



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

January 7, 2021

Paul Fairbairn
Stantec Consulting Services Inc.
Maplewood Building
1687 114th Ave SE, Suite 100
Bellevue, WA 98004

RE: No Further Action at the following Site (Groundwater Model Remedy #5):

- **Site Name:** 7 Eleven 25821 (aka 7 Eleven Store 2304 25821)
- **Site Address:** 1824 George Washington Way, Richland
- **Facility/Site No.:** 77113577
- **CSID No:** 6650
- **VCP Project No.:** CE0457

Dear Paul Fairbairn:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the 7 Eleven Store 25821 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 into the soil and groundwater
- Benzene into the soil
- Diesel into the 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. Stantec Consulting Service Inc., Memo Former 7-Eleven Store No. 2657821, October 2, 2020.
2. Stantec Consulting Service Inc., Work Plan for Subsurface Investigation with Recent Groundwater Sampling Results, January 23, 2019.
3. Stantec Consulting Service Inc., Cleanup Action Report, May 25, 2017.

A number of these documents are accessible in electronic form from the Site webpage¹. The complete records are kept in the Central Regional Office (CRO) of Ecology for review by appointment only. You can make an appointment by calling the CRO public records coordinator at 509-454-7658 or emailing CROPublicRequest@ecy.wa.gov. Visit our Public Records Request page² to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or 360-407-6040.

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

¹ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=6650>

² <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

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.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

Sample analysis, for both soil and ground water, established known contamination and eliminated other potential contaminants related to facility operations. Investigations established vertical and horizontal extent of contamination within both soil and ground water.

2. Establishment of cleanup standards.

a. Substance-specific standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA. The use of unrestricted land use cleanup levels are appropriate, as the site does not meet the MTCA definition for an industrial property.

Soil cleanup levels are based on the potential for direct contact to 15 feet below ground surface, and protection of groundwater through potential leaching throughout the site. The Site meets Groundwater Model Remedy 5 criteria therefore the use of Method B cleanup levels are appropriate for soil.

The Method B soil cleanup levels used at the Site, as established in the Cleanup Action Plan (CAP) are:

- 1,500 mg/kg generic cleanup level for total petroleum hydrocarbons (TPH)
- 18 mg/kg for Benzene
- 6,400 mg/kg for Toluene
- 8,000 mg/kg for Ethylbenzene
- 16,000 mg/kg for Xylenes
- 250 mg/kg for Lead

Groundwater cleanup levels are based on the same unrestricted land use. MTCA Method A cleanup levels, as established in the Cleanup Action Plan, are appropriate. The ground water cleanup levels are:

- 1,000 µg/L for gasoline but is adjusted downward to 800 µg/L when Benzene is present (adjustment is noted in memo tables)
- 500 µg/L for diesel.
- 5 µg/L for Benzene
- 1,000 µg/L for Toluene
- 700 µg/L for Ethylbenzene
- 1,000 µg/L for Xylenes
- 15 µg/L for Lead

The Site's cleanup levels meet the substantive requirements of MTCA. Ecology provided guidance on sites with petroleum impacts to ground water. This Site meets the requirements outlined in Groundwater Model Remedy 5, from Ecology's guidance (Model Remedies for Sites with Petroleum Impacts to Groundwater).

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

During initial removal of the tanks, contaminated soil was removed and transported off-site to a facility capable of receiving this contaminant type. Further remedial efforts on remaining impacted soil included injecting BOS-200® to increase biodegradation and reduce the natural attenuation period.

The cleanup is protective of human health and the environment, and complied with the other minimum requirements from WAC 173-340-360(2).

4. Cleanup.

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

Soil over-excavation and removal occurred during tank decommissioning. Contaminated soil remaining on-site was treated with BOS-200® injections, BOS-200® is a compound used to increase the biodegradation capability and reduce the natural attenuation period. Sufficiency of soil cleanup was demonstrated through soil confirmation sampling conducted between 2004 and 2015. Groundwater monitoring was conducted between 1989 and 2020. Groundwater monitoring concluded when a minimum of four quarters of samples remained below MTCA cleanup levels.

The cleanup actions achieved the established cleanup levels and subsequent groundwater sampling indicates these standards will be maintained.

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:

- 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**:

- 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).

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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.

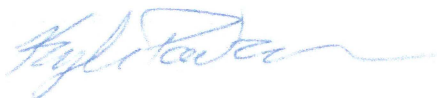
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See RCW 70.105D.180.*

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 (#CE0457).

For more information about the VCP and the cleanup process, please visit our VCP webpage³. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 509-454-7833 or e-mail at kyle.parker@ecy.wa.gov.

Sincerely,



Kyle Parker
Toxics Cleanup Program
Central Regional Office

Enclosures (1): A – Site Description and Diagrams

cc: Jose Rios, 7-Eleven
Cazier Enterprises
VCP Financial Manager

³ <http://www.ecy.wa.gov/vcp>

Enclosure A

Site Description and Diagram

Site Description

The Site is located in Richland Washington approximately 2,100 feet west of the Columbia River. Gasoline impacted soil was discovered during removal of three 10,000 gallon gasoline USTs. Investigation at the Site indicates that contamination remained within property boundaries and was restricted to the northern portion of the property (see site figure). Soil and ground water were the only media affected by the release. Groundwater is present at approximately 17-feet below ground surface.

Site soils consist of gravelly flood deposits and windblown sands, these surficial gravels and sands overly the Hanford Formation. The Hanford Formation, deposited during the flooding from Glacial Lake Missoula, consists of fine- to medium-grained sand with trace silt and varying amounts of gravels and boulders.

The Site description is a summary of information taken from the May 2017 CAP

Site Diagram

