



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 13, 2019

Mr. Brain Pletcher
HydroCon Environmental, LLC
314 W 15th St Suite 300
Vancouver, WA 98660

Re: No Further Action at the following Site:

- **Name:** Handy Mart
- **Address:** 1410 Ocean Beach Hwy, Longview, WA 98632
- **Facility/Site No.:** 98186449
- **VCP No.:** SW1623
- **Cleanup Site ID No.:** 11294

Dear Mr. Pletcher:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Handy Mart facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Gasoline Range Petroleum Hydrocarbons (GRPH), and Benzene, Toluene, Ethylbenzene, and Xylenes (BTEX) into Soil;
- GRPH and BTEX into Groundwater.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. HydroCon, LLC. (HydroCon), *Environmental Summary Report*. December 1, 2017.
2. HydroCon, *Response to Ecology Request for Additional Information on Cleanup under the VCP for the John's Shell Site*. January 24, 2019.
3. HydroCon, *Environmental Site Assessment Work Plan*, January 24, 2019.
4. HydroCon, *Environmental Site Assessment Report*, October 11, 2019.

These documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at 360.407.6365 or sending an email to swro_public_request@ecy.wa.gov.

This opinion is void if any of the information contained in those documents is materially false or misleading.

The Site is located in Longview, Washington (Figure 1), and is more particularly described in **Enclosure A** to this letter, which also includes detailed Site diagrams. The description of the Site is based solely on the information contained in the documents listed above.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. **Characterization of the Site.**

Characterization Activities:

In July 1991, Sweet Edwards/ Emcon Inc. (EMCON) discovered soil and groundwater impacted with GRPH south of the underground storage tanks (USTs). The source of the release was determined to be two loose bolts on the leak detector.

In October 1991, approximately 140 cubic yards of soil was removed from the southern end of the USTs (Figure 2), under the supervision of Environmental Inspection Services (EIS). From the excavation pit, four confirmation soil samples and one water sample were collected and analyzed for GRPH and BTEX. The detected concentrations in soil samples were below corresponding MTCA Method A Cleanup Levels (CULs). The groundwater sample exhibited a GRPH concentration of 12,800 micrograms per liter (ug/L) and a benzene concentration of 22 ug/L, which are above their CULs of 800 ug/L and 5 ug/L, respectively.

In February 2005, 3 Kings Environmental, Inc. (3 Kings) advanced ten soil borings (B1 through B10; Figure 2) at the Site during a Phase I and Limited Phase 2 Environmental Site Assessment (ESA). Heavy oil was detected in three borings (B2, B4, and B5) but at levels below the CUL. At Boring B5, GRPH was detected below the CUL in soil at the soil-water interface, while groundwater sample contained 4,410 ug/L of GRPH. Benzene was not detected in soil or groundwater sample during the February 2005 investigation.

In May 2005, 3 Kings installed three groundwater monitoring wells (MW1, MW2, and MW3) in the vicinity of the USTs (Figure 2). Soil samples were collected from MW2 and MW3 and tested for GRPH, which were found to be below detection limit or CUL. GRPH and BTEX were detected in the groundwater samples from MW3, but only benzene exceeded the CUL. 3 Kings concluded that the detected GRPH and benzene were from the 1991 documented release.

From September 2015 to June 2017, groundwater monitoring was conducted by HydroCon at the three existing monitoring well, on a quarterly basis. GRPH concentrations in groundwater were always below the CUL. Exceedance in benzene was observed in 2015 and early 2016, but not in the following five monitoring events.

In September 2019 HydroCon advanced five borings (HC1 through HC5; Figure 3) to a maximum depth of 20 feet (ft) below ground surface (bgs). Soil samples were analyzed for GRPH and BTEX, and also diesel- and oil-range petroleum hydrocarbons (DRPH and ORPH), as well as groundwater samples collected from the borings. GRPH and ORPH were detected in several soil and groundwater samples but at levels below their CULs. BTEX were not detected in soil or groundwater.

