



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

# **Draft Cleanup Action Plan Amendment 1**

Warden City Water Supply Wells 4 & 5

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**1900 W Street, City of Warden**  
**Facility Site ID 2802409, Cleanup Site ID 1618**

July 2024

## **Contact Information**

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## **Document Availability and Accessibility Requests**

This document is available on the Washington State Department of Ecology's website at [Warden City Water Supply Wells No. 4 and 5 - \(1618\)ZZZZ](#).

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# Executive Summary

This document presents an amendment to the Final Cleanup Action Plan (CAP) for the Warden City Water Supply Wells 4 and 5 Site (Site) at 1800 West First Street in the City of Warden, Grant County, WA 98857. This CAP Amendment was prepared by the Washington State Department of Ecology (Ecology) in collaboration with J.R. Simplot Company (Simplot). The CAP is Ecology's decision document for the Site and provides the rationale for selecting the cleanup alternative. This CAP Amendment describes the selected cleanup action to contain ethylene dibromide-(EDB) contaminated soil that could not be excavated and treated in accordance with the original CAP. This CAP has been prepared to meet the requirements of the Model Toxics Control Act (MTCA). Ecology has determined that actual or threatened releases of EDB from the Site, if not addressed by implementing the proposed cleanup action, presents a threat to human health and the environment.

The Site has been a retail outlet for agro-chemicals since 1971. The City had observed EDB contamination in Wells No. 4 and 5 near the Site since 1989.

Simplot carried out a remedial action between 2019 and 2020 that consisted of excavation and treatment of EDB-contaminated soil at two locations using an applied vacuum to the soil and collection of the EDB vapors from the soil. Treated soils were returned to the excavation and the ground restored to its original condition.

Approximately 12,000 cubic feet (cu ft) of EDB contaminated soil with concentrations above applicable cleanup levels remain due to their proximity to railroad tracks. Ecology proposes to cover these soils with an impermeable cap and divert stormwater run-off to a dry well. The cap will be maintained by Simplot and any repair work or corrective actions will be documented annually in an Operations and Maintenance (O&M) Plan for the Site.

# 1 Introduction

This document is the Washington State Department of Ecology's (Ecology) first Amendment to the Cleanup Action Plan (CAP) for the City of Warden (City) Water Supply Wells No. 4 and 5 Site (Site). This document focuses on new information obtained since the Final CAP.

In May 2020, Ecology and the potentially liable person (PLP), J.R. Simplot Company (Simplot) signed Agreed Order (No. 16890) to implement the CAP. This CAP Amendment is conducted in accordance with the Agreed Order.

This CAP Amendment outlines the selected remedial action for the Site.

Ecology has made a preliminary determination that a cleanup conducted in conformance with this CAP will comply with the requirements for selection of a remedy under WAC 173-340-360 through 390.

## 1.1 Updates to Administrative Record

The documents used to make the decisions discussed in this CAP Amendment are on file in the administrative record for the Site. Major documents are listed in the reference section. The entire administrative record for the Site is available for public review by appointment at Ecology's Eastern Regional Office, located at 4601 N. Monroe Street, Spokane, WA 99205-1295. Results from applicable studies and reports are summarized to provide background information pertinent to this CAP Amendment. These studies and reports include:

- *Cleanup Action Plan (CAP), Ecology 2019*
- *Engineering Design Report (EDR), HDR, February 2021*
- *Compliance Monitoring Plan (CMP), first Addendum, HDR August 2023a*
- *Partial Cleanup Action Completion Report, HDR, August 2023b*
- *Groundwater Monitoring Well Construction Report, October 2023*

## 2 Site Background

The Simplot property is currently used by Simplot for storing agricultural products (e.g., packaged fertilizers) in warehouses. The property consists of two warehouse buildings, an unpaved parking area, and several storage bins. Figure 1 and Figure 2 are aerial photographs of the site and surrounding area that provide an indication of current land use. The parcel and surrounding parcels are listed by Grant County as “trade-general merchandise.” Land use within 1/2 mile of the property includes commercial and light industry, undeveloped open space, and agricultural. Simplot anticipates continuing to use the property for storage of agricultural products for the near future and has not identified any long-term changes to property use.

The area immediately around the Simplot Growers Solutions property is industrial (agricultural), with irrigated agricultural areas on the north and west sides of the East Low Canal. A railroad spur borders the property to the north and west, with industrial buildings to the east, West First Street to the south, and industrial facilities to the west. Further description of the Site surroundings can be found in the Cleanup Action Plan (Ecology 2019).

