STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Eastern Region Office
4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

January 7, 2026

Kevin Singh and Gary Kalkat
GUR K&G LLC
2285 East Isaacs Avenue
Walla Walla, WA 99362
nbakg66@live.com

Re: Further action opinion for the following contaminated Site:
Site name: Mountain Oil Inc Isaacs
Site address: 2285 E Isaacs Ave
Facility/Site ID: 8187465
Cleanup Site ID: 5454
VCP Project ID: EA0403

Dear Kevin Singh and Gary Kalkat:

The Washington State Department of Ecology[1] (Ecology) received your request for an opinion regarding the sufficiency of your independent cleanup of the Mountain Oil Inc Isaacs (PPI Mart) facility (Site) under the Voluntary Cleanup Program (VCP).[2] This letter provides our advice and assistance. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.[3]

Opinion

Ecology has determined that 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, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA").

[1] https://ecology.wa.gov/
[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[3] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

Site description

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

- Petroleum hydrocarbons, volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs) into the soil.
- Petroleum hydrocarbons and VOCs into the groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the opinion

This opinion is based on information in the following documents:

- Martin S. Burck Associates, Inc. (MSBA), UST Site Assessment and Excavation Cleanup Report- PPI Mart, November 7, 2025.
- ERM, 2013-2014 Groundwater Monitoring and Groundwater Compliance Confirmation Report, Mountain Oil Facility, December 17, 2014.
- ERM, October and November 1998 Groundwater Monitoring and Site Characterization Activities, Mountain Oil Facility, January 19, 1999.
- ERM, July 1998 Groundwater Remediation Activities, Mountain Oil Facility, August 14, 1998.
- GeoEngineers, Progress Report Number 2, Supplemental Site Characterization Study and Interim Remedial Actions, Pacific Pride Property, December 1, 1994.
- GeoEngineers, Progress Report Number 1, Supplemental Site Characterization Study and Interim Remedial Actions, Pacific Pride Property, June 22, 1994.

You can request these documents by filing a records request.[4] For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360)

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

407-6040. Before making a request, check whether the documents are available on the Site webpage.[5]

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

Analysis of the cleanup

Ecology has concluded that further remedial action is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

Characterizing the Site

Ecology has determined that further characterization is necessary to establish cleanup standards at the Site.

In August 1993, approximately 1,400 gallons of unleaded gasoline were released to the surface during a delivery truck overfill and migrated to the subsurface within the underground storage tank (UST) area illustrated in **Figure 2 of Enclosure A**. Site investigations in 1993 and 1994 included test pits, trenches, soil borings, vapor sampling points, and monitoring wells to characterize the extent of contamination in soil and groundwater. Concentrations of gasoline-range petroleum hydrocarbons (GRPH) and VOCs including benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected above MTCA Method A cleanup levels in soil and groundwater. Contaminated soil was observed in samples collected from soil borings at a maximum depth of 42.5 feet below ground surface (bgs), below the observed groundwater table at approximately 35 feet bgs. Approximately five feet of light non-aqueous phase liquid (LNAPL) petroleum was observed in monitoring well MW-2. Sixteen monitoring wells were installed at the Site between 1993 and 1994, and groundwater monitoring was conducted on a variable basis from 1994 through 2014. Results indicated concentrations of GRPH and BTEX decreased to concentrations below cleanup levels from 2013 to 2014 with no LNAPL present in any of the wells. Following the interim cleanup actions completed from 1993 through 2014 described in the subsequent sections of this letter, residual concentrations of petroleum hydrocarbons and VOCs in soil continued to exceed MTCA cleanup levels within the UST area.

In September 2025, the UST system was decommissioned and removed and soils in the area were excavated to approximately 16 feet bgs, with additional test pits excavated to 23 feet bgs. Confirmation soil samples collected following the removal action indicated GRPH, diesel- and oil- range petroleum hydrocarbons (DRPH and

[5] https://apps.ecology.wa.gov/cleanupsearch/site/5454

ORPH), BTEX, naphthalenes, and PAHs exceeding MTCA cleanup levels at 16 feet bgs, with a lateral extent of approximately 50 feet by 50 feet. Residual concentrations of petroleum hydrocarbons in soil range up to 1,500 milligrams per kilogram (mg/kg) GRPH and 2,100 mg/kg DRPH. Groundwater samples were collected from monitoring wells MW-1 and MW-2 and air sparging well ASW-1, with GRPH and benzene exceeding MTCA Method A cleanup levels in MW-2, and DRPH and ORPH exceeding MTCA cleanup levels in MW-2 and ASW-1.

