



FILE COPY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 West Yakima Avenue, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

March 22, 2005

Mr. James C. Cach
Coleman Oil Company
335 Mill Road
Lewiston, ID 83501

Dear Mr. Cach:

RE: Voluntary Cleanup Program Review of *Phase II Limited Subsurface Investigation Report*, Dynamart Yakima Nob Hill/Former Maid O'Clover, 1802 East Nob Hill Boulevard, Yakima, FS # 503^{Bole} (VCP # CE0218)

Thank you for submitting your *Phase II Limited Subsurface Investigation Report*, 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).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the Dynamart Yakima Nob Hill/Former Maid O'Clover site located at 1802 East Nob Hill Boulevard, Yakima.

1. *Phase II Limited Subsurface Investigation Report*, EBI Consulting, July 29, 2004
2. *Site Assessment Engineering Report on Petroleum Release at Maid O'Clover, Inc.*, PLSA Engineering & Surveying, July 1992
3. *Results of a Site Assessment Investigation at Maid O'Clover Facility*, Environmental Science & Engineering, Inc., March 25, 1991
4. Dynamart/E Nob Hill Correspondence File, Ecology's Central Regional Office

Based upon the above listed information, Ecology has determined that, at this time, further actions are needed to address soil and groundwater contamination at the Dynamart Yakima Nob Hill property located at 1802 East Nob Hill Boulevard, Yakima. This determination is based on the following.

- **Groundwater samples collected from soil borings in 2004 indicate tetrachloroethene exceeds the MTCA Method A cleanup standard.** Laboratory analysis of groundwater samples collected from borings B1 and B2 indicate the presence of tetrachloroethene (PERC) at levels which exceed the MTCA cleanup levels. PERC was detected at 16.7 and 38.2 ppb; the cleanup standard is 5 ppb. These samples were not collected from groundwater monitoring wells.



- **Petroleum hydrocarbons detected in groundwater samples collected from groundwater monitoring wells exceed the MTCA Method A cleanup standards.** During Site Assessment work conducted in 1991 and/or 1992, gasoline, benzene, toluene, ethylbenzene, and total xylenes were detected at levels which exceed State cleanup levels in MW3 and MW6.
- **Groundwater flow direction has not regularly been determined for the site.** In 1991 and 2004 flow direction was *assumed* to be flowing to the southeast. During the 1992 Site Assessment the hydraulic gradient was determined to be in an easterly direction. Information pertaining to groundwater flow direction is important in determining if downgradient wells have been placed properly.
- **Groundwater has not been periodically monitored so that seasonal fluctuations are considered.** Ecology recommends quarterly groundwater monitoring for all contaminants of concern to establish the effect of the annual rise and fall of groundwater on the gradient and concentration.
- **Groundwater has not been fully characterized.** Install or use existing monitoring wells to fully characterize the extent and degree of contaminated groundwater at the site. If contaminated groundwater extends beyond the downgradient property boundary, monitoring wells should be installed on and off site.

To receive a No Further Action determination for this site, you must complete the following actions and provide Ecology with documentation.

1. Determine the hydraulic gradient for the site and collect groundwater samples up and downgradient from the source to determine the extent of contamination.
2. Implement a groundwater monitoring program which calls for groundwater samples to be collected on a quarterly basis. This will help to establish the effect of the annual rise and fall of groundwater on the gradient and concentration of contaminants in the groundwater. To receive an NFA determination, contaminants in groundwater samples collected over the course of one year (i.e. four consecutive quarters) must be below MTCA Method A cleanup levels.
3. Determine the extent and degree of soil and groundwater contamination at the site for all contaminants of concern. These include tetrachloroethylene, benzene, toluene, ethylbenzene, xylenes, and all ranges petroleum hydrocarbons. Also, refer to WAC 173-340-900 Table 830-1 in the MTCA regulations for additional sampling requirements.
4. Address any residual soil and groundwater contamination that exceeds the MTCA Method A cleanup standards listed in WAC 173-340-900 Tables 720-1 and 740-1.

Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(I) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

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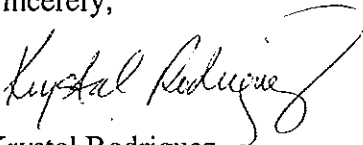
The opinions presented by Ecology in this letter are made only with respect to the information provided in the reports and correspondence file listed above. This opinion is only applicable to the specified site and may not be used to justify action at any other site nor any other properties owned or operated by Amresco or Coleman Oil Company.

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 determination.

I will hold this review open in anticipation of further work to be completed at the site. If you would prefer that this review be closed, please let me know and Ecology will close this review. At the time of closure, any overages in your deposit account will be forwarded to you for this site from our Fiscal office. Once the review has been closed, if you wish to have Ecology review future work on this site you must submit another request for review through the Voluntary Cleanup Program.

Please contact me at (509) 454-7842 if you have any questions or would like clarification of any portion of the letter.

Sincerely,



Krystal Rodriguez
Site Manager
Toxics Cleanup Program – CRO

cc: Trish Amundson, Amresco Finance