



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
4601 N Monroe Street • Spokane, WA 99205-1295 • 509-329-3400

October 19, 2021

Ryan Bixby  
Sound Earth Strategies  
2811 Fairview Avenue East, Suite 2000  
Seattle, Washington 98102

RE: Site Assessment Update Supplemental Remedial Investigation and Well Decommissioning Report March 2020 – North Colfax Petroleum Contamination Site, Tax Parcels 1-0135-00-01-01-0000, 1-0135-00-01-04-0000, 1-0135-00-01-15-0000, 2-0000-43-16-10-4910, 8-0195-00-00-00-00323, located at 102 E Tyler Street, 104 E Tyler Street, and 804 Main Street, Colfax, Whitman County, Washington

Dear Ryan Bixby:

The Washington Department of Ecology (Ecology) received your Supplemental Remedial Investigation and Well Decommissioning Report dated March 2020. The report documents additional soil assessment activities as outlined in a work plan submitted to and approved by Ecology in August 2019. The approved work plan, based in part on previous sampling activities conducted in 2014, indicated that soil sampling activities would be limited to the Colfax Grange and Time Oil properties, as well as select monitoring wells were to be decommissioned. Previous soil sampling activities at the Cenex property indicated that soil concentrations for petroleum hydrocarbons were below MTCA Method A cleanup levels and therefore not included in the 2019 sampling event. At the time of the work plan approval, Ecology requested notification prior to the site activities commencing in order to be onsite to observe soil and/or groundwater conditions. However, soil sampling and well decommissioning activities were completed at the North Colfax Site in October 2019 and Ecology was notified of activity completion in March 2020. Ecology is disappointed the work was performed without being given the opportunity to observe the work as we had agreed.

The soil sample results collected from the October 2019 assessment activities indicate soils exceeding the MTCA Method A cleanup levels remain at the Colfax Grange and Time Oil

Properties with maximum gasoline-range concentrations detected at 260 mg/Kg and 1,200 mg/Kg, respectively, a decrease in concentrations from 360 mg/Kg and 2,000 mg/Kg. Though soil sample results indicate natural attenuation is occurring at the respective properties, the results do not align with the expected soil attenuation rates calculated in 2014 for each property. Based on the recent sampling event, petroleum hydrocarbon and related benzene, continue to persist at the Colfax Grange and Time Oil properties.

In previous correspondence, Ecology stated that groundwater contamination, if currently present at the site, is confined within the site boundaries. Based on the October 2019 soil sampling results and previous groundwater determinations, contamination is still present above MTCA Method A cleanup levels. As stated in previous discussions, a Model Remedy utilizing an environmental covenant is available for the Site. The covenant would cover the portions of the site where contamination remains above cleanup levels. Following recording of the Ecology approved covenant, Ecology will hold the covenant until it is no longer required. Please let me know if you have any questions.

Sincerely,



Evelyn Cummings  
Site Manager  
Toxics Cleanup Program  
Eastern Regional Office

cc: William J. Fees, Ecology WJF