Setting cleanup standards

Cleanup standards include cleanup levels, points of compliance, and applicable local laws and requirements. Ecology has determined that the cleanup levels established for contaminants of concern in 1993 remain appropriate for the Site, with additional cleanup levels for contaminants identified in 2025. The points of compliance established in 1993 remain appropriate for the Site but may be amended based on compliance monitoring data following the additional cleanup actions. Please see the Additional Requirements section below for more information.

For soil, the cleanup levels were established using MTCA Method A and are based on protection of groundwater for drinking water use. The cleanup level for GRPH has been lowered from 100 to 30 milligrams per kilogram (mg/kg) as specified in Table 740-1 in WAC 173-340-900 since benzene is present in soil. The point of compliance for soils is throughout the lateral and vertical extent of the Site. This is the standard point of compliance based on the protection of groundwater. The cleanup levels are as follows:

Contaminant	**Cleanup Level (mg/kg)**
GRPH	30
DRPH + ORPH	2,000
Benzene	0.03
Toluene	7
Ethylbenzene	6
Xylenes	9
Naphthalenes	5
PAHs (based on toxicity equivalency normalized to benzo(a)pyrene)	0.1

mg/kg = milligrams per kilogram

For groundwater, the cleanup levels were established using MTCA Method A and are based on the protection of drinking water use. The cleanup level for GRPH has been

lowered from 1000 to 800 micrograms per liter (µg/L) as specified in Table 720-1 in WAC 173-340-900 since benzene is present in groundwater. The point of compliance for groundwater is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site. This is the standard point of compliance. The cleanup levels are as follows:

Contaminant	**Cleanup Level (µg/L)**
GRPH	800
DRPH + ORPH	500
Benzene	5
Toluene	1,000
Ethylbenzene	700
Xylenes	1,000
Naphthalenes	160
PAHs (based on toxicity equivalency normalized to benzo(a)pyrene)	0.1

µg/L = micrograms per liter

Evaluation of interim cleanup actions

Ecology has determined your interim cleanup actions meet some, but not all of the cleanup standards established for the Site. The following interim cleanup actions have been completed at the Site to date:

- In September 1993, perforated pipes were installed in the trench excavations for in-situ soil treatment using a bioremediation compound. Four treatment events were conducted with confirmation samples collected in October 1993 indicating that soil cleanup levels had not been met.

- In April 1994, passive floating skimmers were installed in monitoring wells MW-2 and MW-8 to recover LNAPL. Approximately 0.2 gallons of LNAPL were recovered between April and May 1994.

- In May 1994, a groundwater remediation system was installed in monitoring well MW-12, which pumped groundwater into 4,000-gallon tanks and volatized petroleum compounds using air strippers. The system was operated until October 1994.

- In June 1994, approximately 40 cubic yards of petroleum-contaminated soil (PCS) were removed during installation of a 12,000-gallon UST. Confirmation soil samples

from the excavation indicated residual PCS remained in place following the removal action.

- In October 1994, a groundwater remediation system was installed in monitoring wells MW-4, MW-6, and MW-12, utilizing air stripping similar to the previous system. Soil vapor extraction (SVE) pumps were installed in monitoring wells MW-4, MW-5, MW-7, MW-10, MW-12, and MW-14, with vapors treated using a catalytic oxidizer. Both remediation systems were operated until October 1998. An estimated 1,200 to 1,500 gallons of petroleum hydrocarbons were recovered from soil and groundwater during all interim cleanup actions conducted between 1993 and 1998.

- In October 2025, approximately 535 tons of PCS were excavated and disposed at the Sudbury Landfill in Walla Walla. Prior to backfilling the excavation, approximately 200 pounds of an oxygen release compound (ORC) amendment were added to the excavation to promote biodegradation of residual PCS.

Additional requirements

Ecology has identified the following additional requirements which should be addressed for the Site to meet the substantive requirements of MTCA.

