



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 21, 2019

Joel Glaze
Commercial Claims & Superfund Advisor
Environmental & Property Solutions (E&PS) – Strategy & Commercial
ExxonMobil Environmental and Property Solutions Company
Wellness 3, 2B.481
22777 Springwoods Village Parkway
Spring, TX 77389

RE: Ecology comments on the Work Plan for the Former Mobil Station 99SUN (Site northeast of the Cascade Natural Gas Site in Sunnyside)

- **Site Name:** Cascade Natural Gas
- **Site Address:** 512 Decatur Avenue, Sunnyside
- **Facility/Site ID No.:** 492
- **Cleanup Site ID No.:** 4925

Dear Joel Glaze:

The Washington State Department of Ecology (Ecology) has reviewed the Work Plan for the Former Mobil Station 99SUN (Site northeast of the Cascade Natural Gas Site in Sunnyside), and has the following comments:

1. **Guidance.** Please refer to Ecology's "*Guidance for Remediation of Petroleum Contaminated Sites (2016)*" for details regarding all aspects of fieldwork, field screening, analytical methods and reporting for this project. The guidance document can be found at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1009057.html>
2. **Lateral Delineation Borings.** Plate 2: Proposed Groundwater Monitoring Figure illustrates the location of the two proposed borings for this project, indicating that the borings are almost 50 feet from each other. In lieu of these two borings, Ecology recommends using 4 step-out borings at intervals of no more than 25 feet apart. If field screening indicates petroleum hydrocarbon impacts to the soils, please use step out borings to delineate the horizontal extent of the petroleum hydrocarbon impacts. If field screening indicates any petroleum hydrocarbon impacts, Ecology recommends completing at least three borings as permanent groundwater monitoring wells. Three wells are necessary to delineate the groundwater gradient and direction. Permanent wells that have been properly installed, developed and sampled are Ecology's standard for collection of *representative* groundwater samples.



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If field screening does *not* indicate any petroleum hydrocarbon impacts, Ecology will accept the use of temporary groundwater monitoring points for one-time site groundwater analyses.

3. **Laboratory Analyses.** Please refer to Table 7.3 in our petroleum guidance (see above) for the recommended analytical samples to be collected for soil and groundwater. In addition to TPHg, TPHd, and TPHoil, Ecology requires sampling for BTEX, fuel additives and naphthalenes. In order to use Eurofins in Garden Grove, California, please check our website to be assured that they are certified for use in Washington State. Required analytical methods and practical quantitation limits (PQLs) for petroleum analytical methods are included in Table 7.3 of our petroleum guidance.

Ecology appreciates your willingness to gather additional data for the Cascade Natural Gas and Commercial Tire Sites in Sunnyside. Please contact me at 509-454-7840 or Mary.Monahan@ecy.wa.gov if you have questions or comments regarding the Work Plan and this letter.

Regards,



Mary Monahan
Site Manager
Toxics Cleanup Program
Central Regional Office

cc: Commercial Tire site file