



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 12, 2025

Rachel Roskelley
J.R. Simplot Company
Simplot Headquarters
P.O. Box 27
Boise, ID 83707
rachel.roskelley@simplot.com

RE: Ecology Comments on the Draft Cleanup Action Plan 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 Draft Cleanup Action Plan (DCAP) Simplot Soilbuilders Sunnyside, received on September 25, 2024. 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: General Comment

In the DCAP, please include a summary of how impacts on likely vulnerable populations and overburdened communities were considered when selecting the cleanup action and developing the plan per WAC 173-340-380(5)(c).¹ In our meeting on April 10, 2025, we also discussed updating the Feasibility Study to include this information.

¹ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-380>

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Ecology Comment 2: General Comment

Please change or replace "Target Remediation Level" or "TRL" with "Cleanup Level" or "CUL."

Ecology Comment 2: Section 2.3 Cleanup Standards

Table 1 and Table 2 can be combined with the most protective cleanup level for each contaminant being used in the table, and the title should be changed to "Soil Cleanup Levels." For the current Table 3, the title should be changed to "Groundwater Cleanup Levels." Please refer to the Excel file with cleanup level determinations sent by Ecology via email on March 26, 2025. The tables should be updated to reflect this content. Ecology welcomes further discussion on this section.

Ecology Comment 3: Section 4.3 Cleanup Standards and Point of Compliance

Text reads: "The point of compliance for this remedy is soil and groundwater up to an average target depth of 15 feet bgs, which is the MTCA standard definition for shallow soils." Per WAC 173-340-720(8)(b),² the standard point of compliance for groundwater extends to the lowest most depth that could potentially be affected by the site, which may be deeper than 15 feet bgs.

Ecology Comment 4: Section 4.7 Schedule for Implementation

Update, as necessary, based on additional pilot testing to be completed this spring/summer.

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: Jeffrey Hamilton, J.R. Simplot Company
David Allison, Geosyntec
Brett Miller, Geosyntec

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