



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

July 1, 2022

James P. Kiernan  
Project Manager  
CEMREC  
6001 Bollinger Canyon Road  
San Ramon, CA 94583

**RE: Ecology comments on the DRAFT Temple Distributing Interim Action Work Plan**

- **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 James P. Kiernan:

The Washington State Department of Ecology (Ecology) appreciates you sending the revised version of the DRAFT Interim Action Work Plan for the Temple Distributing Carson Oil Site dated May 19, 2022. Ecology has reviewed the documents provided and has the following comments:

- Section 5.1 contains a statement that the cleanup levels for the Site have not been established at this time and will be developed in the Cleanup Action Plan. According to the Model Toxics Control Act (MTCA)<sup>1</sup> this statement is erroneous and should be removed from the document in all places where it appears.
- Washington Administrative Code (WAC) 173-340-430<sup>2</sup> states that if the cleanup action is known, the interim action shall be consistent with the cleanup action. Based on multiple discussions between the Temple consultants and Ecology site managers, this interim action will be consistent with any cleanup action for soils conducted at the Site.

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<sup>1</sup> <https://apps.ecology.wa.gov/publications/documents/9406.pdf>

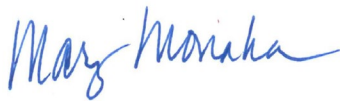
<sup>2</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-430>

James P. Kiernan  
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Page 2

- Ecology expects that all removal actions will comply with MTCA, and requires submission of an Engineering Design Report meeting MTCA criteria in WAC 173-340-400(4)(a)<sup>3</sup> prior to Interim Action activities.
- Post-construction activities and compliance monitoring must be conducted according to WAC 173-340-410.<sup>4</sup> Ecology expects submission and approval of a compliance monitoring plan prior to post-construction activities.

Please provide an additional draft of the Interim Action Work Plan with the minor edits requested within the time period required in Enforcement Order DE 14134 to Mary Monahan. Please contact me with any questions or concerns via email at [Mary.Monahan@ecy.wa.gov](mailto:Mary.Monahan@ecy.wa.gov).

Regards,



Mary Monahan  
Site Manager  
Toxics Cleanup Program  
Central Regional Office

By certified mail: 7014 3490 0001 5526 6810

cc: Allyson Bazan, Attorney General's Office, Ecology Division  
Eric Epple, Arcadis

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<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-400>

<sup>4</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-410>