STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

April 22, 2016

Mr. Jon Morrow
Stormwater Program Manager
City of Ellensburg
501 North Anderson St.
Ellensburg, WA 98926

Mr. Stephen Carter
207 S. Railroad Ave.
Ellensburg, WA 98926

Re: Responsiveness Summary for Smith Kem Ellensburg Inc:

Site Name:	Smith KEM Ellensburg Inc.
Site Address:	200 Railroad Avenue, Ellensburg
Facility/Site ID No.:	12832256
Cleanup Site ID No.:	4257
Agreed Order No.:	DE 12908

Dear Mr. Morrow and Mr. Carter:

Thank you for the submittal of your comments regarding the Agreed Order for the above-referenced Site. Please see the attached Responsiveness Summary.

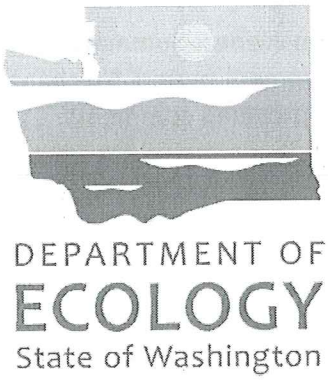
I can be reached at (509) 454-7836 if you have any questions.

Sincerely,

John Mefford

John Mefford
Cleanup Project Manager
Toxics Cleanup Program, Central Region Office

cc: Mrs. Allison Geiselbrecht, Principal
Elizabeth Black, Cascadia Law Group PLLC
Kelly Wood, Assistant Attorney General



RESPONSIVENESS SUMMARY

Smith Kem Ellensburg Inc

Agreed Order No. DE 12908

FSID No. 12832256

CSID No. 4257

March 4 – April 3, 2016 Public Comment Period

Agreed Order for Remedial Investigation and Feasibility Study

Prepared by
Washington State Department of Ecology
Central Regional Office
Toxics Cleanup Program
Union Gap, Washington

April 22, 2016

The Washington State Department of Ecology (Ecology) held a 30-day public comment period from March 4 through April 3, 2016 for an agreed order that will require the completion of a Remedial Investigation/Feasibility Study (RI/FS) at the Smith Kem Ellensburg Inc. site (Site).

The potentially liable persons (PLPs) are Smith Kem Ellensburg, Inc., Ad Gro, LLC and Shell Oil Products US (SOPUS).

Two comments were received. This Responsiveness Summary provides Ecology's responses to the comments submitted during the public comment period. No changes will be made to the Agreed Order. Ecology appreciates all those who provided comments.

Responses to Comments

Comments received during the public comment period were provided by:

Mr. Jon Morrow, City of Ellensburg Stormwater Program Manager

Mr. Stephen C. Carter, property owner at 207 S. Railroad Avenue, Ellensburg

Ecology appreciates that both individuals reviewed the documents and took the time to comment.

Comment 1:

Jon Morrow submitted the following comment by email dated March 14, 2016.
"The only comments I have are, during excavation or de-watering, no discharge is allowed to storm/surface water or sanitary sewer without approval from the local authority. I've attached a map with surface water and sewer features. Work must be contained on site at all times including track out. If you need any assistance, don't hesitate to call."

The diagram provided by Mr. Morrow is attached to the end of this Responsiveness Summary.

Ecology Response:

Excavation and de-watering is not anticipated. However, any investigation-derived water will be containerized in appropriately labeled DOT-approved drums and temporarily stored pending analysis before final disposal at a properly permitted disposal facility. Best management practices will be applied to prevent track out by work vehicles and will be addressed in the RI work plan.

Comment 2:

Stephen Carter submitted written comments in a letter dated March 15, 2016.

He provided an account of his observations as an adjacent landowner. As such, he expressed his concern for completion of an investigation sufficient to determine the full nature and spatial extent of site contamination, his expectation that the resulting remedial action will be adequate to clean up the hazardous substances present on the Site, and that ongoing operations should include proper management practices to minimize and/or contain any hazardous substances released to the environment.

The comments in their entirety are attached to the end of this Responsiveness Summary.