Exposure Pathways:

Soil-Direct Contact:

This pathway is *incomplete*. Conformation soil samples from the historical and most recent sampling work collectively demonstrated no concentrations of contaminants of concern (CoCs) exceeding their CULs for soil.

Soil-Leaching:

This pathway is *incomplete*. For the CoCs at the Site, the established CULs for soil are also considered protective of ground water.

Soil-Vapor:

This pathway is *incomplete*. The buildings are located greater than 30 horizontal feet from the soils that contain CoCs at levels below CULs.

Groundwater:

The pathway is *incomplete*. Groundwater monitoring results from April 2016 to June 30 2017 indicated that concentrations of CoCs are below their CULs for groundwater.

Surface Water:

The pathway is *incomplete*. No surface water features are located within the immediate vicinity of the Site.

Ecological:

This pathway is *incomplete*. HydroCon completed a simplified terrestrial ecological evaluation, concluding no further evaluation is necessary.

2. Establishment of cleanup standards.

Ecology has determined the CULs you established for the Site meet the substantive requirements of MTCA.

Substance	Soil – MTCA Method A for Unrestricted Land Uses milligram per kilogram (mg/kg)	Ground water – MTCA Method A microgram per liter (µg/L)
GRPH	30/100 ¹	800/1,000 ²
Benzene	0.03	5
Toluene	7	1,000
Ethylbenzene	6	700
Xylenes	9	1,000

¹ GRPH soil cleanup level is 100 mg/kg for gasoline mixtures without benzene and total toluene, ethylbenzene, and xylene are less than 1% of the gasoline mixture. For all other gasoline mixtures, the cleanup level is 30 mg/kg;
² 800 µg/L if benzene is present in groundwater; 1,000 µg/L if no detectable benzene in groundwater

Ecology has determined the points of compliance (POCs) you established for the Site meet the substantive requirements of MTCA.

Media	Points of Compliance
Soil-Direct Contact	<i>"The MTCA standard POC for direct contact with soil is from the ground surface to a depth of 15 feet bgs."</i>
Soil- Protection of Groundwater	<i>"This is a cross-media pathway that concerns all Site soil that is a potential source of COPCs to groundwater."</i>
Groundwater	<i>"The POC for groundwater, therefore, is the shallow saturated zone beneath the Site."</i>

3. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

In October 1991, a total of approximately 140 cubic yards of petroleum-contaminated soil was excavated from the southern end of the USTs. Analytical results from confirmation soil samples, collected recently and in the history, demonstrated the concentrations of CoCs in the soil are below CULs.

Groundwater monitoring of CoCs demonstrated that no exceedances of any CULs were detected in the ground water in five consecutive monitoring events.

Decommissioning of Site Monitoring Wells

Resource protection wells³ associated with this Site no longer being used for their intended purpose must be properly decommissioned.⁴ Specific standards apply to decommissioning resource protection wells.⁴ Please work with a licensed well driller, and report to Ecology the decommissioning of Site resource protection wells MW1 through MW3. Ecology may revoke this no further action opinion determination, if resource protection wells at the Site are not properly decommissioned.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

³ WAC 173-160-460

⁴ WAC 173-160-381

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.
- Leaking Underground Storage Tank List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Change the boundaries of the Site.
- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (SW1623).

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For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 360.407.7239 or same461@ecy.wa.gov.

Sincerely,



Sam Meng, PhD, PE
Site Manager
Toxics Cleanup Program

SM:AF

Enclosures (1): A – Description and Diagrams of the Site

cc: Mike Scott, Wilcox and Flegel
Sandra Caldwell, Ecology
Lindsey Gordon, Ecology
Nicholas Acklam, Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site Location:

The Site is located at 1410 Ocean Beach Highway in Longview, Washington, and is currently comprised of a single Cowlitz County Parcel (no. 1029901), totaling 0.41-acre (Figure 1).

