WCEC

West Central Environmental Consultants

1030 South Avenue W. • Missoula, MT 59801
(406) 549-8487 • Fax (406) 549-8490

June 28, 2000

Donna Smith
Department of Ecology
15 W. Yakima, Suite 200
Yakima, Washington 98902-3452

Dear Ms. Smith:

Please consider this letter a formal response to your March 30 letter from Max Linden regarding a release of petroleum product from the Ag Supply Company, 1115 N. Wenatchee Ave., Wenatchee, Wa. (Figure 1). This letter also serves a report on subsequent investigative and remedial work carried out cooperatively by West Central Environmental Consultants (WCEC) and Ag Supply Company.

These letters will first address the questions outlined in your letter followed by a description of the following actions undertaken by Ag Supply and WCEC.

Response to DOE questions:

Question # 1
Describe in detail the incident beginning on January 18, 2000 and ending on February 14, 2000 that caused petroleum products to be discharged to the Wenatchee Wastewater Treatment Plant.

Response # 1
On January 18, 2000 our transport was unloading a full load of dyed number 1 diesel into our bulk plant. Al Asher was the transport driver that was delivering the product. Due to a break down in communications, Al was not aware that he was to leave one compartment of product on the transport to be delivered to another location. Al also did not check the level of the product in the tank prior to unloading to make sure that the entire load would fit. As the pump was completing the transfer of the entire load, the tank overfilled. The excess product flowed out through the vent and ran down the side of the tank and was contained in the secondary containment area. At 4:00 am Al notified Vic Clayson, the Bulk Petroleum Manager and his supervisor of the release.

Vic Clayson arrived on scene at 5:30 am and determined that the amount of the release was only about 50 gallons and that we could recover the product with a pump. Since there was snow in the containment area and the product had not completely separated from the water attempts to recover the product were discontinued until the temperatures moderated.

On February 5, 2000, the snow had melted and the containment had accumulated additional water from rain. Vic Clayson pumped approximated 265 gal of water from the bottom of the containment on to the ground outside of the containment.

On February 7, 2000, when in Vic's opinion there was a possibility of product being mixed with the water, about 400 gal of liquid was pumped into storage containers until a better separation occurred.

On February 14, 2000, Darwin Wilson, one of Vic's staff, started draining the water from the bottom of one of the storage containers onto the ground outside of the containment area. This procedure was started in the

morning (8:00 am). The process was intermittent until noon. At 1:30 pm we were notified that the Wentachee Wastewater treatment plant was finding signs of petroleum and we stopped any discharge.

Question # 2
What was the quantity of oil discharged to the secondary containment on January 18, 2000?

Response # 2
Our preliminary estimate was 50 gallons. Upon recovery we now believe the amount was 275 gallons. The majority of the fuel was recovered and stored in plastic totes. This material was later recycled by Harbor Oil.

Question # 3
What was the quantity of contaminated water/oil removed from secondary containment following the January 18, 2000?

Response # 3
On February 5 – 265 gal.
On February 7 – 400 gal.

Question # 4
How and where was the contaminated water/oil stored between January 18, 2000 and February 14, 2000?

Response # 4
Initially in the secondary containment and then in portable storage containers.

Question # 5
What was the quantity of contaminated water/oil drained or discharged to the sewer manhole?

Response # 5
February 5 – 265 gal.
February 14 – 250 gal.

Question # 6
What time did the discharge/draining begin and end on February 14, 2000?

Response # 6
The draining process began at 8:00 am and ended at 12:00 noon.

Question # 7
What steps has Cenex taken since the January 18, 2000 release to secondary containment to prevent petroleum products from coming into contact with water?

Response # 7
Procedures have been implemented that require the bulk site operator to be on site to check tank levels and then calculate and document how much product will safely fit in the tanks. Ag Supply has also discontinued the discharge of any liquids from the containment area. If significant amounts of liquids accumulate within the secondary containment due to precipitation events, the excess water will be transferred to plastic containers within the containment area. Stored water will be periodically drained back into the containment and allowed to evaporate.