Ecology Response:

Ecology appreciates the very relevant and helpful information concerning this Site. Ecology will ensure the environmental consultants retained by the PLPs will use your information to assist in the development of the RI work plan A major part of the RI is determination of the full extent and nature of contamination.

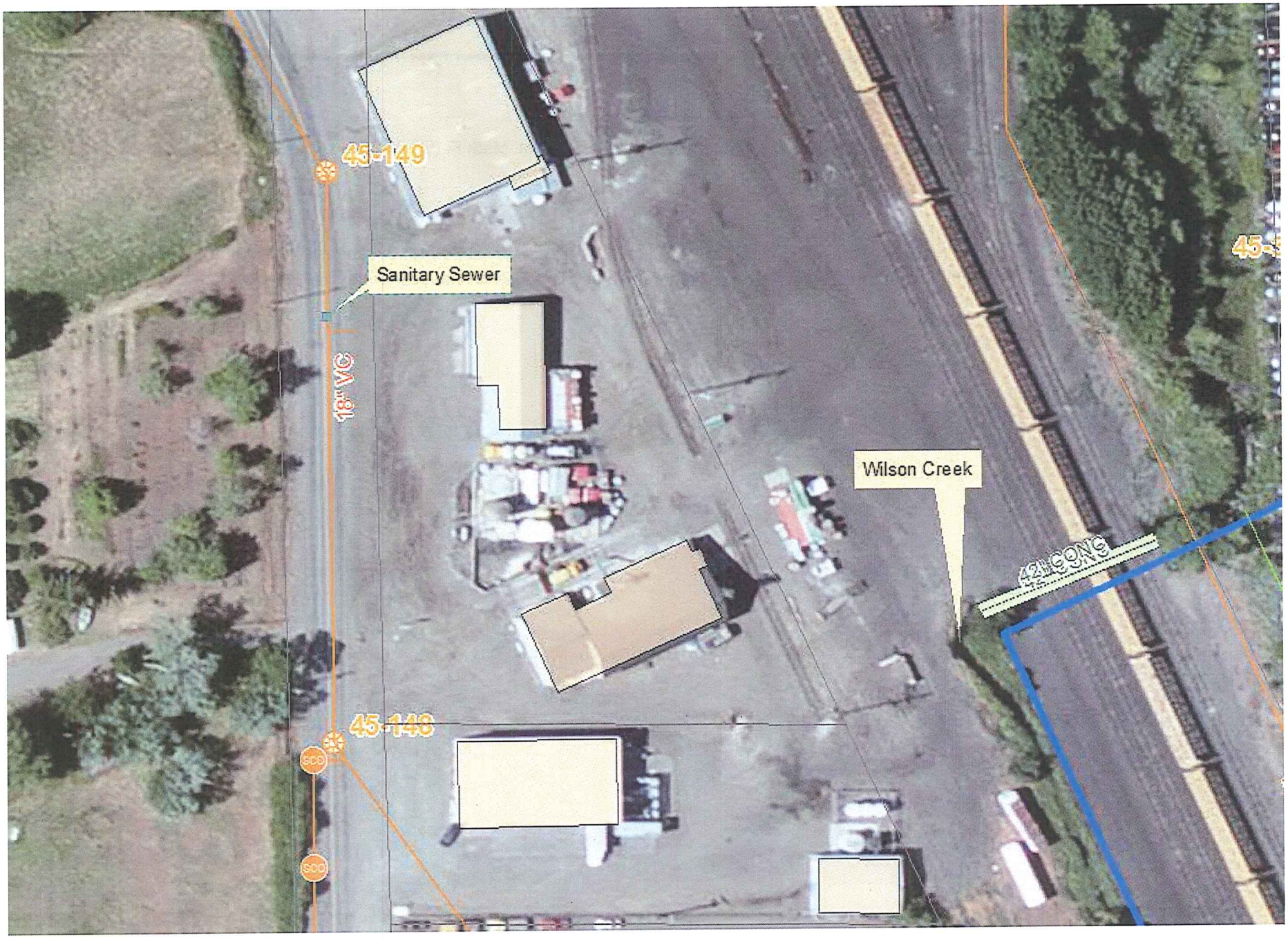
Espinosa, Maria (ECY)

