



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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

April 2, 2025

Debra Manjarrez  
Manjarrez & De Leon Inc. PS  
2010 W Nob Hill Blvd  
Yakima, WA 98902

**Re: No Further Action Opinion for the following Contaminated Site**

- **Site Name:** Hahn Motor Company
- **Site Address:** 1201 S 1<sup>st</sup> Street, Yakima
- **Facility/Site ID:** 502
- **Cleanup Site ID:** 4927
- **VCP Project No.:** CE0529

Dear: Debra Manjarrez:

The Washington State Department of Ecology (Ecology) received your request for an opinion regarding the sufficiency of your independent cleanup of the Hahn Motor Company (Site) under the Voluntary Cleanup Program (VCP).<sup>1</sup> This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.<sup>2</sup>

## Opinion

---

Ecology has determined that **no further remedial action is necessary** to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC<sup>3</sup> (collectively called "MTCA").

---

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

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

<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

## Site description

---

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s).

- Tetrachloroethylene (PCE) into groundwater
- Diesel, Heavy Oil, and Metals into the soil and groundwater

Please note that releases from multiple sites can affect a parcel of real property. Currently, Ecology has no information that other sites affect the parcel(s) associated with this Site.

Please note the Site is a known sub-facility of the Yakima Railroad Facility (FSID NO. 500). The Yakima Railroad is a comingled plume and is comprised of several sub-facilities along the Yakima Railroad Corridor. Each sub-facility must demonstrate that site soils meet appropriate MTCA cleanup levels or removed to the greatest extent practicable and are no longer contributing to the areawide PCE contamination.

Hahn Motors Company was established in 1946, and its facility was constructed with the installation of a 2,000-gallon heating oil underground storage tank (UST) on the northwest side of the building's basement to provide heating. In the 1970s, a second UST was added, and both tanks were used to store and manage used oil. In 2007, the site was notified by the Department of Ecology for non-compliance with the Underground Storage Tank Regulations, Chapter 173-360A.<sup>4</sup> As a result, both USTs were decommissioned and backfilled in November 2007. Subsequently, soil, groundwater, and indoor air investigations were conducted, followed by remediation efforts to address contamination.

## Basis for the opinion

---

Ecology bases this opinion on information in the documents listed in Enclosure A. You can request these documents by filing a records request.<sup>5</sup> For help making a request, contact the Public Records Officer at [recordsofficer@ecy.wa.gov](mailto:recordsofficer@ecy.wa.gov) or call (360) 407-6040. Before making a request, check if the documents are available on the Hahn Motor Company cleanup site website.<sup>6</sup>

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

---

<sup>4</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-360A>

<sup>5</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>6</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/4927>

## Analysis of the cleanup

---

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

### Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action.

The Site's geologic, hydrogeologic, geographic, and terrestrial habitat settings were appropriately identified. Soil, groundwater, and indoor air samples appropriately identified the nature and extent of contamination. Contamination was found in soil and groundwater with sufficient sampling to determine potential exposure pathways.

### Setting cleanup standards

Cleanup standards include cleanup levels, points of compliance, and applicable local laws and requirements. Ecology has determined the cleanup levels set for the Site meet the substantive requirements of MTCA.

Historical Site use identified diesel, heavy metals (arsenic, chromium, mercury, cadmium, and lead), PCE, and its breakdown products as potential contaminants. Groundwater, soil, soil vapor, and indoor air were identified as potentially contaminated media, and cleanup levels were identified for each. Standard points of compliance for direct contact were selected for soil at the location of the exterior drywell immediately outside the washing bay.

The Site uses MTCA Method A Cleanup Levels for soil and groundwater, these cleanup levels are for unrestricted land use and implement standard points of compliance. The Site uses MTCA Method B Cancer and Noncancer for Indoor air.

Contaminants of concern	Method A Cleanup levels Soil (mg/kg)	Method A Cleanup levels Groundwater (µg/L)
Diesel	2,000	500
Oil	2,000	500
Gasoline	30/100*	800/1,000*
Benzene	0.03	5
Toluene	7	1,000

Ethylbenzene	6	1,000
Total Xylenes	9	1,000
EDB	0.005	0.01
EDC	N/A	5
MTBE	0.1	20
Naphthalene	5	160
TCE	0.03	5
Cadmium	2.5	N/A
Chromium	34	N/A
Arsenic	20	N/A
Lead	250	N/A

MTCA Method A Cleanup Level for Unrestricted Land Use for gasoline is 30 mg/kg if benzene is detected and 100 mg/kg if benzene is not detected in soil and 800 µg/L for groundwater if benzene is not detected and 1,000 µg/L for groundwater if benzene is detected.

Blue Mountain Environmental completed both Tier 1 and Tier 2 vapor intrusion evaluations at the site to assess whether indoor air quality could be impacted by subsurface contaminants. During these evaluations, the consultant referred to MTCA Table 830-1 to identify and analyze the appropriate contaminants of concern. The results of the Tier 2 evaluation confirmed that there is no indication of poor indoor air quality, and therefore indoor air is not expected to pose a concern at the site. This thorough assessment ensures that potential vapor intrusion risks are properly addressed and mitigated.

