



Response to Comments

State Environmental Policy Act documents for Stillwater Holdings Chevron

Public comment period held April 1 – 15, 2024

Facility Site ID: 70525886, Cleanup Site ID: 16913

Toxics Cleanup Program

Washington State Department of Ecology
Spokane, Washington

May 2024

Document Information

This document is available on the Washington Department of Ecology's [Stillwater Holding Chevron cleanup site page](#).¹

Related Information

- Facility site ID: 70525886
- Cleanup site ID: 16913

Contact Information

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¹ <https://apps.ecology.wa.gov/cleanupsearch/site/16913>

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Toxics Cleanup in Washington State

Accidental spills of dangerous materials and past business practices have contaminated land and water throughout the state. The Washington State Department of Ecology (Ecology) Toxics Cleanup Program (TCP) works to remedy these situations through cleanup actions. TCP cleanup actions range from simple projects requiring removal of a few cubic yards of contaminated soil to large, complex projects requiring engineered solutions.

Contaminated sites in Washington are cleaned up under the [Model Toxics Control Act](#)⁴ (MTCA, Chapter 173-340 Washington Administrative Code [WAC]), a citizen-mandated law passed in 1989. This law sets standards to ensure toxics cleanup protects human health and the environment and includes opportunities for public input.

Public Comment Period Summary

Ecology held a comment period April 1 through April 15, 2024, for the draft State Environmental Policy Act (SEPA) documents for replacing the underground storage tank (UST) system at the Stillwater Holdings Chevron cleanup site.

Ecology appreciates the comments we received from four people. We address them in the Response to Comments section that begins on Page 4. We finalized the SEPA documents, and Stillwater Holdings Chevron is working toward replacing the UST system.

Site Background

On September 14, 2023, the Marcus Whitman Hotel was evacuated due to volatile organic vapors entering the building, also known as vapor intrusion. Gasoline was collecting in adjacent building sumps, which were pumped to help reduce vapor concentrations.

The nearby Circle K and Stillwater Holdings Chevron gas stations performed tank and line tests of their UST systems, and issues were found on the regular unleaded gasoline UST system at the Stillwater Holdings Chevron, also known as the Wine Country Store. Analysis of the gas collected from the building sumps showed it matched the regular gasoline at Stillwater Holdings Chevron.

The Stillwater Holdings Chevron owner hired an environmental consultant and UST contractor to complete an investigation and develop a plan for cleanup, which Ecology will review and provide input on. Replacing the UST system is part of this process.

⁴ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

Response to Comments

The comment letters are printed verbatim. Ecology’s responses follow the comments. The letters are in alphabetical order based on the commenter’s last name.

Index of comments received

Everyone who submitted comments is listed in Table 1 in alphabetical order by their last name, followed by the date we received their comments and the page on which their comments are printed as received. Contact information (postal and email addresses and phone numbers) has been omitted.

Table 1. Index of comments received

Name	Organization	Date received	Page
Bob Carson	None	April 13	4
Brian Fullen	Confederated Tribes of the Umatilla Indian Reservation (CTUIR)	April 12	4
Elbert Hardin	None	May 15	
Gwendolyn Elliott Woodruff	None	April 11	

Bob Carson, received online April 13

EVERY TIME a gas station needs updating or repair, at least one charging station should be installed. This also applies to new gas stations. We must prepare for the future of electric vehicles! We must wean ourselves from our addiction to fossil fuels. Global climate change is the worst natural disaster ever. Thank you.

Ecology’s response

Thank you for your comment. Ecology has no authority to require charging stations to be added as part of an UST replacement.

Brian Fullen, CTUIR, received via email April

I have personally lived in Walla Walla for 45 years ,(born there) and my family has lived in the Walla Walla valley since 1853, My Great Grand Father Built the 106 N Second building , community and environmental protection of my community is not only my career it is in my roots in protection of our home, I am reaching out personally as a private local citizen and as a very close resident of this disaster site , and writing to express my grave concerns and objections regarding the proposed replacement of underground storage tanks at the downtown Walla Walla Chevron station located at 7 E. Rose St. As a concerned citizen and steward of our environment, I find this proposal not only alarming but potentially catastrophic, given the station's environmental history and the site's specific challenges.

Firstly, it is imperative to highlight the significant issue of high groundwater levels in the area, a concern that cannot be overlooked. The presence of several sump pumps operating continuously in adjacent buildings, such as the 106 building, is a clear indicator of the high groundwater conditions. Past incidents where power outages led to emergency situations and flooding basements are a testament to the area's vulnerability. This alone should caution against any underground storage tank installations, which pose a significant risk of exacerbating groundwater contamination.

Moreover, the proximity (170-200 ft away) of the site to a creek channel, which lies within the critical 200 ft distance determined for environmental safety, elevates the risk of contaminating not just the groundwater but also affecting the broader ecosystem. The environmental checklist's acknowledgment of no proposed measures to mitigate impacts on recreation or historic and cultural preservation further underscores the project's lack of consideration for its broader environmental and cultural impact.