From: Jon Morrow <morrowj@ci.ellensburg.wa.us>
Sent: Monday, March 14, 2016 9:02 AM
To: Mefford, John (ECY)
Cc: Ryan Lyyski; Derek Mayo; Rodney Paul; Jonathan Kesler; Peterschmidt, Mark F. (ECY)
Subject: Smith Kem Ellensburg Inc, Site 4257
Attachments: Jon Morrow.vcf

The only comments I have are, during excavation or de-watering, no discharge is allowed to storm/surface water or sanitary sewer without approval from the local authority. I've attached a map with surface water and sewer features. Work must be contained on site at all times including track out. If you need any assistance, don't hesitate to call.

Jon Morrow
COE
Stormwater Program Manager
Ellensburg, WA 98926

509-925-8619 Work
morrowj@ci.ellensburg.wa.us


45-149
Sanitary Sewer
18" VC
Wilson Creek
42" CONC
45-148
SCO
SCO

March 15, 2016

John Mefford - Site Manager
WA Department of Ecology
Toxic Cleanup Program
1250 W Alder St.
Union Gap, WA 98903-0009

Subject: Smith-Kem Agreed Order No. DE 12908

Dear Mr. Mefford,

I received your invitation to comment on the Smith-Kem Agreed Order and have reviewed the Order. Since May 1979 I have owned and lived on the land at 207 S Railroad Ave. Ellensburg, WA west across Railroad Avenue from Smith-Kem. This letter contains my comments and casual observations of conditions at and adjacent to the Smith-Kem site. These comments are based on my memory of activities I observed at the site from the perspective of an adjacent landowner. I have had no direct contact with any of the owners or operators of the Smith-Kem business nor do I have direct knowledge of their standard operating practices.

It is my understanding that the first thing the order is to produce is a Remedial Investigation Plan that will direct the sampling and identify the needed future cleanup. My biggest concern is that the Remedial Investigation will be extensive enough to determine if toxic substances have left the site. It is my hope that a large enough area will be sampled to clearly identify the extent of toxic contamination and that the resulting remedial action will clean up all toxins found and further prevent the release of toxic chemicals to the ground water and the surrounding area. I hope by submitting this letter containing my casual observations made over the past 37 years it will help reach that goal.

It is clear there are several ways toxic chemicals may have left the site:
(1) In the air as gas or volatile evaporation, (2) bound to soil particles and washed, blown or mechanically removed from the site, and (3) as solubles migrating in surface and sub-surface water.

There have been many releases of gaseous Anhydrous Ammonia from the site. Most were small and localized like the one described in the attached article from the Ellensburg Daily Record dated July 15, 1985. Few were reported by the local media. One was substantial, nearly 7000 gallons was released on May 10, 1987.(see attached article from Ellensburg Daily Record May 11, 1987). In addition to the gaseous releases, there was evaporation of unknown chemicals from pools of wash water that collected in *Wash Area 1* identified on the site plan in Exhibit 1.

From the time I moved to my property until a year or two after the 1987 spill, field equipment would routinely be washed and flushed in front of the above ground tanks. Large puddles of

brightly colored waste water, some orange, some green, would lay on the gravel parking area for days until they evaporated away or soaked in. The smell was so bad that I often could not sit on my porch several hundred feet to the west. On warm, calm summer days chemicals in the air would burn my eyes and nose when I tried to work in my fields across the street from Smith-Kem. Following the large spill in 1987 a stationary ammonia tank was installed and the parking of railroad cars of anhydrous ammonia was discontinued. Better containment was established for the above ground tanks. The washing of field applicator equipment was largely moved to the vicinity of *Wash Area 2* identified on the site map in Exhibit 1. Pools of waste water do not seem to collect at that site, but soak into the ground quickly. Some rinsing and testing of field applicator equipment continues there to this day.

