



FILE COPY

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

April 16, 2008

Mr. Parminder Gillon  
PNS Properties  
1000 East First Street  
Cle Elum, WA 98922

RE: **Voluntary Cleanup Program Review**  
Former Devere and Sons Distributing, 1000 East First Street, Cle Elum  
**Facility Site ID # 398, VCP ID # CE0281**

Dear Mr. Gillon:

Thank you for submitting your *Proposed Scope of Work – Supplemental Remedial Activities* for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA).

Based on Washington Administrative Code (WAC) 173-340-515, which outlines Independent Remedial Actions, I have reviewed the *Proposed Scope of Work* for the above-referenced site submitted by Associated Environmental Group, LLC, dated November 28, 2007, and have the following comments:

1. The injection of 3,000 pounds of ORC may require registration through Ecology's Underground Injection Control Program. Please contact Mary Shaleen Hansen, the program's coordinator, via phone at 360-407-6143 or via e-mail at [maha461@ecy.wa.gov](mailto:maha461@ecy.wa.gov); to ensure proper requirements are met.
2. Ecology's files at the Central Regional Office contain two reports AEG was unable to locate. They are *Status Report #4*, dated November 30, 1994, by Pacific Northern Geoscience and *UST Decommissioning & Site Assessment Report*, dated July 15, 1994, by Pacific Northern Environmental. Also, a *Site Cleanup & Site Assessment Report* from July 22, 2003, by Blue Mountain Environmental Consulting Services was not referenced. I recommend AEG contact Roger Johnson, our Public Records Coordinator, at (509) 454-7658 to obtain these reports, even though they may not alter the scope of work.
3. I recommend continued monitoring of the natural attenuation parameters (pH, conductivity, turbidity, dissolved oxygen, temperature, and salinity) during the groundwater monitoring events for MW-4. This will provide additional information about the effectiveness of the ORC.



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4. I want to use this opportunity to remind you that all data for this site must be submitted to Ecology's Environmental Information Management system prior to the issuance of any No Further Action letter. Depending on the amount of data and one's familiarity with the EIM system, this can be a time-consuming task. I recommending inputting data sooner rather than later. Please feel free to contact Kristin Kinney, our EIM Coordinator, at 509-454-4243 if you have any questions or difficulties.

The opinions presented by Ecology in this letter are made only with respect to the information provided. This opinion is only applicable to the specified site and may not be used to justify action at any other site nor any other properties owned or operated by PNS Properties.

Again, Ecology appreciates your initiative in conducting independent remedial activities and requesting technical consultation under the VCP. Please contact me at (509) 454-7886 if you have any questions or would like clarification on any portion of the letter.

Sincerely,



Valerie Bound  
Unit Supervisor  
Toxics Cleanup Program  
Central Regional Office

cc: Michael Chun, Associated Environmental Group, LLC