Periodic Review

Wondrack Ellensburg Site
Facility/Site ID #: 25139
Cleanup Site ID #: 3189
301 and 303 West 15th Avenue
Ellensburg, Washington 98926

Prepared by:
Washington State Department of Ecology
Central Regional Office
Toxics Cleanup Program

December 2017

1.0 INTRODUCTION

This document is the Department of Ecology's periodic review of post-cleanup site conditions and monitoring data to assure that human health and the environment are being protected at the Wondrack Ellensburg site (Site). The cleanup at this Site was implemented under the Model Toxics Control Act (MTCA), Chapter 173-340 of the Washington Administrative Code (WAC).

Cleanup activities at this Site were completed through the Voluntary Cleanup Program (VCP) under VCP Project No. CE0336. The cleanup actions resulted in residual concentrations of gasoline-range (TPH-G), diesel-range (TPH-D), heavy oil-range (TPH-O) petroleum hydrocarbons, and benzene that exceed MTCA Method A cleanup levels for soil established under WAC 173-340-740(2). As a result of residual contamination, institutional controls were required for the Site to be eligible for a no further action (NFA) determination. WAC 173-340-420(2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

(a) Whenever the department conducts a cleanup action
(b) Whenever the department approves a cleanup action under an order, agreed order or consent decree
(c) Or, as resources permit, whenever the department issues a no further action opinion
(d) And one of the following conditions exists:

    1. Institutional controls or financial assurance are required as part of the cleanup
    2. Where the cleanup level is based on a practical quantitation limit
    3. Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

(a) The effectiveness of ongoing or completed cleanup actions;
(b) New scientific information for individual hazardous substances of mixtures present at the Site;
(c) New applicable state and federal laws for hazardous substances present at the Site;
(d) Current and projected Site use;
(e) Availability and practicability of higher preference technologies; and
(f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site History

The Wondrack Ellensburg Site is located on the northwest corner of the intersection of Water Street and 15th Avenue at 301 and 303 West 15th Avenue in Ellensburg, Washington. It is located in an area that is primarily occupied by single-family residences.

The Site operated as a bulk fuel transfer station from the 1920s through the 1980s. The property was sold to ARH Distributors in 1980, and purchased shortly after by Wondrack Distributing in 1986. Operations on the Site ceased after the transfer to Wondrack Distributing. The facility was decommissioned, and all aboveground and underground tanks, piping, and associated buildings were removed in 1997. The only exception was a garage located in the southwest comer of the property that has been privately rented as a storage facility.

In 2016, several modular homes were relocated to the Site and developed as multi-family housing by Pioneer West LLC. These residences were constructed slab on grade and are connected to City utilities.

A Site plan is available as Appendix 6.1.

2.2 Site Investigations

The City of Ellensburg encountered petroleum contaminated soils during trenching operations while installing a sewer line along North Water Street in 1995. The Department of Ecology was notified of the City's findings. Impacted soils were removed from the trench by the City of Ellensburg.

As a result, a Site Hazard Assessment (SHA) was performed by the Kittitas County Health Department as required under the Model Toxics Control Act (MTCA). Soil samples were collected from twelve test pits (TP-1 through TP-12) and analyzed for petroleum constituents and total petroleum hydrocarbons. Analytical results indicated levels of contamination above the MTCA Method A cleanup levels were present on the property, and offsite to the southeast. The Site was given a SHA ranking of 2.

In response to the SHA ranking, a Site Assessment was performed on behalf of Chevron in the summer of 1998. Assessment activities included the installation of eight monitoring wells (MW-1 through MW-8). Soil and groundwater samples were collected from each well location.

Petroleum impacted soils were again encountered in the public right-of-way in 1999 during the installation of a television cable line along West 15th Avenue. The Department of Ecology was notified of these findings.

In 2002, under partial fulfillment of Ecology issued Agreed Order No. DE 02TCPCR-3982, Remedial Investigation/Feasibility Study (RI/FS) activities began to determine the nature and extent of subsurface contamination. Upon completion of the RI/FS in March 2003, the Agreed Order expired, and the Site was entered into the Voluntary Cleanup Program (VCP).