In an effort to indicate the possible locations of potentially contaminated silt, I have attempted to show the historic irrigation ditches that once crossed the site. The full extent of the irrigation system is shown in Exhibit 2. In the 1954 aerial photo the ditches are clearly visible, and moist areas indicating subsurface flow are also evident. The ditches were mostly filled in sometime after I moved here in 1979. The ditch that ran behind the Smith-Kem shop still carried water when I first arrived, and the culvert under Railroad Ave near the northwest corner of the shop building was still functional. Both have since been covered with fill material. The only remnant of the ditch running north south adjacent to the railroad tracks is identified in Exhibit 3. The City of Ellensburg removed most of the diversion head gate from Mercer creek in 2012. The north wall of the head gate is still in place and marks the location of the historic diversion. Exhibit 4 (lower right corner) shows the location of the southern portion of the irrigation ditch after it crosses the Wilson creek channel.

In addition to the irrigation water that historically crossed the site, numerous floods have washed over the area, sometimes moving soil and gravel from the site onto neighboring property. The direction and flow of surface runoff has varied greatly over the years as the site has been re-graded and the gravel surfaces maintained. Presently, following heavy rain or snow melt, the largest pools of water form between the Habitat for Humanity building and the El Quin dry fertilizer building along the south boundary of the site.

The ground water in this area is shallow. On my property it seems to occur from 1.5 to 4 feet below the surface. It varies in depth depending on the location and the time of year. During late summer it is deeper than in the winter. The subsurface water also seems to have significant flow related to Mercer Creek. From the sampling history listed in the Agreed Order it is evident that the ground water under the site has been contaminated with several toxic chemicals. It is very important that future sampling determine how far the contamination has spread.

Mechanical removal from the site has occurred by blowing dust, grading, and during snow removal. The site has been graded and reshaped many times. Until recently dust would blow readily from the site. Most dust was blown toward the southeast from the site. In recent years dust abatement treatments have been use on the main parking area between Railroad Ave and the buildings. The dust abatement has greatly reduced the blowing dust, but has increased the surface pooling following heavy rain.

On most years snow is stockpiled east of the main buildings along the railroad tracks. During several heavy snow years, a front loader was used to collect and deposit large piles of snow onto the west side of Railroad Ave. Snow was piled on the City of Ellensburg right-of-way, between my fence and the paved running surface of Railroad Ave. (see Exhibit 1) When the snow melted it left potentially contaminated sand, gravel, and silt in the roadside ditch as well as potentially contaminated runoff which soaked into the roadside soil.

Plans need to be developed that will fully clean up all toxic substances on and adjacent to the site. Then the site needs to be actively and quickly cleaned up. Better containment needs to be established to prevent any future spills or releases of toxic chemicals from leaving the site and impacting neighbors. Proper management procedures need to be put in place to minimize the possibility that current and future operators of agricultural chemical businesses on the site will release toxic chemicals into the area.

I hope this letter explaining some of my recollections and casual observations will be helpful in the effort to clean up the Smith-Kem site. All locations on the maps in Exhibits 1-4 are approximate and entered to the best of my memory. Field survey will be needed to locate actual positions of any features displayed on the maps.

