



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

April 18, 2000

CERTIFIED MAIL

P 148 983 987

Mr. Jim Fife, Manager
Cenex Agricultural Supply Co.
PO Box 599
Wenatchee, WA 98807

Dear Mr. Fife:

RE: Early Notice Letter Regarding the Release of Hazardous Substances on property located at the Cenex Bulk Plant, 1115 N. Wenatchee Avenue, Wenatchee, WA, ERTS #C509325

Under Chapter 70.105D Revised Code of Washington (RCW), upon receiving a report of a release or threatened release of a hazardous substance that may pose a threat to human health or the environment, the Department of Ecology (Ecology) is required to conduct an Initial Investigation.

On April 5, 2000, I made a site visit to the above Wenatchee petroleum bulk plant and completed an Initial Investigation. I met with Mr. Vic Clayson, Bulk Petroleum Manager for Cenex. Mr. Clayson showed me the Cenex bulk plant and the areas where the release(s) occurred. I also reviewed the following documents in Ecology's file:

- (1) Ecology Water Quality Program Notice of Violation No. DE 00WQCR-879 (March 30, 2000; Mr. Max Linden) to the Cenex Agricultural Supply Company (Wenatchee).
- (2) City of Wenatchee Department of Public Works (Ms. Jayne Strommer) fax (March 14, 2000) to Ms. Donna Smith (Ecology Water Quality Program). This fax includes a cover memo, Sound Analytical Services, Inc. lab analyses, and a February 14, 2000 e-mail message from Mr. Dan Curry to Mr. Jim Ajax.
- (3) Telephone memo (March 7, 2000) of a conversation between Ms. Donna Smith (Ecology) and Mr. James Fife (Cenex).
- (4) E-mail message (February 16, 2000) from Mr. Jeff Lewis (Ecology Spills) to Ms. Donna Smith (Ecology).
- (5) E-mail message (February 15, 2000) from Mr. Jeff Lewis to Mr. Jim LaSpina et al (several Ecology Programs).
- (6) E-mail message (February 15, 2000) from Ms. Jayne Strommer to Mr. Jeff Lewis.
- (7) E-mail message (February 14, 2000) from Mr. Dan Curry (City of Wenatchee) to Mr. Tom Hardie and Ms. Jayne Strommer (City of Wenatchee).



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After surveillance of the bulk plant area, my conversations with Mr. Clayson, and a review of the file documents, I came to the following conclusions.

- (1) On January 18, 2000, a release of 50-60 gallons of #1 diesel occurred into a Cenex bulk storage secondary containment. Cenex collected what they could of the release.
- (2) On February 14, 2000, Cenex pumped fluids to the ground from their bulk secondary containment.
- (3) On February 14, 2000, the City of Wenatchee sewage treatment plant personnel smelled strong diesel odors entering the plant. The plant personnel followed the flow and odors to the Cenex bulk plant and to a manhole on the Burlington Northern-Sante Fe (BNSF) right-of-way. When Cenex was asked about the release by Mr. Dan Curry (City of Wenatchee), Cenex explained of their unsuccessful attempts to pump the release into a 300-gallon container (Dan Curry February 14, 2000 e-mail to Jim Ajax).
- (4) The release(s) flowed from the Cenex property onto the BNSF right-of-way and to the City of Wenatchee sanitary sewer manhole. In my conversation with Mr. Clayson, he told me that snow was beginning to melt at the same time as the February 14, 2000 release. At the bulk plant on April 5, 2000, I observed several areas of petroleum-stained soils in the compound, several ground paths where fluids had flowed, three large six thousand-gallon tanks with no containment, and two downgradient detention pits. The pits were excavated after the releases occurred. Aside from the containment release, the snowmelt over the compound petroleum-stained soils contributed to the contaminants.
- (5) Based on the hydrocarbon-stained soils in the compound, Ecology is concerned that the compound is contaminated. Under such circumstances, MTCA (enclosed) requires that an adequate sampling and investigation for contaminants take place in the compound and in the BNSF right-of-way, and that an appropriate cleanup occurs.

Under the Model Toxics Control Act (MTCA), Ecology maintains a listing of known or suspected contaminated sites. It is Ecology's decision that the above-referenced property will be added to this information system. Ecology has determined also that a Site Hazardous Assessment (SHA) described in Washington Administrative Code (WAC) 173-340-320 will be required at this site. It is the policy of the Department of Ecology to work cooperatively with persons to accomplish prompt and effective site cleanups. Ecology prefers to achieve site cleanup cooperatively through independent cleanup actions (WAC 173-340-510). Cooperating with Ecology in planning or conducting remedial actions is not an admission of guilt or liability.

In proceeding with an independent cleanup, please be aware that there are requirements in state law which must be adhered to. In particular, WAC 173-340-300(4) which requires a report of independent actions. To the extent known, the report shall include: The identification and location of the hazardous substance; circumstances of the release; the discovery and remedial actions planned, completed, or underway. More requirements of independent cleanup actions are discussed in WAC 173-340-120(8)(b). Ecology will use the appropriate requirements contained

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throughout this chapter in its evaluation of the adequacy of any independent remedial actions performed. In the future Ecology may still need to conduct a more detailed inspection of this property, including testing for possible contamination. At that time we may assess the need for further action.

You are encouraged to contact Ecology for limited informal advice and assistance. For technical assistance you are advised to hire an engineering consultant with the appropriate environmental expertise. A copy of Chapter 70.105D RCW, the Model Toxics Control Act, and the implementing regulation Chapter 173-340 WAC, which details the requirements of the Act, are enclosed.

If you have any questions regarding this letter or the requirements under the Model Toxics Control Act, please call. My phone number is (509) 454-7839.

Sincerely,



Dick Bassett
Site Manager/Initial Investigations
Toxics Cleanup Program

Enc: Chapter 173-340 WAC
Chapter 70.105D RCW

cc: Bruce Sheppard, BNSF
Debra Kroon, CRO
Jeff Lewis, CRO
Donna Smith, CRO