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 76
Site Address:	920 N 6th Avenue, Yakima
Assessor's Parcel No.:	181313-31506
Facility/Site ID No.:	53365837
VCP Project No.:	CE0468

Dear Mr. Davis:

Thank you for submitting your proposed work plan titled "Revised Site Assessment Work Plan, Unocal 76" 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 12, 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.

Replacement Monitoring Wells

As mentioned in the work plan, historical water levels have varied from 13 to 24 feet below ground surface. The water level depth at 24 feet was in 2014, immediately prior to the monitoring well network becoming dry. Ecology understands the stated rationale for using 20 foot screens. However, this screen length introduces significant dilution potential for groundwater sampling. We propose that if monitoring well "A" has a depth to water of 22 feet or less, then a 15 foot screened interval (e.g. 13 to 28 feet) be used. If monitoring well "A" has a depth to water of 22 feet or greater, then a 20 foot screened interval (e.g. 10 to 30 feet) be used. This approach will ensure that the new monitoring well network does not result in excessive dilution when well sampling. Note that sampling of wells using a peristatic pump or low flow submersible pump could target a sampling depth of five feet below the current water level in order to mitigate this concern.

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 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