



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

April 30, 2024

Ben Kleban  
Stillwater Holdings, LLC  
7 East Rose Street  
Walla Walla, Washington 99362

**Re: Comments on Interim Action Sampling Plan, Stillwater Holdings Chevron UST and Soil Removal Action:**

- **Site Name:** Stillwater Holdings Chevron
- **Site Address:** 7 East Rose Street, Walla Walla, WA
- **County Assessor's Parcel Number(s):** 360720574707
- **Facility Site ID number:** 70525886
- **Cleanup Site ID number:** 16913
- **UST ID number:** 005073

Dear Ben Kleban:

The Washington Department of Ecology (Ecology) Toxics Cleanup Program has reviewed Aspect Consulting's April 24, 2024, *Interim Action Sampling Plan, Stillwater Holdings Chevron UST and Soil Removal Action (Sampling Plan)*.<sup>1</sup> The Sampling Plan provides the details of sampling to be conducted as part of the interim action, including both pre-construction groundwater monitoring and compliance soil sampling at the excavation limits. The interim action approach includes decommissioning and removal of three existing USTs and removal of soil above MTCA Method A cleanup screening levels (CULs) within the planned excavation extent. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#) RCW.<sup>2</sup>

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<sup>1</sup> Aspect Consulting, *Interim Action Sampling Plan, Stillwater Holdings Chevron UST and Soil Removal Action*, April 24, 2024.

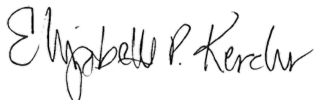
<sup>2</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

## Recommendations

- As part the sampling requirements for petroleum releases<sup>3</sup>, add diesel-range total petroleum hydrocarbons (TPH-d) analysis to the UST excavation soil samples to address any potential release(s) from the diesel underground storage tank (UST) system.
- Based on the recent analytical results from the sump sampling at the Marcus Whitman Hotel, the full volatile organic compounds (VOC) suite should be analyzed for during the initial round of groundwater sampling.
- Add stockpile sampling and details of stockpile disposal or reuse.
- Include rinse blanks and field blanks in addition to the trip blanks as part of the QA/QC program. Include TPH-g and BTEX in the analytical suite for the QA/QC samples.
- Add a minimum; 10% field duplicate samples should be collected. Duplicate soil samples should be analyzed for TPH-g, TPH-d, and benzene, toluene, ethylbenzene, and xylenes (BTEX). Duplicate groundwater samples should be analyzed for TPH-g and VOCs.
- Include past soil and groundwater sampling analytical data, including observations of free product and elevation data in wells collected after September 14, 2023, in the interim action assessment report.
- Create a figure showing utility conduits including wells, storm drains, and other features with potential and confirmed free product, sheen, and/or contamination. Include dates sheen and/or product was observed in included tables.

Should you have any questions regarding this project, please contact the site manager Beth Kercher either by phone (509) 385-5443 or email at [Beth.Kercher@ecy.wa.gov](mailto:Beth.Kercher@ecy.wa.gov).

Sincerely,



Elizabeth P. Kercher  
LUST Site Manager  
ERO Toxics Cleanup Program

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<sup>3</sup> MTCA Table 830-1 Required Testing for Petroleum Releases  
<https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-900>

Ben Kleban  
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cc: Nicholas Acklam, Ecology <sup>NAK</sup>  
Carla Brock, Aspect Consulting  
Ecology Site file