Ag Supply also excavated two shallow catch basins capable of holding all surface water runoff from the site. During significant runoff events, the surface water accumulated in the catch basins will be inspected for any evidence of sheen. These catch basins would also prevent off site migration of any petroleum released during an accidental release event. Any petroleum released during such a release could be recovered from the catch basins. Each basin has a capacity of approximately 4,000 gallons.

Ag Supply also installed plastic containment sumps directly beneath all load/off-load piping at the facility.

Question # 8
What steps have been taken, or are planned, to prevent the discharge of contaminated water from the site? Please include both interim measures taken and long term measures planned.

Response # 8
Interim and long-term measures were described in Question # 7.

Question # 9
Does Cenex have an operations manual that addresses the processing and disposal of materials spilled into secondary containment? If yes, did Cenex follow the manual for the incident beginning on January 18, 2000 and culminating with the illegal discharge on February 14, 2000, and if so, how?

Response # 9
At the time of the incident Ag Supply did not have an operational manual that discussed this issue.

Question # 10
Has Cenex made changes to the operations manual since the January 18, 2000 – February 14, 2000 incident? If yes, what changes have been made to the manual?

Response # 10
Since the incident, policies have been developed which prohibit the discharge of any liquids from the containment area.

Question # 11
How have the changes made to the operations manual been implemented?

Response # 11
No liquids are discharged from the floor of the containment areas.

Question # 12
Does Cenex have a spill prevention and response plan?

Response # 12
Ag Supply did not have one on file, nor were they technically required to have one at the time of the release. However, in response to this incident, Ag Supply is developing a comprehensive Spill Plan with assistance from a Consultant/Engineer. At this writing, this plan should be complete.

Question # 13
If the answer to number 7 is yes, are spills of petroleum to the ground addressed and if so, how?

Response # 13
This question requires some clarification. However, an accidental release of petroleum would immediately be contained and recovered. Soil impacted by such a release would be excavated and temporarily stockpiled on plastic or another impervious surface. Stockpiled soils would then be analyzed using appropriate methodology and disposed of at an approved facility.

All accidental releases of petroleum onto the ground surface will be immediately reported to DOE.

Report of Remedial Actions:

Ag Supply Company of Wenatchee contacted WCEC in April of 2000 to assist with the investigation into this incident. WCEC was asked to conduct a thorough site investigation of the spill area, assist with operational modifications, and to act as a liaison with state officials.

On May 2, 2000, Jerry Eide (WCEC) arrived on site to conduct a preliminary inspection of the facility and develop a remedial strategy for the property.

Arrangements were made for an excavator to be on site May 4th to advance a series of test pits to facilitate sampling for petroleum products. WCEC personnel arrived on site at 7:30 am., May 4th, to determine appropriate sample locations. The backhoe was used to remove the upper 6" of soil all along the spill trace and to advance several test pits to a depth of 2'.

The original spill trace followed a narrow (<3') track extending from the berm to a fence line on the east edge of the property (Figure 2). The discharged water then turned south and entered a sanitary sewer vent originally set slightly below grade. This vent has subsequently been raised approximately 6" above grade to prevent infiltration by surface runoff.

A photonization detector (PID) was used to screen soils every 3 – 4 feet along the spill track. There was no evidence of any contamination anywhere along the spill track based on PID readings, lack of odor, and absence of any soil discoloration. One composite soil sample was obtained from spill track on the Ag Supply property (Figure 2) and submitted to Cascade Analytical for analysis. This analysis did not detect any petroleum products in the soils along the release trace.

The backhoe was also used to remove several small areas of petroleum stained soils near the off-loading piping at the site. The excavated soil was stockpiled on plastic pending disposal. After each area was excavated, a plastic sump was placed under each pipe to catch any drips resulting from connecting and disconnecting piping during off load operations.

A total of 10 cubic yards of soil was stockpiled and later disposed of at the Wenatchee landfill. Complete lab reports are attached to this letter.