Source Evaluation

The characterization and cleanup actions conducted from 1994 through 2014 did not identify DRPH, ORPH, or PAHs in soil or groundwater at the Site. With these contaminants recently identified exceeding MTCA cleanup levels, further evaluation is warranted to determine if a new source of contamination is present and whether the release has been mitigated. In addition, confirmation sidewall samples collected following the October 2025 remedial excavation were not analyzed for DRPH and ORPH. All future soil and groundwater analyses should include both analytes.

Groundwater Monitoring Requirements

Additional groundwater monitoring well locations are needed to define the extent of petroleum hydrocarbons and VOCs in groundwater and establish groundwater flow characteristics including flow direction and hydraulic gradient. If former monitoring wells cannot be located and utilized to collect representative groundwater samples, then additional wells will need to be installed in at least two hydraulically downgradient locations.

Groundwater samples should be collected from monitoring wells MW-2, ASW-1, and the new well locations on a quarterly basis until a minimum of four consecutive quarters of groundwater samples from all wells are below MTCA Method A cleanup levels for all contaminants of concern.

Vapor Intrusion Potential

The benzene concentration of 80 µg/L in groundwater from monitoring well MW-2 exceeds the groundwater petroleum vapor intrusion (VI) screening level provided in Ecology's Guidance for Evaluating Vapor Intrusion in Washington State: Investigation and Remedial Action[6]. However, the depth to groundwater of approximately 35 feet bgs exceeds the vertical separation screening distance of 6 feet bgs for VI specified in Table B-1 of the guidance. If further site characterization or monitoring data indicate the potential for soil or groundwater petroleum concentrations to impact indoor air quality, further VI assessment may be required.

Point of Compliance and Institutional Controls

The point of compliance for soil is throughout the lateral and vertical extent of the Site, which is the standard point of compliance based on protection of groundwater. The point of compliance cannot be revised until groundwater monitoring data provides an empirical demonstration that residual soil contamination is not impacting groundwater, as detailed under Groundwater Monitoring Requirements above. Once an empirical demonstration is made, Ecology may establish the point of compliance at 15 feet bgs based on human exposure via direct contact. At that time, Ecology may decide to amend or terminate the institutional controls established for the Site, including the environmental covenant recorded with Walla Walla County under recording number 2015-07261.

Terrestrial Ecological Evaluation

A Terrestrial Ecological Evaluation (TEE) has not been performed at the Site. The TEE is necessary to meet the substantive requirements of MTCA, to set cleanup levels that are protective of terrestrial species, and to determine an appropriate cleanup action. Please conduct the TEE and provide the associated documentation forms to Ecology. Additional information on satisfying this requirement can be found at the following link: https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Terrestrial-ecological-evaluation

EIM data submittal

All sampling data should be submitted to Ecology's Environmental Information Management (EIM) database[7], which is required in order to receive a final Ecology opinion for this Site. The Toxics Cleanup Program Policy 840[8] describes data submittal requirements. Please visit the EIM Submit Data webpage for data submittal instructions.

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[6] https://apps.ecology.wa.gov/publications/documents/0909047.pdf
[7] https://ecology.wa.gov/eim
[8] https://fortress.wa.gov/ecy/publications/SummaryPages/1609050.html

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 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]

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 performed is substantially equivalent. Courts make that determination. *See* RCW 70A.305.080[10] and WAC 173-340-545.[11]

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).[12]

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. 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 e-mail at ted.uecker@ecy.wa.gov.

[9] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040
[10] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[11] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[12] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

Sincerely,

Ted M. Uecker
ERO Toxics Cleanup Program

tmu:hg

Attachments (1): A – Description and Diagrams of the Site

cc: Jonathan White, MSBA
Martin Burck, MSBA
Nicholas Acklam, Ecology

Appendix A

Site description, history, and diagrams

Site description

The Site is located at 2285 E Isaacs Avenue on Walla Walla County tax parcels 360722210032 and 360722210033. It is bounded by mixed commercial and residential properties to the north, east, and west, and E Isaacs Avenue to the south. The Site was developed into a gas station in 1959 by Phillips 66, who operated the station before selling to an independent owner in 1978. Mobil operated the station from 1982 to 1987 when it was purchased by Mountain Oil and operated as a Pacific Pride station.

