



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

March 13, 2023

Molly Dimick
J.R. Simplot Company
PO Box 912
1130 West Highway 30
Pocatello, ID 83204

Re: Comments on the Proposed Groundwater Well Installation Plan:

Site Name: Warden City Water Supply Wells No. 4 and 5

Site Address: 1900 Block W 1st St Warden, WA 98857

Cleanup Site ID: 1618

Facility/Site ID: 2802409

Dear Molly Dimick:

Please see Ecology's comments below on HDR Engineering's revised draft *Groundwater Monitoring Well Construction and Monitoring Plan* dated February 2023:

1. **Subsection 2.2, Groundwater Conditions, first bullet:** Please add that no upper wells in the shallow aquifer have been installed north of the canal.
2. **Subsection 3.2, Groundwater Monitoring Well Installation with Rotasonic Drilling, sixth paragraph:** Has the proposed CSSI silica sand (gradation #10-20) filter pack been optimized for the shallow aquifer formation (Palouse Formation) found at the Site? If not, please calculate the optimal filter pack gradation using available Palouse Formation (loess) gradation data and using a commonly accepted industry standard method to calculate the optimal filter pack gradation.
3. **Subsection 3.2, Groundwater Monitoring Well Installation with Rotasonic Drilling, sixth paragraph:** Is the proposed factory-slotted 0.020-inch slot size well screen 0.020-inch slot size optimal for the Palouse Formation? Also please consider the final slot size based on the filter pack gradation to be used for the wells. Please see previous comment.

4. **Subsection 3.2, Groundwater Monitoring Well Installation with Rotosonic Drilling, last paragraph:** Please add “WAC” to 173-160-450 in the text.
5. **Subsection 3.5, Well Surveying:** If the “Warden” benchmark previously used to survey wells at the Site in the past cannot be found or has been destroyed, then previously surveyed wells (MW-1 through MW-5) must be re-surveyed to this new benchmark.
6. **Subsection 4.1 Scope, third paragraph; and Page 12, subsection 7.2, Semi-annual Groundwater Compliance reports, first paragraph:** Compliance with CULs is determined by the number of monitoring events as outlined in Ecology’s Guidance for Contaminated Petroleum Sites [04130394.TEX \[TEX\] \(wa.gov\)](#) Section 10.3.1, Table 10.2: Stage 1 Monitoring, no EDB detections in any wells above PQLs; Stage 2 Monitoring, detections of EDB above PQLs but below CUL, and Stage 3 Monitoring, detections of EDB above CUL during post-cleanup action compliance monitoring.

Stage 1 Monitoring would entail two consecutive monitoring events with no EDB detections above PQLs; Stage 2 Monitoring would entail four consecutive events with EDB detections above PQL but below CUL; and Stage 3 monitoring would entail eight consecutive detections above PQL, but below CUL and after the last post remediation detections with EDB concentrations above CUL (if any).

7. **Page 10, subsection 4.1.1, Groundwater Sampling Procedures, second bullet, Pumps:** Please use a low-flow submersible pump for groundwater sampling for all groundwater sampling at the Site. It can be anticipated that the Site aquifer could be oversaturated in carbon dioxide which would cause effervescence and potential stripping of VOCs such as EDB from the groundwater.
8. **Page 10, subsection 4.1.1, Groundwater Sampling Procedures, second to last bullet, Parameter monitor:** Please perform quantitative monitoring for turbidity during well purging using a turbidity meter.

If you have any questions about these comments, please contact me at (509) 329-3543 or clof461@ecy.wa.gov.

Sincerely,



Christer Loftenius, L.G. L.H.G.
Site Manager
Toxics Cleanup Program, Eastern Region

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cc: Rachel Roskelley, Simplot
Tyler Allen, HDR Engineering, Inc.
Nick Acklam, Ecology 