Conclusions:

There do not appear to be any residual environmental impacts relating to the release of water/oil from the containment area during the February release. This is probably due to the fact the ground was frozen during the discharge preventing any significant infiltration into the underlying soils.

Ag Supply has initiated policies, which prohibit the discharge of any liquids collecting within the containment area. Two retention areas have also been constructed which should prevent any migration of storm water or petroleum products offsite. A formal SPCC plan to be reviewed by all appropriate personnel has been developed and will be used as a guideline should any accidental releases occur.

The operational changes and equipment modification implemented by Ag Supply in response to this incident should be protective of the environment in and around the Ag Supply bulk facility.

I hope this letter addresses your concerns regarding this incident and adequately describes the actions taken in response to this release.

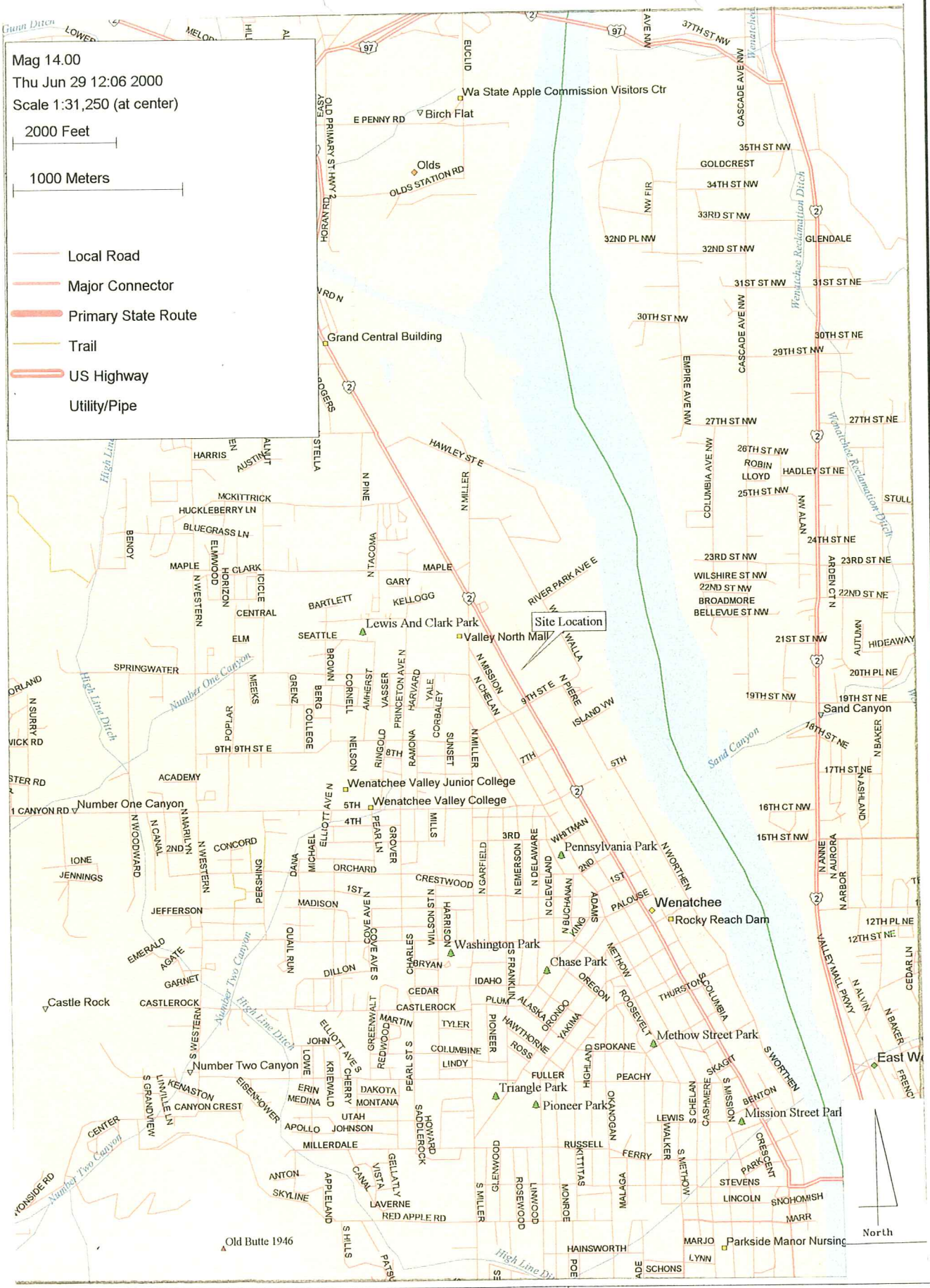
Sincerely,

Willie R. Long FOR

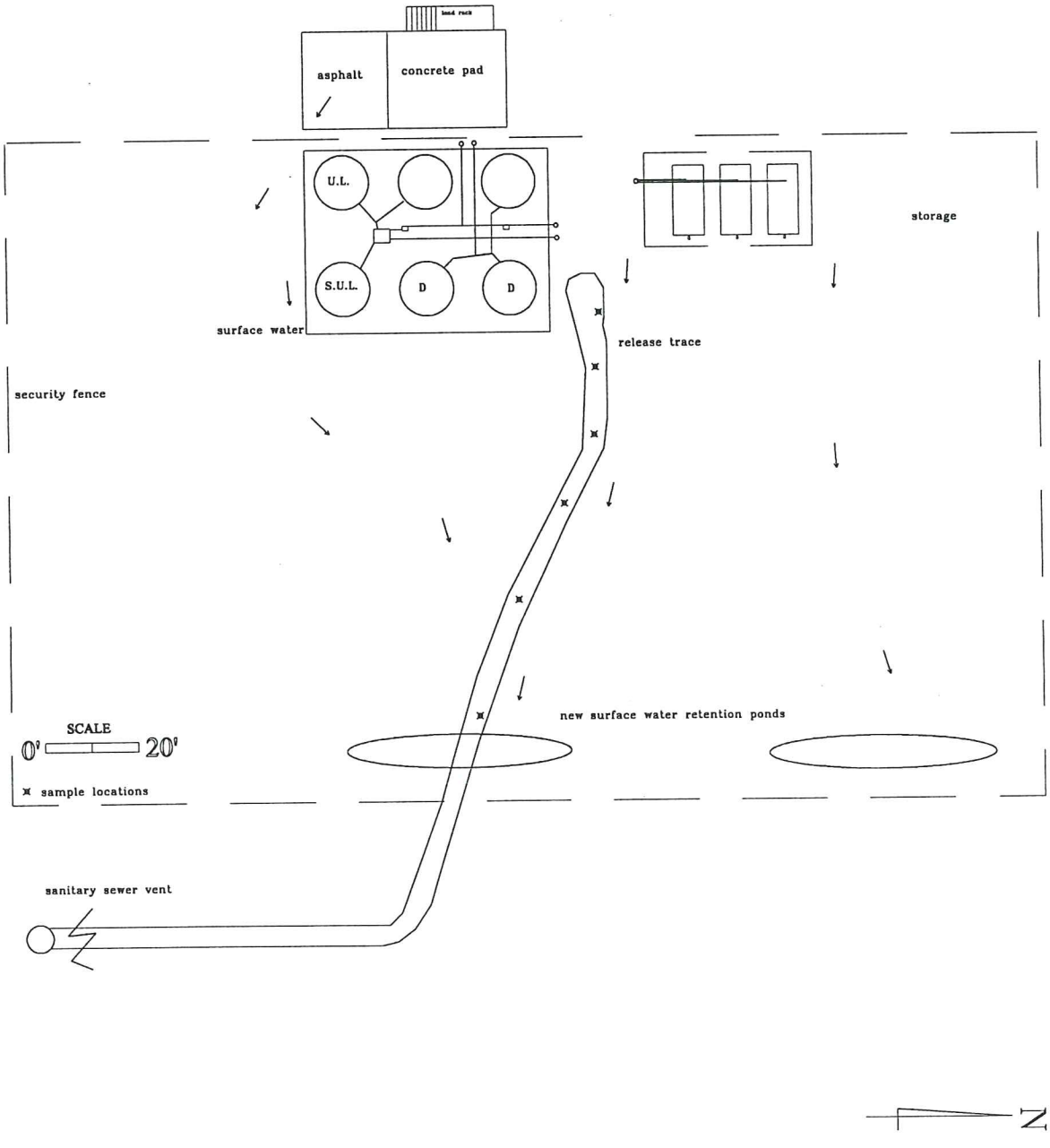
Jerry Eide
Manager, WCEC

Enc.

