



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

March 11, 2024

Niklas Bacher
Anchor QEA, LLC
949 Market Street, Suite 700
Tacoma, WA 98402

RE: 2022 Groundwater Monitoring Report and Request for Closure for the following Site:

- **Site Name:** Yakima Valley Spray
- **Site Address:** 1108 S 1st Street, Yakima
- **Facility Site ID No.:** 445
- **Cleanup Site ID No.:** 3664

Dear Niklas Bacher:

Washington State Department of Ecology (Ecology) has reviewed the Yakima Valley Spray facility (Site) files, including the 2022 Groundwater Monitoring Report, as part of the request for closure. The 2022 Groundwater Monitoring Report was submitted on behalf of the Yakima Valley Spray Site Remediation Group (YVSSRG) on March 2, 2023. Site data indicates that all the Indicator Hazardous Substances (IHS) except for diesel and gasoline have met site cleanup requirements for the appropriate consecutive quarter sampling events across the Site. However, there is insufficient analysis to determine if conditional points of compliance are appropriate for this Site.

Ecology's August 8, 2019 letter¹ provided a tiered approach to eliminate ongoing monitoring of IHS's as they have met performance measures on a per-well basis. The following analytes have met the established site cleanup standards for the required amount of consecutive quarterly sampling events, and therefore no further monitoring of them is required:

- Method 8080
 - DDT
 - Aldrin

¹ <https://apps.ecology.wa.gov/cleanupsearch/document/85533>

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- Dieldrin
- Beta BHC
- Gamma BHC (Lindane)
- Method 8260
 - Benzene
 - PCE
- Method 6010/700
 - Arsenic

However, TPH-Dx and TPH as gasoline have not met cleanup levels for the requisite number of consecutive quarterly samples in well YVS-2. One additional quarterly sample is required for gasoline at monitoring well YVS-2. In the 2019 letter Ecology, required that performance monitoring continue for TPH-Dx until cleanup levels were achieved and maintained (a minimum of two consecutive sampling events). At that time Ecology will review a confirmational monitoring plan. Monitoring well YVS-2 has not meet the Site's TPH-Dx cleanup level.

WAC 173-340-720(8)(c)² indicates the prerequisites for conditional points of compliance to be utilized in a cleanup action plan:

Conditional point of compliance. Where it can be demonstrated under WAC 173-340-350³ through 173-340-390⁴ that it is not practicable to meet the cleanup level throughout the site within a reasonable restoration time frame, the department may approve a conditional point of compliance that shall be as close as practicable to the source of hazardous substances, and except as provided under (d) of this subsection, not to exceed the property boundary. Where a conditional point of compliance is proposed, the person responsible for undertaking the cleanup action shall demonstrate that all practicable methods of treatment are to be used in the site cleanup.

It has not been shown that it is not practicable to meet CULs throughout the site on a reasonable time frame, so Ecology will continue to require standard points of compliance at the Site. This means that groundwater should meet cleanup levels throughout the site from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected by the Site. Naturally occurring organics may interfere with the NWTPH-Dx analysis.

² <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340-720>

³ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-350>

⁴ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-390>

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A silica gel cleanup step can be employed to determine the possible influence of naturally occurring organics on the analysis. Appropriate use of this method could demonstrate that Site conditions meet established cleanup levels. Ecology's publication, Guidance for Silica Gel Cleanup in Washington State⁵, outlines how to use silica gel cleanup at MTCA Sites. Ecology will provide support if you choose to demonstrate compliance using this method. This will require a minimum of four consecutive quarters of sampling.

The Site could potentially meet cleanup standards by analyzing the naturally occurring organics and comparing them to the Site's sampled NWTPH-Dx concentrations. Another option is to provide sufficient analysis to meet the conditions required for use of "conditional point of compliance." Either option will require additional investigation and or sampling.

If you have any questions, please contact me at 509-490-5298 or will.strand@ecy.wa.gov.

Sincerely,



Will Strand
Toxic Cleanup Program
Central Regional Office

⁵ <https://apps.ecology.wa.gov/publications/documents/2209059.pdf>