



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

September 29, 2014

Mr. James M. Whitman
Consolidated Grange Supply CO-OP
2946 East Ralston-Benge Road
Benge, WA 99105

Re: No Further Action at the following Site:

- **Site Name:** Washtucna Fertilizer Plant
- **Site Address:** Hwy 261 and North Street Junction
- **Facility/Site No.:** 567
- **VCP Project No.:** EA0215

Dear Mr. Whitman:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Washtucna Fertilizer Plant 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

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined no further remedial action is necessary to clean up contamination 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 release:

- Petroleum hydrocarbons and metals into the Soil.

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



Mr. James M. Whitman
Washtucna Fertilizer Plant, VCP #EA0215
September 29, 2014
Page 2

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information 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:

- Phase II/III Environmental Assessment for the Following Properties: #1 Washtucna Fertilizer Plant, #2 Washtucna Railroad Lease Property, #3 Washtucna Gardens in Washtucna, Washington and #4 Original Benge Property in Benge, Washington: Huntingdon Consulting Engineers & Scientists, June, 1994.
- Review of Site Operations and Proposed Work Plan, Former Washtucna Fertilizer Plant, Washtucna, WA: URS, May 2, 2012.
- Remedial Investigation Report, Former Washtucna Fertilizer Plant: URS, September 18, 2012.
- Proposed Cleanup Action Plan, Former Washtucna Fertilizer Plant: Leppo Consulting, LLC, January 10, 2014.
- Final Closure Report, Former Washtucna Fertilizer Plant: Leppo Consulting, LLC, July 29, 2014.

Those documents are kept in the Central Files of the Eastern Regional Office of Ecology (ERO) for review by appointment only. You can make an appointment by calling Kari Johnson at 509-329-3415.

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 **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

The lateral and vertical extent of petroleum hydrocarbons and metals in the soil was defined in the reports listed above.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

For soil, the cleanup levels were established using MTCA Method A and are based on the protection of groundwater. The land use is classified as Unrestricted. The cleanup levels are as follows:

- Diesel Range Organics: 2,000 mg/kg
- Heavy Oil Range Organics: 2,000 mg/kg
- Cadmium: 2 mg/kg

The point of compliance for soil is throughout the soils at the Site. This is the standard point of compliance.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

The selected cleanup includes the following:

SOIL

- Removal of source (aboveground storage tanks).
- Excavation and removal of contaminated soil.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

The sources (aboveground storage tanks) were removed. Contaminated soil was excavated and transported off-site for disposal.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

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 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 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).

Mr. James M. Whitman
Washtucna Fertilizer Plant, VCP #EA0215
September 29, 2014
Page 5

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#EA0215).

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 or the termination of the Agreement, please contact me by phone at 509-329-3522 or e-mail at patti.carter@ecy.wa.gov.

Sincerely,



Patti Carter
ERO Toxics Cleanup Program

PC:ew

Enclosure: A – Description and Diagrams of the Site

cc: Galen Schweitzer
 Jeff Leppo, Leppo Consulting
 Dolores Mitchell, VCP Financial Manager (without enclosures)

Site Description

Land use at the Site included historical bulk fuel storage and sales, retail supply, hardware store, vehicle maintenance, and the storage and sales of bulk feed and agrichemicals. Washtucna Grange Supply purchased the property in 1975 and built a dry goods supply store and vehicle maintenance shop on the north end of the property. UGS was bought by Lind Grand Supply in the late 1980s, and later became Consolidate Grange Supply. Agricultural suppliers operated the Site until approximately 1995. The property was sold in 1996 and operated as a vehicle repair business until 2000. The Site has been vacant since 2000.

Petroleum aboveground storage tanks (ASTs) were removed from the Site in 1975. The former AST area was converted to agrichemical storage with construction of new ASTs in the same location. The fuel delivery system was decommissioned in 1975 and fuel has not been stored or sold at the Site since then.

A wood storage shed in the northwest corner of the Site was used to store packaged petroleum products and agrichemicals. A smaller herbicide/pesticide storage shed was located on the south end of the wood storage shed. Both sheds have been removed from the Site.

Several areas of concern were identified at the Site during site investigations in 1994. A Remedial Investigation was completed in 2012 that identified two areas with petroleum hydrocarbons concentrations exceeding cleanup levels. Several pesticides and herbicides were identified in Site soils, but at concentrations below cleanup levels. Remedial cleanup actions were conducted in 2014. Approximately 117 cubic yards of petroleum impacted soils were excavated and transported off-site for disposal. Confirmation soil samples indicated all impacted soil had been removed.



(URS, 2012; Leppo Consulting, 2014).