In 1987, Mountain Oil removed the original underground storage tanks (USTs) and installed five new tanks: one 4,000-gallon unleaded gasoline tank, one 3,000-gallon unleaded gasoline tank, one 3,000-gallon regular gasoline tank, one 15,000-gallon diesel tank, and one 2,000-gallon diesel tank. A seven-inch thick concrete slab was installed over the UST network. On August 10, 1993, approximately 1,400 gallons of unleaded gasoline were spilled due to an overfill from a delivery truck. The spill migrated beneath the concrete slab covering the USTs and into the subsurface.

Site history

In August 1993, vapor monitoring wells were installed at both ends of each of the five USTs. A trench was excavated to 16 feet below ground surface (bgs) at the north end of the concrete slab. Gasoline odors were detected in the first trench, and a second trench was excavated a few feet north of the first, with no visible or olfactory signs of contamination. Eight feet of the south edge of the concrete slab was removed to allow access to tanks 1-3. Another trench was excavated in the south to 12 feet bgs; petroleum-saturated soils and evidence of previous petroleum spills were observed in the south trench.

Soil samples were collected from the bases of the three excavations and near the exposed ends of the USTs. A soil sample from between tanks 2 and 3 contained gasoline-range petroleum hydrocarbons (GRPH) exceeding the MTCA Method A cleanup level with a concentration of 28,100 milligrams per kilogram (mg/kg). Benzene, toluene, ethylbenzene, and xylenes (BTEX) concentrations also exceeded their respective cleanup levels. Results from the other soil samples were below cleanup levels. All excavated soils were disposed offsite.

Three groundwater monitoring wells (MW-1 through MW-3) were installed in October 1993. Approximately five feet of non-aqueous phase liquid (NAPL) petroleum were observed in MW-2. In January 1994, six soil borings (B-4 through B-9) were installed and completed as monitoring wells MW-4 through MW-9. Soil samples from B-8 exceeded the cleanup levels for GRPH and benzene at 42.5 feet bgs, and groundwater samples from MW-3 through MW-9 exceeded cleanup levels for GRPH and/or BTEX. Approximately 1.55 feet of NAPL were measured in MW-2 in January 1994.

Seven additional groundwater monitoring wells (MW-10 through MW-15 and ASW-1) were installed in March 1994. Wells MW-13 through MW-15 were located on the

adjacent property west of the Site. Measurable NAPL (0.1 foot or greater) was observed in MW-2, MW-8 and MW-10. Groundwater samples were collected from MW-5 and MW-13 through MW-15 in April and May 1994, with GRPH and BTEX concentrations exceeding cleanup levels in all wells.

In September 1993, an in-situ bioremediation program was implemented at the Site to treat the petroleum-contaminated soils (PCS) near the USTs. Prior to backfilling the trench excavations, perforated pipes were installed to mobilize the bioremediation compound in the subsurface. The compound consisted of a water solution with microbes and nutrients to enhance natural oxidation of the petroleum hydrocarbons, and a surfactant to facilitate dispersal of the compound. Four in-situ treatment events occurred in September 1993; confirmation soil samples collected in October 1993 continued to exceed the GRPH and BTEX cleanup levels.

In April 1994, passive floating skimmers were installed in MW-2 and MW-8 to recover free NAPL on the water table. NAPL was also removed from MW-10 by hand bailing. A total of 0.2 gallons of free NAPL was removed during April and May 1994. A pneumatic recovery pump-and-treat system was installed in MW-12 in May 1994 and operated until October 1994. Groundwater was pumped into three 4,000-gallon steel tanks with air strippers to volatize the petroleum hydrocarbons and BTEX. The treated groundwater was transported to the City of Walla Walla wastewater treatment plant while the effluent was collected and disposed as hazardous waste.

A groundwater pump-and-treat and soil vapor extraction (SVE) remediation system was installed in October 1994, which pumped groundwater from MW-4, MW-6, and MW-12 and pumped vapor from MW-4, MW-5, MW-7, MW-10, MW-12, and MW-14. Pumped groundwater was treated through an air stripper and discharged to the city sewer, while vapors were treated in a catalytic oxidizer. The system was operated until October 1998, when it was shut down due to low recovery rates.

