

July 16, 2013

Mr. Norman Hepner, PE  
Washington Department of Ecology  
Toxics Cleanup Program - Central Region Office  
15 W. Yakima Ave, Suite 200  
Yakima, WA 98902

Subject: Revised, Additional Groundwater Sampling and Analysis, VCP Site CE0389  
Noland DeCoto Site, Western Washington Ave, Yakima, WA

Dear Mr. Hepner,

This letter presents the additional sampling and analysis Hayman Environmental (HE) will conduct on behalf of the Yakima Airport Land Company at the Noland Decoto Site (Site) in Yakima, Washington (Figure 1) to address your concerns about conflicting analytical data from two investigations. The Site is enrolled in Ecology's Voluntary Cleanup Program (VCP), is VCP Number CE0389 and is Facility Site Number 39563633.

In April 2013 HE collected soil and groundwater samples at the Site consistent with the work plan (HE, 2013a) submitted to and approved by Ecology in March 2013. A report summarizing the investigation findings (HE, 2013b) was submitted to Ecology on June 5, 2013. The report documents that none of the samples collected and analyzed contained analytes above the applicable Model Toxics Control Act (MTCA) cleanup level.

A 2006 investigation of the Site that was conducted by a California Registered Environmental Assessor collected groundwater samples using direct push technology to assess groundwater conditions. Samples were analyzed by a laboratory, not certified in Washington, by EPA Method 8260 for TPH Gasoline. The groundwater sample from location B1 (Figure 2), on the west side of building 2810, contained a reported TPH Gasoline concentration of 3,110 ug/L (JMK, 2006).

As presented in the HE report, a Washington Licensed Hydrogeologist collected a groundwater sample, OSS-1, from the same area as B1 on April 9, 2013. The sample was analyzed by a Washington Certified Laboratory using Method NWTPH-Gx. Gasoline Range Organics (GRO) were not detected in the sample. The practical quantitation limit (PQL) was 100 ug/L (HE, 2013b).

To reconcile the results of the JMK 2006 and the HE 2013 investigations, HE has conducted discussions with Ecology and the parties have agreed to the following scope of work.

- Collect a groundwater sample near OSS-1 and analyze the sample for NWTPH-Gx.
- Collect a groundwater sample from existing monitoring well MW-2 (Figure 2) and analyze the sample by NWTPH-Gx and NWTPH-Dx.

To complete this scope of work, HE will have a licensed driller install a monitoring well using direct push technology within 10 ft of location OSS-1. This well will be constructed, developed and sampled as follows:

1. Construct new monitoring well, MW-OSS-1, with a Geoprobe using no water. It will be a 2 inch well with 10 ft pre-packed screen and be screened across the water table. The water table was 8 ft below ground surface in April.
2. Measure depth to water following placement of the surface monument and no less than one hour after placement of the bentonite seal.
3. Combine well development and purging. Using a peristaltic pump, pump the well at nominal rate of 500 milliliters/minute (ml/min) until 3 water filled well volumes have been purged.
4. Measure and record water quality parameters pH, conductivity, turbidity, and temperature.
5. Following well purging, groundwater samples will be collected into laboratory supplied bottles for analysis by NWTPH-Gx method.

Collection of a groundwater sample from monitoring well MW-2 will be conducted as follows.

1. The well monument will be opened and depth to water measured from the top of the well casing.
2. Purging will be conducted with a peristaltic pump at a nominal rate of 500 ml/minute. During purging the water quality parameters in the following table will be measured and recorded until they meet the stabilization criteria or until three water-filled-well volumes of water have been purged.
3. Following well purging, groundwater samples will be collected into laboratory supplied bottles for analysis by NWTPH-Gx and NWTPH-Dx methods.

#### Groundwater Purging Stabilization Criteria

Parameter Stabilization	Criteria
pH +/-	0.1
Specific Conductance +/-	3% mS/cm
Temperature +/-	1 degree Celcius
Dissolved oxygen +/-	0.3 milligrams per liter
Turbidity +/-	0% or until turbidity is below 10 NTU

Groundwater samples will be delivered under chain-of-custody to OnSite Environmental, a Washington Certified laboratory, for chemical analysis.

Depth to groundwater will be measured in a third monitoring well so groundwater flow direction can be determined. The Monitoring well locations and top of casing elevations will be measured by a Washington Licensed surveyor.

Investigation derived waste will be stored at the Site in drums. Waste disposal will be determined based on the sample analytical results.

The results of this additional investigation will be interpreted as follows. If the results for the groundwater sample from MW-OSS-1 are reported by the laboratory to be "non-detect," the JMK 2006 TPH Gasoline result will be discounted. If, in addition to the non-detect result from MW-OSS-1, the analytical results of the sample from MW-2 are below cleanup standards, the results of the April investigation (HE 2013b) will be confirmed. This means no contaminated soil or groundwater is known to be present on the Noland Decoto Site at concentrations above MTCA cleanup levels. That being the case, HE, on behalf of the Yakima Airport Land Company, will request Ecology issue a No Further Action opinion letter and remove the Site from the confirmed and suspected sites list. If the above analytical results are not met, the need for additional work will be discussed with Ecology.

