

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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

May 6, 2014

Mr. Jim Rolle, Regional Manager West Central Environmental Consultants, Inc 1030 South Avenue West Missoula, MT 59801

Re: Further action required at the following site:

• Site Name: Pacific Pride Tanker Fire Site

Address: Highway 2, Milepost 116, Monitor

Facility/Site ID No.: 357Cleanup Site ID No.: 4757

Dear Mr. Rolle:

The Washington State Department of Ecology (Ecology) has received your report, September 2013 Groundwater Monitoring Report for Whitley Fuel Tanker Spill near Monitor, Washington.

Ecology appreciates your ongoing activity at the Site. However, contamination has persisted at the Site above state compliance levels for approximately <u>23 years</u>. Although contaminant levels for gasoline have dropped below applicable cleanup levels, analytical results show that benzene has remained above compliance for the last five years.

Long-term groundwater monitoring, by itself, is not an acceptable cleanup action under Chapter 173-340-360 of the Model Toxics Control Act (MTCA). Despite the interim cleanup action in 1992, monitoring indicates that the remedial action was insufficient to meet the substantive requirements of MTCA. <u>Additional action is required.</u>

Ecology is requiring that future groundwater submittals contain the following:

- A determination of whether concentrations are increasing, stable, decreasing or unknown;
- Projected time to restoration that compares implementation of active remedial measures versus passive monitoring.
- An explanation of why additional cleanup action is not justified, if no work other than monitoring is planned.

Additionally, the following are deficiencies Ecology has noted about this Site:

Mr. Jim Rolle, Regional Manager West Central Environmental Consultants, Inc May 6, 2014 Page 2

- Insufficient monitoring of points of compliance. Only one well currently exists. Several monitoring wells were destroyed and not replaced.
- Insufficient frequency of sampling. Quarterly sampling should be resumed to assess variation of contaminant concentration with fluctuations in groundwater level.
- Lack of collection of geochemical parameters to demonstrate that conditions conducive to natural attenuation exist.

We suggest that you enter our Voluntary Cleanup Program (VCP) to move this Site forward towards closure. For additional information about VCP, please contact our VCP coordinator, Frosti Smith at 509-454-7841 or look on Ecology's web page at http://www.ecy.wa.gov/programs/tcp/vcp/Vcpmain.htm.

If you have any questions regarding this letter, please feel free to contact me at (509) 454-7836 or by email at john.mefford@ecv.wa.gov.

Sincerely,

John Mefford

Site Manager

Toxics Cleanup Program

Enclosures (2)

cc: Mr. Ben Whitley, Whitley Fuel Company