Groundwater monitoring was conducted concurrently with vapor sampling from October 1994 through December 1997 to evaluate the effectiveness of the groundwater treatment and SVE system. In October 1998, well MW-16 was installed to replace MW-3 due to an insufficient screening interval and MW-17 was installed downgradient of MW-15. Groundwater monitoring continued on an annual basis from 1998 through 2012, and quarterly beginning in September 2013. As of June 2014, all contaminants of concern (COCs) were reported below the applicable groundwater cleanup levels.

Total GRPH recovery was estimated between 1,200 and 1,500 gallons, based on PCS excavation, groundwater treatment, SVE, and NAPL recovery. Residual PCS remained in the area of the former UST system. Ecology determined that since the area is capped with asphalt and concrete to prevent direct contact and groundwater monitoring demonstrated that residual soil contamination is not impacting groundwater, institutional controls could be implemented to protect the cleanup action and address the residual contamination. An environmental covenant was recorded in Walla Walla County on

August 19, 2015, and Ecology issued a No Further Action determination for the Site on September 1, 2015.

From September to October 2025, the UST system was decommissioned, and a site assessment was performed. The overburden soil above the USTs was excavated and screened with a photoionization detector (PID), which indicated petroleum contamination. The USTs did not show signs of damage or leaking, but soil beneath the USTs, product piping, and transition sumps indicated petroleum contamination. Soil excavation continued to approximately 16 feet bgs, where petroleum contamination was observed and detected using the PID. The excavation extended to the south and east where contamination was not observed at approximately 15 feet bgs. Two test pits (TP-1 and TP-2) were also excavated within the UST cavity to 23 feet bgs. Groundwater was not encountered during the excavation activities. Twenty soil samples were collected beneath the USTs and from the sidewalls of the tank cavity from between 3 and 16 feet bgs, four soil samples were collected from beneath the product lines and dispensers at 4 feet bgs, six soil samples were collected from the test pits between 15 and 23 feet bgs, and seven confirmation soil samples were collected between 5 and 15 feet bgs following the completed excavation. All samples were collected from native soil. The UST excavation, product line/dispenser, test pit, and full excavation samples were analyzed for GRPH, DRPH, ORPH, BTEX, PAHs, and total lead.

During the UST removal and cleanup activities, approximately 535 tons of soil were excavated and stockpiled onsite. Following waste characterization, the soil was disposed at the Sudbury Landfill in Walla Walla. New USTs, product piping, and dispensers were installed. Prior to backfilling the excavation, approximately 200 pounds of an oxygen release compound were added to the base of the excavation cavity along the western sidewall (presumed downgradient direction) to promote aerobic biodegradation of TPH in soil and groundwater.

In September 2025, groundwater samples were collected from monitoring wells MW-1 and MW-2, and air sparging well ASW-1 and analyzed for GRPH, DRPH, ORPH, BTEX, PAHs, and total lead. GRPH and benzene exceeded the MTCA Method A cleanup levels in MW-2 at 3,400 ug/L and 80 ug/L, and DRPH and ORPH exceeded the combined cleanup level in MW-2 and ASW-1 at 6,700 and 3,800 ug/L, respectively. DRPH was detected in MW-1 below the cleanup level.

Source: GeoEngineers, 1994; ERM, 1998, 1999, 2014; MSBA, 2025

Site Diagrams

Adapted from Google Earth Imagery (Imagery Date: 12/30/15)

MSBA
Martin S. Burck Associates, Inc.
Geologic and Environmental Consulting Services

LEGEND

Symbol	Description
MW-1	Monitoring Well Location and ID
MW-6	Remediation Well Location and ID
MW-1 G < 54 D 140 O < 120	Monitoring Well Location and ID Gasoline Concentration (NWTPH-Gx) (ppb) Diesel Concentration (NWTPH-Dx) (ppb) Oil Concentration (NWTPH-Dx) (ppb)
Bold Value	Indicates Analyte was Detected Above the Laboratory Reporting Limit
Red Text	Indicates Analyte Concentration Exceeds the MTCA Method A Cleanup Level
<	Analyte was Not Detected Above the Method Detection Limit (MDL), as Listed
(dashed outline)	Underground Storage Tank Location