cc: Dick Bassett



WCEC Environmental Consultants	Site Location Map	Ag Supply
	Current Date: 06/29/2000	Wenatchee, Washington
Figure 1	Project Number: 00-3064-90	
	Drawn By: RFF	



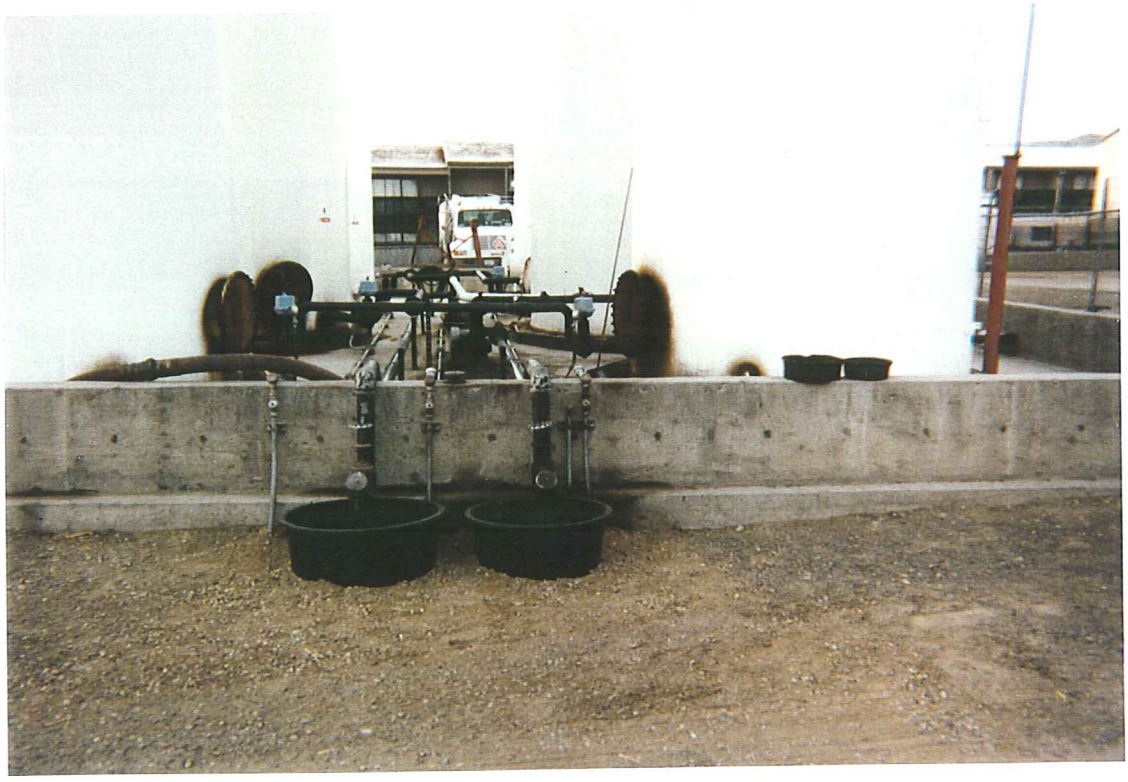
WCEC ENVIRONMENTAL CONSULTANTS Figure 2	SITE DETAILS MAP CURRENT DATE: 05/09/00 FILE NAME: 3064-2.DWG PROJECT NUMBER: 00-3064-90 DRAWN BY: WHC	Ag-Supply Wenachee Wenachee, WA

1. Backhoe removing top 6" of spill trace.
2. Spill trace on BN Property.

WCEC	**Site Photographs**
Project No.:	00-3064-90
Location:	Ag Supply - Wenatchee, WA

3. Re-landscaped spill trace area after excavation surface soils.
4. One of the two catch basins excavated by Ag Supply.

WCEC	**Site Photographs**
Project No.:	00-3064-90
Location:	Ag Supply - Wenatchee, WA



5. Plastic sumps installed to collect drips during off load activity.
6. Site after excavation of stained soil and along spill trace. Note plastic sumps installed at all off load points.