### 2.1 Completed Cleanup Actions

#### 2.1.1 Cleanup Action Plan

After completing the RI/FS, and in cooperation with Simplot, Ecology completed a *Cleanup Action Plan* (CAP) in May 2019 (Ecology, 2019). This CAP was required as part of the site cleanup process under the MTCA, Chapter 70.105D Revised Code of Washington (RCW), implemented by Ecology under WAC Chapter 173-340. The CAP is Ecology’s decision document for the site and provides the rationale for selecting the cleanup alternative. The CAP outlined the following:

- The history of operations, ownership, and activities at the site,
- The nature and extent of contamination as presented in the RI/FS report,
- Cleanup levels for the site that are protective of human health and the environment,
- The selected remedial action for the site, and
- Any required compliance monitoring and institutional controls.

In the CAP Ecology selected Alternative 3, consisting of excavation and treatment of EDB-contaminated soil using an applied vacuum to the soil and collection of the EDB vapors from the soil in a granular activated carbon filter. The cleanup alternatives are described in the CAP (Ecology, 2019)

## **2.1.2 Implemented Cleanup Actions**

### **2.1.2.1 Contaminated Soil Excavation**

Simplot conducted EDB-contaminated soil excavation activities from March to April 2021, in accordance with WAC 173-340-410, the EDR (HDR, 2021), and the CMP, (HDR, August 2023b), The soil excavation activities are described in detail in the Partial Cleanup Action Completion Report (HDR, August 2023a).

### **2.1.2.2 Treatment of Contaminated Soils**

Approximately 6,500 – 7,200 cubic yards of EDB-impacted soil from the excavation were treated on-site with an ex-situ soil vapor extraction. The soil treatment activities are described in detail in the Partial Cleanup Action Completion Report (HDR, August 2023a). Figure 4 shows the aerial extent of the excavated and treated soils.

### **2.1.2.3 Removal and Installation of Groundwater Monitoring Wells**

Two groundwater monitoring wells within the excavated area, MW-5S and MW-D were properly decommissioned before field work was started. The decommissioning details are found in two resource well protection reports submitted to Ecology by Simplot in 2020.

After treatment of contaminated soils and backfilling of excavated areas, replacement wells (MW-5SR and MW-5DR) were installed approximately at approximately the same locations as the decommissioned wells. A detailed description of the new wells can be found in the Groundwater Monitoring Well Installation Report dated October 2023 (HDR, October 2023).

### **2.1.2.4 Post-treatment Site Restoration**

The Site contractor graded the Site according to the grading plan provided in the partial cleanup action completion report (HDR August 2023a). Upon completion of grading activities, the contractor measured elevation levels at multiple locations to confirm the site was graded according to the grading plan. Confirmational elevation levels were recorded the second sheet in the grading plan (HDR, August 2023a).

## **2.2 Remaining Area to be Cleaned Up**

Due to the proximity to a railroad spur running along the northwest property boundary an approximately 1,000 square feet (sq ft) area was not accessible for excavation and treatment. An estimated 12,000 cu ft of EBD contaminated soil remains at this location that needs to be addressed. See Figure 4 showing the location and extent of this area.



## **3 Remaining Soil Remedial Actions**

The approximate footprint of remaining contamination at the Site as shown in Figure 4 is approximately 1,000 sq ft. The remedial actions outlined in the CAP Amendment will address and prevent potential exposure of future Site occupants to contaminated soil and minimize EDB impact to groundwater.

### **3.1 Remedial Action Objectives**

The Remedial Action Objectives (RAOs) are defined to protect human health and the environment by eliminating, reducing, or otherwise controlling risks associated with completed exposure pathways and are as follows:

1. Prevent human exposure (direct contact, ingestion, and inhalation) to contaminated soils at the Site.
2. Minimize the leaching of contaminants from soils to groundwater and surface water.
3. Prevent erosion of impacted soils remaining at the Site.

### **3.2 Evaluation of CAP Amendment with Respect to MTCA Threshold Criteria**

The selected cleanup actions must meet minimum threshold criteria as defined in WAC 173-340-360(2)(a). These threshold criteria and the CAP Amendment adherence to these criteria are described below.

#### **3.2.1 Protection of Human Health and the Environment**

Ecology concludes that the cleanup actions provided for in the CAP Amendment as part of the Property redevelopment are protective of human health and the environment through containment and institutional control and conform to the objectives set forth in the original CAP.

