



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

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

March 27, 2024

**Sent via email and hard copy**

Shane DeGross  
BNSF Railway Company  
605 Puyallup Avenue  
Tacoma, WA 98421

**Re: Supplemental Investigation to Define the West Boundary for the following Site:**

- **Site Name:** Coleman Oil Yakima Bulk Plant
- **Site Address:** 1 East I Street, Yakima
- **Facility/Site ID:** 4233
- **Cleanup Site ID:** 13200

Dear Shane DeGross:

The Department of Ecology (Ecology) has determined that it is necessary to define the west boundary of the contaminated groundwater plume at the Coleman Oil Yakima Bulk Plant Site. The delineation of the west boundary is required in order to demonstrate that the contaminant source mass remaining at the Nakano Foods Site is not impacting the Coleman Oil Yakima Bulk Plant Site.

Six monitoring wells remain at the Nakano Foods Site (FSID 62969449, CSID 6409), located at 115 West I Street in Yakima. These wells are situated on parcel #18131312030, owned by the BNSF Railway Company. We request BNSF's cooperation to collect the relevant information that pertains to the delineation of this groundwater contaminant plume.

Ecology has reviewed the records for the Nakano Foods Site and finds sufficient evidence to rescind the No Further Action (NFA) determination that was issued for this Site in January 2010 if needed to initiate the further actions described in this letter.

Ecology proposes the following actions with the results to be reported to Ecology:

1. Use a licensed surveyor to survey all six monitoring wells to obtain the elevations of the measuring points on each well casing and the geographic coordinates of each well.



Elevations should be reported relative to the North American Vertical Datum of 1988 (NAVD 88). Geographic coordinates should be reported relative to the North American Datum of 1983 (NAD83). Produce a table that lists this information for the monitoring network at Nakano Foods.

2. Measure the depth to the groundwater elevations from the measuring point on each well casing for all six wells. Use this information to create a diagram that depicts the groundwater flow direction and show these elevations in an embedded table on the diagram.
3. Collect and analyze groundwater samples from monitoring wells, MW-2 and MW-6. Compile the analytical results in a table.
  - a. Use analytical method NWTPH-Dx to assess for diesel range organics (DRO) and heavy oil range organics (HRO). Sum any concentrations that are quantified above their detection limits and report the total concentration (DRO + HRO).
  - b. Use EPA Method 8270E to analyze for naphthalene including naphthalene (CAS no. 91-20-3) and 2-methylnaphthalene (CAS no. 91-57-6).
  - c. Use EPA Method 8270E to analyze for the carcinogenic polycyclic aromatic hydrocarbons (cPAHs) including:
    - i. benz(a)anthracene (CAS no. 56-55-3),
    - ii. benzo(b)fluoranthene (CAS no. 205-99-2),
    - iii. benzo(k)fluoranthene (CAS no. 207-08-9),
    - iv. benzo(a)pyrene (CAS no. 50-32-8),
    - v. chrysene (CAS no. 218-01-9),
    - vi. dibenz(a,h)anthracene (CAS no. 53-70-3), and
    - vii. indeno(1,2,3-cd)pyrene (CAS no. 193-39-5).
4. Submit all the information described above to Ecology so that the entirety of this information can be used to update the conceptual site model for the Coleman Oil Yakima Bulk Plant Site.

If we find that the contaminant source mass from the Nakano Foods Site does impact the Coleman Oil Yakima Bulk Plant Site, the source mass must be addressed so that site closure can be achieved through the implementation of cleanup actions.

Shane DeGross  
BNSF Railway Company  
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You can reach me at (509) 731-9613 or [john.mefford@ecy.wa.gov](mailto:john.mefford@ecy.wa.gov), if you have any questions or wish to discuss this letter.

Sincerely,



John Mefford  
Cleanup Project Manager/Hydrogeologist  
Toxics Cleanup Program  
Central Region Office

Enclosures (2):      Parcel Map  
                                 Monitoring Well Network Diagram

cc:      Jim Cach, Coleman Oil Company  
         Eric Hetrick, Chevron Environmental Management Company  
         Tom Mergy, PBS Engineering and Environmental, Inc