



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

February 25, 2025

Sent via email and hard copy

Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

RE: Next Steps under the Existing Agreed Order for the following Site:

- **Site Name:** Coleman Oil Biodiesel Spill
- **Site Address:** 600 South Worthen Street,¹ Wenatchee
- **Facility Site ID:** 83844381
- **Cleanup Site ID:** 13215
- **Agreed Order:** DE 15389

Dear Jim Cach:

I want to reiterate the items we covered during our February 6, 2025 meeting. The purpose of that call was to discuss a site closure strategy. We identified two general items that are discussed below.

Agreed Order DE 15389, issued in October 2017, requires Coleman Oil Company to complete a Remedial Investigation (RI), a Feasibility Study (FS), and a draft Cleanup Action Plan (DCAP) as required under the Model Toxics Control Act.² Our records show that the RI was completed in December 2018 and the FS was finalized in July 2023. The only outstanding deliverable to finish is the DCAP.

HydroCon submitted an initial review version of the DCAP in July 2022 prior the completion of the FS. However, this version was insufficient as well as out of order, so the review process was suspended with the goal of resolving these issues at a future time.

¹ Previously, this site address was listed as 3 E. Chehalis Street. This street address does not match the parcel address for the former bulk fuel facility, as shown in records at the Chelan County assessor's office. Thus, the site address has been revised.

² <https://app.leg.wa.gov/wac/default.aspx?cite=173-340>



Here are some of the issues Ecology identified:

- Revise the figures to show areas where excavation or other cleanup activities have already occurred, including the cleanup around MW-14.
- Identify the reference source for the 2017 cleanup of the former storage building and warehouse. Arrange to have this report sent to Ecology.
- Depict any remaining impacted areas to be addressed.

Ecology will send you, under separate cover, a different template version of the DCAP to be finalized. Completion of this version of the DCAP will be suitable enough for public comment and, once that has gone through the comment period, will fulfill the requirement for standard deliverables under AO DE 15389. Note that any substantive comments that arise during public comment will require revision of the DCAP.

The other item is the development of a formal work plan to evaluate the effectiveness of the ongoing interim action which consists of a recirculation treatment system. This system has operated since 2017, so it has had a runtime of approximately seven years. Per WAC 173-340-430,³ an interim action typically does not constitute a final cleanup action since it is generally implemented for limited purposes.

It is time to evaluate the efficacy of the treatment system, given the extended length of time that the system has operated. The work plan development, finalization with agency approval, and the execution of this plan is incorporated as a deliverable under the existing agreed order.

The Groundwater Recirculation System Evaluation Work Plan (Work Plan) should address the items described in my email dated December 13, 2024, enclosed with this letter, and with some of the highlights briefly described below:

- When the system will be shut down and the length of time that will be required for groundwater conditions to attain equilibrium. Ensure enough time for groundwater conditions to reach equilibrium before assessing whether groundwater may meet the cleanup standard.
- Based on seasonal changes, the proposed shutdown should occur prior to the period when the river reaches its highest elevation. Prior to the implementation of the treatment system, the surface water impacts occurred during the high water period.
- The Work Plan will incorporate a contingency plan ready to implement if nonaqueous phase liquid (NAPL) is observed at any of the monitoring points.

³ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-430>

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- The Work Plan will also formally incorporate the compliance requirements.

The draft of the Work Plan is due on or before March 25, 2025. If you have any questions regarding this letter or the investigation, call me at (509) 731-9613 or email at john.mefford@ecy.wa.gov.

Sincerely,



John Mefford
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Central Region Office

Enclosure (1): Email dated December 31, 2024

cc: Craig Hultgren, HydroCon