



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

April 23, 2019

Mathew Davis  
GHD Services Inc.  
732 Broadway, Suite 301  
Tacoma WA 98402

**Re: Voluntary Cleanup Program – Status of Cleanup:**

- **Site Name:** Unocal 76 (Bulk Plant 0888)
- **Site Address:** 920 N 6th Ave, Yakima
- **Assessor's Parcel No.:** 181313-31506
- **Facility/Site ID No.:** 53365837
- **VCP Site:** CE0468

Dear Mathew Davis:

This letter is in response to your request via telephone and email for Ecology to consider a No Further Action (NFA) determination for the above-referenced site. We understand that Unocal/GHD is requesting that continued monitoring be conducted under an Environmental Covenant (EC), because groundwater contamination remains above Model Toxics Control Act (MTCA) cleanup levels at the Site.

**At the present time, a No Further Action determination is not appropriate.** The groundwater at this Site is accessible, and no disproportionate cost is needed to achieve cleanup.

Achieving a NFA determination under MTCA generally involves contamination concentrations being reduced to below MTCA cleanup levels. Occasionally, contamination may be inaccessible, such as beneath a structure. In such a case, an Environmental Covenant (EC) can be used in concert with an NFA. The EC commonly stipulates that Ecology expects that the remaining contamination will be cleaned up at a time in the future when the contamination becomes accessible, such as when a structure is removed.

As we have discussed, natural attenuation of the petroleum in groundwater is believed to be ongoing, and it is likely that cleanup levels will be achieved in the relatively near future. Unocal/GHD is welcome to submit a request to reduce the frequency of monitoring until such time that it is anticipated that a case can be made via quarterly monitoring for a NFA. In addition, Ecology could potentially prepare a “NFA Likely” letter, if so requested.



Mathew Davis  
GHD Services Inc.  
April 23, 2019  
Page 2

Please contact me at (509) 454-7835 or email me at [frank.winslow@ecy.wa.gov](mailto:frank.winslow@ecy.wa.gov) if you have any questions or would like clarification of any portion of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank P. Winslow". The signature is fluid and cursive, with a large initial "F" and a long, sweeping underline.

Frank P. Winslow  
Site Manager  
Toxics Cleanup Program  
Central Regional Office

cc: Ed Ralston, Program Manager – Remediation Management, Phillips 66 Company