

## MEMORANDUM

TO:	FILE
FROM:	Chelsea Wisotzkey, Site Manager, TCP-CRO
SUBJECT:	Roy Farms: summary of file review
SITE:	Roy Farms Inc, FSID 89739294, Cleanup ID 6830
DATE:	March 2024

## Background

Roy Farms (Site) is located at 401 Walters Road, Moxee in Yakima County. The parcel number is 20120532002.

The site has been listed since 1991 after PCS was discovered during the decommissioning of one 8000gallon diesel UST. Approximately 500 cubic yards of PCS was excavated and land-farmed on the property, which was (and is) being used as farmland and crop processing. Some PCS was left behind due to an onsite building and disruptions to farm operations. Method A exceedances in soil in the excavation included DRPH (10,380 mg/kg), toluene (9.79 mg/kg), ethylbenzene (12 mg/kg) and xylene (48.1 mg/kg). The pit was later converted into the basement of an office building extension. Groundwater was encountered at 12 ft bgs. No contamination was detected in the single groundwater sample that was analyzed for TPH and BTEX.

Two additional tanks were reported by the property owner to have been removed in 1993- one 1000 gallon gasoline tank and one 8000 gallon gasoline tank. The tanks were decommissioned and removed independently of tank closure protocols and requirements. A site assessment was performed in November 2000 based on the reported locations of the tanks removed in 1993. Soil samples taken from the (reported) former tank basin and analyzed for GRPH had no detectable contamination.

In 2007 three soil samples were collected, analyzed for diesel (results were ND) and sent to Ecology for review, along with a request to issue an NFA for the site. However, no report was attached to the analytical data showing sample locations or depths.

## **Current Status**

No work has been done since the 2007 soil sample data was sent to Ecology. An ENL letter was sent in 2007, but there has been no correspondence since. The property is still owned by Leslie Roy and still operates as a hops farm and processing center.

## **Next Steps**

The history of this site and the tanks that have been removed is not well documented. It remains unclear exactly where the tanks were located, as the reports included in the file do not include clear descriptions, maps and pictures about the exact location of the former tanks. I spoke with Leslie Roy and he feels sure that the only location of the tanks was just north of the office building that still remains on site (and which was expanded following the 1991 tank removal). However, this would mean that the two tanks that were reportedly removed in 1993 would have been located in a separate location, since the office expansion would have already occurred. According to Mr. Roy they were located close together. Based on pictures from the 2000 site assessment (which occurred 7 years after the last two tanks were removed and which was based solely on the property owner's account of tank locations) the two gasoline tanks were located south of the office building. Confirmation is needed to determine if soil or groundwater is contaminated in the general vicinity of the current office building.

This site may be able to achieve an NFA after confirmational samples, given the work the property owner has already done and the time since the release occurred. Some cleanup has occurred, and most PCS was reportedly removed during the 1991 cleanup. Several subsequent sampling events have demonstrated non-detectable concentrations of diesel and gas contamination in soil. However, the reliability of those data is questionable given the poorly documented accounts of where those samples came from. Groundwater needs to be sampled since only one pit water sample has ever been collected. Soil needs to be resampled in the areas where the tanks may have been located which is north and south of the current office building. Although soil samples showing no detectable levels of contamination were submitted in 2007, they were not included as part of a report describing where and how deep they were taken. Although the contaminated soil was land-farmed onsite, it is not clear where the soil was distributed. After 30+ years of attenuating, the land farmed soil should not be the focus of additional investigation. Sampling the soil and groundwater around the current office building for gasoline, diesel and related constituents is the best way to determine if this site qualifies for an NFA.