The historical context of a massive gasoline leak from one of the Chevron station's tanks, leading to the shutdown of the Marcus Whitman Hotel & Conference Center among other buildings, cannot and should not be forgotten. This incident, involving the leakage of 2,500-3,000 gallons of gasoline, is a stark warning of the potential hazards associated with continuing fuel operations at this location. It demonstrates not only the environmental risks but also the operator's past negligence in monitoring fuel levels and system integrity.

Allowing the installation of new fuel tanks, despite these glaring environmental and safety concerns, would be a direct affront to the community's well-being and the integrity of our environmental regulations. It is inconceivable to consider such a proposal without a thorough examination of its longterm impact on the groundwater, local ecosystems, and the community's health and safety.

In conclusion, I strongly urge a reevaluation of the proposal to install new underground storage tanks at the Chevron station. The potential for environmental disaster, coupled with the site's historical negligence and the known high groundwater levels, presents an unacceptable risk. I advocate for a cessation of fuel operations at this location, to prevent any further environmental degradation and to prioritize the health and safety of the community and the preservation of our natural resources.

Thank you for your attention to these critical concerns. I hope to see a prudent and environmentally responsible decision made regarding this project.

Ecology's response

Thank you for sharing your concerns. Agencies including Ecology and the City of Walla Walla Public Works and Fire departments have been working together to ensure regulations set to protect human health and environment are followed during this UST system replacement.

Monitoring and testing of Walla Walla's municipal water and wastewater systems, and Mill Creek, show no evidence of contamination. Engineering controls have been put in place to

ensure the air, water, and soil in the area are continually monitored and pose no risk of future contamination.

Elbert Hardin, received via email April 11

The newspaper said that you were taking comments on the gasoline spill. I only have two comments. First off I would like to say that I would be disappointed if the responsible party did not replace the old tanks with double wall tanks. I would also like to see the rest of the gas stations around town inspected for leaks. All the rest of the gas stations in town are about the same age.

Ecology's response

Thank you for your comments. Washington law sets standards for installing, operating and maintaining UST systems. All new USTs are required to be double-walled ([WAC 173-360A-0310](https://app.leg.wa.gov/WAC/default.aspx?cite=173-360A-0310)⁵). As another layer of protection, all owners and operators must also operate and maintain release-detection equipment ([WAC 173-360A-0480](https://app.leg.wa.gov/WAC/default.aspx?cite=173-360A-0480)⁶).

Ecology's goal is to inspect all regulated USTs within three years of the last inspection, and we are working as quickly as possible to meet that schedule. There have been setbacks over the last few years due to COVID contact precautions.

Walla Walla has numerous regulated UST sites that are aged, as well as newer ones. While the systems may differ, they all must meet the requirements of the current regulation. The site owner/operator must inspect their site ([WAC 173-360A-0420](https://app.leg.wa.gov/WAC/default.aspx?cite=173-360A-0420)⁷) every 30 days and document their findings. This inspection includes checking the leak-detection equipment, spill and overflow equipment, corrosion protection equipment (if used), and general housekeeping of the associated components of those systems.

Gwendolyn Elliott Woodruff, received online April 11

Walla Walla residents deserve to live in a healthy and safe community, where business decisions are made with a sustainable future in mind.

It was reported that the leak "had the right factors for an explosion," (Walla Walla Union Bulletin) and the event was terrifying for locals to live through.

The incident narrowly avoided blowing up a huge portion of Walla Walla, not to mention the wide contamination of Mill Creek, which runs right through downtown and directly under the station. Wherever the new tanks go, preserving Mill Creek, and not blowing up Walla Walla, must be seriously and thoroughly considered in recognition of what we now know to be very real risks.

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-360A-0310>

⁶ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-360A-0480>

⁷ <https://app.leg.wa.gov/wac/default.aspx?cite=173-360A-0420>

The proposal should provide for at least one electric vehicle charging station, if not multiple stations, as a gesture of Stillwater Holdings' commitment to, and good faith in, the community it operates in.

As much of the project's funding will be provided by Chevron—with a purported "commitment to sustainability" claim on its website, and another that it is "working to advance a lower carbon future"—this would be an opportunity for the company to uphold its own values.

Chevron has already invested in an EV charging network, so not bringing them to the downtown Chevron station as part of this proposal would be a glaring omission that would not go unnoticed.

There is a revenue opportunity, and precedence. Many tourists arrive in electric vehicles from Portland and Seattle, and more and more locals are driving them. Many City of Walla Walla-operated trucks and vehicles are electric, as are some of our public transit buses, and even our Parks and Recreation department operates electric lawn equipment.

Please consider electric vehicle charging stations in this proposal and underscore your commitment to the health and safety of this community, and a sustainable future for everyone who lives, works, and visits here.

Ecology's response

We understand the events that happened last September were stressful for the local community. Ecology's Spill Response Team came quickly to assist the Walla Walla Fire Department with managing the explosion risk.

Monitoring and testing of Walla Walla's municipal water and wastewater systems, and Mill Creek, show no evidence of contamination. Engineering controls have been put in place to ensure the air, water, and soil in the area are continually monitored and pose no risk of future contamination.

Ecology has no authority to require charging stations to be added as part of an UST replacement. The current property owner and operator of the service station, Stillwater Holdings, is responsible for cleanup, not Chevron Corporation.