



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 30, 2013

Brad Card
PLSA Engineering & Surveying
1120 W. Lincoln Avenue
Yakima, WA 98902

Re: Opinion on Work Plan detailing additional assessment:

- Site Name: Sunfair Chevrolet
- Address: 1600 E. Yakima Avenue, Yakima
- Facility/Site ID No.: 49569148
- Cleanup ID No.: 6173
- VCP ID No.: CE0393

Dear Mr. Card:

Thank you for submitting your *Work Plan* for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA).

Based on Washington Administrative Code (WAC) 173-340-515, which outlines Independent Remedial Actions, I have reviewed the *Work Plan* for the above-referenced site.

Our evaluation determined that your submittal does not meet the standard of work required by Ecology for cleanup sites. Therefore, any data or information generated from the work implemented may not be accepted and/or used for making a final determination of compliance with MTCA.

Also, additional assessment of soil and groundwater, beyond what is outlined in the *Work Plan*, is required under the Model Toxics Control Act (MTCA).

To assist you, we have identified several specific areas of concern. Once these items are addressed, a revised work plan can be submitted to Ecology.

1. **Characterization of soil in the waste oil area (UST #3) is incomplete. Field screen and collect soil samples in the area of known contamination in addition to**

the collection of soil samples at the soil/groundwater interface. Assess the soil samples for the contaminants of concern related to the documented release at UST #3 and for the potential contaminants of concern that may be associated with waste oil releases.

Sample soil in accordance with standard field screening procedures including the use of field instrumentation (such as a PID) to enable the collection of "worst case" samples of potential hydrocarbon contamination. Consistent with Ecology's Implementation Memorandum #4, prescreen the samples by NWTPH-HCID and then quantify the contaminant concentration using the appropriate analytical method, e.g., NWTPH-Dx for diesel-range and heavy oil-range hydrocarbons.

Perform other soil analyses (waste oil **UST #3**) for screening and characterization purposes consistent with **Table 830-1**. Refer to Table 7.3 of the *Guidance for Remediation of Petroleum Contaminated Sites* (Publ. No. 10-09-057) for the recommended analytical methods to assess for particular chemicals of concern, e.g., EPA Method 8260 will assess halogenated VOCs and BTEX.

2. **Collect soil samples from the waste oil areas: confirmational samples for UST#5 and samples for UST #3 to assess current levels of contamination.** Sample soil in accordance with standard field screening procedures including the use of field instrumentation (such as a PID) to enable the collection of "worst case" samples of hydrocarbon contamination in the vicinity of **UST #3**. Consistent with Ecology's Implementation Memorandum #4, prescreen the samples by NWTPH-HCID and then quantify the contaminant concentration using the appropriate analytical method, e.g., NWTPH-Dx for diesel-range and heavy oil-range hydrocarbons.

Perform other soil analyses for screening and characterization purposes consistent with Table 830-1. Sample soil in the vicinity of **UST #5** and analyze for methylene chloride.

3. **Issues with well construction:** Based on our understanding of your proposal, groundwater samples truly representative of site conditions would not be collected over the period of assessment. We recommend the depth of the well extend fifteen to twenty feet below the ground surface with a five foot screen interval to adequately ensure collection of samples throughout the year. Also, consistent with standard practices in resource protection well construction, we recommend that the well installer use pre-slotted screen with an adequate filter (sand) pack.
4. **Groundwater Monitoring and Frequency:** Sample the groundwater from the three monitoring wells for contaminants of concern related to the documented releases (UST #3 and UST #5) and for the potential contaminants of concern that may be associated with waste oil releases.

With regard specifically to petroleum hydrocarbons, if HCID analysis indicates hydrocarbon contamination in groundwater, then quantify the contaminant concentration using the appropriate analytical method, e.g., NWTPH-Dx for diesel-range and heavy oil-range hydrocarbons.

Perform other groundwater analyses consistent with Table 830-1 and the appropriate analytical methods. Table 7.3 in the *Guidance for Remediation of Petroleum Contaminated Sites* lists the recommended analytical methods to assess for particular chemicals of concern.

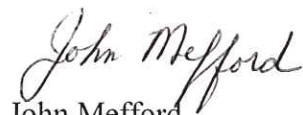
Assessment of groundwater in the three monitoring wells should follow the recommendations as outlined in the *Guidance for Remediation of Petroleum Contaminated Sites*. **The frequency of groundwater sampling for the analytes of interest should be determined by the compliance requirements in the guidance in conjunction with the initial analytical results.**

5. **Sampling of media for proper contaminants consistent with known releases and suspected releases** in association with waste oil (volatile petroleum compounds, fuel additive and blending compounds, carcinogenic PAHs, halogenated volatile organic compound, metals and PCBs—See **Table 830-1**). **Refer to Table 7.3** of the *Guidance for Remediation of Petroleum Contaminated Sites* (Publ. No. 10-09-057) **for the recommended analytical methods** to assess for particular chemicals of concern, e.g., EPA Method 8260 will assess halogenated VOCs and BTEX.

Currently, the characterization of this site is insufficient. Your proposed work plan, if implemented, will not add the necessary data to properly characterize this site. We encourage a more robust work plan, in terms of both quality and quantity.

If you have any questions regarding this opinion, please contact me at (509) 454-7836.

Sincerely,



John Mefford
Site Manager
Toxics Cleanup Program

JT:JM:RAZ (130811)

Cc: Mr. Bob Hall