



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

February 25, 2019

Eric Hetrick
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

RE: Status of contamination cleanup at the following site:

- **Site Name:** Simpsons Texaco
- **Site Address:** 207 W 1st Street, Cle Elum
- **Facility/Site No.:** 92387155
- **Cleanup Site ID No:** 6866

Dear Eric Hetrick:

Ecology has received the report titled "2018 First Quarter Groundwater Monitoring and Sampling Report, Former Texaco Service Station No. 211576," prepared by Leidos and dated February 13, 2019. Thank you for submitting this monitoring report.

The monitoring report presented sampling results from two monitoring wells sampled in March of 2018. Historically there were twelve (12) monitoring wells at the Site; however, as of 2018, ten of the twelve have been destroyed or paved over. Of the two that were sampled in 2018 (MW-7 and MW-29), one had a cleanup level exceedance of heavy oil, while the other had no cleanup level exceedance. However, these two monitoring wells historically had non-detected to relatively low concentrations of concern. The sampled monitoring wells are in contrast to:

- TB-2, when last sampled in 2007 had 290,000 µg/L diesel range organics (DRO) and 111,000 µg/L gasoline range organics.
- TB-1, when last sampled in 2003 had 16,000 µg/L heavy range oil (HRO) and 23,000 µg/L DRO.
- MW-27, when last sampled in 2014 had 750 µg/L HRO, 1,100 µg/L DRO, and 4,500 µg/L GRO.
- MW-31, when last sampled in 2014 had 4,000 µg/L GRO.

Ecology has the following concerns based on this monitoring report:



Eric Hetrick
Chevron Environmental Management Company
February 25, 2019
Page 2

- Use of silica gel cleanup for analysis of groundwater by method NWTPH-Dx is not consistent with Ecology's guidance.
- The data from the March 2018 monitoring round does little to update the current understanding of groundwater contamination at the Site, because the remaining monitoring network is not sufficient.
- The monitoring report did not include any conclusions or recommendations, so we are unaware of what Chevron's planned next steps are for the Site.
- It is unclear why sampling results from the two monitoring wells sampled in March 2018 was not reported until February 2019.

The Site was enrolled in the Voluntary Cleanup Program (VCP) in January 2018. Ecology expects that any site enrolled in the VCP will be making continuous progress toward reaching a goal of a No Further Action (NFA) determination. The pace of work at this Site at present has not been consistent with our expectations under the VCP. If continual progress is not demonstrated, then Ecology may choose other administrative options.

Monitoring wells MW-6 and MW-8 were listed as "unable to locate" (potentially paved over) in the monitoring report. Paved over monitoring wells can potentially be located using a magnetometer (metal detector), and there is potential that they could be uncovered and brought back into service. However, neither MW-6 nor MW-8 are located in areas of elevated historical concentrations, therefore their utility may be less critical when compared to other locations.

It appears that replacement monitoring wells are needed, in particular at locations TB-1 and TB-2. Ecology requests that Chevron provide plans for ensuring continual cleanup progress at the Site. Ecology notes that monitoring alone is not considered a sufficient remedial action under the Model Toxics Control Act (MTCA).

We request your reply to this letter within 30 days. Please contact me at (509) 454-7835 or email at frank.winslow@ecy.wa.gov with any questions.

Sincerely,



Frank P. Winslow
Toxics Cleanup Program
Central Regional Office

cc: Ruth Otterman, Leidos
Paul Jhuty, Short Stop LLC