



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

December 1, 2025

Niklas Bacher
Anchor QEA, LLC
949 Market Street, Suite 700
Tacoma, WA 98402

Re: Further Action Determination under WAC 173-340-515(5) for the following Site:

- **Site Name:** Yakima Valley Spray
- **Site Address:** 1108 S 1st Street, Yakima
- **Facility/Site ID:** 445
- **Cleanup Site ID:** 3664

Dear Niklas Bacher:

Thank you for submitting a response to Ecology's comments on the March 2024 comments (Site) for review by the Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing the cleanup of your Site.

This letter is an advisory opinion regarding whether further action is necessary to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70A.305 RCW¹ and Chapter 173-340 WAC.²

Based on our review, **further action is required.**

The further action opinion is based on our review of the following document(s):

1. Yakima Valley Spray – Memorandum Response to Ecology Letter dated March 11, 2024, March 24, 2025, Anchor QEA.³
2. Yakima Valley Spray – Ecology Comments on GWMR and Request for Site Closure, March 11, 2024, Washington State Department of Ecology.⁴

¹ <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305>

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

³ <https://apps.ecology.wa.gov/cleanupsearch/document/164224>

⁴ <https://apps.ecology.wa.gov/cleanupsearch/document/137713>

3. Yakima Valley Spray – ERTS 696549 Initial Investigation report, February 5, 2024, Washington State Department of Ecology.⁵
4. Yakima Valley Spray 2022 Groundwater Monitoring Report, March 1, 2023, Anchor QEA.⁶
5. Yakima Valley Spray 2021 Groundwater Monitoring Report, March 23, 2022, Anchor QEA.⁷
6. Yakima Valley Spray U-Haul Final Cleanup Action Plan, August 14, 2001, Department of Ecology⁸

Ecology has determined that further action is necessary to clean up contamination at the Site. The referenced documents are available online.

Investigation Summary

The Site is defined by the extent of contamination caused by the following release(s):

- Diesel plus oil in groundwater
- Gasoline in groundwater

The Yakima Valley Spray (U-Haul) Facility is a 3.7-acre commercial property in Yakima consisting of three historically distinct parcels with documented contamination sources. Parcel C previously operated as a pesticide manufacturing facility for approximately 65 years, including a 6,000-gallon PCE tank and a waste disposal pit used for pesticide waste. Parcel B was historically used for bulk petroleum storage and distribution, with seven documented 50,000-gallon aboveground tanks. Parcel A was formerly used as a salvage and heavy equipment business, with drywells and sumps contaminated with petroleum products and lead.

During the remedial investigation, twelve monitoring wells were installed onsite and along the property boundary to a depth of 29 feet, and soil samples were collected across all three parcels. A total of 62 contaminants were identified, including 49 in soil and 37 in groundwater, with 24 detected in both media.

Cleanup Summary

The selected cleanup actions for the site were completed through excavation, disposal at appropriately licensed facilities, and bioventing. All areas with soil contamination exceeding cleanup levels were excavated, including contaminated soil on adjoining properties to the west and north. Two buildings were demolished to access contaminated soil beneath them, and any contaminated floor materials were removed and disposed of at permitted waste facilities. Confirmation sampling was conducted in all excavation areas before they were backfilled with clean material.

⁵ <https://apps.ecology.wa.gov/cleanupsearch/document/141171>

⁶ <https://apps.ecology.wa.gov/cleanupsearch/document/137532>

⁷ <https://apps.ecology.wa.gov/cleanupsearch/document/113080>

⁸ <https://apps.ecology.wa.gov/cleanupsearch/document/43137>

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Bioventing was implemented to address TPH in areas that could not be fully excavated, and quarterly groundwater monitoring continues.

Further Requirements

Groundwater concentrations for gasoline, diesel, and oil remain above MTCA cleanup levels. As discussed in our previous meeting, benzene is not present, and the applicable cleanup level for gasoline is the MTCA Method A standard of 1,000 µg/L. Petroleum-related groundwater data should be evaluated in accordance with Ecology's silica gel cleanup level guidance to ensure non-petroleum hydrocarbons are not contributing to exceedances. Ecology requires four consecutive quarters of groundwater results below cleanup levels before a No Further Action (NFA) determination can be issued.

Limitations

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).⁹

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).¹⁰

If you have any questions regarding this opinion, please contact me at tavi.wise@ecy.wa.gov.

Sincerely,



Tavi Wise
Site Manager
Toxics Cleanup Program
Central Regional Office

cc: 9589 0710 5270 0589 5643 58

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

¹⁰ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>