



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

August 31, 2016

Mr. David Pollart  
Provisioners Express  
P.O. Box 1096  
Mercer Island, WA 98040

**Re: Opinion pursuant to WAC 173-340-515(5) on Proposed Remedial Action for the following Hazardous Waste Site:**

- **Name:** Provisioners Express Inc
- **Address:** 2102 West Valley Highway North, Auburn, Washington
- **Facility/Site No.:** 91612121
- **Cleanup Site ID No.:** 6847
- **VCP No.:** NW2532

Dear Mr. Pollart:

Thank you for submitting documents regarding your proposed remedial action for the Provisioners Express (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following releases at the Site:

- Diesel and heavy oil range petroleum hydrocarbons (DRPH, ORPH) in soil and ground water.

Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.



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Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial actions:

1. Environmental Management Resources, 1999, *Remedial Investigation and Feasibility Study for Provisioners Express Auburn Facility*.
2. Environmental Partners Inc., January 4, 2013, *Underground Storage Tank Site Assessment Report, Estes Express Facility*.
3. Environmental Partners Inc., December 9, 2013, *Phase II Environmental Assessment Estes West trucking Facility*.
4. Environmental Partners Inc., April 4, 2014, *Groundwater Remediation System Work Plan for Estes West Express Trucking Facility, VCP#NW2532*.
5. Environmental Partners Inc., August 17, 2015, *Response to Ecology Letter: Opinion Pursuant to WAC 173-340-515(5) on Proposed Remedial Action for Provisioners Express Inc.*
6. Environmental Partners Inc., October 15, 2015, *September 2015 Groundwater Sampling Report – Seventeenth Round*.
7. Environmental Partners Inc. March 15, 2016, *March 2016 Groundwater Sampling Report – Eighteenth Round*.
8. Environmental Partners Inc., July 29, 2016, *June 2016 Groundwater Sampling Report - Nineteenth Round*.
9. Environmental Partners Inc. 2016, *Estes West VCP#NW2532 – Proposed well locations and screening intervals*.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at 425.649.7235 or sending an email to: [nwro\\_public\\_request@ecy.wa.gov](mailto:nwro_public_request@ecy.wa.gov).

The Site is defined by the extent of contamination caused by the following releases:

- Diesel and heavy oil range petroleum hydrocarbons (DRPH, ORPH) in soil and ground water.

Enclosure A to this letter includes a detailed Site diagram.

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the releases at the Site, Ecology has determined:**

- The following is an iteration of the opinion letter from the Department of Ecology dated July, 19, 2016.
- DRPH and ORPH in soil and ground water are from two areas, one from near the northwest corner of the maintenance building and the other a former 12,000-gallon underground storage tank (UST) that held diesel fuel outside of the south end of the maintenance building. The release at the maintenance building is reported as likely from spilled petroleum during maintenance operations that migrated into the groundwater near monitoring well MW-1.
- Ground water samples from the September 2015 sampling event indicate that DRPH concentrations exceed the Method A cleanup levels of 500 micrograms per liter in ground water at MW-1 and MW-6.
- An air injection system plan was installed in May 2014 near monitoring well, MW-1. The system operated from May 2014 through August 2014. In January 2015 three additional injection wells were placed near monitoring well, MW-6. The second set of wells operated from April 2015 to June of 2015 when an electrical failure occurred. The purpose of the air injection system is to increase oxygen levels and enhance microbial degradation of the petroleum hydrocarbons in the ground water. Analysis and discussion of the data before, during, and after injection is necessary to evaluate the effectiveness of this remedy. Note, that this system has operated intermittently since installation and the contribution to cleanup is not clear at this point.
- An email proposal was received on May 27, 2016 to suggest installing two monitoring wells south and east of the former 12,000-gallon UST with the purpose of defining the extent of the DRPH plume. Ideally, soil and ground water samples from these proposed well locations will bound the extent of contamination as required by WAC 173-340-350(7). Additionally, these wells may serve as sentinel wells for protection of Mill Creek, which is located about 300 feet to the east and downgradient of the former 12,000-gallon UST. The proposed wells screen interval depth is 4 to 14 feet below ground surface (bgs), which must bracket the average reported ground water depth at the Property.
- Installation of the two new proposed wells is recommended since the lateral and vertical extent of contamination at this Site (east of MW-6 and DP-08) has not yet been achieved. The following additional information should also be provided in an updated status report,
  - Provide an updated time-series plot of the ground water sampling results at wells

