



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

October 11, 2018

Jim Cach
Coleman Oil Company
529 E. Kennewick Avenue
Kennewick, WA 99336

Re: Ecology Comments of Revised Supplemental Remedial Investigation (SRI) Report

- **Site Name:** Coleman Oil Biodiesel Spill
- **Site Address:** 3 E Chehalis St., Wenatchee, Chelan County
- **Facility/Site ID:** 83844381
- **ERTS ID No.:** 671575
- **Agreed Order No.:** DE 15389

Dear Jim Cach:

The Department of Ecology (Ecology) received a revised Supplemental Remedial Investigation (SRI) Report for the above-referenced Site dated October 1, 2018. The SRI report had been revised based on Ecology's comments dated August 16, 2018. Attached are follow up comments on the revised report. The follow up comments reference the original Ecology comment and the current section within the revised report. These comments were emailed to Craig Hultgren of HydroCon on October 2, 2018.

Ecology requests replacement pages as appropriate rather than resubmitting the entire hard copy SRI report and a replacement PDF version of the report. In addition, Ecology has not yet completed review of SRI Report Appendices, so it is possible that some additional comments could be forthcoming regarding the appendices. We are providing these comments at this time to expedite SRI Report completion. As previously discussed, two data gaps have been identified that will require additional data acquisition. The collected additional data are to be submitted to Ecology as Addenda to the SRI report. Once these Addenda are complete, the next step will involve Ecology providing the SRI report and Addenda for public review and comment. The SRI Report will not be considered final until the public review phase is complete.



Jim Cach
October 11, 2018
Page 2

Please feel free to call me at (509) 454-7835 or email me at frank.winslow@ecy.wa.gov with any questions.

Sincerely yours,



Frank Winslow
Cleanup Site Manager
Toxics Cleanup Program, Central Region Office

Enclosure

cc: Craig Hultgren, HydroCon

Patrick Wicks, EEC

Ecology Site File

Ecology comments on Supplemental Remedial Investigation Report, revised October 1, 2018 and/or comment responses.

Ecology has reviewed the revised SRI Report and the responses to our August 16, 2018 comments. Ecology has not yet reviewed all of the SRI Report appendices. Overall, Ecology considers the SRI Report to be relatively complete, and the majority of Ecology's comments have been addressed to satisfaction. The following are remaining comments for which additional report revision is needed.

Original Comment – Section 5.3.3 – Unused Wells (section number unchanged)

Ecology notes that the requested vertical gradient data and the sampling results for the replaced monitoring well MW-1 that are to be presented in an upcoming monitoring report have potential to have consequences on the Conceptual Site Model presented in the RI.

Original Comment – Section 5.5 – Sediment Sampling (now Section 5.3.7)

Text in Section 5.3.7 states sediments were sand and low plastic fines (silty sand?) whereas the field form in Appendix E indicated silty clay. Please clarify the actual sediment material, including the unified soil classification system code.

Original Comment – Section 5.8.2 – Groundwater Flow Direction and Gradient (now Section 5.7.2).

The comment response states "HydroCon does not agree that groundwater beneath the site flows in different directions than the potentiometric surface, rather groundwater flow direction is affected by the slope and shape of the bedrock surface." Ecology asserts that the potentiometric surface maps presented in Figure 13 and Figure 14 represent the average surface conditions as defined by the monitoring well network. The actual potentiometric surface may be considerably more complex, due to the heterogeneity of aquifer materials and complex interconnectivity of fractures or higher conductivity strata. As such, on a local basis, groundwater flow directions may be inconsistent with the flow directions indicated by the potentiometric contours. Note that drawing a curved line perpendicular to potentiometric contours upgradient of MW-10 would not indicate a source at the Coleman facility. However, it is Ecology's understanding that the source of the petroleum found in MW-10 is not disputed and has concluded by both Ecology and Coleman to be consistent with the release of R-99 renewable diesel at the Coleman facility.

Original Comment Section 5.9 – Field Screening Results (now Section 5.8).

The intent of Ecology's original comment was such that the in-text table could show the relatively vertically discrete nature of soil contamination at the site. The first samples (HC01 and HC02) in this table provide this information. However, starting with MW-13, only the range of PID detections and range of depth with detections are reported, which does not clearly convey the depth stratification of contamination (At MW-13, most contamination was between 5 and 10 feet depth, ranging from 468 ppm at 5 ft depth to 1271 ppm at 10 ft depth). These data suggest that the well is likely near a surficial release, but not collocated with a surficial release.

In addition, visual indications of contamination were also requested in this table, which is particularly important in distinguishing between the contamination at MW21 (gray staining at 24.5 to 27.5 ft) and MW22 (free product, resembling black oil at 31.5 ft).

Original Comment Section 6.2 – Chemicals and Media of Concern and Cleanup Levels (now Section 6.3)

The original comment stated “Surface water and sediment are impacted media at the Site and more discussion should be included on these media including a cleanup level table for sediment similar to those provided for soil and groundwater.”

The initial bullet list does not include surface water. Since exact constituents of concern for surface water have not yet been identified, and additional bullet could be added as follows:

- Petroleum constituents in surface water.

Cleanup levels are presented in in-text tables for Soil and Groundwater, but only in Table 7 for sediments. Please include the cleanup levels for sediment in this section in order to be consistent.

As mentioned in the original comment, both surface water compliance locations (i.e. monitoring wells) and analytical parameters will need to be identified in the future. Since the interim remedial actions currently employed at the site are targeting a cessation of petroleum sheen, identification of such compliance points and analytical parameters is not needed at this time. However, Ecology suggests that the SRI report state that surface water compliance points and analytical parameters will be identified during the Feasibility Study (FS) stage of the project. Sampling of monitoring wells adjacent to the river where seepage has been identified will likely be needed in the future and may need to include additional analytes that have not yet been sampled (e.g. full suite VOCs, SVOCs, and PAHs). Such analysis is anticipated to be needed in order to assess surface water compliance once the sheen has been concluded to have permanently ceased.

Original Comment Section 6.5 – Potential Data Gaps (now Section 6.6)

The revised section references Appendix N, titled Additional Interim Action #3 Work Plan – Soil and Sediment Sampling. These work plans should not be considered to be Interim Remedial Actions unless cleanup (e.g. excavation and offsite disposal) are included within the scope. Rather, these should be considered SRI Addenda Work Plans. The results of these investigations will amend the SRI report. The work plans do not need to be attached to the SRI report, but can be referenced as “forthcoming work plans”. It may be worth mentioning in the SRI Report that rather than revising the SRI report with the results of the investigations that Ecology has requested Addenda to append to the SRI report.

Original Comment Figure 11 – Cross Section B-B’ (figure number unchanged).

This revised figure has two locations labeled SS04. Please delete the incorrect one.

Original Comment Figure 20 – Site Boundary Definition (now Figure 21).

Ecology requested inclusion of question marks “along the north west part of the area within the Chelan PUD property and adjacent to the area within the river north of the sediment sample locations.” Question marks were added along the west side of the plume but not in the north east area. In addition to the need for more question marks to the northeast, Ecology suggests that this polygon be dashed.

Original Comment Table 3 – Product Recovery Data (not Table 4).

This new table appears to be missing the date range for the recovered product.