STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Eastern Region Office
4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

May 21, 2024

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

Re: Comments on Engineering Design Report Wastewater Treatment - Marcus Whitman Hotel for Stillwater Holding Chevron, Walla Walla, Washington

Dear Ben Kleban:

The Washington Department of Ecology (Ecology) Toxics Cleanup Program has reviewed Aspect Consulting's May 8, 2024, Engineering Design Report *Wastewater Treatment - Marcus Whitman Hotel* (Report). The report has been prepared to present the general approach to evaluate water treatment in the Marcus Whitman Hotel (MWH)[1]. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.[2]

Recommendations

While Ecology generally concurs with the report, Ecology is providing the additional comments and recommendations.

- The report calls for replacement of the front drum and moving the remaining two drums in the treatment train leg up and placing the new Granular Activated Carbon (GAC) drum as the new third and final drum in the train leg. The workplan does not mention the function the two different treatment train legs A and B have. Is the plan to alternate between the treatment train legs between GAC drum changeout, or is there another GAC drum changeout procedure in which the two treatment train legs A and B fit?

[1] Aspect Consulting, *Engineering Design Report Wastewater Treatment - Marcus Whitman Hotel May 8*, 2024.
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

- The report has designed the system to support a flow of 5 to 6 gallons per minute (gpm) with a maximum flow of 10 gpm. However, the last paragraph of Subsection 3.2 estimates the actual flow into the sump to be 17 gallons per hour (gph) between January and March 2023 which translates to 0.28 gpm. This is considerably less than the 5 to 6 gpm design flow. Is there a minimum flow rate for the proposed system? Secondly, how does the low flow rate affect the planned GAC changeout schedule?
- Please show the assembly in the design drawings of the on/off float switches. Please provide a description of how the automatic pulsing system will be used with upper and lower float on/off switches. How will the system be monitored for potential malfunctions and risk for sump overflow or pump burnout due to pumping air only?
- There is a detailed description of the floats and alarms in the text and drawings Describe what kind of alarms will be used, who will respond to the alarms, and who will check the alarms.
- Include any additional flow rate data beyond January to March 2024, if available.
- The pre-treatment calculations and sizing of the treatment system are based on one round of data collected on March 28, 2024. If more data is available, compile the data to create a time series plot for indicator hazardous substances such as TPH-g and BTEX to see if there is an asymptotic decrease in constituents over time.
- On Figure 2, highlight the sump under the hotel and show that this is the actual sump to be pumped.

Comments

- Will the system equipment and materials fit through the building and on the elevators? Will the elevators support the weight of full GAC drums?
- Will the ongoing operation and monitoring (O&M) work of the system interfere with the hotel daily operations? Please plan the work in cooperation with the hotel management. Avoid certain days with special events.
- How is the system going to be wired into the hotel's electrical network? Will there be an electric energy need that may affect some of the hotel's operations?
- Is there an agreement between the various parties who will pay for O & M ongoing costs such as electricity, troubleshooting, and replacement costs?
- Will there be an O&M plan?

Should you have any questions regarding this project, please contact me either by phone (509) 385-5443 or email at Beth.Kercher@ecy.wa.gov.

Sincerely,

Elizabeth P. Kercher

Beth Kercher
LUST Site Manager
ERO Toxics Cleanup Program

cc: Carla Brock, Aspect Consulting
Nicholas Acklam, Ecology
Ecology Site file