- that have exceeded cleanup levels within the last eight quarters.
- Analyze for naphthalene since this constituent is often found with diesel and oil range hydrocarbons. If detectable, it may help confirm the contamination is from the former UST.
  - Include a summary of the operating dates for both MW-1 and MW-6 air injection systems. Identify the number and locations of injection wells. Include dissolved oxygen (DO) and oxidation reduction potential (ORP) information collected before and during operation.
  - Plot contaminant concentration against DO for each well. This may provide multiple corroborating lines of evidence to support microbial degradation. Discuss how the changes in concentration and dissolve oxygen relate to evolution of microbial activity.
- Install two additional borings east of the 12,000 gallon tank, between MW-6 and the new, down gradient sentinel wells. Collect soil and groundwater samples. The purpose of the boring is to assess extent of contamination in each media and establish a possible contaminant gradient.
  - Further remedial action will be necessary at the area of the former 12,000 gallon diesel tank location. An air injection system has been installed where contamination above the MTCA Method A levels has been identified. Ground water confirmation sampling at locations near MW-1 and MW-6 will be necessary after the air injection system is turned off to monitor for potential contaminant rebound.

**This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action.** To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.**

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

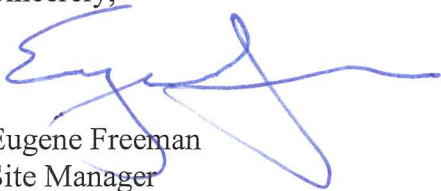
The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

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Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at 425.649.7191 or email at Eugene.Freeman@ecy.wa.gov.

Sincerely,



Eugene Freeman  
Site Manager  
NWRO Toxics Cleanup Program

Enclosure: [1]: A - Site Map

cc: Doug Kunkel, Environmental Partners Inc.  
Sonia Fernandez, VCP Coordinator, Ecology





KEY:



MONITORING WELL LOCATION

GROUNDWATER FLOW DIRECTION

UNDERGROUND STORAGE TANK



**ENVIRONMENTAL PARTNERS INC.**  
 295 N.E. Columbia Boulevard, Suite 201  
 Longwood, FL 32070 38027

FIGURE 2

SITE REPRESENTATION

PROJECT 61901.0

PREPARED FOR MR. DAVID POLLART

LOCATION ESTES WEST EXPRESS FACILITY  
 2102 WEST VALLEY HIGHWAY NORTH  
 AUBURN, WASHINGTON

SHEET 1 of 1

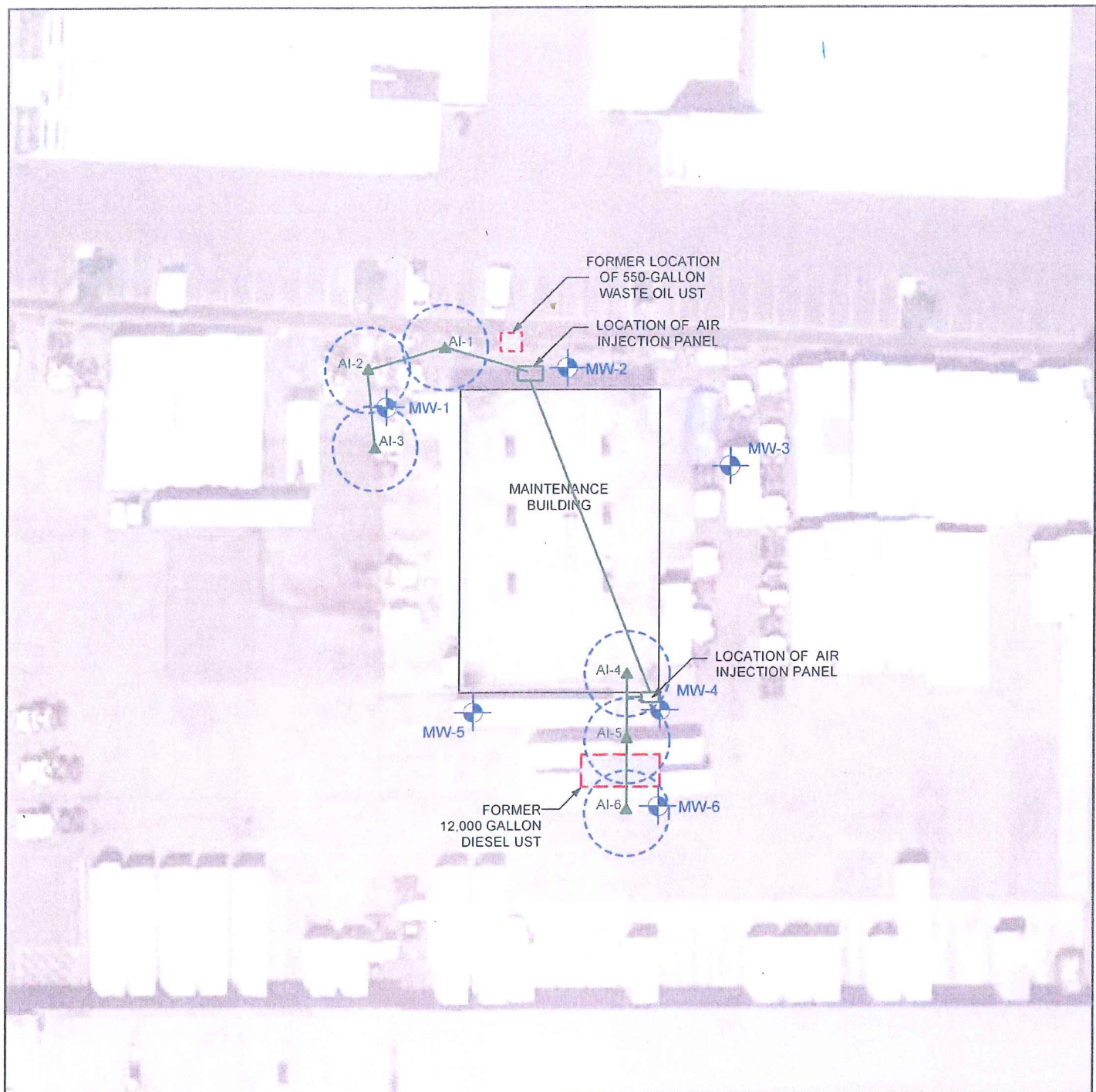
DRAWN BY ALW

REVIEWED BY GAM

DATE 12/27/12







FORMER LOCATION OF 550-GALLON WASTE OIL UST

LOCATION OF AIR INJECTION PANEL

MAINTENANCE BUILDING

LOCATION OF AIR INJECTION PANEL

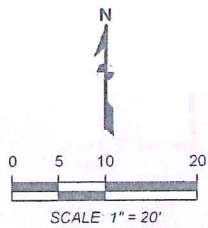
FORMER 12,000 GALLON DIESEL UST

OFFICE

**FIGURE 2**

**AIR INJECTION REMEDIATION SYSTEM LAYOUT**

- NOTES:**
- EXISTING MONITORING WELL LOCATION
  - AIR INJECTION WELL LOCATION
  - APPROXIMATE LOCATION OF AIR INJECTION PIPING
  - APPROXIMATE RADIUS OF INFLUENCE (ROI)
  - FORMER UNDERGROUND STORAGE TANK



PREPARED BY	ENVIRONMENTAL PARTNERS INC		
REPORT	JUNE 2016 GROUNDWATER SAMPLING REPORT - NINETEENTH ROUND		
LOCATION	ESTES WEST EXPRESS FACILITY 2102 WEST VALLEY HIGHWAY NORTH, AUBURN, WASHINGTON		
PREPARED FOR	MR. DAVID POLLART		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
7/18/16	VPB	DCK	61901 1

