



FILE COPY

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 West Yakima Avenue, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

May 13, 2002

Ms. Jacqueline M. King
Shook, Hardy, & Bacon LLP
84 Corporate Woods
10801 Mastin, Suite 1000
Overland Park, Kansas 66210-1671

RE: Voluntary Cleanup Program Submittal, Keyes Fibre Company Oil Contaminated Soils,
3715 Chelan Highway, Wenatchee, Washington, Facility Site #85479678 (VCP #CE0138)

Dear Ms. King:

Thank you for submitting the results of your independent remedial action(s) for review by the State of Washington Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the oil contaminated soils closure, Keyes Fibre Corporation, located at 3715 Chelan Highway, Wenatchee, Washington:

1. Voluntary Cleanup Program Request for Assistance/Review Form and attachments including VCP Site Summary [ECY 020-073], submitted on behalf of Huhtamaki Foodservice, Inc. by Jacqueline King, dated 4/22/02.
2. Ecology Toxics Cleanup Program File, Chinet Company, including the following documents:
 - Data Report: Soil Sampling at Railroad/Loading Dock and Former Oil Shed Areas, Addendum No. 1, CH2M HILL, MAY 1991.
 - Remedial Action Plan for Former Oil Shed Area, CH2M HILL, SEP 1991.
 - Data Report: Soil Sampling at Railroad/Loading Dock and Former Oil Shed Areas, Addendum No. 1, CH2M HILL, SEP 1991.

Based on our review of the file, Ecology requires additional documentation demonstrating that the remediation actions occurred and were effective; for example,

- provide oil contaminated soil receipts from the disposal location (Greater Wenatchee Regional Landfill);



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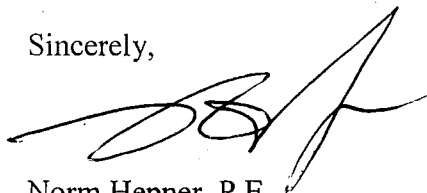
- provide any final reports on this site completed by CH2M-HILL;
- provide a restrictive covenant for oil contaminated soil remaining onsite in the Railroad Loading Dock area (the contaminated material is described as being under and adjacent to the south Molding Building and Railroad tracks); and,
- provide a demonstration that remaining residual contamination adjacent and under structures does not pose a threat to groundwater.

Your remediation does not qualify for a No Further Action (NFA) letter from Ecology at this time. Please submit the information requested at your earliest convenience in accordance with WAC 173-340-515, Independent Remedial Actions. The state, Ecology, and its officers and employees are immune from all liability and no cause of action of any nature may arise from any act or omission in providing this consultation. **NOTE:** Washington State has legislated, effective July 1, 2002, that all geologists working in the state be licensed. Please refer to the Washington Department of Licensing web page for more information [<http://www.wa.gov/dol/bpd/geofront.htm>].

The above listed reports will be kept in the Central Files of the Central Regional Office (CRO) of Ecology for review by appointment only. Appointments can be made by calling Roger Johnson, CRO resource contact, at (509) 454-7658.

Please contact me at (509) 457-7127 if you have any questions or require additional clarification.

Sincerely,



Norm Hepner, P.E.
Environmental Engineer
Toxics Cleanup Program