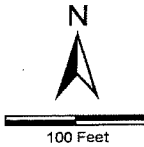
Site Diagrams




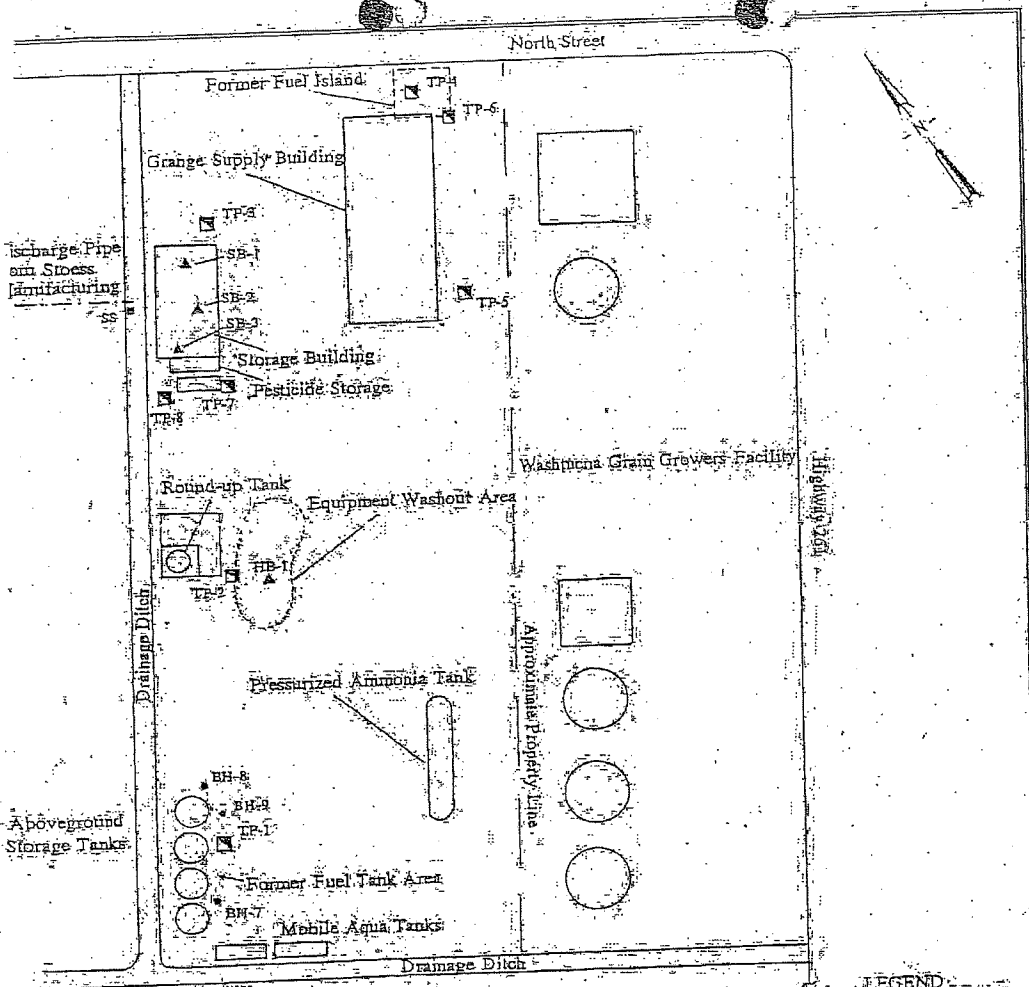
Image Source: USDA NAIP 2013 Adams County, Washington

Legend

-  Property Line
-  Drainage Ditch



	Leppo Consulting LLC	FINAL CLOSURE REPORT Former Washtucna Fertilizer Plant 135 West North Street Washtucna, Washington
AERIAL PHOTO SITE MAP		FIGURE 2
DATE: July 2014		LC Project No. 0101-2014
DRAWN: JASPER GEOGRAPHICS		CHECKED: JEL



- LEGEND**
- ☐ - Test Pit Location
 - TP-1 - Test Pit Number
 - ▲ - Hand Dug Auger
 - - Boring Location
 - - Stross Sample (SS)



HUNTINGDON, INC. Job No.: 199-2121-1	DETAILED SITE MAP FERTILIZER PLANT WASHITONA GRANGE SUPPLY WASHITONA, WASHINGTON				SCALE: 1:720	FIGURE NO.: 3
	DATE: 5/23/94	DRAWN BY: GT	REVIEWED BY: GB			

