



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

November 19, 2018

Robert D. Miller  
Robert D. Miller Consulting, Inc.  
PO Box 514  
West Linn, OR 97068

**Re: Public Comment for the Remedial Investigation/Feasibility Study:**

- **Site Name:** Big B Mini Mart
- **Address:** 1611 Canyon Road, Ellensburg
- **Facility/Site ID No.:** 386
- **Cleanup Site ID No.:** 4901
- **Agreed Order No.:** DE 12908

Dear Robert D. Miller:

Thank you for your review of the Remedial Investigation/Feasibility Study (RI/FS) report and for the comments you offered, via email on October 26, 2018, which said:

*“On behalf of WSCO Petroleum Co, owner of down gradient property Astro 113, I wish to express WSCO’s concerns regarding the three options recommended by your consultant Floyd & Snider.*

*1. WSCO strongly supports Alternative #1 - Excavation of soil exceeding MTCA method A. The results of WSCO’s efforts in this regard is clearly evident in the test results at Astro 113 of groundwater samples collected to date.*

*2. WSCO opposes Alternatives 2 & 3 for several reasons: a) these alternatives are incomplete in level of MTCA required cleanup; b) are both high risk options that may prove useless and lead back to option 1; there has been no pilot studies to confirm the potential outcomes of options 2 & 3; c) it does not appear that F/S has considered the poor bioactivity associated with low temperatures of air and groundwater associated with the Big B site throughout most of the year, d) how is Opt 2 - bio venting/air injection suppose to cleanup contaminants below the groundwater table, or total petroleum hydrocarbons?, and finally e) Opt 3 - ISCO assumes that all free product including globules trapped between soil particles have been removed, which is questionable, and ISCO is limited to temperatures as noted in concern “c” above.*

*WSCO appreciates the progress Ecology has been making, but would like Ecology to pursue alternatives with high probabilities of success and occur within reasonable time frames. Alternative 1 is the clear choice.”*



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Your comment addressed the preference for a certain remedial action, which we will take into consideration. However, Ecology notes that the agreed order simply requires the completion of a RI/FS, and no cleanup action has been selected yet.

Per WAC 173-340-350(7), the purpose of the Remedial Investigation is to perform site characterization, i.e., *“to collect data necessary to adequately characterize the site for the purpose of developing and evaluating cleanup action alternatives.”* Following site characterization, the Feasibility Study (FS) will develop and evaluate alternative cleanup actions per WAC 173-340-350(8). As such, Floyd Snider has complied with the requirements of the Agreed Order.

Note that this Agreed Order does not require the completion, at this administrative phase, of a Draft Cleanup Action Plan (DCAP) which is described in WAC 173-340-380(1). Floyd Snider, however, did complete a Disproportionate Cost Analysis (DCA) per WAC 173-340-360(3)(e).

You can reach me at (509) 454-7836 or [john.mefford@ecy.wa.gov](mailto:john.mefford@ecy.wa.gov) if you have any questions.

Regards,



John Mefford  
Cleanup Project Manager/Geologist  
Central Region Office  
Toxics Cleanup Program

JM:rl

cc: Tom Colligan Floyd Snider  
Glenn Zirkle, ZZZ Company, LLC and WSCO Petroleum Corporation, Inc.