Property Historical and Current Use:

The Site is zoned as Central Business District, while the west adjacent property is zoned as Traditional Neighborhood Residential. The current site plan includes a convenience store building, a carwash, and a UST system. The UST system, which consists of three USTs and a dispenser island, is located on the central portion of the Site (Figure 2). The USTs were installed in 1968 and continue to operate to date.

In 1991, petroleum-impacted soil and groundwater were discovered during an ESA. A total volume of 140 cubic yards of soil was excavated from the south end of the USTs (Figure 2). The Site received a no further action letter from Ecology on March 19, 1992. The Site only dispensed gasoline until 2005, when the mid-grade gasoline UST was converted to diesel fuel. There is currently no planned redevelopment for the Site. The Site was reopened when petroleum-impacted soil was encountered in 2005 during another ESA.

Surface Water:

No surface water features are located on the Site. The Columbia River is located approximately 2.8 miles southwest of the Site, and the Cowlitz River is approximately 0.8 miles east of the Site. An unnamed drainage ditch is located approximately 300 ft upgradient of the Site.

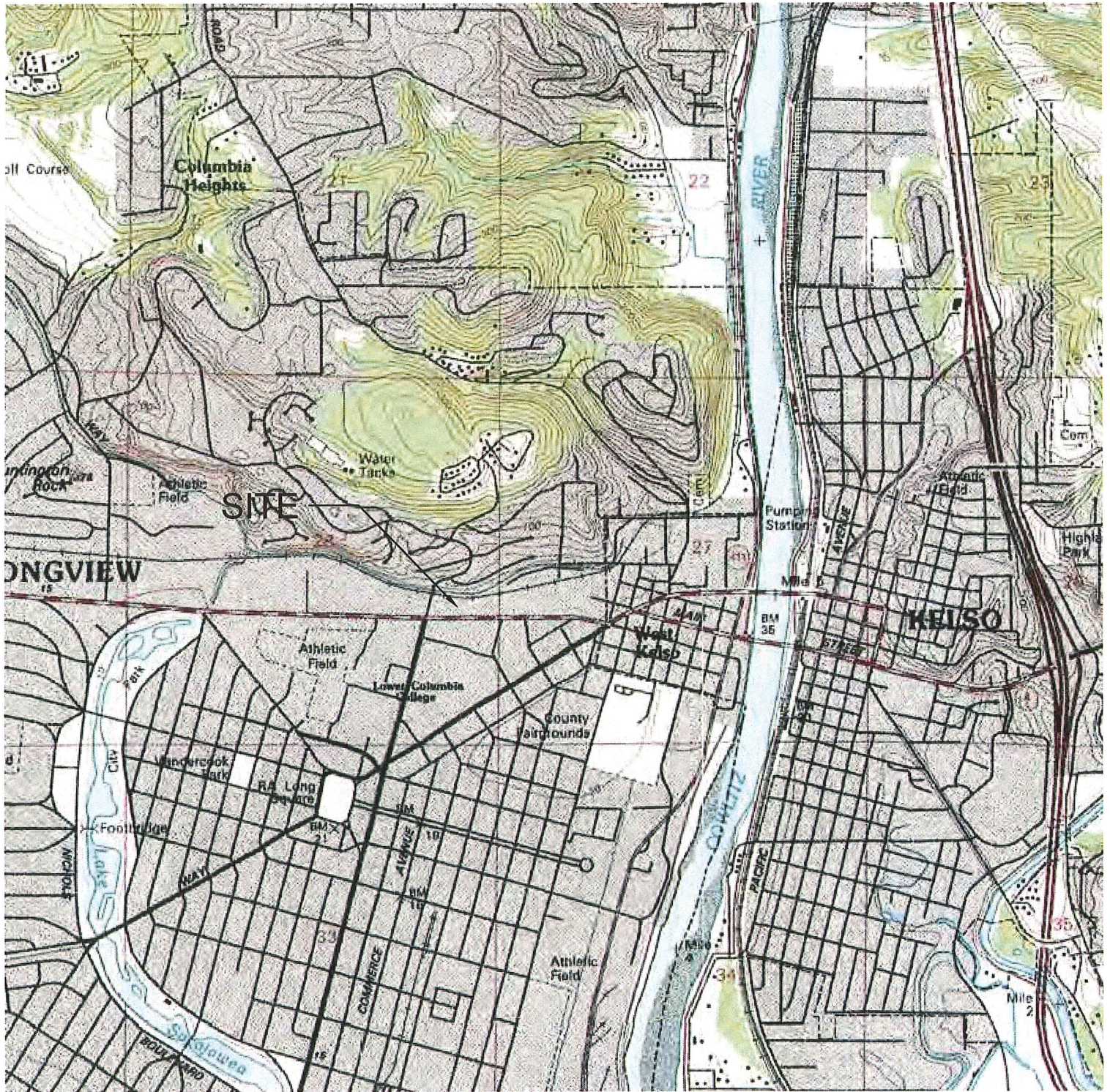
Soils and Geology:

The soils underneath the Site are Quaternary age alluvial sediments. Boring logs indicate that the Site soils consist of silts and silty sand to a depth of 20 ft bgs.

Groundwater:

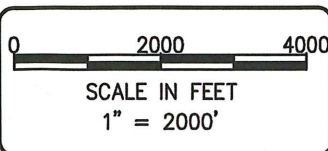
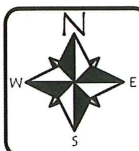
According to water levels in the three existing monitoring wells, the depth to groundwater varied seasonally between 5.13 and 10.67 ft bgs. Groundwater flow direction varied from northeast, east, to west.

Site Diagrams



NOTE(S):

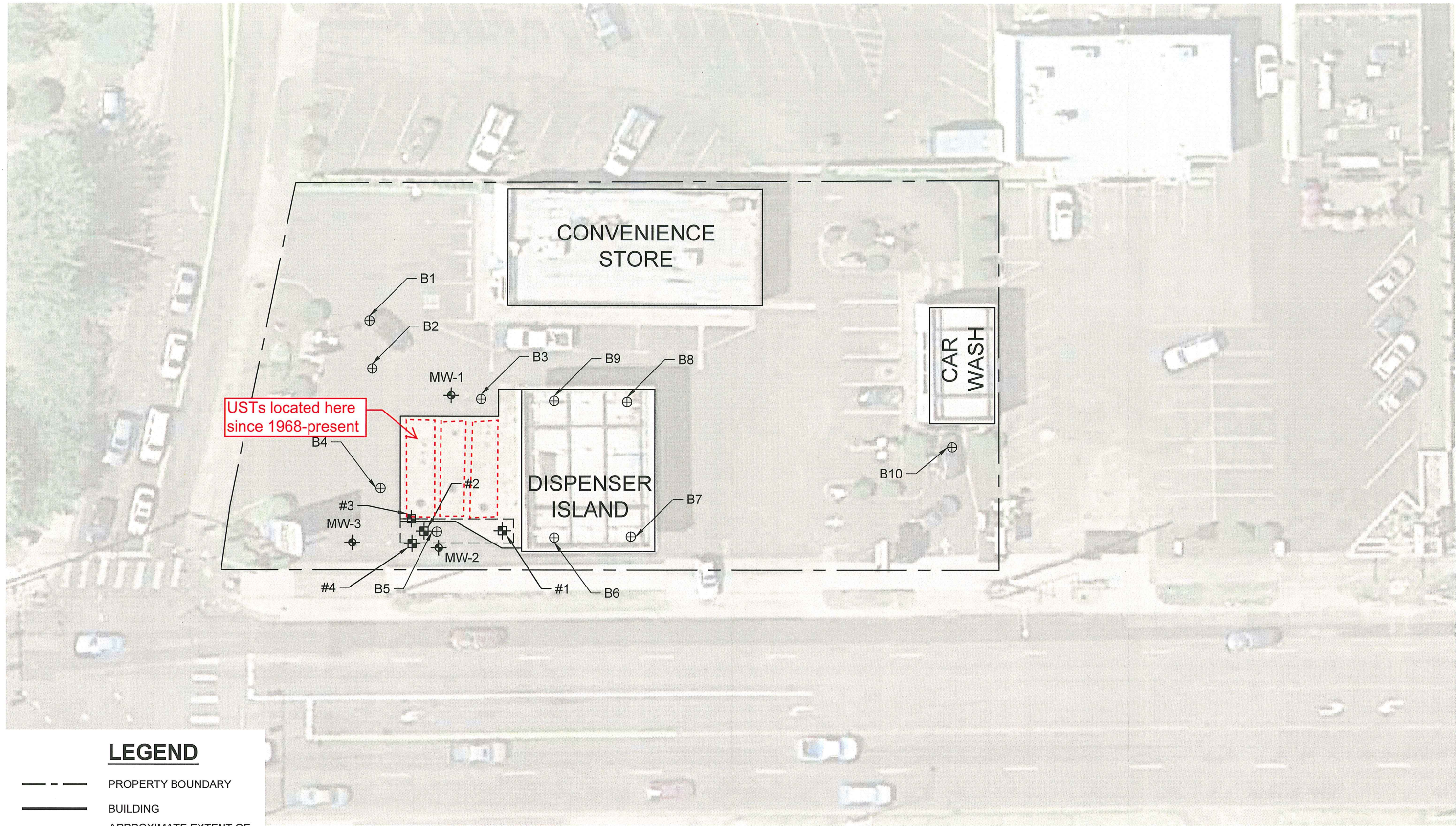
1. USGS, KELSO QUADRANGLE
WASHINGTON
7.5 MINUTE SERIES (TOPOGRAPHIC)






