



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

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

March 11, 2025

Travis Trent
Fulcrum Environmental Consulting
207 West Boone Avenue
Spokane, WA 99201
ttrent@efulcrum.net

Re: Technical Assistance for the Following Contaminated Site:

Site Name: Lone Dollar General
Site Address: 4392 WA-31, Lone
Facility/Site No.: 100001836
Cleanup Site No.: 17087
VCP Project No.: EA0385

Dear Travis Trent:

The Washington State Department of Ecology (Ecology) received your request for technical consultation pursuant to WAC 173-340-515(5) on your proposed cleanup of the Lone Dollar General facility (Site) under the Voluntary Cleanup Program (VCP)¹. This letter provides our technical assistance and guidance. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter [70A.305](#)² RCW.

Issues Presented and Opinion

Thank you for providing Ecology the opportunity to review and provide comments on your Sampling Analysis Plan and Quality Assurance Project Plan. Ecology has determined that the proposed work plans meet the stated objectives with respect to Site data gaps.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

Description of the Site

This opinion applies only to the Site described as follows. The Site is defined by the nature and extent of contamination associated with the following releases:

- Heavy metals into the soil.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the Property is affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Fulcrum Environmental Consulting, Lone Dollar General Store Sampling Analysis Plan, February 11, 2025.
2. Fulcrum Environmental Consulting, Dollar General Soil Incident Investigation, November 21, 2024.
3. Fulcrum Environmental Consulting, Lone Dollar General Store Soil Remediation Plan, October 11, 2024.
4. GN Northern, Inc., Geotechnical Site Investigation Report- Proposed Dollar General Store, September 14, 2023.

You can request these documents by filing a [records request](#).³ For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check whether the documents are available on the [Site webpage](#).⁴

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis and Technical Assistance

Ecology has concluded that the Sampling Analysis Plan and Quality Assurance Project Plan meet the stated objectives with respect to Site data gaps. Ecology is providing the following comments on your proposed cleanup actions:

1. Site hydrogeologic investigation (Section 4.1 and Appendix C)

Ecology concurs that potable groundwater is likely not present within the upper 20 feet of the Site and private wells in the vicinity are screened in the confined

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁴ <https://apps.ecology.wa.gov/gsp/CleanupSiteDocuments.aspx?csid=17087>

aquifer present at greater than 100 feet below ground surface (bgs). However, the provided well logs indicate unconfined or semi-confined groundwater is present in sand and gravels at approximately 17 and 24 feet bgs. This separation is likely sufficient to prevent leachable metals from reaching groundwater, and the additional soil sampling at depth should demonstrate this separation distance is representative throughout the Site, as detailed in comment 3.

2. Onsite stockpile characterization (Section 5.1 and 7)

Please clarify the number of stockpile samples, and the methodology for compositing each sample prior to analysis. The sampling description refers to a core sample through each “section” and then refers to each sample “quadrant”, while Figure 7 shows the stockpile location divided into three sample units. Please provide a description of how many aliquots will be collected from each core sample and from what depth. Ecology concurs with the proposed analytical methodology.

3. Additional Site characterization sampling (Section 5.2 and Figures 6 and 7)

Ecology disagrees that additional soil characterization is necessary on the eastern half of the Site (grids 6, 16-20) as these areas have already been confirmed as not exceeding MTCA Method A cleanup levels for lead. Ecology recommends focusing confirmation sampling on the western half of the Site, surrounding and within the excavation footprint and near the northern, southern, and western property boundaries. Once the additional sampling is completed, please update Figure 6 to include sample locations and depths, as well as a plan view map illustrating the cross section end points. Ecology concurs with the proposed sampling and analytical methodologies.

4. Second offsite stockpile characterization (Section 5.3)

While the proposed sampling methodology is sufficient to characterize the stockpile, composite sampling throughout the full stockpile depth would also be sufficient and would reduce the number of samples required. Ecology concurs with the proposed analytical methodology.

5. Field duplicates

The Quality Assurance Project Plan does not clarify whether field duplicate samples will be collected at each investigation location to measure precision. Please collect a minimum of one duplicate soil sample from each investigation location (onsite stockpile, onsite confirmation, and offsite stockpile).

Limitations of the Opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Change the boundaries of the Site.
- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. See RCW 70A.305.080 and WAC 173-340-545.

Opinion is limited to proposed cleanup

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Property upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170.

Contact Information

Thank you for choosing to clean up your Property under the Voluntary Cleanup Program (VCP). As you conduct your cleanup, please do not hesitate to request additional services. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at 509-342-5564 or by e-mail at ted.uecker@ecy.wa.gov.


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Sincerely,



Ted M. Uecker
Toxics Cleanup Program, Eastern Regional Office

tmu:hg

cc: Kirk Farrelly, Capital Growth Buchalter
Nicholas Acklam, Ecology 
Forrest Thorniley, Ecology