# OCTAVIA PARKER

In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.

Signed,

February 28, 2023 10:30 A.M. E.S.T

Octavia Parker,

Octavia@oulwa.xyz

Project Title: Avista Corp Spokane Service Center Year: February 28, 2023 1:00 P.M. EST Site Conditions: Exposures Company: Oulwa Research Studio

### Public Notice Date: February 13, 2023 Comment Period Ends: March 15, 2023

The general operating procedures for monitoring and maintaining the integrity intended to fulfill the requirements found in the Model Toxics Control Act (MTCA) WAC 173-340-400 was prepared to supplement the remedial action performed at the site and submitted to Washington Department of Ecology. The Site is located northeast of downtown Spokane on the 19.62-acre Avista campus (tax parcel number 35093.2006), directly north of Mission Park. The Site is located approximately 400 feet west of the Spokane River, within the bounds of the Spokane Valley- Rathdrum Prairie Aquifer. Depth to groundwater ranges from 10 to 37 feet bgs, with the groundwater table below the former garage building at approximately 30 feet bgs. The Site has been used to service Avista's (formerly Washington Water Power) fleet since 1955, and is zoned Light Industrial (LI) by the City of Spokane. Approximately 3,792 tons of contaminated soil were excavated and disposed at Waste Management's Graham Road Facility near Medical Lake. Complete removal of deeper soil was not possible without impacting the structural integrity of nearby buildings and utility infrastructure. Confirmatory soil samples were collected to define the extent of residual contaminated soil between approximately 15 and 24 feet bgs.

#### Determinations

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

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC (collectively called "MTCA").

#### **Exposures:**

Heavy metals, polycyclic aromatic hydrocarbons (PAHs), and petroleum hydrocarbons into the soil and PAHs and petroleum hydrocarbons into the groundwater.

#### Information

Site characterization began in 1994 during removal of the hydraulic lifts within the garage building. Four groundwater monitoring wells were installed in 1996-1997 and a fifth was installed

in 2017. The garage building was demolished in 2018 and five test pits were excavated between 12 and 16 feet bgs within the footprint of the building. Soil samples were analyzed for petroleum hydrocarbons, metals, PAHs, and PCBs. Diesel- and oil-range petroleum hydrocarbons were detected from 3 to 12 feet bgs and exceeded MTCA soil cleanup levels between 9 and 10 feet bgs. PAHS were detected at similar depths and exceeded cleanup levels between 11 and 12 feet bgs. Metals were detected below cleanup levels, while PCBs were not detected in any samples.

## Questions

When can we expect a response and determination by the Department of Ecology for final comment ?

In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.

Signed,

February 28, 2023 10:30 A.M. E.S.T

Octavia Parker,

Octavia@oulwa.xyz