when and how was the approval communicated? Add this approval to the references page as described for Comment 9 above.
- Comment 11. **Section 3.0, Purpose and Scope:** Revise the text as shown in the draft WORD document.
- Comment 12. **Section 4.3, Remedial Excavation:** Revise the text. State whether the assessment of contaminant impacts is based on field observations.
- Comment 13. **Section 4.4, Soil Sampling:** Revise the figure reference.
- Comment 14. **Section 4.6, Installation of 4-Inch Diameter Slotted PVC Pipe in Remedial Excavation:** This additional work is not described in the Interim Action Work Plan Addendum #4 Work Plan. Thus, this work was not approved by Ecology under the existing agreed order. Do not perform any additional work that has not received specific written approval from Ecology. Performance of any cleanup action without specific Ecology approval under the existing agreed order is a violation of the terms and conditions of this agreement.
- Comment 15. **Section 4.7, Installation of MW14R:** Add the location of MW14R on Figure 2. Previous diagrams show the location of MW14 so the location of this decommissioned well does not need to be shown.
- Comment 16. **Section 4.8, Surveying:** The geographic coordinates are not listed in Table 1. State the geographic coordinates in the report and add the well log for MW14R to Appendix D.
- In the report, state the horizontal and vertical resolution of the survey. The accuracy of the vertical elevation of any monitoring wells should be 0.01 feet.
- Comment 17. **Section 5.0, Analytical Results:** There is no Figure 4. The text should read Figure 2.

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Comment 18. **Section 5.1, Remedial Excavation Sample Results:** In the seventh paragraph, revise the text to refer to the correct sample names. Remove any erroneous sample names.

Comment 19. **Section 5.2, Data Quality Review:** State in the report why sample SSW01-10 was analyzed outside of its holding time. The notes on the chain of custody state that the sample was on hold and that a decision was made later to analyze it. The analytical sheet shows that the sample was received on 11/3 but was not extracted and analyzed until 11/21.

State that the consequence of analyzing the sample outside of its holding time before extraction may have affected quantification by low biasing the concentration of volatile organic compounds such as benzene.

Comment 20. **Section 6.0, DISCUSSION:** Revise the text as shown. Also, state the quantity of contaminated soil that was removed.

Comment 21. **Section 6.0, DISCUSSION:** Any statements about groundwater quality should be qualified by reference to groundwater monitoring.

Comment 22. Did you request for the laboratory to submit an Electronic Data Deliverable (EDD)? If so, please state this in the report in **Section 5.2, Data Quality Review**. If not, then explain why. Were any of the analytical results submitted to Ecology's EIM database as required under the agreed order? Any sample data generated under the agreed order must be submitted to the EIM database, as stated in Section VII.E of Agreed Order DE 15389.

Please contact me with any questions at john.mefford@ecy.wa.gov or 509-731-9613.

Sincerely,



John Mefford
Hydrogeologist
Toxics Cleanup Program
Central Regional Office

cc: Craig Hultgren, HydroCon