



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

**CERTIFIED MAIL**

March 31, 2005

Graybar Electric, Inc.  
34 North Meramek Avenue  
St. Louis, MO 63105  
Attn: Alice Lehnhoff

Dear Ms Lehnhoff,

RE: NOTICE OF POTENTIAL LIABILITY FOR THE RELEASE OF HAZARDOUS  
SUBSTANCES UNDER THE MODEL TOXICS CONTROL ACT.

Chapter 70.105D RCW, the Model Toxics Control Act (MTCA), requires the Department of Ecology to provide written notice to all persons it believes to be potentially liable for the release of hazardous substances.

It is Ecology's understanding that you, Graybar Electric, Inc. are an owner of a Graybar Electric facility located at 1414 Center Street, Tacoma, Washington 98409, and that credible evidence exists indicating that a release (or threatened release) of a hazardous substance has occurred at this site. The evidence supporting these findings is as follows:

1. Graybar Electric, Inc. is the owner of record of property located at 1414 Center Street, Assessor's Parcel No. 0320084098.
2. During remedial investigations on adjacent property (Camas Property), petroleum hydrocarbon contamination was found in soils immediately next to the property line between the two parcels. The proximity of this contamination to the Graybar parcel indicates that it is likely that a release is present on the Graybar parcel, also. Groundwater, which flows generally from the direction of the Graybar parcel towards the Camas parcel was also found to contain petroleum hydrocarbons and heavy metals in wells immediately adjacent to the property line.
3. These types of contamination represent a threat to human health and the environment

As a result of this evidence, you have been identified as a person potentially liable for the release at this site.

Under the MTCA, you have thirty (30) calendar days from the receipt of this letter to submit written comments to Ecology on your proposed status as a potentially liable person (PLP). Following a review of those comments, Ecology will make a final written determination of your status.



In the interest of expediting this process without admitting liability, you may wish to accept your status as a Potentially Liable Person by waiving your right to the thirty (30) day notice and comment period. This may be accomplished by signing and returning the enclosed form or sending a letter containing similar information to Ecology.

If you are aware of any other persons who may be potentially liable for the release at this site, Ecology encourages you to provide us with their identity and the reason you believe they are potentially liable.

Ecology intends to conduct the following actions at the site: Negotiate conditions to perform an initial investigation to determine the potential extent of contamination present on the property. Depending upon the outcome of initial investigations, it may then be appropriate to negotiate an Agreed Order under which a remedial investigation will be conducted to determine the scope and distribution of contaminants at the site.

Ecology's policy is to work cooperatively with PLPs. Please note that cooperating with Ecology in planning or conducting remedial actions at the site is not an admission of guilt or liability and could ultimately result in a more efficient, prompt, and effective cleanup.

To date, Ecology has notified the following additional persons that they may be potentially liable for the release at the site: Shell Oil Company, Environmental Claims, 910 Louisiana, NO. 689, Houston, TX 77002.

Ecology suggests you contact these other persons to discuss how you can jointly work together to most efficiently address the contamination at this site.

A copy of Chapter 70.105D RCW and Chapter 173-340 WAC has previously been sent to you for your information. Please let me know if you are in need of additional copies.

If you have any questions or comments please feel free to contact me.

Sincerely,



Marv Coleman, Site Manager/Inspector

Southwest Regional Office

Toxics Cleanup Program

Phone: 360 407 6259

Fax: 360 407 6305

Pager: 360 709 4139

Email: mcol461@ecy.wa.gov

cc: Diane Conway, Gordon/Thomas/Honeywell  
Suzanne Womack, Shell Oil Company  
Sharonne O'Shea, Ecology AAG  
Bob Warren, Ecology

Graybar Electric, Inc.  
34 North Meramek Avenue  
St. Louis, MO 63105  
Site Address: 1414 Center Street, Tacoma, Washington

Pursuant to WAC 173-340-500 and WAC 173-340-520(1)(b)(i), I

(NAME) \_\_\_\_\_, a duly authorized representative of  
(COMPANY NAME) \_\_\_\_\_, do hereby waive my  
right to the thirty (30) day notice and comment period described in WAC 173-340-500(3) and  
accept(s) status as a Potentially Liable Person. This waiver is solely for purposes of entering into  
negotiations for remedial investigation. By waiving this right, I make no admission of liability.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Relation To The Site  
(ie, Owner or operator)

7003 3110 0004 2965 4832

**U.S. Postal Service™**  
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*Mano Coleman*

Postage	\$ .60
Certified Fee	2.80
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
<b>Total</b>	<b>4.65</b>

**Sent to:**  
 Graybar Electric, Inc.  
 34 North Meramek Avenue  
 St. Louis, MO 63105  
 Attn: Alice Lehnhoff



PS Form 3800, June 2002

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Graybar Electric, Inc.  
 34 North Meramek Avenue  
 St. Louis, MO 63105  
 Attn: Alice Lehnhoff

2. Article Number

(Transfer from service label)

7603 3110 0004 2965 4832

PS Form 3811, February 2004

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☐ Agent  
☒ *Senille Morgan* ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery  
*Senille Morgan*

D. Is delivery address different from item 1? ☐ Yes  
 If YES, enter delivery address below: ☐ No

3. Service Type  
☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

Domestic Return Receipt

*Mano Coleman* 102595-02-M-1540