



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

February 16, 2018

Mr. Mathew Davis  
GHD Services Inc.  
732 Broadway, Suite 301  
Tacoma WA 98402

Re: Voluntary Cleanup Program – Revised Work Plan Review Comments:

Site Name: Unocal Bulk Plant 0853  
Site Address: 6 N 5<sup>th</sup> Street, Wenatchee  
Facility/Site No.: 346  
Cleanup Site ID No: 4713  
VCP Project No.: CE0466

Dear Mr. Davis:

Thank you for submitting your proposed work plan titled “Revised Site Assessment Work Plan, Former Unocal Bulk Plant 0853”, dated February 8, 2018, for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your efforts in pursuing an independent remedial action under the Model Toxics Control Act (MTCA). This work plan was revised from an earlier version dated December 14, 2017, based on Ecology comments in a letter dated January 10, 2018.

With the following exceptions, Ecology has no further comments on the revised work plan. No further revision of the work plan is required. Ecology suggests that you proceed with executing the work plan with the following modifications to be incorporated within the program.

Laboratory Analyses

The following contingency analyses are intended to clarify Table 3.1:

- Any soil or groundwater samples with an exceedance of the MTCA Method A cleanup level (CUL) for TPH-g or BTEX should have contingency analysis for total lead and additives (see WAC 173-340-900 Table 830-1). Note that analysis for dissolved lead and field turbidity measurements are recommended in case of false positives for lead.
- Any soil or groundwater samples with an exceedance of the MTCA Method A CUL for TPH-d should have contingency analysis of cPAHs.
- Any soil or groundwater samples with an exceedance of the MTCA Method A CUL for TPH-o should have contingency analysis of cPAHs and PCBs.



- Any soil or groundwater samples with an exceedance of the MTCA Method A CUL for TPH-o and suspected of potential impact by waste oil based on site operational information should also have contingency analysis of halogenated VOCs.

Groundwater Monitoring

Ecology concurs with the proposed monitoring plan with the addition of MW-15. The following table clarifies the quarterly groundwater monitoring network. Ecology is open to consider further modifications to the network in the future, as appropriate.

	TPH-G	TPH-D*	TPH-O*	BTEX	Comments
MW-3	--	--	--	--	
MW-6	--	--	--	--	
MW-8	--	--	--	--	
MW-9	--	--	--	--	
MW-10	--	--	--	--	
MW-11**	--	--	--	--	TPH-d and TPH-o above Method A CULs in 2015.
MW-12**	--	--	--	--	TPH-o above Method A CULs in 2014.
MW-13	--	X	X	--	TPH-d above Method A CULs in 2017.
MW-14	--	--	--	--	
MW-15	--	X	X	--	TPH-d above Method A CULs in 2017.
MW-16	--	--	--	--	
MW-17	--	--	--	--	
F***	X	X	X	X	
G***	X	X	X	X	
H***	X	X	X	X	

X = to be analyzed.

-- not analyzed.

\* Monitoring wells MW-11 and MW-12 had Method A CUL exceedances in 2015 and 2014, respectively. However these wells are located hydraulically upgradient of the site and results appear to be outliers (detected above Method A CULs in 2 of 24 rounds and 1 of 23 rounds, respectively).

\*\* TPH-D and TPH-O to be analyzed by NWTPH-Dx. Both TPH-D and TPH-O results should be reported. The sum of TPH-D and TPH-o should be compared with Method A CULs. (see Guidance for Remediation of Petroleum Contaminated Sites, Revised June 2016).

\*\*\* To be constructed as permanent monitoring well and added to monitoring network if any Method A exceedances in grab sample.

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The opinions presented by Ecology in this letter are made only with respect to this site, and based on the information provided and discussed above.

Please contact me at (509) 454-7835 or email me at [frank.winslow@ecy.wa.gov](mailto:frank.winslow@ecy.wa.gov) if you have any questions or would like clarification of any portion of this letter.

Sincerely,



Frank P. Winslow  
Site Manager  
CRO Toxics Cleanup Program

cc: Ed Ralston, Phillips 66 Company