

Oulwa Research Studio

We'd like you to extend any comments on the remedial techniques used to address the residual contamination and any new scientific information for individual hazardous substances of mixtures present at the Site.

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 21, 2023 10:30 A.M. E.S.T

Octavia Parker,

Octavia@oulwa.xyz

Project Title: Wolfe & Parks Properties Second Periodic Review

Year: February 21, 2023 1:00 P.M. EST

Site Conditions: Unavoidable Daily Activities - Passive Exposures

Company: Oulwa Research Studio

Public Notice Date: January 26, 2023 **Comment Period Ends:** February 27, 2023

The Site is located at 149 and 167 Main Avenue, in Morton in Lewis County, Washington. The Site was a former bulk terminal located near the northeast corner of the intersection of Main Avenue and First Street in Morton, Washington. Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). The MTCA Method A cleanup levels for soil are established under WAC 173-340-740. The groundwater cleanup levels were established under WAC 173-340-720. Cleanup activities at this Site were completed by the potentially liable persons under an Enforcement Order No. DE 3683 dated August 22, 2006. The cleanup actions resulted in concentrations of gasoline, and diesel-range petroleum hydrocarbons (TPH-G, and TPH-D) and benzene in soil and groundwater that exceeds MTCA Method A cleanup levels. Historical records indicate that Standard Oil Company of California constructed the former bulk terminal in 1924 near the intersection of Main Avenue and First Street on property leased from Chehalis Western Railroad. From 1924 until the mid-1950s the terminal was supplied by rail. Rail tank cars were positioned on a railroad spur located southwest of the warehouse and unloaded via the TCUHs. On the Cowlitz River Valley Historical Society parcel, contaminated soil exists beneath a planter box located in the northwest corner of the parcel.

Based on the Findings of Fact and Ecology Determinations,

The first periodic review was completed in October 2016. This periodic review evaluates the period from November 2016 through December 2021.

The groundwater cleanup levels have not been met at the Site. However, the TPH-G, and TPH-D concentrations have been decreasing. Restrictions on the groundwater use and implemented institutional controls at the Site have been effective in protecting the human health and the environment.

An interim action was performed in October 2005. All the excavated soil was transported to Rinker Materials Northwest in Everett, Washington, where it was treated using the low-temperature thermal desorption. The results of confirmation soil samples collected at the floor of the excavation were all below the MTCA Method A cleanup levels. TPH-G and benzene were detected above MTCA Method A cleanup levels in some of the sidewall samples beyond the depot footprint.



Based on this review, Ecology has determined that the remedial actions conducted at the Site continue to be protective of human health and the environment.

Soil and groundwater investigations were conducted from May through October of 2004 to define the nature and extent of contamination. As a part of this investigation a total of 55 soil borings and 12 groundwater monitoring wells were installed.

In November 2006, the final cleanup action was conducted under an Enforcement Order No. DE 3683. As a part of this action, a total of approximately 600 cubic yards of contaminated soil was excavated exceeding the remediation level for direct contact/ingestion by human pathway (MTCA Method B cleanup level of 2,225 mg/kg for total petroleum hydrocarbons and 250 mg/kg lead) and soil exceeding remediation level for the vapor pathway (0.03 mg/kg benzene). All the excavated soil was transported to the Waste Management Inc. landfill in Hillsboro, Oregon for disposal.

Results of the latest round of semi-annual groundwater monitoring conducted in July 13, 2021 indicated the exceedance of TPH-D in monitoring well MW-7 and MW-16 at a concentration 1,080 µg/l and 550 µg/l, respectively to MTCA cleanup level of 500 µg/l. None of the other analyzed constituents were detected at concentrations above MTCA Method A cleanup levels. During this round, the depth of groundwater flow direction was to the south-southwest with a hydraulic gradient of 0.014 foot/foot.

Based upon the Site visit conducted on July 16, 2021, the asphalt cover at the Site continue to eliminate direct exposure pathways (ingestion, contact) to contaminated soils. Additionally, the asphalt cover prevents water infiltration which could increase the mobility of the contaminants to groundwater. The asphalt cap appears in satisfactory condition with no repairs, maintenance or contingency actions needed.

Evaluation of the soil to vapor pathway is required at sites contaminated with volatile organic hydrocarbons (VOCs) to determine the potential for adverse impacts on the indoor air quality that may pose a threat to human health and the environment. Examples of when this pathway should be evaluated include at sites where soil TPH-G and/or other VOC concentrations are significantly higher than the cleanup levels derived for the protection of groundwater for drinking water beneficial use, or where soil TPH-D concentrations are higher than 10,000 mg/kg;

Comments

An EC was recorded for the Site and remains active. This EC restricts groundwater extraction for domestic, agricultural, or any other use and the use of property that is inconsistent with the Covenant or will release contaminants remaining in soil at the Site.



Further more We'd like to request an update on the condition of the wells. And the further examination for the state of levels of contamination present.

Conclusions

Soil cleanup levels have not been met at the Site.

The next review for the Site will be scheduled five years from the date of this periodic review.

To our knowledge the passive exposures have been contained. We need the fullest possible information on this danger, and we look to the department of ecology to provide it, under WAC 173-340-420 as required. We therefore urge the department to include this analysis in the final review. We are confident in the capabilities your team brings to the site, and that we therefore believe, the Cowlitz River Valley Historical Society, Jan's Lost and Found Thrift Shop, site, given the hazards mentioned above require additional investments, because of this we are very concerned with what could be done for more provocative assessments.

We'd like you to extend any comments on the remedial techniques used to address the residual contamination and any new scientific information for individual hazardous substances of mixtures present at the Site.

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.



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