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

June 5, 2023

Mitch Dimke
Bennett Lumber Products, Inc.
PO Box 670
Clarkston, Washington 99403

Re: Request to Address Residual Contamination at the following Site:

- **Site Name:** Guy Bennett Lumber Company UST 6606
- **Site Address:** 1785 Elm St Clarkston, Washington 99403
- **Asotin County Assessor Parcel Number:** 11320002500000000
- **Facility Site ID:** 47812495
- **Cleanup Site ID:** 9387
- **Underground Storage Tank (UST) ID:** 6606

Dear Mitch Dimke:

The Washington State Department of Ecology (Ecology) appreciates your previous independent cleanup actions, however; Ecology is contacting you to let you know the Site is still registered in the state system as an area with existing contamination. The information is publicly available on Ecology's Hazardous Sites List. [1] As part of a nation-wide effort led by the United States Environmental Protection Agency to evaluate and clean up leaking underground storage tank sites that have not been cleaned up yet, Ecology is exercising the statutory authority in Washington to assist you with the site cleanup and removing the Site from the Hazardous Sites List.

Ecology's file review shows the most recent correspondence regarding this Site is a letter from the Department of Ecology dated May 4, 2006. The most recent report for this site is '*Site Investigation Report, Site Assessment with Tank Removal,'* dated January

[1] nupsearch/reports/cleanup/contaminated?FacilitySiteId=47812495

29, 1999. The report documents the excavation of gasoline and diesel contaminated soil and the subsequent confirmation soil sampling. The report also documents that petroleum contamination remains in the soil at the site. If there has been additional work completed at the site since then, you are encouraged to submit any new Site information.

Notice of Intent to Perform Site Characterization Activities

Ecology has recently received funding to provide additional site characterization to assist a limited number of LUST sites. The intent of these proposed activities is to further characterize previously identified petroleum impacts at LUST sites with currently insufficient data to be able to obtain an NFA determination from Ecology. Ecology has selected this Site: Guy Bennett Lumber Company UST 6606 to receive a portion of these funds.

Ecology will work with local consultants to perform the characterization activities described below in the next few months and would like to discuss these events with you. Ecology will procure, fund, coordinate, and manage the contractors performing this work.

Although the Model Toxics Control Act (MTCA) requires potential liable persons to assume responsibility for the cleanup of contaminated sites, the site characterization work proposed herein will be funded by Ecology and you will not incur costs associated with these activities. If no contamination is found at your Site, or if residual contamination is discovered below the appropriate MTCA cleanup levels, an NFA determination may be issued for the Site by Ecology. However, if residual contamination exceeding the applicable MTCA cleanup levels is identified during the characterization process, your property will remain on Ecology's CSCL[2]. If you choose to forgo this Ecology-funded site characterization or if residual contamination is discovered exceeding the appropriate MTCA cleanup levels, Ecology may require additional characterization or remediation, at your cost.

Sites remaining on Ecology's CSCL are encouraged to enroll in the department's Voluntary Cleanup Program, which is designed to provide fee-based technical assistance in an effort to facilitate and accelerate the site cleanup and closure processes. If you would like additional information regarding this program, please visit the VCP program website at https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-

[2] https://apps.ecology.wa.gov/cleanupsearch/site/9387

Cleanup-Program or contact the Eastern Regional Office VCP Coordinator, Ted Uecker, by email at tuec461@ecy.wa.gov or by phone at (509) 342-5564.

Proposed Characterization Activities

To further characterize the current nature and extent of previously identified petroleum hydrocarbon impacts at the Site, three small-diameter, direct-push borings are proposed to be advanced to approximately 30 feet below ground surface (bgs) in the vicinity of the former USTs (Enclosure A - Scope of Work). Soil samples will be collected at each borehole location and analyzed for petroleum hydrocarbon constituents. Depth to groundwater is estimated at approximately 22 feet bgs. If groundwater is encountered, a groundwater sample will be collected. To minimize disruptions to Site daily activities during characterization activities, a small truck mounted, direct-push drill rig will be used to advance the borings.

Soil samples will be collected from the borings at approximately every five feet starting five feet below the ground surface or where there is visible soil staining from petroleum hydrocarbons. The soil samples will be analyzed for petroleum hydrocarbon constituents gasoline range total petroleum hydrocarbons (TPH-G) by method NWTPH-GX; diesel range total petroleum hydrocarbons (TPH-D) by analytical method NWTPH-Dx; benzene, toluene, ethylbenzene, and xylenes (BTEX), ethylene dibromide (EDB), ethylene dichloride (EDC), and methyl tert-butyl ether (MTBE) by EPA method 8260D, and lead by EPA method 6010D.

If groundwater is encountered, groundwater samples will be collected and analyzed for petroleum hydrocarbon constituents TPH-G by method NWTPH-GX, TPH-D by analytical method NWTPH-Dx; BTEX, EDB, EDC, and MTBE by EPA method 8260D; and lead by EPA method 6010D.

Prior to commencing the above activities, the contractor performing the work will coordinate these activities with you and contact a utility survey to assure each proposed boring location is free of subsurface utilities before drilling starts. The contractor will also contact 811, call before you dig at a minimum two business days before drilling starts. Following advancement and sampling, boring locations will be grouted and sealed in an effort to match both surface grade and material as close to original conditions as possible. Waste from the drilling activities such as soils and rinse water will be securely stored on-Site in 55-gallon steel drums, pending characterization and disposal. It is estimated up to four drums will be stored at the Site for a maximum of 90 days upon which the drums will be picked up for lawful disposal.

A Scope of Work describing specific details of the proposed further characterization activities is included in this transmittal for your records (Enclosure A – Scope of Work).

Access Agreement and Scheduling

A Property Access Agreement is included with this transmittal (Enclosure B – Access Agreement). Please complete, sign, and return the original copy of this form to the address indicated at the bottom of that document. Once the executed form is received by Ecology, you will be contacted regarding scheduling both the pre-field utility clearance visit and site characterization work, as described in the attached Scope of Work.

Contact Information

If you have any questions regarding this letter or if you would like additional information regarding the cleanup of contaminated sites, please contact me at (509) 385-5443 or beth.kercher@ecy.wa.gov.

Sincerely,

Elizabeth P. Kercher

Elizabeth Kercher
LUST Project Manager
ERO Toxics Cleanup Program

Enclosures (2): A. Scope of Work
B. Access Agreement

By Certified Mail: 9214 8901 9403 8317 3278 09

cc: Christer Loftenius, Acting Unit Supervisor, TCP-ERO
Ecology file