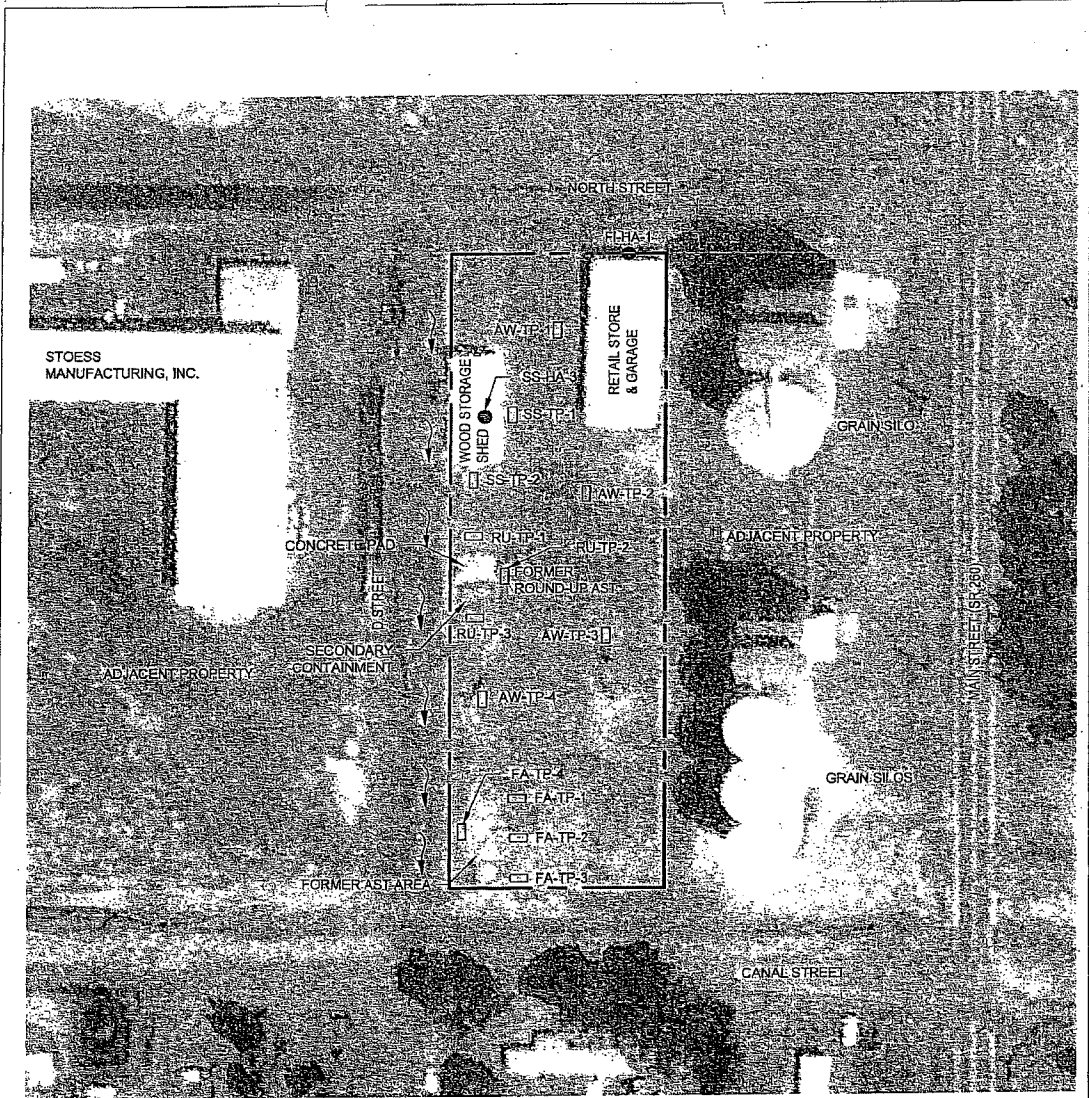


IMAGE SOURCE: GOOGLE EARTH PROFESSIONAL EDITION

LEGEND

- PROPERTY LINE
- ~ DRAINAGE DITCH
- HAND AUGER No. & LOCATION
- TEST PIT No. & LOCATION

ALL LOCATIONS AND DISTANCES ARE APPROXIMATE.
FOR REPRESENTATION PURPOSES ONLY.

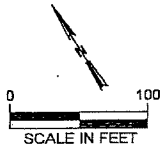


Figure 4.
TEST PIT & HAND AUGER LOCATIONS
FORMER WASHTUCNA FERTILIZER PLANT
WASHTUCNA, WA
PROJECT No. 36310134
AUGUST 20, 2012

URS

820 N. ARGONNE, STE. 300
SPOKANE VALLEY, WA 99212
PHONE: (509) 828-4413
FAX: (509) 828-4415

FILE NAME: P:\36310134_025\WASHTUCNA\FERTILIZER\FIGURE 4.AUGUST 20, 2012



IMAGE SOURCE: GOOGLE EARTH PROFESSIONAL EDITION

FILE NAME: P:\ARGONNE\GIS\INVESTIGATION_MASTER.dwg PLATTEN13 September 13, 2012

LEGEND

- PROPERTY LINE
- DRAINAGE DITCH
- ESTIMATED AREAL EXTENT OF TOTAL PETROLEUM HYDROCARBON (TPH) AFFECTED SOIL

ALL LOCATIONS AND DISTANCES ARE APPROXIMATE. FOR REPRESENTATION PURPOSES ONLY.

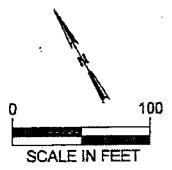


Figure 5.
AREAL EXTENT - TPH AFFECTED SOIL
 FORMER WASHTUCNA FERTILIZER PLANT
 WASHTUCNA, WA
 PROJECT No. 36310134
 AUGUST 20, 2012

URS

920 N. ARGONNE, STE. 300
 SPOKANE VALLEY, WA 99212
 PHONE: (509) 826-4413
 FAX: (509) 828-4415