Periodic Review
Vestal Jobber Manufacturing Co

902 N Dyer Rd, Spokane Valley, Spokane County
Facility Site ID: 697, Cleanup Site ID: 1422

Toxics Cleanup Program, Eastern Region

Washington State Department of Ecology
Spokane, Washington

July 2024

Document Information

This document is available on the Department of Ecology's Vestal Jobber Manufacturing Co cleanup site page.[1]

Related Information

- Facility Site ID: 697
- Cleanup Site ID: 1422

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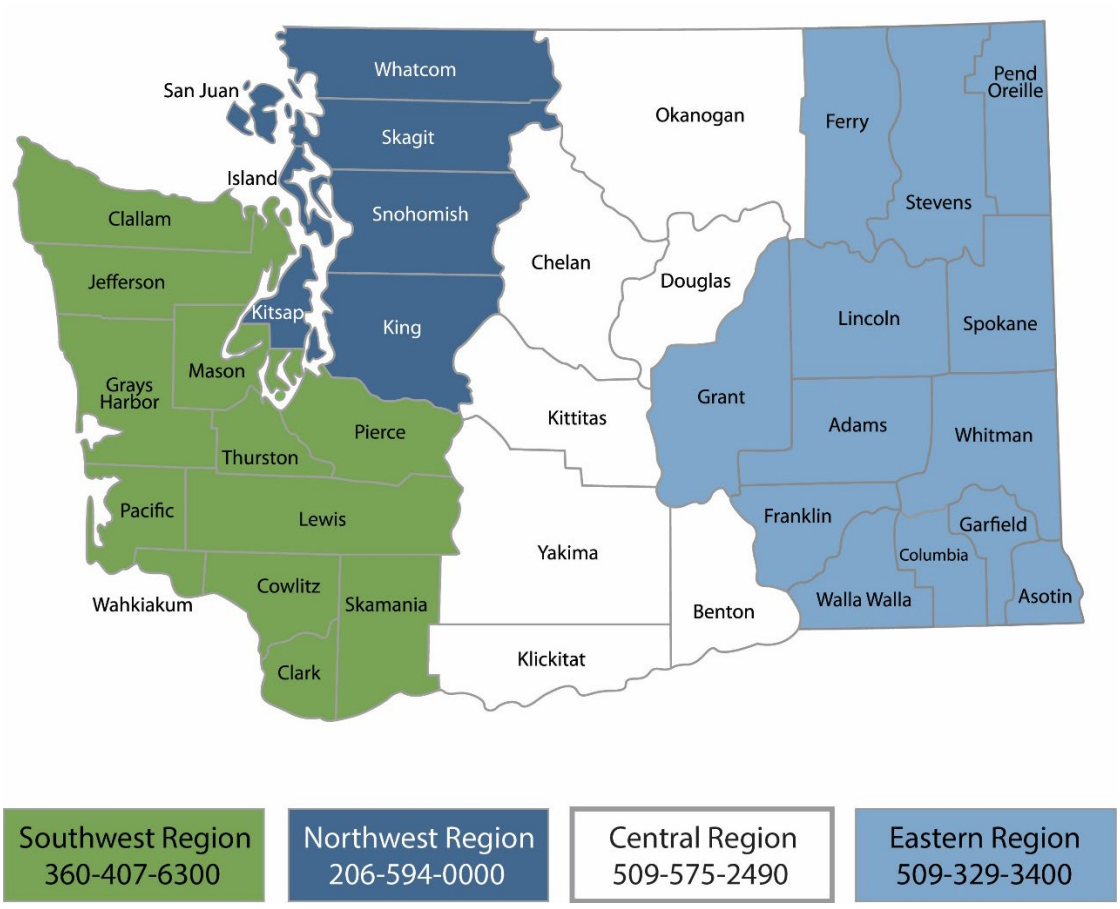
[1] https://apps.ecology.wa.gov/cleanupsearch/site/1422
[2] https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup
[3] https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

Department of Ecology's Regional Offices

Map of Counties Served



Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Vestal Jobber Manufacturing Co cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the first periodic review conducted for this Site.

Cleanup activities at this Site were completed under an independent remedial action. Residual concentrations of chromium, diesel-range petroleum hydrocarbons (DRPH), and polycyclic aromatic hydrocarbons (PAHs) exceeding MTCA cleanup levels remain on the property. The MTCA cleanup levels for soil and groundwater are established under WAC 173-340-740[4] and WAC 173-340-720,[5] respectively.