Additional cleanup actions outlined in this CAP Amendment will enhance existing cleanup components by:

- Enhancing the cover with hard surfaces to prevent direct exposure to remaining soil contamination on the Site.
- Managing stormwater runoff from the planned hard surfaces to reduce infiltration into contaminated soils and minimize the potential for contaminant leaching to groundwater.
- The additional cleanup actions will include an Environmental Restrictive Covenant to be recorded that will restrict future uses to protect the cleanup action and ensure

protection of human health and the environment. Therefore, the hardscaped area must be surveyed and recording using a Washington State-licensed surveyor.

Contaminated materials and soil that needs to be removed during construction of the hard surface will be disposed off-Site at an appropriate facility in accordance with all applicable Federal and State regulations.

### **3.2.2 Compliance with Cleanup Standards**

Soil cleanup levels have not been met at the portion of the Site where contaminated soils remain present at concentrations above the Site cleanup level as defined in the Site CAP (Ecology, 2019). A remedy will be implemented for the Site consistent with the requirements of WAC 173-340-740(6)(f) for cleanup actions using containment of hazardous substances. The CAP Amendment will enhance the existing cleanup action and will continue to comply with the Site cleanup standards.

Groundwater cleanup levels will be met at the points of compliance as defined in the original CAP. The need for additional cleanup actions, if required, would be identified during Ecology's periodic review process which occurs every 5 years.

Long-term operations and maintenance (O & M) will be conducted to ensure the integrity of the containment system as described below.

### **3.2.3 Compliance with Applicable Federal and State Regulations**

The Applicable Relevant and Appropriate Requirements (ARARS) identified in the CAP are still applicable in this CAP Amendment.

Any handling and disposing of contaminated soils generated during the CAP implementation will be conducted in compliance with Washington State Dangerous Waste regulations (WAC 173-303).

## **3.3 Provide for Compliance Monitoring and Oversight and Maintenance**

Inspections and maintenance of the hard cover and stormwater conveyance structures diverting stormwater away from the hardscape must take place regularly. Simplot will provide Ecology an annual oversight and maintenance (O & M) report as an addendum to the Site Compliance Monitoring Plan. The O & M report will document the state of the hardscape and stormwater conveyance system and what actions were necessary to maintain the hardscape and stormwater conveyance system.

### **4.3 Stormwater management**

Stormwater from the hardscaped area will be routed to a drywell outside the area with contaminated soil as defined in the CAP. Stormwater retention and infiltration must be revised, or new stormwater structure(s) designed, to prevent stormwater contact with contaminated soil.

## **4.4 Long-term project compliance-monitoring and maintenance**

An addendum to the current Site Compliance Monitoring Plan, an O & M plan will be submitted to Ecology for review and approval. The additional monitoring requirements will include:

- Site cover inspections and maintenance
- Inspections and maintenance of stormwater conveyance structures serving the hardscaped area
- Documentation of any changes in the cover and stormwater system serving the hardscaped area

## **4.5 Institutional controls**

Institutional controls are measures undertaken to limit or prohibit activities that may interfere with the integrity of a cleanup action or result in exposure to hazardous substances. Such measures are required to assure the continued protection of human health and the environment, and the integrity of the cleanup action whenever hazardous substances remain at the Site at concentrations exceeding applicable CULs. Institutional controls can include both physical measures and legal and administrative mechanisms. WAC 173-340-440 provides information on institutional controls, and the conditions under which they may be removed.

An environmental restrictive covenant must be prepared for the Site in accordance with the Uniform Environmental Covenants Act (Revised Code of Washington 64.70). Ecology will establish the protective provisions in the covenants.

## 4 References

Ecology [Washington State Department of Ecology] May 2019: *Final Cleanup Action Plan. Warden City Water Supply Wells site, Warden, WA.* Washington Department of Ecology, Toxics Cleanup Program, Eastern Region Office, Spokane, Washington.