WCEC	**Site Photographs**
Project No.:	00-3064-90
Location:	Ag Supply - Wenatchee, WA

Copy 3064

AG SUPPLY COMPANY

Petroleum Convenience Store Hardware Farm Supply

FAX TRANSMITTAL SHEET

If you experience transmission problems, please contact the AG SUPPLY COMPANY office at (509) 662-8188.

To:	JERRY EIDE	**From:**	JIM FIFE
Company:	WEST CENTRAL ENVIR.	**Company:**	Ag Supply Company
Fax #:	(406) 549-8490	**Fax #:**	(509) 663-1034
# of Pages:	[redacted] 6 (Excluding this page)		
Notes:	[redacted] LAB TEST RESULTS		

CASCADE ANALYTICAL, INC.
3019 G.S. Center Rd.
Wenatchee, WA 98801
(509) 662-1888
Fax: (509) 662-8183
1-800-545-4206

Batch: 001681
Client: Ag Supply Co
Account: 02580
Sampler: Jerry Eide
PO Number:

--- Analytical Services Report ---

Report Date: 5/31/00

Ag Supply Co
PO Box 599
Wenatchee, WA 98807

Laboratory Number: 00-C003475
Sample Identification: Stock 1

Date Received: 5/ 4/00
Date Sampled: 5/ 4/00

Test Requested	Results	Units	MDL	Method	Date Analyzed	Flags
TCLP Extract	Extracted 5/17/00					
Arsenic	< 0.2	mg/L	0.20	3113B/3120B	5/17/00	
Barium	0.440	mg/L	0.100	SW846 6010A	5/17/00	
Cadmium	< 0.02	mg/L	0.02	SM 3120B	5/17/00	
Chromium	< 0.01	mg/L	0.01	SW846 6010	5/17/00	
Lead	0.15	mg/L	0.10	SM3120	5/17/00	
Mercury	< 0.005	mg/L	0.005	EPA 245.1	5/17/00	
Selenium	< 0.4	mg/L	0.40	SM 3113B/3120B	5/17/00	
Silver	0.10	mg/L	0.10	SM 3120B	5/17/00	

Approved By: Jerry L Baum

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3019 G.S. Center Rd.
Wenatchee, WA 98801
(509) 662-1888
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Batch: 001681
Client: Ag Supply Co
Account: 02580
Sampler: Jerry Eide
PO Number:

--- Analytical Services Report ---

Report Date: 5/31/00

Ag Supply Co
PO Box 599
Wenatchee, WA 98807

Laboratory Number: 00-C003475
Sample Identification: Stock 1

Date Received: 5/ 4/00
Date Sampled: 5/ 4/00

Test Requested	Results	Units	MDL	Method	Date Analyzed	Flags
Other Analysis	Analyzed by SAS				5/ 9/00	

Approved By: Jerry L Brown

SPECIAL SERVICE ORDER FORM

CASCADE ANALYTICAL, INC.

AGRICULTURAL & ENVIRONMENTAL ANALYSIS

3019 G.S. Center Rd.
Wenatchee, WA 98801

(509) 662-1888
Fax: (509) 662-8183
1-800-545-4206

SAMPLE #	1	2	3	4
SEND RESULTS TO 1) Client 2) Billing 3) Both				
SAMPLE REPRESENTS 1) Food 2) Water 3) Soil 4) Plant Tissue 5) Other				
SAMPLE BY 1) Client 2) Field Rep. 3) Quality Control 4) Cascade 5) Other				

CLIENT NAME/ADDRESS
Ag Supply (Vic Classen)
P.O. Box 599
Wenatchee, WA 98807

BILLING NAME/ADDRESS
Same

PHONE NO. 509-662-8188

SAMPLER'S NAME Jerry Ede WCCC

FORM MUST BE COMPLETED BEFORE ANALYSIS WILL BE PERFORMED.

