STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

January 20, 2021

Timothy L. Bishop, P.G.
CEMREC Project Manager
6001 Bollinger Canyon Road
San Ramon, CA 94583

RE: Ecology comments on the DRAFT Temple Distributing Remedial Investigation and Feasibility Study:

- **Site Name:** Temple Distributing Carson Oil
- **Site Address:** 808 South Columbus Avenue, Goldendale
- **Facility/Site ID No.:** 95474961
- **Cleanup Site ID No.:** 11985
- **Enforcement Order:** DE 14134

Dear Timothy Bishop:

The Washington State Department of Ecology (Ecology) has reviewed the Remedial Investigation and Feasibility Study (RI/FS) prepared by Arcadis. This review was completed even though Ecology had previously approved an earlier RI/FS prepared by Leidos. However, it was agreed to allow Arcadis the opportunity to provide its own data interpretation and feasibility study options. Unfortunately, this report does not provide additional information that would change the feasibility recommendations from the earlier Leidos report. Although our comments are included in the enclosure to this letter, Ecology is inclined to reject this report in its entirety.

In the spirit of collaboration, Ecology recommends a meeting to discuss the cleanup options appropriate for this site.

I will be contacting you within the next week to discuss how to best proceed. We appreciate your cooperation and commitment, and look forward to moving the site forward towards cleanup.

Regards,

Mary Monahan
Site Manager
Toxics Cleanup Program
Central Regional Office

Enclosure: Ecology Comments

By certified mail: 7019 2280 0001 4141 2927

cc: Steve Mahony, Arcadis
Allyson Bazan, Attorney General's Office, Ecology Division

Ecology Comments

General Comments

Use of monitored natural attenuation (MNA) as a major cleanup option would require additional site characterization and placement of additional groundwater monitoring wells in order to determine if this site is even eligible for MNA.

This site is located within one mile of a number of drinking water supply wells, one of which belongs to the Goldendale School District. Due to the uncertainty of critical site characterizations (absence/presence of fractured basalt, aquifer transmissivity, etc.), it is still unknown how contamination at this site may affect these drinking water supply wells.

Section Specific Comments

Section 2.1

The site is where contamination has come to lie, and encompasses more than the parcel boundaries. Edit this section to reflect the Model Toxic Control Act (MTCA) definitions of "site" and "property."

Section 2.4.1

Please note the approximate depths to basalt refusal when discussing topography.

Section 2.5

Please add the depths excavated to in 2012 to this section.

Section 3.2.1

Please provide cross sectional figures that include the location of the water table, as well as the location of the groundwater monitoring wells and screened intervals.

Section 4.2

There are three parts to the rule for determining potability of groundwater; lack of sufficient volume alone is not be enough to make such a determination. Please provide a figure showing the number of private and public water supply wells located within 1 mile of the property. See WAC 173-340-720 for details regarding the definition of potable, and the items needed to preclude potability.

Section 5.1

EDB was detected at the MTCA cleanup level during site characterization activities. Leidos used empirical demonstration to justify taking it off the list of preliminary contaminants of concern, and Ecology approved the empirical demonstration results.

Section 5.2

Mr. O'Gara's 2012 samples from B-2, B-4, B-6, and B-8 are not groundwater samples, but pit water samples. The results should not be classified as groundwater samples. In addition, please discuss any other potential controls on groundwater movement other than the perched conditions.

Table 6.2

Exposure pathways are not specifically designated primary or secondary. They are either open pathways or closed pathways. For example, Table 6.2 states that Ingestion of soil is a secondary pathway that is currently limited. This approach is not one outlined in MTCA, and should be revised accordingly.

Table 6.3

Ingestion pathway is not precluded or closed based on the groundwater being seasonal, as the groundwater must be determined to be non-potable for this argument. Arcadis has not provided enough data to support the argument that groundwater is not potable. Please refer to WAC 173-340-720 for determination of groundwater potability.

Section 6.2.3

The soil vapor pathway is still open for this site, and should be included in all potential cleanup decision making. Evaluating the VI pathway after initial soil removal is completed is acceptable, but the soil vapor assessment must be completed.

Table 6.4 TEE

Ecology agrees that this site does not meet the requirements for a site specific Terrestrial Ecological Evaluation based on scoring for Table 749-1.

Section 6.4

Use of Method A CULs for unrestricted soils and groundwater are appropriate for this site.

Section 7

Ecology does not accept most of your remedial alternatives due to the lack of supporting evidence.