2.3 Remedial Actions

In January 2005, remedial activities were performed at the Site and resulted in removal of all petroleum impacted soil from the ground surface to below the water table. A total of 4,850 tons of petroleum impacted soil were removed from the Site. It was determined that excavating impacted soils beneath the public right-of-way was infeasible based on cost and effectiveness. Any residual soil impacts were determined to be capped by asphalt under West 15th Avenue and do not pose a threat to human health or the environment.

After the excavation, four groundwater monitoring wells were installed hydrologically downgradient of the Wondrack property. They were sampled for four consecutive quarters until the groundwater contamination for all petroleum constituents were below MTCA Method A groundwater cleanup levels.

A Soil Management Plan was created to deal with any future contact to residual petroleum impacted soil by City or utility workers working in the area, and is available on Ecology's website at: https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=3189

2.4 Cleanup Levels and Point of Compliance

WAC 173-340-704 states that MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be 'routine', few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

For soil, the point of compliance is the area where the soil cleanup levels must be attained. Standard points of compliance are used for the Site. The standard point of compliance for soil is defined as the area throughout the Site affected by petroleum hydrocarbons in soil above MTCA Method A cleanup levels, regardless of depth, to protect groundwater.

2.5 Restrictive Covenant

Because contamination remained at the Site at concentrations exceeding MTCA Method A cleanup levels, institutional controls were required for the Site to be eligible for a NFA determination. Because the City right-of-way is not deeded property, an environmental covenant could not be used and an alternative institutional control was required. Internal City of Ellensburg public works records were used in place of an environmental covenant. The

notification letter provided to the City of Ellensburg to implement this process is available as Appendix 6.3. Any subsurface construction activities will be flagged, and directed to the Soil Management Plan. An NFA determination was issued for the Site in 2011.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

3.1.1 Direct Contact Pathway

The Site is currently occupied by multi-family housing and the City of Ellensburg public right-of-way. It was determined that risk associated with direct contact to contaminated soils would be effectively eliminated by institutional controls and impermeable ground cover (asphalt). Based upon the Site visit conducted on November 28, 2017, the asphalt cover at the Site continues to eliminate the exposure of contaminated soils by ingestion and direct contact. Contamination is located in the public right-of-way, which is covered with asphalt. A photo log is available as Appendix 6.3.

3.1.2 Institutional Controls

Because contamination was left beneath the roadway at the Site, institutional controls were required to prevent activities that may expose contaminated soils. Because contamination is located beneath a public roadway, the primary risk of exposure is during road or utility maintenance and repair. An environmental covenant is typically used to restrict activities that might expose contaminated soils; however, the public roadway is not a deeded property and therefore an environmental covenant cannot be used in this case. It was determined that internal processes within the Ellensburg Public Works Department would be used as an alternative institutional control. In the event that construction activities are planned in that area, the project will be flagged by the City of Ellensburg mapping system. Workers will take appropriate precautions, and Chevron Environmental Management Company will provide resources to manage and dispose of contaminated soils, should they be encountered. This alternative institutional control serves to assure the long term integrity of the remedy.

On November 28, 2017, Ecology inquired with the City of Ellensburg Public Works Department. A test scenario was introduced to the City to conduct utility line maintenance at the Site. The Public Works mapping system successfully flagged the Site location and City staff were able to implement the appropriate precautions for maintenance staff. It was determined that the alternative institutional control was functioning effectively.

3.2 New scientific information for individual hazardous substances for mixtures present at the Site

There is no new pertinent scientific information for the contaminants related to the Site.

3.3 New applicable state and federal laws for hazardous substances present at the Site

Cleanup levels for petroleum hydrocarbons have not changed since remedial actions were conducted at the Site. Contamination remains at the Site above MTCA Method A cleanup levels and the cleanup action is still protective of human health and the environment.

3.4 Current and projected Site use

A portion of the Site is occupied by multi-family residences; however, the only remaining contamination is located beneath the public roadway. There have been no changes in current or projected future Site or resource uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of contaminated soils, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection well below MTCA Method A cleanup levels. The presence of improved analytical techniques would not effect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

- The cleanup actions completed at the Site are protective of human health and the environment.

