



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

October 24, 2012

Mr. Terry Austin, Project Coordinator
Yakima County Prosecuting Attorney's Office
128 N 2nd Street, Room 211
Yakima, WA 98901

RE: Response to Supplemental Remedial Action Work Plan

- Site Name: Cascade Natural Gas Site
- Site Address: 512 Decatur Avenue, Sunnyside
- Facility/Site ID No.: 492
- Cleanup Site ID No.: 4925

Dear Mr. Austin:

This letter provides Washington State Department of Ecology's (Ecology's) review findings and response to Pacific Groundwater Group's (PGG) September 2012 Supplemental Remedial Action Work Plan for the Cascade Natural Gas Site in Sunnyside, Washington (Facility Site ID 492). PGG's remedial action work plan is supplemental to an outlined approach discussed in the Technical Memorandum Cascade Natural Gas Cleanup Site Exceedance Report, dated December 16, 2011.

Ecology agrees that the approach set out in the work plan is appropriate; however, Ecology requests the following items be clarified or revised prior to approval:

1. Section 2.1 - The inclusion of monthly sampling of monitoring well CNGMW-12 following injection, and requests sampling should continue until the elevation of dissolved oxygen and attenuation parameters are observed in at least the nearest downgradient well to more closely monitor injectant in-situ behavior.
2. Section 3.1.3 - Use of an oil-water interface probe in preference to a bailer as a more accurate means of measuring presence and/or thickness of Light Non-Aqueous Phase Liquid (LNAPL).
3. Section 3.1.4 – Evaluation of revision of Oxygen Release Compounds (ORC) treatment injection interval to include a narrower depth interval. Ecology anticipates this to



Mr. Terry Austin, Project Coordinator
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Page 2

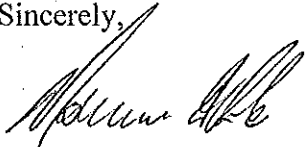
increase effectiveness by targeting contamination rather than having a larger proportion consumed by matrix Chemical Oxygen Demand (COD) below the smear zone.

4. Section 3.3 – See comment 1, above. Monthly monitoring of wells CNGMW-3, -4 and -12 is suggested from 1 month post-injection until detection in downgradient monitoring wells. This should confirm estimates of groundwater travel time and also assure downgradient effect of remedial treatment.

Subsequent to the review and approval of a final work plan, Ecology will work to facilitate funding anticipated to be allocated in July 2013. I will be transitioning management of this site to Ms. Jennifer Lind over the next week or so. You should have received a notice letter of the change in Project Coordinator concurrently with this letter.

Please contact me at (509) 454-7837 if you have any questions.

Sincerely,



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

cc: David Stevens, Cascade Natural Gas
Mike Clapp, Cascade Natural Gas
Glen Wallace, Pacific Groundwater Group
Kalle Godel, Montana-Dakota Utilities Co.