If you have any questions or if I can be of further assistance; please contact me at your convenience.

Best regards,

*Delivered via email*

Glenn A. Hayman, LHg.

glenn@HaymanEnvironmental.com

Hayman Environmental, LLC

cc: Dan Langdon, Yakima Airport Land Co., LLC  
Brad Goodspeed (email), Yakima Air Land Co., LLC  
Rick Hathaway (email), Reston Companies, Inc.

Attachments:

- Figure 1. Site Location Map
- Figure 2. Site Map with Boring Locations

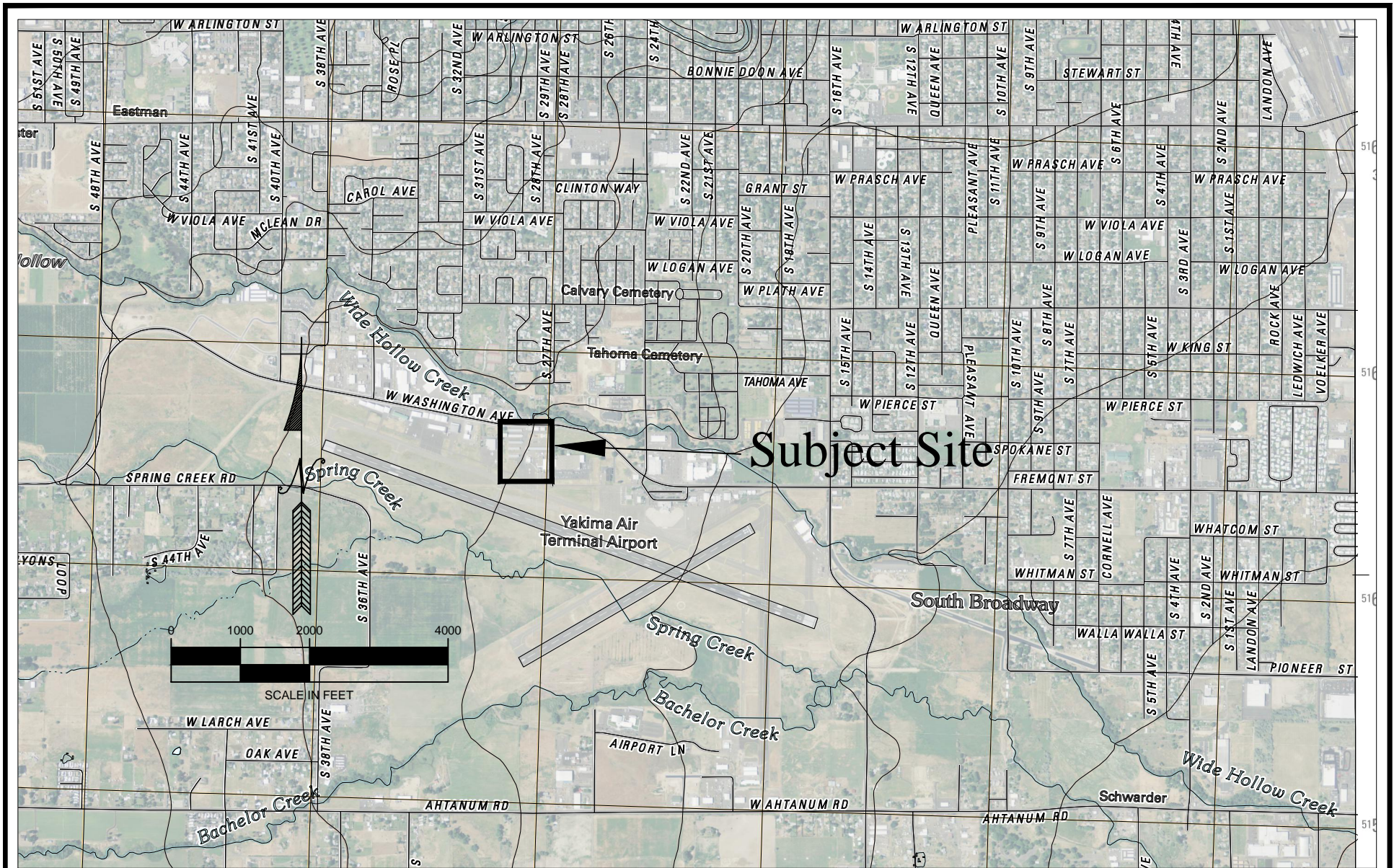
Mr. Norman Hepner, PE  
Revised, Additional Groundwater Sampling and Analysis, VCP Site CE0389  
July 16, 2013

References:

Hayman Environmental, LLC, 2013a; Potential Sources Soil Investigation and Focused Groundwater Investigation Work Plan, Noland DeCoto Flying Services, Yakima, Washington, March 2013.

Hayman Environmental, LLC, 2013b; Report on Potential Sources Soil Investigation and Focused Groundwater Investigation, Noland DeCoto Flying Services, Yakima, Washington, June 2013.  
Hayman.

JMK Environmental Solutions Inc., 2006; Project JMK-SII-21280, 2810-2810 West Washington Avenue, Yakima, WA 98902; November 6, 2006.