- Soil cleanup levels have not been met at the Site; however, the cleanup action for the Property is determined to comply with cleanup standards under WAC 173-340-740(6)(f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.

- The alternative institutional control that has been implemented for the property is active and will be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, the Department of Ecology has determined that the requirements of the institutional control are being satisfactorily followed. No additional remedial actions are required by the property owner. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the cap is maintained.

4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

Science Applications Corporation. *Request for No Further Action.* February 2, 2011.

Science Applications International Corporation. *Soil Management Plan.* February 3, 2011.

Chevron Environmental Management Company. *Notification Letter.* March 28, 2011.

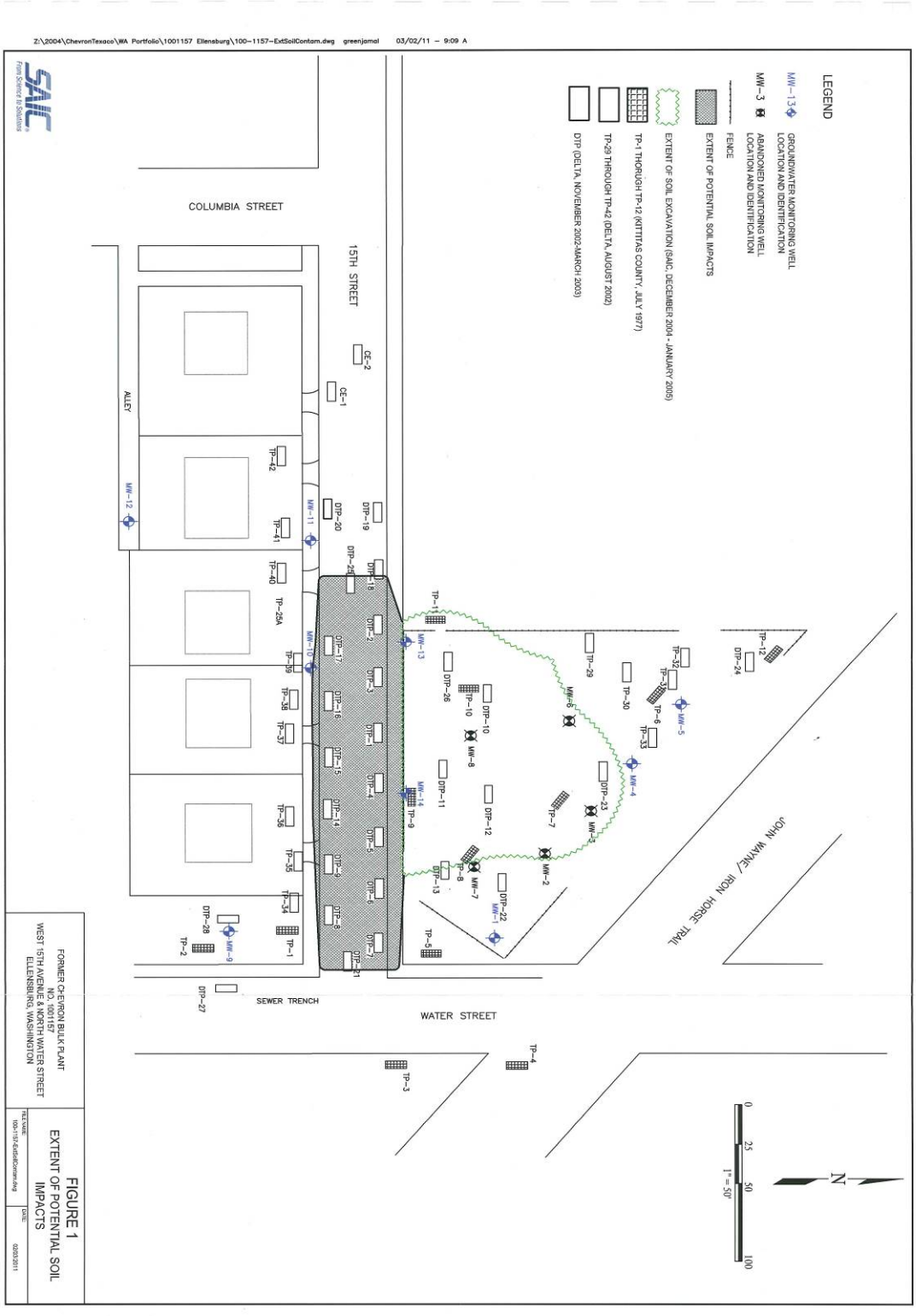
Science Applications International Corporation. *Remedial Excavation Report.* June 8, 2011.