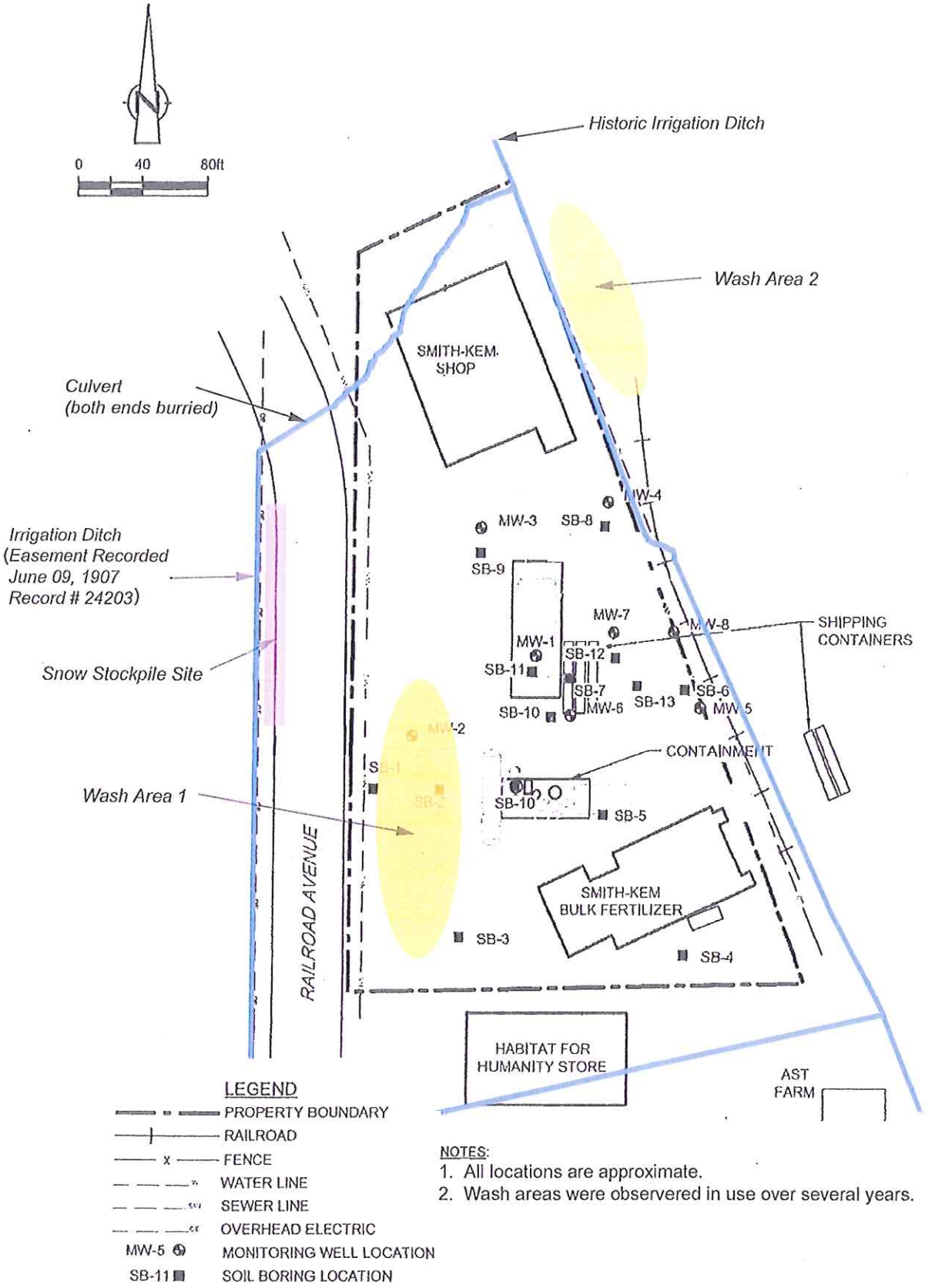
I would also like to request that you keep me on the mailing list for announcements concerning this project and others that are in the immediate vicinity of the Smith-Kem site or adjacent to my property. Thank you for the opportunity to comment on this cleanup action.

Sincerely,

Stephen C. Carter
207 S Railroad Ave.
Ellensburg, WA 98926

attachments:
Exhibit 1 to 4
Article Ellensburg Daily Record - July 15, 1985
Article Ellensburg Daily Record - May 11, 1987

EXHIBIT 1



NOTES:
1. All locations are approximate.
2. Wash areas were observered in use over several years.

Site plan modified to show observed historic use and historic waterways associated with the area.