DATE: 03-20-17
 DWN: JH
 CHK: JH
 APPROVED:
 PRJ. MGR: DB
 PROJECT NO:
 2015-007-01

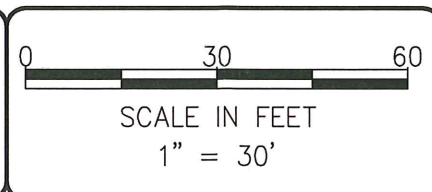
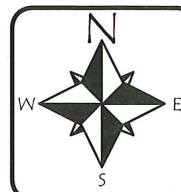
FIGURE 1
 SITE LOCATION
 HANDY MART
 WILCOX & FLEGEL
 1410 OCEAN BEACH HWY
 LONGVIEW, WA

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LEGEND

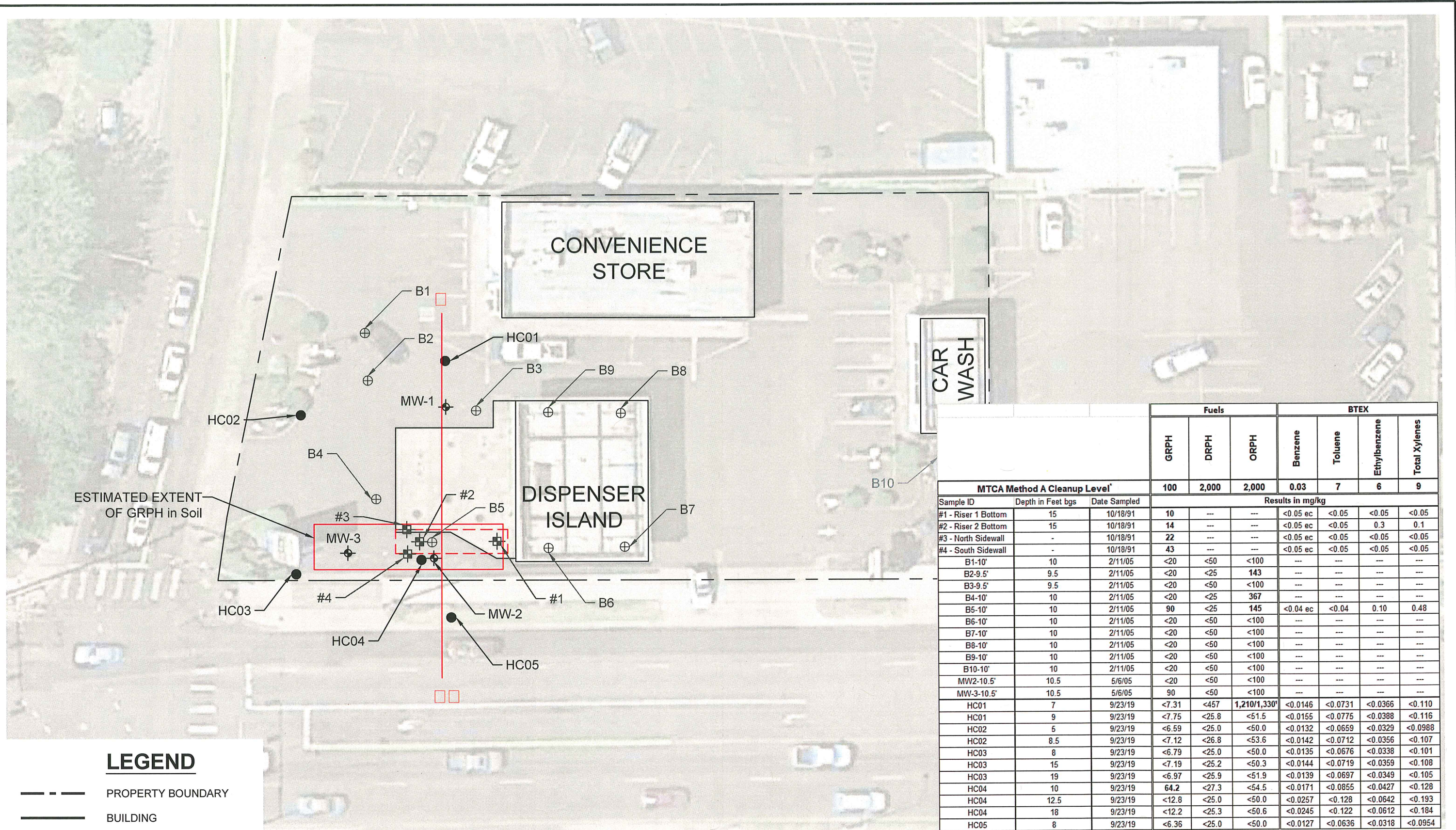
- PROPERTY BOUNDARY
- BUILDING
- - - APPROXIMATE EXTENT OF 1991 REMEDIAL EXCAVATION
- MW-1  MONITORING WELL LOCATION
- B1  BORING LOCATION
- #1  EXCAVATION SAMPLE LOCATION