SMD: 02/11/2013

Source: USGS 7.5' Quadrangle, Yakima West (2011)

**Hayman Environmental, LLC**

18425 NE 95th Street, Suite 201  
 Redmond, WA 98052  
 (206) 235-0589

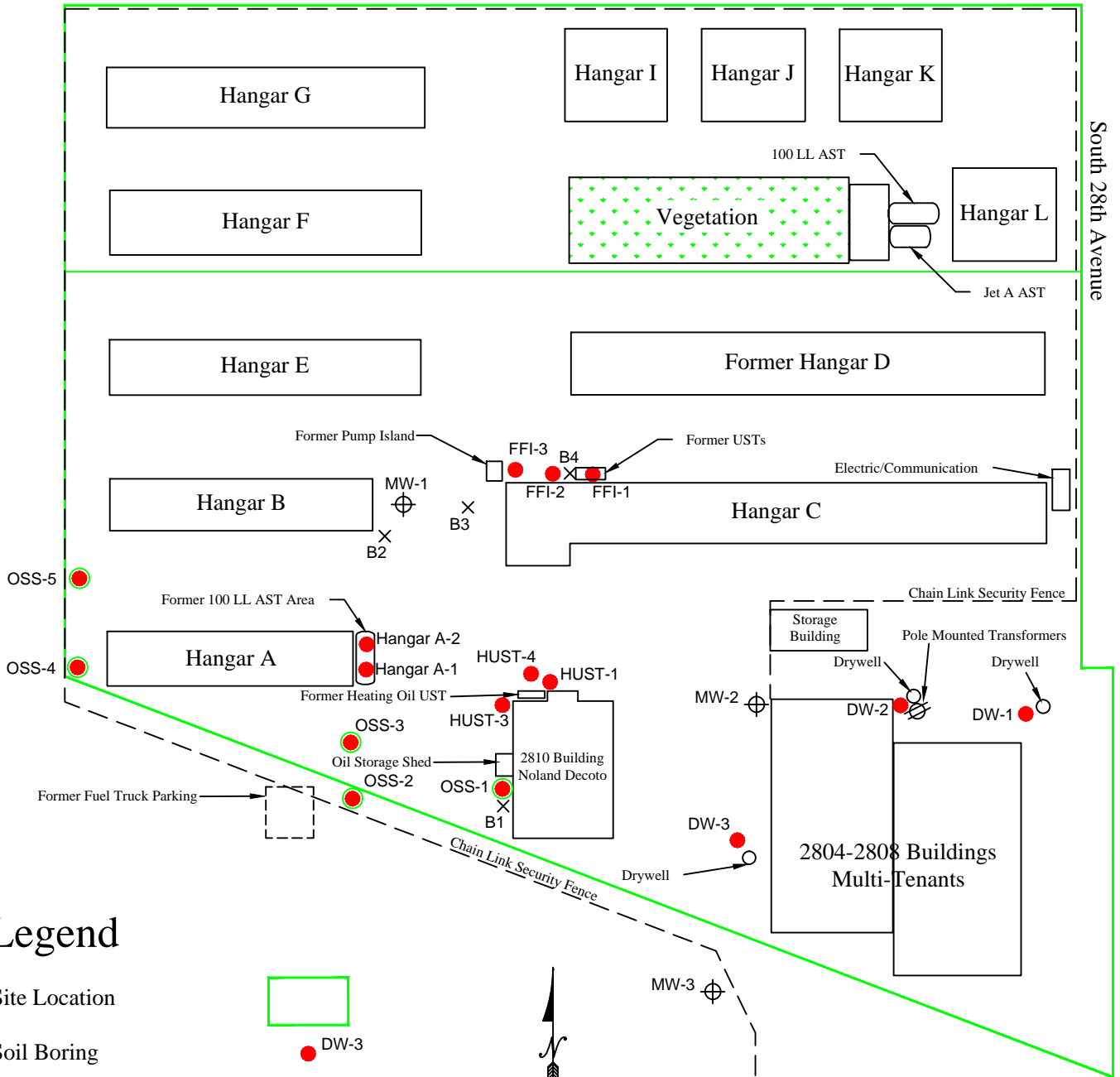
Noland DeCoto Site  
 2804 & 2810 West Washington Avenue  
 Yakima, Washington

Figure 1  
 Site Location Map


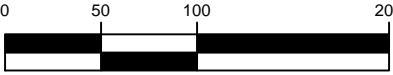
Flightline Convenience Center

West Washington Avenue

South 28th Avenue



### Legend

- Site Location
  - Soil Boring  DW-3
  - Soil Boring w/groundwater sample  OSS-1
  - Monitoring Well (PLSA, 2007) ⊕ MW-2
  - Soil Boring (JMK, 2006) × B2
-   
  
 SCALE IN FEET

SMD: 05/07/2013

**Hayman Environmental, LLC**

18425 NE 95th Street, Suite 201  
Redmond, WA 98052  
(206) 235-0589

**Noland DeCoto Site**

2804 - 2810 West Washington Avenue  
Yakima, Washington

**Figure 2**

Site Map with  
Boring Locations