### **Selecting and implementing cleanup action**

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

In November 2007, two underground storage tanks (USTs) were decommissioned, and soil samples collected at that time revealed the presence of heavy oil contamination. A further investigation in January 2022 identified additional contaminants, including diesel, cadmium, and chromium in the soil. In July 2022, Blue Mountain Environmental and Consulting Company Inc. (BMEC) oversaw the removal and excavation of two dry wells, along with associated piping and contaminated soils.

During the excavation, Drywell 1 was removed, resulting in the removal of a total of 123.66 tons of contaminated soils. Overexcavation of Drywell 1 and the excavation of Drywell 2 led to the removal of an additional 119.81 tons of contaminated soil. All contaminated materials were disposed of at Wasco Landfill in The Dalles, Oregon. Soil samples were collected from the base and sidewalls of the excavations before backfilling. The confirmation samples confirmed that no contaminants remained above MTCA Cleanup Levels following the over-excavation of the two dry wells.

By removing the USTs and excavating the contaminated soil, the source of contamination in the groundwater was eliminated, resulting in a gradual reduction in groundwater contamination over time.

You must decommission resource protection wells<sup>7</sup> installed as part of the remedial action that is not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.<sup>8</sup>

## **Listing of the Site**

---

Based on this opinion, Ecology will initiate the process of removing the Site from the Contaminated Sites List. The Site will be added to the No Further Action sites list.

## **Limitations of the opinion**

---

### **Opinion doesn't 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 doesn't resolve or alter a person's liability to the state or 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).<sup>9</sup>

### **Opinion doesn't constitute a determination of substantial equivalence**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action.

---

<sup>7</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410>

<sup>8</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

<sup>9</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

Debra Manjarrez  
Manjarrez & De Leon Inc. PS  
April 2, 2025  
Page 6

This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080<sup>10</sup> and WAC 173-340-545.<sup>11</sup>

### **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(6).<sup>12</sup>

### **Termination of agreement**

---

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. CE0529.

### **Questions**

---

If you have any questions about this opinion or the termination of the Agreement, please contact me at 509.406.6959 or Tavi.wise@ecy.wa.gov.

Sincerely,



Tavi Wise  
Toxics Cleanup Program  
Central Region Office

Enclosure: A – Basis for the opinion: Document List

Copy: Yancy Meyers, ymeyer@bmecww.com  
Peter Trabusiner, ptrabus1@frontier.com

Fiscal, VCP Fiscal Analyst  
TCP, Operating Budget Analyst

---

<sup>10</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>11</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>12</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

# Enclosure A

---

## Basis for the Opinion: Documents List

The following documents were reviewed for this opinion.

- Hahn Motor Company – Remedial Investigation/Feasibility Study, Blue Mountain Environmental Co. Inc., October 11, 2024<sup>1 2 3</sup>
- Hahn Motor Company – Vapor Intrusion Assessment Report, Blue Mountain Environmental Co. Inc., November 14, 2024<sup>4</sup>
- Hahn Motor Company – June 2024 Groundwater Sampling Event Report, Blue Mountain Environmental Co. Inc., June 14, 2024<sup>5</sup>
- Hahn Motor Company – December 2023 Groundwater Sampling Event Report, Blue Mountain Environmental Co. Inc., January 29, 2024<sup>6</sup>
- Hahn Motor Company – Further Action, Department of Ecology, January 12, 2024<sup>7</sup>
- Hahn Motor Company – September 2023 Groundwater Sampling Event Report, Blue Mountain Environmental Co. Inc., October 5, 2023<sup>8</sup>
- Hahn Motor Company – June 2023 Groundwater Sampling Event Report, Blue Mountain Environmental Co. Inc., July 10, 2023<sup>9</sup>
- Hahn Motor Company – December 2022 Groundwater Sampling Event Report, Blue Mountain Environmental Co. Inc., January 27, 2023<sup>10</sup>
- Hahn Motor Company – Additional Subsurface Investigation Report, Blue Mountain Environmental Co. Inc., October 17, 2022<sup>11</sup>
- Hahn Motor Company – Drywell Decommissioning and Contaminated Soil Removal, Blue Mountain Environmental Co. Inc., July 28, 2022<sup>12</sup>
- Hahn Motor Company Subsurface Investigation Report, Blue Mountain Environmental Co. Inc., March 4, 2022<sup>13</sup>

---

<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/154052>

<sup>2</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/154053>

<sup>3</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/154054>

<sup>4</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/154049>

<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/143642>

<sup>6</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/136808>

<sup>7</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/135221>

<sup>8</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/131121>

<sup>9</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/135116>

<sup>10</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/122389>

<sup>11</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/118102>

<sup>12</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/114972>

<sup>13</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/111174>

- Hahn Motor Company UST Decom & Site Assessment, PETCO Incorporated, February 1, 2008<sup>14</sup>
- Hahn Motor Landfarmed soil rpt, Brad Card, June 29, 1992<sup>15</sup>
- Hahn Motor Company – Site Hazard Assessment, Department of Ecology, March 12, 1991<sup>16</sup>

---

<sup>14</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/4485>

<sup>15</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/4481>

<sup>16</sup> <https://apps.ecology.wa.gov/cleanupsearch/document/4484>