



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

August 6, 2013

Russell Shropshire
SAIC Energy, Environment & Infrastructure, LLC
18912 North Creek Parkway, Suite 101
Bothell, WA 98011

Re: Opinion on a draft work plan at the following Site:

- **Site Name:** Alder's Chevron
- **Site Address:** 1702 East Yakima Avenue, Yakima
- **Facility/Site No.:** 511
- **VCP Project No.:** CE0391

Dear Mr. Shropshire:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Alder's Chevron facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Upon completion of the proposed additional site characterization, will further remedial action likely be necessary at the Site?

YES. Ecology has determined that, upon completion of your proposed additional site assessment, further remedial action will likely be necessary at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

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

- Petroleum hydrocarbons and various other used oil contaminants (including waste oil) into the soil.
- Petroleum hydrocarbons, volatile organic compounds, and various other used oil contaminants (including waste oil and metals) into the groundwater.

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 the information contained in the following documents:

1. SAIC Energy, Environment & Infrastructure, LLC, 2013. "Supplemental Site Assessment Work Plan, Alder's Chevron/Former Chevron Station No. 93883 (VCP # CE0391), 1702 East Yakima Avenue, Yakima, Washington". June 14.
2. Contents of site file, Central Regional Office

Those documents are kept at the Central Regional Office (CRO) of Ecology for review by appointment only. You can make an appointment by calling the CRO resource contact, Roger Johnson, at 509-454-7658.

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

Analysis of the Draft Work Plan

Ecology has concluded that, upon completion of your proposed additional site assessment, **further action** will still be necessary at the Site. Ecology has determined the proposed groundwater characterization of the Site does not appear to be sufficient to meet the substantive requirements of MTCA. Please review our comments below:

:

- Regarding sample analytical methodology, Ecology recommends not using silica gel cleanup when performing NWTPH-Dx groundwater analysis for compliance purposes. There may be certain cases where it is appropriate provided that requirements are met as outlined in the *Guidance for Remediation of Petroleum Contaminated Sites* (publ. no. 10-09-057). However, collection of sufficient samples

for comparison of analytical results with and without silica gel cleanup, and demonstration of naturally occurring organic matter in areas not impacted from petroleum, is acceptable.

- Per Table 830-1, MTCA and Table 7.2, of the above referenced guidance, analyses for metals including cadmium, chromium, nickel and zinc in addition to lead are recommended based on site-specific information (presence of a former waste oil UST and drywell).
- Your well construction specifications call for well depths to extend to 25 feet below ground surface (bgs) with a screen interval of 15 feet. Ecology recommends a smaller screen interval e.g. 5-feet. Historical groundwater elevations suggest groundwater fluctuations of less than 2-feet.
- The proposed location of MW-7 is acceptable as a potential sentry well. Ecology recommends installation of additional monitoring wells to inform decisions for further remedial action, if necessary. For example, upgradient well for characterizing background conditions such as naturally occurring organic matter and monitored natural attenuation parameters; and downgradient well to refine the geometry and geochemistry of the groundwater plume, if one still exists.

Limitations of the Opinion

1. 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.
- 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 70.105D.040(4).

2. 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

Russell Shropshire
SAIC Energy, Environment & Infrastructure, LLC
August 6, 2013
Page 4

performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

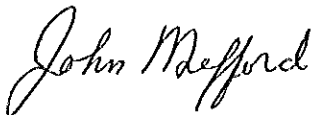
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to ask for an opinion about your 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: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>. If you have any questions about this opinion, please contact me by phone at 509-454-7836 or e-mail at john.mefford@ecy.wa.gov.

Sincerely,



John Mefford
Site Manager
CRO Toxics Cleanup Program

cc: Mr. Bob Hall, Sunfair Chevrolet
Dolores Mitchell, VCP Financial Manager