



FILE COPY

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

May 24, 2000

Mr. Ken Peterson  
1013 East 10th Avenue  
Ellensburg, WA 98926

Dear Mr. Peterson:

RE: Voluntary Cleanup Program Review of Limited Phase II Environmental Assessment, Ken's Auto Wash Facility, Ellensburg, Washington

Thank you for submitting your Limited Phase II Environmental Assessment, Ken's Auto Wash Facility, for State of Washington, Department of Ecology's (Ecology) review. Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding Ken's Auto Wash facility located at 1013 East 10th Avenue, Ellensburg:

1. Limited Phase II Environmental Assessment, Ken's Auto Wash Facility, Ellensburg, Washington; by HartCrowser, dated November 29, 1999
2. Fourth Quarter 1999 Ground Water Monitoring Report, Voluntary Cleanup Program, Ken's Auto Wash Facility, Ellensburg, Washington; by HartCrowser, dated February 10, 2000
3. First Quarter 2000 Ground Water Monitoring Report, Voluntary Cleanup Program, Ken's Auto Wash Facility, Ellensburg, Washington; by HartCrowser, dated February 10, 2000
4. Materials and Correspondence from the Department of Ecology Files for Ken's Auto Wash II, 1013 E. 10th, Ellensburg. Files maintained at the Central Regional Office of the Department of Ecology.

Based upon the above listed information Ecology has determined that, at this time:

Further actions are needed to address soil and groundwater contamination in the southwestern corner of the Ken's Auto Wash Facility. Remedial action alternatives are examined in the report and include two types of technologies, excavation of contaminated soil and facilitation of natural breakdown of petroleum contamination that could not be practically excavated.

As indicated in the report, the proposal of excavating as much contamination from the ground as possible is a good, practical first step. While I cannot address the cost of the option, Ecology's experience is that removal of as much petroleum contamination from a site as possible greatly



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speeds the cleanup of groundwater. Removal of contaminated soils provides several treatment options for the soil, most common is sending the soil to an off site treatment facility where the soil is treated to standard before re-use or disposal. Please be sure to include documentation showing the fate of contaminated soils removed from the facility with subsequent cleanup reports. This documentation should show quantity and destination of the contaminated soil. Should the contaminated soils be treated by the facility owner rather than at a permitted soil treatment/disposal facility, please include soil treatment information showing how treatment is accomplished and the results of soil treatment with the final remediation report.

The Limited Phase II Environmental Assessment for Ken's Auto Wash facility recognizes that not all of the contamination will be excavated due to portion of the contamination extends under 10th Avenue for an unknown distance. The report proposes to treat the contamination in place (*in situ*) under the street. I believe that this is a good second step to the cleanup actions as it provides for the cleanup of soil and groundwater required by the MTCA.

Remedial alternatives screened for treating the contamination *in situ* under the street primarily rely on the natural breakdown of petroleum product by microorganisms existing in the soil. All of the remedial alternatives considered for the *in situ* soil treatment rely on the addition of oxygen to the environment to increase the rate that the microorganisms can consume the petroleum contamination. Each of these *in situ* technologies has been shown to work at a variety of sites and I am not going to express a preference for any particular style for use at this site. The selection of a style of *in situ* treatment is the choice of the proponents of the cleanup due to each style having different costs that relate to the maintenance cost and the expected amount of time the system will be operated.

Please note that if a remedial technology employed for the treatment of petroleum products at this site will produce a quantifiable release of toxic air pollutants (ex. BTEX compounds, etc., as specified in Chapter 173-460 WAC) to the atmosphere, then an air quality permit will be required. Technologies such as the Soil Vapor Extraction system considered in the remedial alternatives screening are very likely to require an air discharge permit. The permitting authority for air discharges in the Ellensburg area is Ecology's Central Regional Air Quality Program, which can be reached at (509) 575-2490.

Groundwater monitoring will be important to determining the success of your cleanup actions at the Ken's Auto Wash facility. Review of the information submitted to Ecology shows that the system of groundwater monitoring wells in place at this time appears to be adequate for the task. Groundwater monitoring will determine when the cleanup of the contamination is complete. It is important to periodically sample the wells and establish the effect of the annual rise and fall of groundwater on the gradient and concentration of petroleum contamination in the groundwater.

Please note that because your actions were not, or will not be conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(I) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

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The opinions presented by Ecology in this letter are made only with respect to the information provided in the reports, documents, and telephone conversations listed above. This opinion is only applicable to the specified site (or portion of the site) and may not be used to justify action at any other site (or portion of the site) nor any other properties owned or operated by Ken Peterson.

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 determination.

Please contact me at (509) 454-7840 if you have any questions or would like clarification of any portion of the letter.

Sincerely,

A handwritten signature in cursive script that reads "Mark Peterschmidt". The signature is written in black ink and is positioned above the typed name.

Mark Peterschmidt  
VCP Coordinator, CRO  
Toxics Cleanup Program

cc: Scott Shock, HartCrowser