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. WAC 173-340-420(2)[6] requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because Ecology issued a no further action (NFA) opinion at the Site and institutional controls were required as part of the cleanup action.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site

b) New scientific information for individual hazardous substances or mixtures present at the site

c) New applicable state and federal laws for hazardous substances present at the site

d) Current and projected site and resource uses

e) The availability and practicability of more permanent remedies

f) The availability of improved analytical techniques to evaluate compliance with cleanup levels

[4] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740
[5] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720
[6] https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420

Summary of Site Conditions

Site description and history

The Site consists of Spokane County tax parcel 35152.1305 and is bounded by E Dean Ave to the north, N Dyer Rd to the west, a fenced property and E Mallon Ave to the south, and commercial buildings to the east. The surrounding land is outside of city zoning but is generally used for commercial and industrial purposes.

The Site was owned and operated by Atlas Industrial Coatings (AIC) from 1978 until 1988 and used for commercial metal plating. It was purchased by Vestal Jobber Manufacturing in 1988 and used as a fabrication, milling, and general machine shop. The Site contains a one-story shop building on the southeast of the property, which was most recently occupied by Vestal Jobber and Accucon Screw Conveyer Specialist. The remainder of the Site is covered with a combination of asphalt and gravel.

The Site was sold in May 2024 and is vacant. The property to the south (Spokane County tax parcel 35152.1354) is fenced and unpaved and is used for vehicle and equipment storage.

Site soils consist of glaciofluvial flood deposits including sand, gravel, and cobbles. Groundwater is approximately 45 feet below ground surface (bgs).

A vicinity map is in Appendix A, and a Site plan is in Appendix B.

Site investigations

A 1,270-gallon underground storage tank (UST) was discovered west of the shop building in July 1991 when a UST fill pipe was exposed during a rainstorm. In October 1991, Gifford Consultants, Inc. collected samples of the oil, aqueous liquid, and sludge within the UST and pumped the contents into 17 waste drums that were stored onsite. The samples were analyzed for total petroleum hydrocarbons and leachable metals using the Toxicity Characteristic Leaching Procedure (TCLP). The analyses indicated the UST contained DRPH and chromium sludge, likely from chrome-plating operations associated with AIC.

In May 1992, Ecology staff were notified that the USTs were being excavated without proper decommissioning and mobilized to the Site to halt the excavation. Ecology staff observed stained soils surrounding the UST.

In June 1993, the UST was decommissioned and removed. Approximately 61 cubic yards of soil were excavated and stockpiled, and six soil samples were collected from the UST excavation base, sidewalls, and soil stockpile. The samples were analyzed for Resource Conservation and Recovery Act metals, volatile organic compounds (VOCs), DRPH, gasoline-range petroleum hydrocarbons (GRPH), oil-range petroleum hydrocarbons (ORPH), and benzene, toluene, ethylbenzene, and xylene (BTEX). Chromium and DRPH concentrations exceeded MTCA Method A soil cleanup levels for unrestricted land use with maximum concentrations of 210 and 21,800 milligrams per kilogram (mg/kg), respectively.

The Spokane County Health Department conducted a site hazard assessment in January 1996 to evaluate the potential threat to human health and the environment posed by the release. Using the Washington Ranking Method relative to other Washington State cleanup sites, the Site received a hazard ranking of 3 out of 5, with 5 being the lowest risk.

From December 1996 to January 1997, Leppo Consultants collected additional soil samples from the UST excavation pit as well as two areas within the adjacent property to the south: a 48-foot-long trench along the eastern property line and a drywell located 75 feet south of the property. Soil samples were analyzed for total chromium, hexavalent chromium (chromium VI), leachable chromium using TCLP, DRPH, ORPH, and PAHs. Results indicated chromium, DRPH, and PAHs exceeding Method A cleanup levels beneath the UST excavation from approximately 5 feet bgs to a maximum vertical extent of 18 feet bgs. The maximum concentrations for total chromium and DRPH were 435 and 11,260 mg/kg, respectively. Chromium and DRPH were also present on the southern adjacent property at maximum concentrations of 1,280 and 7,210 mg/kg, respectively. Additional analyses indicated that hexavalent chromium was not present, and the chromium did not pose a leaching risk to groundwater based on the TCLP results.