HDR (HDR Engineering, Inc.): September 2018. *Final Remedial Action/ Feasibility Study Report [RI/FS]*, Boise, Idaho

HDR (HDR Engineering, Inc.): February 2021: *Final Engineering Design Report [EDR]*, Boise, Idaho

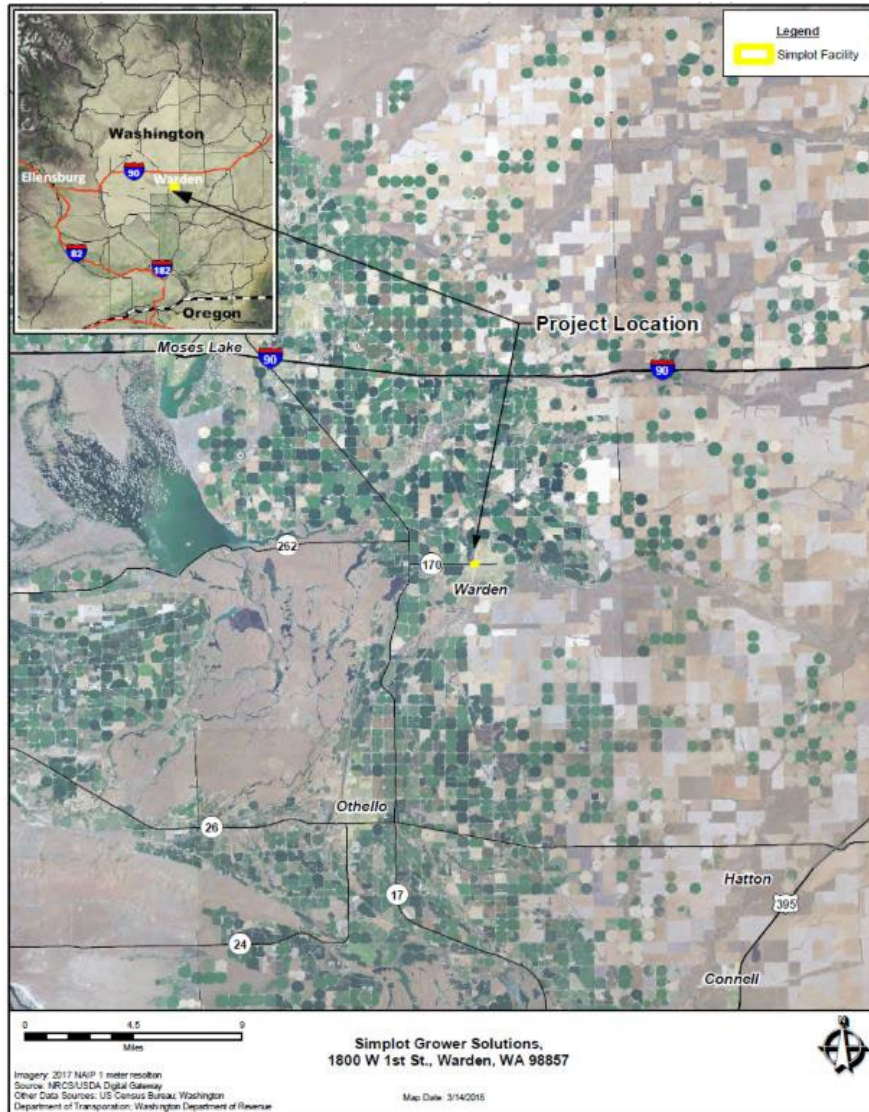
HDR (HDR Engineering, Inc.): August 2023a: *Final [Partial] Cleanup Action Report*, Boise, Idaho

HDR (HDR Engineering, Inc.): August 2023b: *Final Cleanup Action Implementation Compliance Monitoring Report, first Addendum*, Boise, Idaho