SITE PLAN
SMITH-KEM FACILITY
SHELL OIL PRODUCTS US
200 RAILROAD AVENUE SOUTH
Ellensburg, Washington

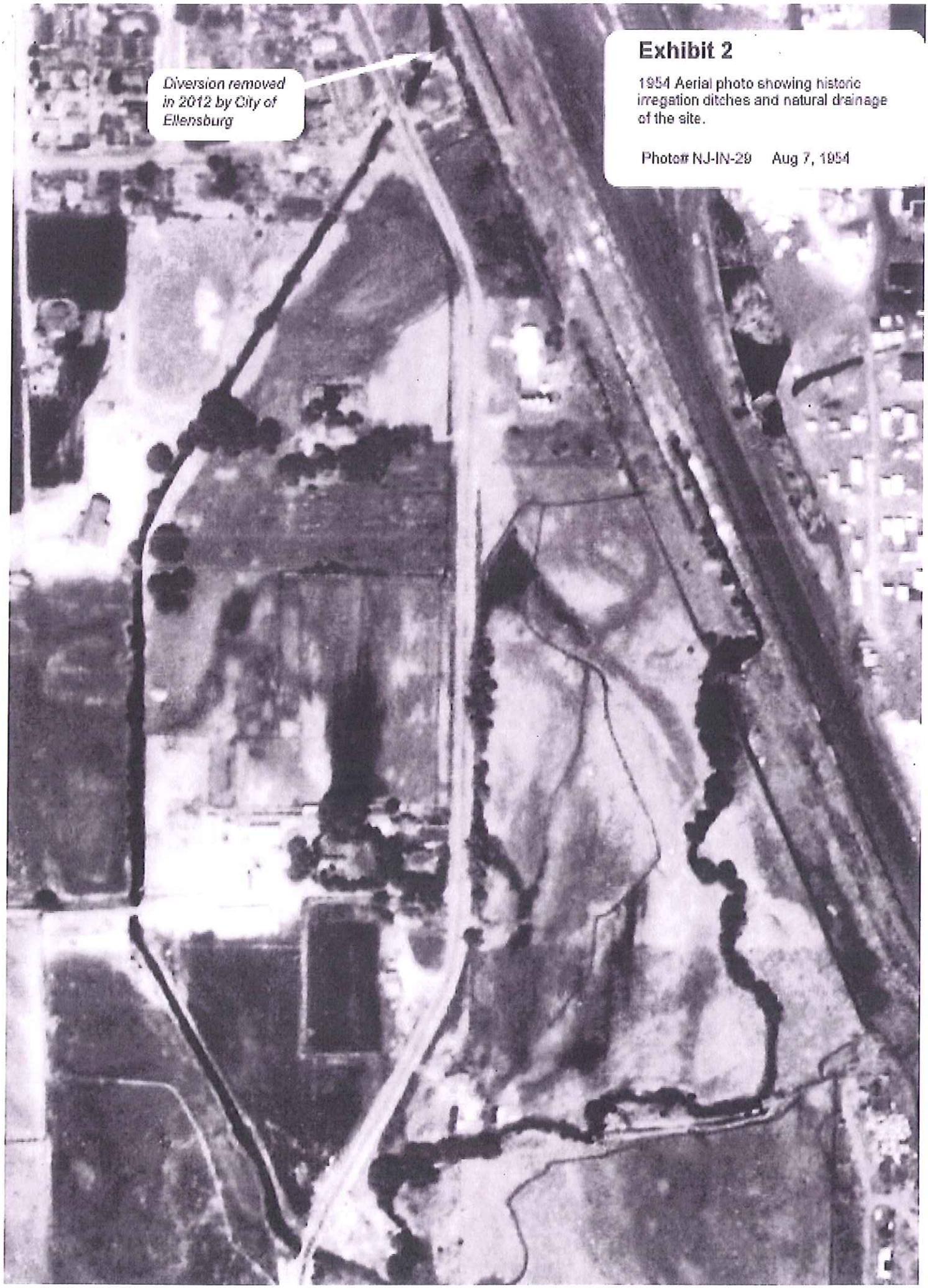


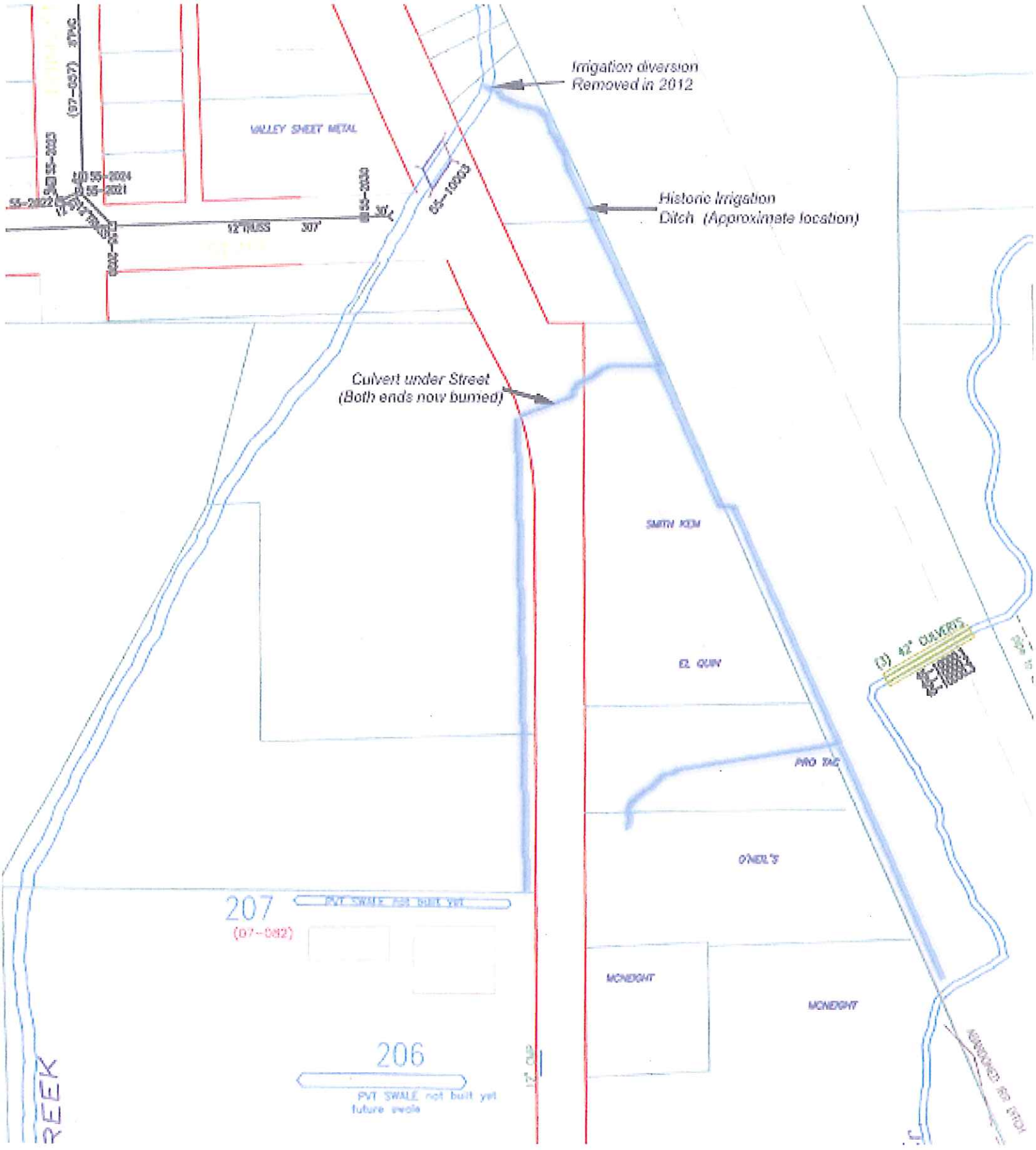
Exhibit 2

1954 Aerial photo showing historic irregation ditches and natural drainage of the site.

Photo# NJ-IN-29 Aug 7, 1954


EXHIBIT 3
Google Maps 2016
Wash Area 2
Permanent of historic irrigation ditch
Mercer Creek
Anderson Rd
Habitat for Humanity Store

EXHIBIT 4


Irrigation diversion
Removed in 2012
Historic Irrigation
Ditch (Approximate location)
Culvert under Street
(Both ends now burned)
VALLEY SHEET METAL
SMITH KOM
EL QUIN
PRO TAC
O'NEIL'S
MOONLIGHT
MOONLIGHT
(3) 42" CULVERTS
207
(07-082)
206
PVT SWALE not built yet
future swale
12" PVC
REEK

ACCIDENT

A 19-year-old Olympia man lost control and ran off the roadway and down an embankment Saturday while trying to pass another vehicle going southbound on the Yakima Canyon Road. Edwin R. Pittman, taken to Yakima Valley Memorial Hospital, suffered rib and possible internal injuries in the accident about 17 miles south of Ellensburg. The 1973 Mazda he was driving was destroyed, the Washington State Patrol said..