Columbia Environmental Sciences, Inc. conducted a Phase II environmental site assessment in June 1997. Soil samples were collected at 5-foot intervals to 20 feet bgs in the UST excavation area and at 5 feet bgs at four onsite drywells and a building floor drain system south and east of the shop building exterior. Soil samples were analyzed for total chromium, DRPH, and VOCs. The results indicated groundwater was not likely to be impacted due to the vertical separation distance between the soil contamination and groundwater table at approximately 45 feet bgs.

Cleanup actions

Following the UST removal in June 1993, the excavation pit was left open, and approximately 61 cubic yards of stockpiled soil were left onsite on asphalt covered in plastic sheeting. Additional excavation was not feasible without compromising the shop building. The UST and stockpiled soil were disposed offsite sometime prior to additional Site characterization in 1996, but Ecology does not have record of the disposal. In 1997, the excavation was backfilled with clean imported soil and capped with asphalt. Ecology determined the Site would be eligible for an NFA if institutional controls were implemented in the form of an environmental covenant. An environmental covenant was recorded in Spokane County, and Ecology issued an NFA determination for the Site on September 18, 2017.

Based on the results of soil sampling conducted on the property to the south in 2017, concentrations of chromium and DRPH still exceed MTCA Method A soil cleanup levels for unrestricted land use. The property is fenced, and there is no indication additional cleanup is planned.

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site. WAC 173-340-704[7] states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance. The cleanup levels were initially established under the 1991 edition of MTCA and updated in the 2001 edition to incorporate new toxicity data and other scientific information. The original and updated cleanup levels are in Table 1.

Table 1. Original and updated cleanup levels

Analyte	1991 MTCA soil cleanup level (mg/kg)	2001 MTCA soil cleanup level (mg/kg)
Chromium (total)	100	2,000
DRPH	200	2,000
PAHs	1.0	0.1

mg/kg = milligrams per kilogram
DRPH = diesel-range petroleum hydrocarbons
PAHs = polycyclic aromatic hydrocarbons

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site. This is the standard point of compliance.

Environmental Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On September 18, 2017, institutional controls in the form of an environmental covenant[8] (Covenant) were recorded for the Site.

[7] https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704
[8] https://apps.ecology.wa.gov/cleanupsearch/document/76725

The Covenant recorded for the Site imposes the following limitations:

1. Land Use.

The remedial action for the Property is based on a cleanup designed for industrial property. As such, the Property shall be used in perpetuity only for industrial land uses as that term is defined in the rules promulgated under Chapter 70.105D RCW. Prohibited uses on the Property include but are not limited to residential uses, childcare facilities, K–12 public or private schools, parks, grazing of animals, and growing of food crops.

2. Containment of Soil/Waste Materials.

The remedial action for the Property is based on containing contaminated soil under a cap consisting of asphalt and located as illustrated in Exhibit B. The primary purpose of this cap is to prevent exposure to contaminated soil. As such, the following restrictions shall apply within the area illustrated in Exhibit B.

Any activity on the Property that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

The Grantor covenants and agrees that it shall annually, or at another time as approved in writing by Ecology, inspect the cap and report within thirty (30) days of the inspection the condition of the cap and any changes to the cap that would impair its performance.

Periodic Review

Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on July 8, 2024, Ecology observed that the Site use was protective of the cleanup actions and consistent with the limitations of the Covenant. The Site contains an unoccupied shop building and is covered with a combination of asphalt and gravel. The property south of the shop building was surrounded with a chain-link fence with razor wire, was unpaved, and contained several vehicles and other heavy equipment. A photo log is in Appendix C.

Direct contact

The cleanup actions were intended to eliminate exposure to contaminated soils at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by an engineered asphalt and concrete cap covering the residual contaminated soil in the vicinity of

the decommissioned UST. The cap appears to be in satisfactory condition, and no repair, maintenance, or contingency actions are required at this time.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2017. The Covenant remains active and discoverable through the Spokane County Auditor's Office. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action.

Ecology was notified of an intent to sell the property on May 1, 2024. The new owner received a copy of the Covenant and is aware of the restrictions. Ecology was also notified of plans to remove the existing septic system on the northwest side of the property and install a connection to the municipal sewer. There are no other plans to redevelop the Site at this time, and the Site use will remain as commercial and industrial.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected Site and resource uses

The Site is used for commercial and industrial purposes, with no anticipated change in Site use. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included containing hazardous substances, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below MTCA Method A cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site to ensure the integrity of the cleanup action and surface cap are maintained.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

References

Ecology. Site Visit. July 8, 2024.

Ecology. No Further Action Letter: Vestal Jobber Manufacturing Co. September 18, 2017.