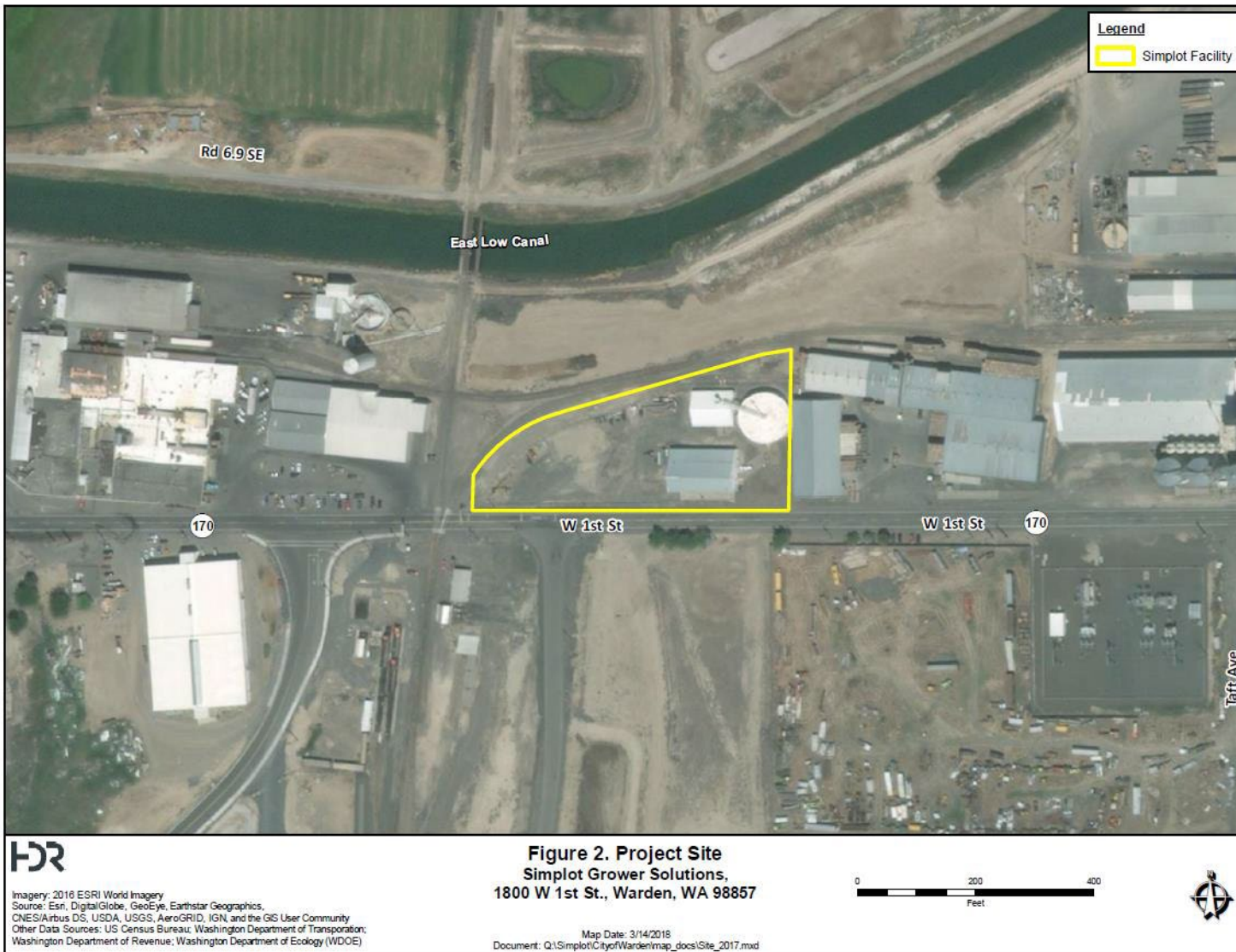
HDR (HDR Engineering, Inc.): October 2023: *Final Groundwater Monitoring Well Construction Report*, Boise, Idaho

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## 5 Figures



**Figure 1, Site Vicinity Map**  
**(from HDR, 2018)**



**Figure 2, Project Site Layout  
 from HDR (2018)**





Figure 3, Existing Groundwater Monitoring Wells from HDR (October 2023)



