



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

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

September 20, 2024

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

Re: Response to September 6, 2024, Email:

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

Dear Ben Kleban:

This letter is in response to your September 6 email. We hope this letter answers your questions.

In your May 7, 2024, email, you notified Ecology insurance funds were nearly depleted and no additional resources were available to continue any projects except for stage 1 of the interim action project. You requested Ecology assume responsibility for all other projects.

In response, Ecology, in an effort to protect the community of Walla Walla, human health, and the environment, issued the Enforcement Order (EO) to direct remaining cleanup funds toward the immediate threat, which continues to be sump water disposal and vapor mitigation. Ecology worked to secure funding and contracting as means to step in when insurance funds were exhausted to ensure human health and the environment remained protected.

The greatest threat posed by the release to date has been the potentially explosive vapors that accumulated in the basement of the Marcus Whitman Hotel. Ecology requested the mitigation efforts continue so the vapors would not accumulate again.

Ben Kleban
Stillwater Holdings, LLC
September 20, 2024
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To date, Stillwater Holdings LLC has not adequately responded to the EO. The emails from July 11 and 29, 2024, were a list of actions you proposed to remove the product lines and install new ones and did not address sump water disposal and vapor mitigation.

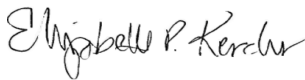
The work Stillwater Holdings LLC completed to expose the underground storage tanks (USTs) and replace product piping and pump islands was done as an independent action. Since this work was not completed under the EO, Ecology's role was to provide technical assistance and guidance on the proposed interim action. Please send a report documenting completion of the independent action and clarify if the entire product piping line was exposed and inspected for a potential leak(s) or if it was just the area immediately around where new lines are to be installed.

Please also send proof of liability insurance showing that the upgraded UST systems meet the financial assurance requirements.

Under federal and state law, polluters are responsible for responding to and cleaning up contamination. Ecology has identified Stillwater Holdings LLC as the potentially liable person (PLP) for this release as groundwater and soil contamination have been identified at your property and fingerprint analysis comparing fuel at the station to product in the 106 Building sump was identified as a match.

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
LUST Site Manager
Toxics Cleanup Program
Eastern Regional Office

cc: Stephan Tan, Cascadia Law
Carla Brock, Aspect Consulting
Nicholas Acklam, Ecology
Ecology Site file