Ecology. Environmental Covenant 6640351. September 18, 2017.

Columbia Environmental Sciences, Inc. Phase II Assessment. June 26, 1997.

Benton County Superior Court. Affidavit of Robert L. Erikson, M.S. June 11, 1997.

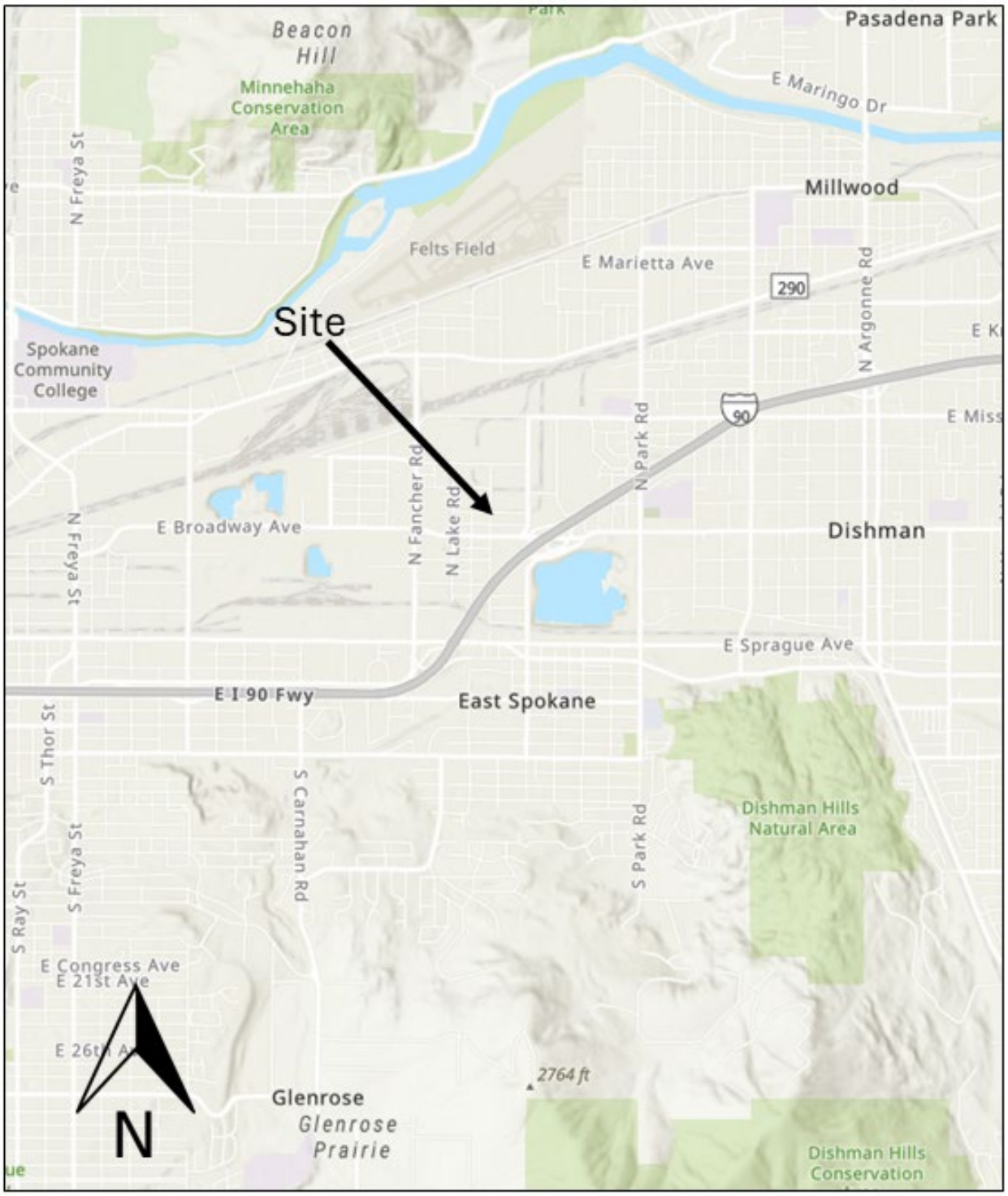
Leppo Consultants, Inc. Project Update: Preliminary Site Assessment Vestal Jobbers. February 26, 1997.

Spokane County Health District. Site Hazard Assessment. January 30, 1997.