Ecology. *No Further Action Determination Letter.* June 27, 2011.

Ecology. *Site Visit.* November 28, 2017.

6.0 APPENDICES

6.1 Site Map


LEGEND
GROUNDWATER MONITORING WELL LOCATION AND IDENTIFICATION
ABANDONED MONITORING WELL LOCATION AND IDENTIFICATION
FENCE
EXTENT OF POTENTIAL SOIL IMPACTS
EXTENT OF SOIL EXCAVATION (SAIC, DECEMBER 2004 - JANUARY 2005)
TP-1 THORUGH TP-12 (KITTITAS COUNTY, JULY 1977)
TP-29 THROUGH TP-42 (DELTA, AUGUST 2002)
DTP (DELTA, NOVEMBER 2002-MARCH 2003)
COLUMBIA STREET
15TH STREET
ALLEY
SEWER TRENCH
WATER STREET
JOHN WAYNE / IRON HORSE TRAIL
FORMER CHEVRON BULK PLANT
NO. 100157
WEST 15TH AVENUE & NORTH WATER STREET
ELLENSBURG, WASHINGTON
FIGURE 1
EXTENT OF POTENTIAL SOIL IMPACTS
1" = 50'
N

6.2 Notification Letter

Hazardous Substances under 15th Avenue in Ellensburg

Notice:

The intent of this memo is cautionary only. For approximately 250 feet west of the intersection with North Water Street hazardous substances may exist under 15th Avenue and the adjacent sidewalks. The substances are trapped in the contaminated soils beneath the street and adjacent sidewalks and include mainly gasoline and benzene, though the soils may also contain lesser amounts of toluene, ethylbenzene, xylenes, and diesel fuel. Because of the avenue's asphalt cover, the substances may be discovered as elevated hydrocarbon fumes or contaminated soils.

The contaminated soils under 15th Avenue were found during an investigation of the Wondrack property. The Wondrack property is on the northwest corner of Water Street and 15th Avenue. It was a large fuel distributing plant that operated from the early 1920's to about 1984. Sixteen of the twenty-one test pits excavated in the street in 2004 found hazardous substances in the soil that were in excess of the Model Toxics Control Act cleanup standards. Contaminants left the Wondrack property and traveled under the street to the opposite sidewalk.

The contaminated soils from the test pits were excavated and hauled off. The pits were back-filled with clean soils. However, because so many utilities (gas main, water main, sewage main, electrical main, cable, telephone) exist under 15th Avenue and the adjacent sidewalks, the excavation of the entire 250 feet was not practical, safe, or economically feasible.

The City of Ellensburg Public Works Department has a February 2, 2011 SAIC submittal and a March 25, 2011, addendum letter that documents this stretch of 15th Avenue. The SAIC submittals include a Soil Management Plan (Attachment B). It obligates the Chevron Environmental Management Company (address below) to have a consultant present during any subsurface activity in this portion of 15th Avenue. They shall also properly dispose of all contaminants found in the soil above MTCA Method A cleanup levels. The Kittitas County Public Works Department mapped this contamination and, where work is required in this stretch of 15th Street, the various utilities are required to reference this map.

Public Works is aware that trapped hydrocarbon contamination in soil can create fumes that may be unsafe for several reasons. Subsurface work in this portion of 15th Avenue should be carefully planned in advance and Chevron and its consultant contacted. It is also possible that in-situ remediation may abate the contamination when subsurface work becomes necessary.

Chevron Environmental Mgmt. Co.

145 S. State College Blvd.
Brea, CA 92821
(714) 671-3371 (as of 03/2011)

Date: March 28, 2011

6.3 Photo log

Photo 1: Site with New Housing - from the southeast

Photo 2: North End of Site - from the northeast

Photo 3: West Side of Site - from the west

Photo 4: 15th Avenue and Residual Contamination Location – from the east