Revised: 11/7/2025 2:48 PM

NORTH

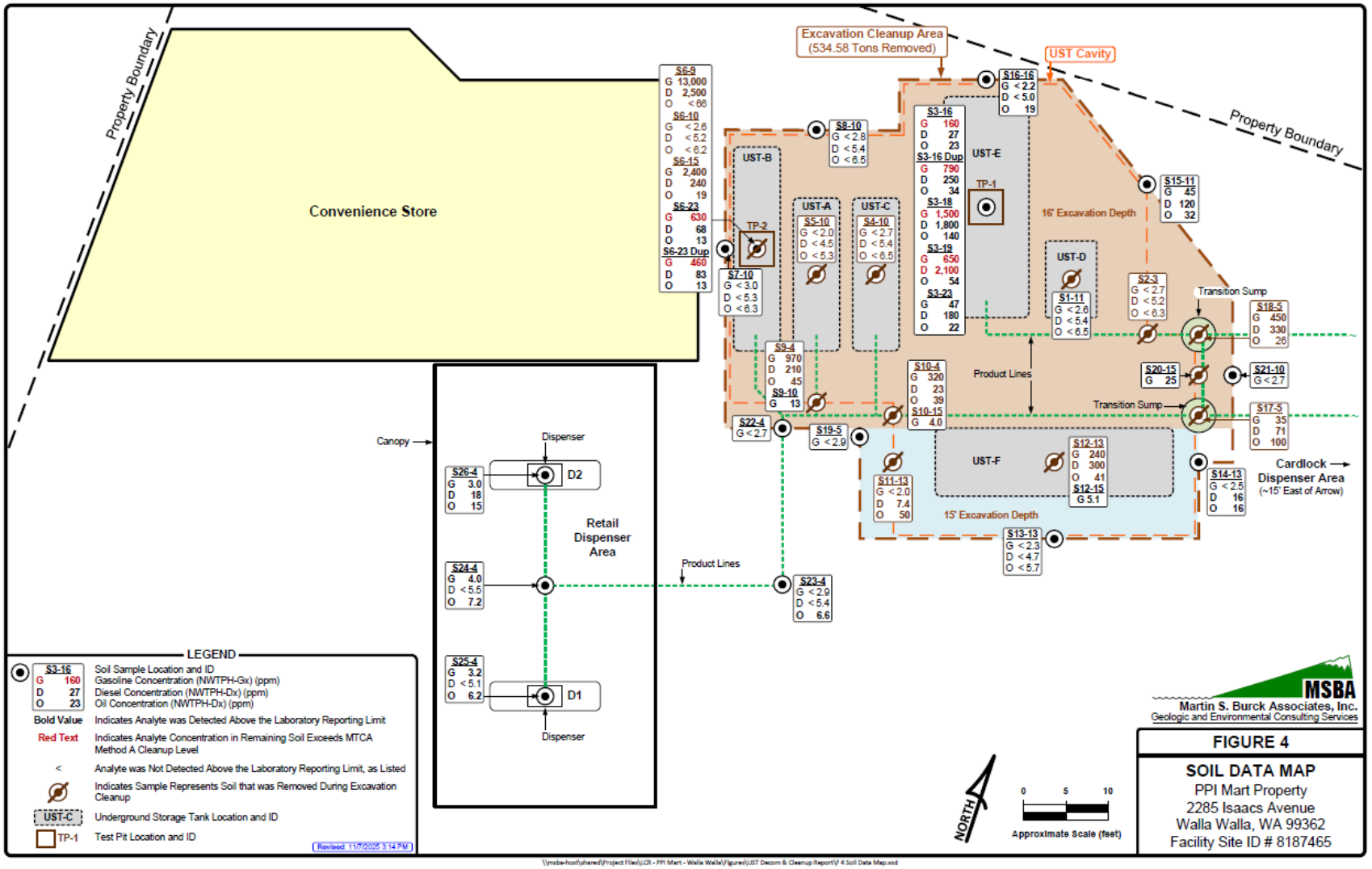
0 20 40
Approximate Scale (feet)

FIGURE 3

GROUNDWATER DATA (SEPTEMBER 2025)

PPI Mart Property
2285 Isaacs Avenue
Walla Walla, WA 99362
Facility Site ID # 8187465

Data Map.vsd



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