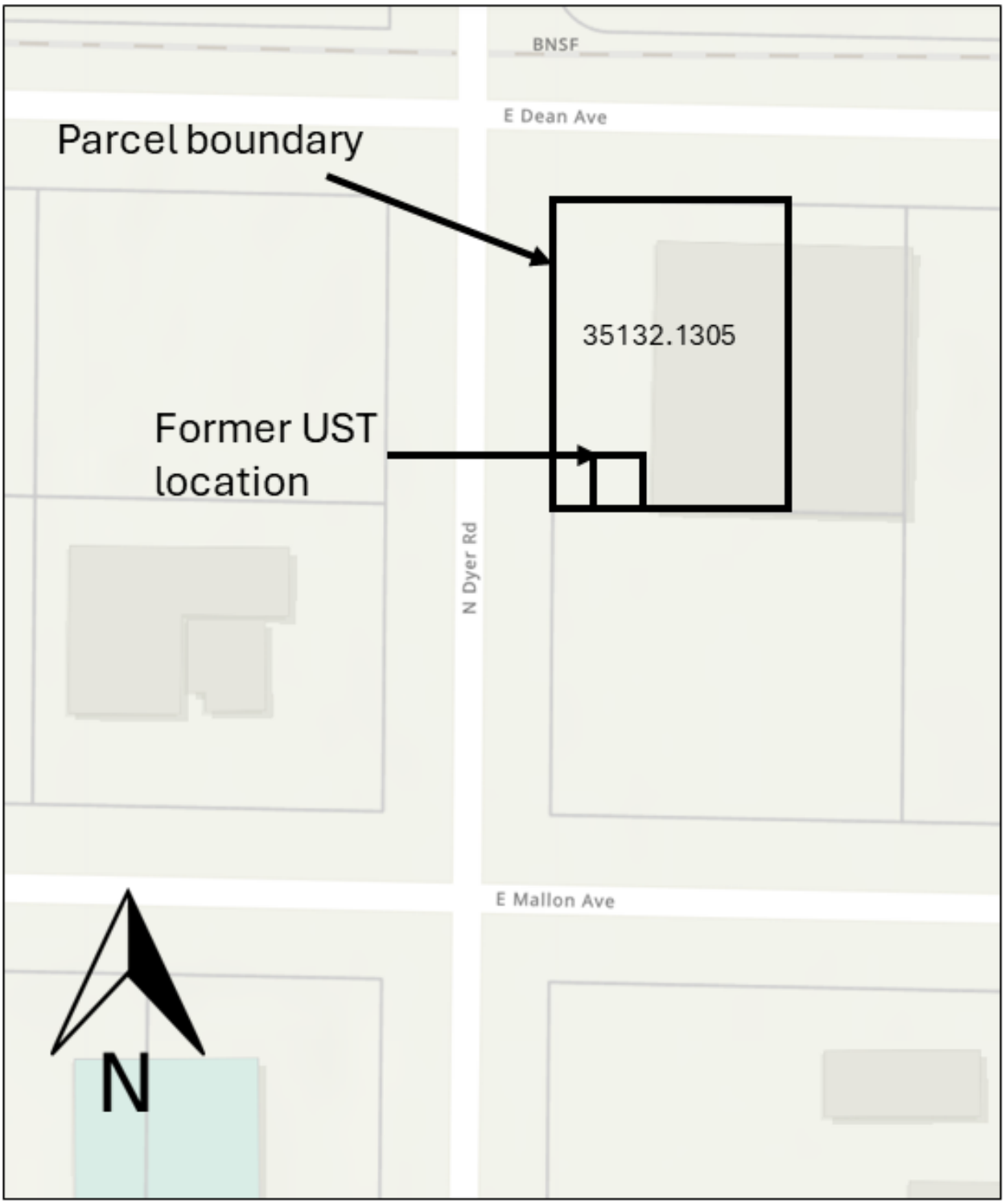
Blue Ridge Associates, Inc. Site Assessment Report: Vestal Jobber Manufacturing Company. August 17, 1993.

Gifford Consultants, Inc. Results of Underground Storage Tank Sampling and Engineering Services for the N. 902 Dyer Road Site. January 8, 1992.

Appendix A. Vicinity Map



Appendix B. Site Plan



Appendix C. Photo Log

Photo 1: South end of shop building near former UST location, from the west

Photo 2: North end of the shop building, with recent sewer line installation, from the west

Photo 3: Shop building and asphalt soil cap, from the north

Photo 4: South end of shop building and fenced property to the south, from the southwest