



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 20, 2012

Angie Goodwin, Project Coordinator  
Hart Crowser, Inc.  
1700 Westlake Avenue North, Suite 200  
Seattle, WA 98901-3056

Re: Status of Agreed Order DE 03 TCPCR-5763 and next steps for  
Ken's Auto Wash II, Ellensburg  
F/S ID #: 3892

Dear Ms. Goodwin:

As we discussed in our teleconference on June 6, this letter describes the status of the Agreed Order and actions needed to move forward with an amendment to that Agreed Order. Ecology continues to appreciate the initiative of Mr. Peterson and Hart Crowser in pursuing remediation at this site.

Ecology has no record that a final letter of approval was sent to Hart Crowser or Ken Peterson for the Remedial Investigation/Feasibility Study Report, nor was a letter of satisfaction for the Agreed Order sent.

The Remedial Investigation/Feasibility Study (RI/FS) submitted under the Agreed Order concludes that natural attenuation (Alternative 1) alone is sufficient to achieve remediation at the Ken's Auto Wash II site, and selects that remedy. Since the actual action taken as an interim action is Alternative 3, Enhanced Biodegradation, it would be appropriate to prepare a brief supplemental FS in support of that choice. Alternative 3 would also have to be modified slightly to include enhanced anaerobic biodegradation, as only aerobic enhancement is addressed in the FS. The RI/FS (2006) and Supplemental FS together would comprise a document pair that could be approved by Ecology following public review and comment, with suitable revisions if needed to be responsive to public comments. The supplemental FS should also address the contingency for reversion to monitored natural attenuation should the interim action fail to achieve cleanup standards, and the anticipated timeframe for site restoration. An Interim Action Plan (IAP) reflecting the remedial choice(s) at the site should also be prepared. The FS and IAP can both be included in the public review process simultaneously.

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Should the data collected in the future show that final cleanup levels have been achieved through application of the interim remedial action, a second public comment period would be needed to complete the process of determining that the interim action has met the requirements of a final remedial action in the IAP, and the site should be delisted since cleanup standards have been met. Should the interim action not achieve final site cleanup standards, the approved supplemental FS and CAP will provide next step, MNA for the site. A second public notice and opportunity for comment will ultimately be necessary when final cleanup is complete, and delisting the site is appropriate.

If Mr. Peterson chooses to continue on the path of completing the Agreed Order and proceed under the VCP, a supplemental FS will still be required to satisfy the Agreed Order, and a public comment period will need to be held prior to issuing a Letter of Completion.

If you have any questions after reviewing the information in this letter, please feel free to contact me and 509-454-7837 or by email at [nope461@ecy.wa.gov](mailto:nope461@ecy.wa.gov) .

Sincerely,



Norman D. (Norm) Peck  
Project Coordinator/Site Manager  
Toxics Cleanup Program, CRO