

December 5, 2016

NICHOLAS ACKLAM
VCP Unit Manager
Department of Ecology
PO Box 47775
Olympia WA 98504-7775

SUBJECT: VCP APPLICATION FOR THE FLEISHMANN'S YEAST FACILITY, 1115 ZEHNDER STREET, SUMNER WA CLEANUP SITE ID 12577

Dear Mr. Acklam:

I am writing to you as the environmental consultant for Fleishmann's Industrial Park LLC, the current owner of the above referenced property. The property underwent a cleanup in 2000 to remove heavy fuel oil (Bunker C) contaminated soil around two former underground storage tanks. Nearly all the contaminated soil was removed, except for a portion that was inaccessible due to structures and interfering underground utilities. This work was reported to the Department of Ecology. Fleishmann's Industrial Park LLC purchased the property in 2004 well after the cleanup was completed. Regardless, due to the fact the some contamination remained behind, the site was never closed out by the Tacoma-Pierce County Health Department, which has authority over cleanups of underground storage tanks in Pierce County. Additionally, in 2013 Ecology added this site to the list of contaminated sites and Ecology subsequently sent an Early Notice Letter to Mr. Bob Code, the manager of Fleishmann's Industrial Park LLC.

Recent construction work at the site made some areas around the former release more accessible due to building demolition. Mr. Code engaged us to assess the possibility that the remaining contamination could finally be dug out and the site closed. In July of 2016, as described in the accompanying report, we advanced Geoprobe borings in and around the area of residual contamination to better define its area. Results indicate that the area of residual contamination is deeply embedded inside a major utility corridor for natural gas, water, electrical, sanitary, and storm water. Further cleanup is not practicable, nor warranted given the low toxicity and mobility of Bunker C, which has not impacted groundwater.

We discussed this situation with Mr. Rob Olsen of TPCHD. He described that to close this site out per TPCHD regulations requires a variance from their rules. We presented our 2016 data as well as our case for a variance to TPCHD in October of this year. TPCHD subsequently approved of the variance as shown in the accompany letter.

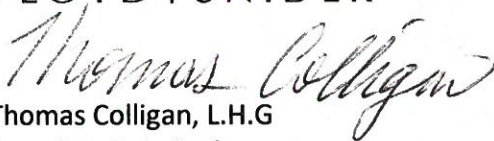
Given that this site was also recently listed with Ecology, we have to now pursue closure through the Voluntary Cleanup Program. We are requesting that that Ecology review this site using the Model Remedy option #3. Our application forms are enclosed, as well as prior reports that clearly and succinctly define the nature and extent of contamination prior to cleanup and a report that describes the cleanup action that was done in 2000.

We understand that Model Remedy #3 will require placement of a restrictive covenant on the property. We are ready to provide that to Ecology for review once we get assurance from the VCP Site Manager that the site otherwise qualifies for a No Further Action designation.

I am looking forward to working with Ecology to get this site thru the closure process.

Sincerely yours,

FLOYD | SNIDER



Thomas Colligan, L.H.G
Associate Principal

Encl.: VCP Application, VCP Agreement, TEE Form, UST Closure Report, TPCHD Variance Letter
Copies: w/o enclosures: Rob Olsen, Tacoma-Pierce County Health Department; Bob Code, Cascade Columbia