



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 1, 2021

Joan Davenport
City of Yakima
129 North Second Street
Yakima, WA 98901

RE: Response to Exhibit A: Proposed Off-Property High-Resolution Site Characterization, Air Quality Assessment and Semi-Annual Groundwater Monitoring 2021 to 2022, Scope of Work

- **Site Name:** Tiger Oil 24th and Nob Hill
- **Site Address:** 2312 West Nob Hill Boulevard, Yakima
- **Facility/Site ID No.:** 469
- **Cleanup Site ID No.:** 4919

Dear Joan Davenport,

Per your request, the Department of Ecology (Ecology) is providing comments on the Scope of Work prepared by MFA for the Tiger Oil Site. **Please address all comments and provide a revised Scope of Work by April 1, 2021.**

Task 25-Project Management

Please add Ecology's project coordinator as a participant in calls that discuss the scope of work, timing and tasks necessary to move this project toward cleanup.

Task 26-Off-Property High-Resolution Site Characterization

A full site investigation for HVOCs is not appropriate at this time. However, data is necessary to establish whether the HVOCs are coming onto the Site from an off-site source. Ecology needs data to assess if the sources of HVOCs come from off-site releases.



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The confirmed presence of HVOCs requires a revised conceptual site model and soil management plan reflecting the additional risks that HVOCs impart to all receptors. Include a schedule for fieldwork to be completed as soon as possible.

Notes on Figure: Ecology agrees that borings need to be advanced on the western edge of 24th Avenue along the length of Tiger Site property boundaries, as well as on the northwest corner of 24th and Nob Hill Boulevard.

Please ensure that Ecology is part of the discussions regarding the number and placement of the borings needed to determine if HVOCs are coming onto the Site groundwater from the west.

Notes on boring placement: Borings can be advanced in the City ROWs, as long as they are upgradient of the Tiger Site (west of 24th Street and Nob Hill Boulevard). This can be done by advancing transects directly upgradient from the Tiger Site, on the west side of 24th Avenue. If for some reason borings cannot be advanced this close to the Tiger Site due to geologic and/or hydrogeologic conditions, Ecology will work with MFA and the City of Yakima to determine alternate boring locations.

Task 27 –Indoor Air and Ambient Air Quality Assessment.

This task is urgent, and must be completed as soon as possible, regardless of the source of the HVOCs.

Task 28-2021-2022 Semiannual Groundwater Monitoring

The ongoing assessment of the groundwater conditions at the Site must be performed twice a year, during high groundwater conditions (fall) and low groundwater conditions (spring).

Additional Notes: The Amended Consent Decree Number 02-2-00956-2, 2014 requires all work must be approved in advance by Ecology (i.e., scopes of work and work plans must be reviewed and approved prior to any fieldwork).

Ecology has not received a budget for this work. Please ensure this information is included so that payment of Remedial Action Grant funds awarded to the City can be approved.

Ecology looks forward to reviewing the revised scope of work.

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Regards,



Mary Monahan
Project Coordinator
Toxics Cleanup Program
Central Regional Office

By certified mail: 7019 2280 0001 4141 2941

cc: Bill Preston, City of Yakima
Sara Watkins, City of Yakima
Yen-Vy Van, Maul Foster Alonghi (MFA)
Jim Maul, Maul Foster Alonghi (MFA)
John Level, Attorney General's Office, Ecology Division