DATE: 05-23-18
 DWN: JH
 CHK: BP
 APPROVED: BP
 PRJ. MGR: DB
 PROJECT NO:
 2015-007-01

FIGURE 2
 SITE FEATURES
 HANDY MART
 WILCOX & FLEGEL
 1410 OCEAN BEACH HWY
 LONGVIEW, WA

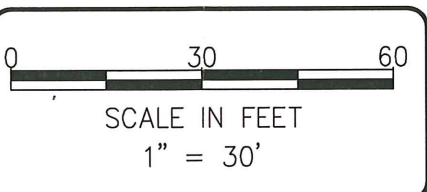
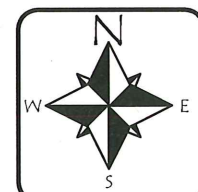
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Sample ID	Depth in Feet bgs	Date Sampled	Fuels			BTEX			
			GRPH	DRPH	ORPH	Benzene	Toluene	Ethylbenzene	Total Xylenes
MTCA Method A Cleanup Level¹			100	2,000	2,000	0.03	7	6	9
#1 - Riser 1 Bottom	15	10/18/91	10	--	--	<0.05 ec	<0.05	<0.05	<0.05
#2 - Riser 2 Bottom	15	10/18/91	14	--	--	<0.05 ec	<0.05	0.3	0.1
#3 - North Sidewall	-	10/18/91	22	--	--	<0.05 ec	<0.05	<0.05	<0.05
#4 - South Sidewall	-	10/18/91	43	--	--	<0.05 ec	<0.05	<0.05	<0.05
B1-10'	10	2/11/05	<20	<50	<100	--	--	--	--
B2-9.5'	9.5	2/11/05	<20	<25	143	--	--	--	--
B3-9.5'	9.5	2/11/05	<20	<50	<100	--	--	--	--
B4-10'	10	2/11/05	<20	<25	367	--	--	--	--
B5-10'	10	2/11/05	90	<25	145	<0.04 ec	<0.04	0.10	0.48
B6-10'	10	2/11/05	<20	<50	<100	--	--	--	--
B7-10'	10	2/11/05	<20	<50	<100	--	--	--	--
B8-10'	10	2/11/05	<20	<50	<100	--	--	--	--
B9-10'	10	2/11/05	<20	<50	<100	--	--	--	--
B10-10'	10	2/11/05	<20	<50	<100	--	--	--	--
MW2-10.5'	10.5	5/6/05	<20	<50	<100	--	--	--	--
MW-3-10.5'	10.5	5/6/05	90	<50	<100	--	--	--	--
HC01	7	9/23/19	<7.31	<457	1,210/1,330 ¹	<0.0146	<0.0731	<0.0366	<0.110
HC01	9	9/23/19	<7.75	<25.8	<51.5	<0.0155	<0.0775	<0.0388	<0.116
HC02	5	9/23/19	<6.59	<25.0	<50.0	<0.0132	<0.0659	<0.0329	<0.0988
HC02	8.5	9/23/19	<7.12	<26.8	<53.6	<0.0142	<0.0712	<0.0356	<0.107
HC03	8	9/23/19	<6.79	<25.0	<50.0	<0.0135	<0.0676	<0.0338	<0.101
HC03	15	9/23/19	<7.19	<25.2	<50.3	<0.0144	<0.0719	<0.0359	<0.108
HC03	19	9/23/19	<6.97	<25.9	<51.9	<0.0139	<0.0697	<0.0349	<0.105
HC04	10	9/23/19	64.2	<27.3	<54.5	<0.0171	<0.0855	<0.0427	<0.128
HC04	12.5	9/23/19	<12.8	<25.0	<50.0	<0.0257	<0.128	<0.0642	<0.193
HC04	18	9/23/19	<12.2	<25.3	<50.6	<0.0245	<0.122	<0.0612	<0.184
HC05	8	9/23/19	<6.36	<25.0	<50.0	<0.0127	<0.0636	<0.0318	<0.0954

LEGEND

- PROPERTY BOUNDARY
- BUILDING
- - - APPROXIMATE EXTENT OF 1991 REMEDIAL EXCAVATION
- MW-1 ⊕ MONITORING WELL LOCATION
- B1 ⊕ BORING LOCATION
- #1 ⊕ EXCAVATION SAMPLE LOCATION
- HC01 ● PROPOSED BORING LOCATION
- CROSS SECTION LOCATION A-A



DATE: 10-09-19
 DWN: DB
 CHK: BP
 APPROVED: BP
 PRJ. MGR: DB
 PROJECT NO: 2015-007-01

FIGURE 3
 SOIL ANALYTICAL RESULTS SUMMARY
 HANDY MART
 WILCOX & FLEGEL
 1410 OCEAN BEACH HWY
 LONGVIEW, WA