



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

November 15, 2023

Sent via email

Rachel Roskelley
J.R. Simplot Company
Simplot Headquarters
P.O. Box 27
Boise, ID 83707

RE: Ecology Comments on the Agency Review Draft Feasibility Study for the Following Site:

- **Site Name:** Simplot Soilbuilders Sunnyside
- **Site Address:** 300 South 1st Street, Sunnyside
- **Facility Site ID No.:** 76742139
- **Cleanup Site ID No.:** 2558
- **Agreed Order No.:** DE 16446

Dear Rachel Roskelley:

Thank you for submitting the above-referenced document. Below are the Department of Ecology's (Ecology) comments on the Agency Review Draft Feasibility Study (FS), Simplot Soilbuilders Sunnyside, received October 13, 2023. Ecology welcomes a discussion of the comments.

Ecology Comments/Discussion/Resolution

Below are Ecology's comments, associated discussion, and expectations about the resolution.

Ecology Comment 1: The recommended remedial alternative presented in the draft FS is *Alternative 5: Pavement Cap, In Situ Chemical Oxidation of Impacted Off-site Groundwater, Permeable Reactive Barrier, and Monitored Natural Attenuation*. It is Ecology's opinion that this alternative does not adequately address contamination on the Simplot Soilbuilders Sunnyside property. The selected remedial alternative needs to target source contamination more actively.

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Ecology believes that this can be accomplished by expanding Alternative 5 to include one or more of the activities described in the draft FS that addresses contamination in the source zone. This revised alternative should be presented in the final version of the Feasibility Study.

Ecology Comment 2:

In Section 8.5 of the draft FS, *Alternative 5: Pavement Cap, ISCO of Impacted Off-site Groundwater*, there is no mention of ISCO, other than in the title. In other areas of the draft FS, ISCO of Impacted Off-site groundwater was included as part of Alternative 5. Please clarify if ISCO was meant to be included in this section.

Ecology Comment 3:

Cleanup levels for soil at the Simplot Soilbuilders Site (site) will be the Model Toxics Control Act (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses (Table 740-1),¹ if available. For contaminants of concern at the site where cleanup levels are not listed on Table 740-1, the most conservative cleanup level of the CLARC “Direct Contact” or “Protectiveness of Groundwater Pathway – Saturated” shall be used, as listed in *Table 5* of the draft FS.

Ecology Comment 4:

In the draft FS, *Table 5, Soil Submerged – Protection of Groundwater*, the value listed for Manganese (3.3 mg/kg) refers to the non-diet value from CLARC, not the fish consumption value. This notation should be changed in *Table 5*.

Ecology Comment 5:

Cleanup levels for groundwater at the site will be the MTCA Method A Cleanup Levels for Ground Water (Table 720-1),² if available. For contaminants of concern at the site where cleanup levels are not listed on Table 720-1, the values listed in the draft FS, *Table 5: Proposed Cleanup Levels - CLARC Values, Groundwater Drinking/Direct Contact* shall be used.

For total xylenes in groundwater, the cleanup level is 1,000 µg/L (MTCA Method A cleanup level, Table 720-1). The cleanup level is based on xylene not exceeding the maximum allowed cleanup level in Table 720-1 for total petroleum hydrocarbons and on the prevention of adverse aesthetic characteristics. This is the total value for all xylenes.

¹ https://www.ezview.wa.gov/Portals/_1987/Documents/Documents/BACKGROUND_WAC_173-340-900_Table740-1_SoilCULunrestrictedLandUse_2001_2004.pdf

² https://www.ezview.wa.gov/Portals/_1987/Documents/Documents/BACKGROUND_WAC_173-340-900_Table720-1_GroundwaterCUL_2001.pdf

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For arsenic in groundwater, the cleanup level is 5 µg/L (MTCA Method A cleanup level, Table 720-1) and is based on background concentrations for the state of Washington.

For ethylene dibromide (1,2-dibromoethane, EDB) in groundwater, the cleanup level is 0.01 µg/L (MTCA Method A cleanup level, Table 720-1). This cleanup level is based on concentration derived using Equation 720-2, adjusted for the practical quantitation limit.

Next Steps

The next step in this process will be to submit a Final Feasibility Study Report that addresses Ecology comments outlined in this letter within 45 days of receiving this letter. This timeline may be adjusted if you would like a meeting to discuss this letter prior to the submission of a Final Feasibility Study Report.

Please contact me at 509-907-1353 or Rachel.Caron@ecy.wa.gov if you require any clarification of these comments or have further questions.

Sincerely,



Rachel Caron
Site Manager
Toxics Cleanup Program
Central Regional Office

cc: Molly Dimick, Simplot
David Allison, Geosyntec
Brett Miller, Geosyntec