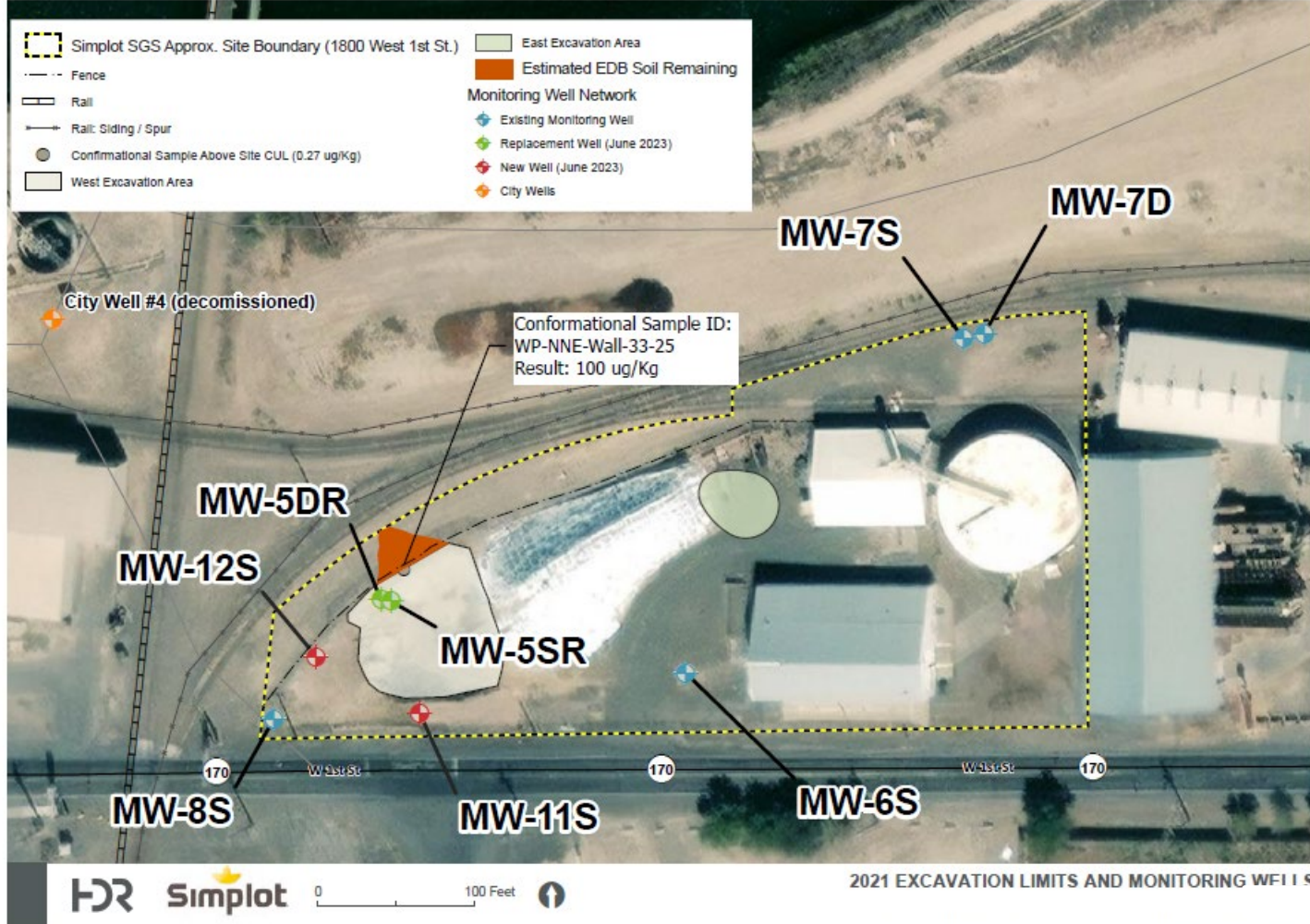


Figure 4, Extent of excavated and treated soils; and remaining EDB-contaminated soil. from HDR (October 2023)

## 6 Tables

**Table 1. Site Description**

<b>Site Name</b>	Simplot Growers Solutions, Warden, Washington Site (Agreed Order refers to site as Warden City Wells site)
<b>Ecology Facility/sites ID</b>	2802409
<b>Agreed Order</b>	No. DE 16890
<b>Cleanup Site ID (CSID)</b>	No. 1618 (Warden City Water Supply Wells 4&5)
<b>Address</b>	1800 West 1st Street Warden, WA 98857
<b>Location:</b>	GPS: 46.97025 46° 58' 13" North and -119.060309 -119° 3' 37" West UTM: Zone 11 N; 343279.18, 5203918.33 Legal: SW T17N R30E S9 Parcel: 060697000 County: Grant, WA
<b>Ecology Site Manager</b>	Christer Loftenius, LG, LHG State of Washington Department of Ecology Toxics Cleanup Program, Eastern Region 4601 N Monroe Street Spokane, Washington 99205-1295 <a href="mailto:clof461@ecywa.gov">clof461@ecywa.gov</a> 509.329.3400
<b>Potentially Liable Person (PLP)</b>	J.R. Simplot Company P.O. Box 27 Boise, Idaho 83707
<b>PLP Contact</b>	Molly Dimick, MBA Environmental Engineer J.R. Simplot Company PO Box 912 1130 W. Hwy 30 Pocatello, ID 83204 208.235.5682 <a href="mailto:Molly.Dimick@simplot.com">Molly.Dimick@simplot.com</a>
<b>Site Owner</b>	Same as PLP
<b>Well Installation Report Preparer</b>	HDR Engineering, Inc. Tyler Allen 412 East Parkcenter Boulevard, Suite 100 Boise, Idaho 83706 <a href="mailto:Tyler.Allen@hdrinc.com">Tyler.Allen@hdrinc.com</a> 208.387.7018