



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 19, 2010

Ms. Mary Lynn Douglas  
Senior Project Manager  
Ryder Truck Rental  
1630 South Church Street, Suite 301  
Murfreesboro, TN 37130

RE: Ryder Truck Rental, Inc. (FSID # 17218256, VCP # CE0276, UST # 4273)

Dear Ms. Douglas:

On June 14, 2010, the State of Washington Department of Ecology (Ecology) received the May 24, 2010, Work Plan for Well Decommissioning and Modified Quarterly Ground Water Monitoring at Ryder Truck Rental, Inc., prepared by David Borys of 3 Kings Environmental. After review of the work plan and communications with Mr. Borys, Ecology approves this work plan provided the following comments are addressed:

- 1) During the first quarterly sampling event where all existing wells will be sampled, additional analysis should be performed on all existing site wells. Groundwater should be analyzed for gasoline and diesel constituents and additives in accordance with Model Toxics Control Act (MTCA), Table 830-1. Summary tables to date indicate that groundwater samples have not been analyzed for 1,2-dibromomethane (EDB), 1,2-dichloroethane (EDC), methyl tertiary-butyl ether (MTBE), and carcinogenic polycyclic aromatic hydrocarbons (cPAHs). If any one of these chemicals is not detected in the upcoming quarterly event in all site wells, then that individual additive or cPAH may be eliminated from future sampling events' analyses.
- 2) The work plan states that pending results from the upcoming round of quarterly sampling from all existing site wells, a limited network of wells are recommended to be carried through for subsequent sampling events.
  - a) After discussions with David Borys of 3 Kings Environmental, Ecology understands that RW-2 will be added as an upgradient monitoring well sampling location for future monitoring events.
  - b) MW-6 should be retained for quarterly sampling because there has been an exceedance of the diesel MTCA cleanup level in the past two monitoring events at this well.



- c) MW-9 should also be included in the monitoring network as a sentry well. It is downgradient of RW-1, which has exceeded cleanup levels for diesel and arsenic in the most recent sampling events. In addition, MW-9 has been included in the monitoring network on a very limited basis. MW-9 has been sampled in a total of three sampling events, falling in Fall and Winter quarters only.

Therefore, the proposed longterm monitoring network will tentatively include at a minimum RW-1, RW-2, RW-3, MW-6, and MW-9. Following the first upcoming quarterly sampling of all existing site monitoring wells, any wells that exceed state cleanup levels for groundwater should be left in place for further sampling. Only wells that remain below cleanup levels for four consecutive quarters and beyond may potentially be abandoned. Please contact Ecology with the upcoming sampling event results before abandoning site wells to discuss the future monitoring network configuration.

- 3) Although not specifically stated within the work plan, Ecology understands that low flow methods (ex. peristaltic pump) will be used to sample shallow monitoring wells at the site to prevent loss of volatile components during sampling.
- 4) Ecology understands that screening of natural attenuation parameters will be conducted in all remaining monitoring network wells during each quarterly sampling event. For more information, please refer to Ecology's Guidance on Remediation of Petroleum-Contaminated Ground Water by Natural Attenuation, July 2005 (Publication No. 05-09-091). EPA's Bioscreen or Ecology's Data Analysis Tool Package (Publication No. 05-09-091A) are simple and free modeling tools designed to evaluate the predicted effectiveness of natural attenuation at petroleum impacted sites. Evaluation of predicted natural attenuation effectiveness should be performed.
- 5) The proposed injection of BacClean 5000 into the water table triggers Underground Injection Control Program (UIC) well permitting requirements. Proper permits should be obtained prior to any injections. For more information, please refer to Ecology's UIC web page (<http://www.ecy.wa.gov/programs/wq/grndwtr/uic/index.html>) or contact Ecology's UIC well program coordinator, Mary Shaleen Hansen, Water Quality Program, Southwest Regional Office (360-407-6143 or [maha461@ecy.wa.gov](mailto:maha461@ecy.wa.gov)).
- 6) Please provide groundwater gradient maps in future quarterly reports. In addition, please confirm the site map configuration for accuracy. In comparing recent quarterly monitoring event maps and past Environmental Site Assessment maps, the site configuration appears to have been distorted or changed. Buildings and monitoring wells appear to have different dimensions or locations.
- 7) In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted simultaneously in both a written and electronic format. For additional information regarding electronic format requirements, see the website <http://www.ecy.wa.gov/eim>.
- 8) Reporting on these types of work when submitted to Ecology for review must be under the seal of an appropriately licensed professional, as required by Chapters 18.43 (engineering work) and 18.220 RCW (geology or hydrogeology work).

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Please contact me at (509) 454-7833 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Laura Klasner".

Laura Klasner, PE  
Site Manager  
Central Regional Office  
Toxics Cleanup Program

CC: David Borys, 3 Kings Environmental, Inc.