LEAK

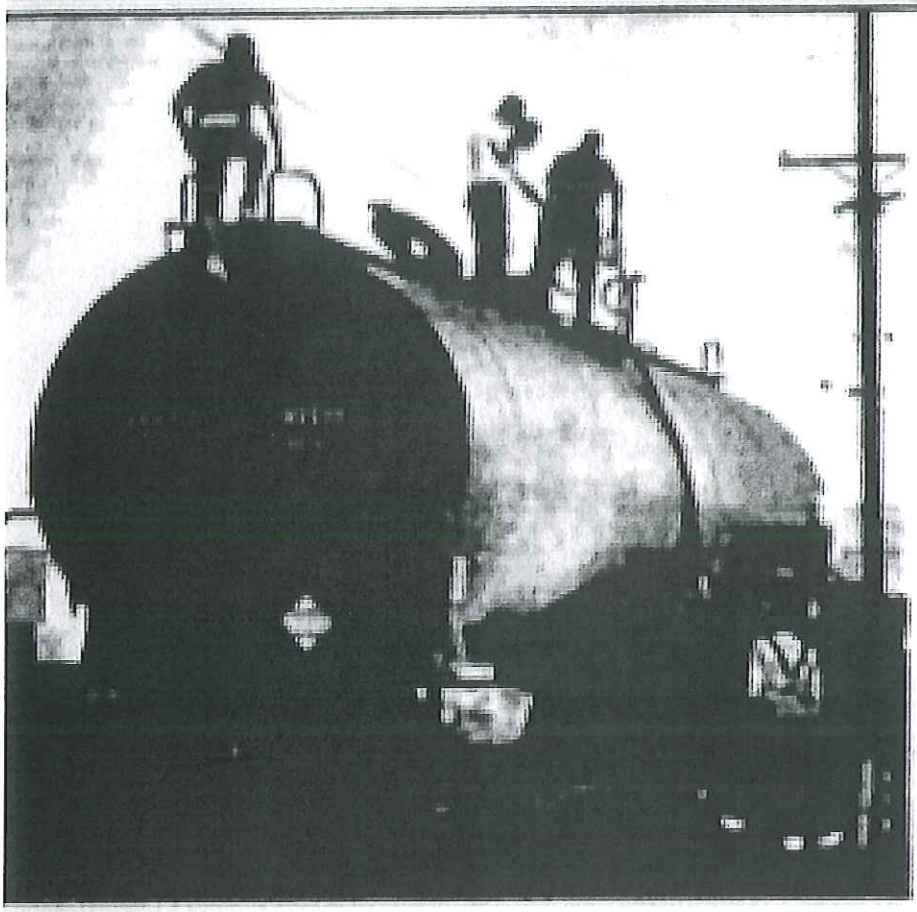
July 15, 1985
Daily Record

Ellensburg police evacuated part of west Ellensburg on Sunday while investigating an ammonia leak at the Smith-Kem Fertilizer Co. on Railroad Avenue. A resident in the area reported the leak to police. After an officer confirmed the leak, Smith-Kem officials were called about 6 p.m. The leak was stopped about one-half hour later.

IN NEED?

Operators of a free coffee stand and a state employee at the Indian John Hill rest area told the Washington State Patrol that a possible fraud was being committed by a man who for two days asked passers-by for money he said he needed to get back to his home in Nebraska. The man, a white male, had a "Need Help" sign in the window of his 1969 blue Oldsmobile. Coffee stand operators said the man would leave after dark and would return in the morning. They also said they had seen the same man

Daily Record



Gas leak prompts evacuation

There's a million at the bottom