RELINQUISHED BY: (Signature) 1	DATE	RELINQUISHED BY: (Signature) 2	DATE	RELINQUISHED BY: (Signature) 3	DATE
Jerry Ede	5/4/00				
(Printed) TERRY EDE	TIME 9:55	(Printed)	TIME	(Printed)	TIME
RECEIVED BY: (Signature)	DATE	RECEIVED BY: (Signature)	DATE	RECEIVED BY: (Signature)	DATE 5/4/2000
(Printed)	TIME 10:00	(Printed)	TIME	(Printed) Laura Meacham	TIME

1	SAMPLE I.D. Trench inside Fence	Sample Date 5/4/00	Sample Time 8:00am
	ANALYSIS REQUESTED WTPH-D & WTPH-HCID (8015M)		
	COMMENT		
2	SAMPLE I.D. Stock 1	Sample Date	Sample Time
	ANALYSIS REQUESTED RCRA 8 metals TCLP extract Hydrocarbon Quant		
	COMMENT		
3	SAMPLE I.D.	Sample Date	Sample Time
	ANALYSIS REQUESTED		
	COMMENT		
4	SAMPLE I.D.	Sample Date	Sample Time
	ANALYSIS REQUESTED		
	COMMENT		

1 sample

Sample container received by client was sealed Yes _____ No _____

Sample container received by laboratory was sealed Yes _____ No _____

Customer Signature _____ Date _____

SOUND ANALYTICAL SERVICES, INC.

Client Name	Cascade Analytical, Inc.
Client ID:	00C-3475
Lab ID:	89464-01
Date Received:	5/5/00
Date Prepared:	5/9/00
Date Analyzed:	5/9/00
% Solids	96.07
Dilution Factor	20

NWTPH-HCID - Hydrocarbon Identification Method for Soil Modified

Surrogate	% Recovery	Flags	Recovery Limits Low	High
1-chlorooctane	84.6		50	150
o-terphenyl	116		50	150

Sample results are on a dry weight basis.

Analyte	Result (mg/kg)	MDL	Flags
Gasoline (Toluene-nC12)	>21	21	
Diesel (>nC12-nC24)	>52	52	
Motor Oil (>nC24-nC32)	>100	100	

SOUND ANALYTICAL SERVICES, INC.

Lab ID:	Method Blank - HC509
Date Received:	
Date Prepared:	5/9/00
Date Analyzed:	5/9/00
% Solids	
Dilution Factor	20

NWTPH-HCID - Hydrocarbon Identification Method for Soil Modified

			Recovery Limits	
Surrogate	**% Recovery**	**Flags**	**Low**	**High**
1-chlorooctane	86.2		50	150
o-terphenyl	81.6		50	150

Sample results are on an as received basis.

Analyte	**Result (mg/kg)**	**MDL**	**Flags**
Gasoline (Toluene-nC12)	<20	20	
Diesel (>nC12-nC24)	<50	50	
Motor Oil (>nC24-nC32)	<100	100	

SOUND ANALYTICAL SERVICES, INC.

Duplicate Report

Client Sample ID:	00C-3475
Lab ID:	89464-01
Date Prepared:	5/9/00
Date Analyzed:	5/9/00
QC Batch ID:	HC509

NWTPH-HCID - Hydrocarbon Identification Method for Soil Modified

Parameter Name	Sample Result (mg/kg)	Duplicate Result (mg/kg)	RPD %	Flag
Gasoline (Toluene-nC12)	>21	>20	4.9	
Diesel (>nC12-nC24)	>52	>49	4.9	
Motor Oil (>nC24-nC32)	>100	>99	4.9	