



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 West Yakima, Suite 200 • Yakima, Washington 98902-3452 • (509) 575-2490

August 16, 1999

CERTIFIED MAIL

P 148 982 153

Mr. Dan Alexander
691 Winslow Way West
Bainbridge Island, WA 98110

RE: Amendment of Emergency Enforcement Order DE 98TC-C138; Alexander Farms

Dear Mr. Alexander:

Pursuant to White Shield, Inc.'s letter dated June 15, 1999 addressed to Tom Mackie, I am herein granting your request to amend Ecology Emergency Enforcement Order DE 98TC-C138 as follows:

Section IV, paragraph 6. Section IV; paragraph 6, which currently reads as follows:

6. The defendant shall, within fifteen (15) days, provide to Ecology a written work plan for an interim action (IA) emergency soil removal and emergency groundwater monitoring within the boundaries of the facility. The IA work plan shall include: an excavation and removal plan for all soils within the boundaries of the facility that exceed 1.6 milligrams per kilogram (ppm); a sampling and analysis plan designed to define the horizontal and vertical extent of the excavation; a Quality Assurance/Quality Control plan written in accordance with Ecology's "Guidelines and Specifications for Preparing Quality Assurance Projects Plans" per WAC 173-340-820; a plan for the designation and disposal of waste contaminated soils generated during the excavation consistent with WAC 173-303; a site safety plan that addresses all potential exposure pathways for those conducting the facility cleanup and those living near the cleanup site in accordance with WAC 173-340-810; and a groundwater monitoring plan that includes the construction of six (6) or more groundwater monitoring wells at the West King Tull Road site and six (6) or more groundwater monitoring wells at the North Hicks Road site. The number and location of the wells shall be sufficient to determine the horizontal and vertical extent of groundwater contamination at each and any other site within the facility boundary. Groundwater monitoring well construction and water quality monitoring shall begin as specified in Attachment "C". Groundwater samples shall be collected and analyzed in accordance with the approved sampling plan weekly for the first two weeks, bi-weekly for the next four weeks, monthly until October 30, 1998, and quarterly until further notice.

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As of the date of this letter, Section IV, paragraph 6 shall read as follows:

6. The defendant shall, within fifteen (15) days, provide to Ecology a written work plan for an interim action (IA) emergency soil removal and emergency groundwater monitoring within the boundaries of the facility. The IA work plan shall include: an excavation and removal plan for all soils within the boundaries of the facility that exceed 1.6 milligrams per kilogram (ppm); a sampling and analysis plan designed to define the horizontal and vertical extent of the excavation; a Quality Assurance/Quality Control plan written in accordance with Ecology's "Guidelines and Specifications for Preparing Quality Assurance Projects Plans" per WAC 173-340-820; a plan for the designation and disposal of waste contaminated soils generated during the excavation consistent with WAC 173-303; a site safety plan that addresses all potential exposure pathways for those conducting the facility cleanup and those living near the cleanup site in accordance with WAC 173-340-810; and a groundwater monitoring plan that includes the construction of six (6) or more groundwater monitoring wells at the West King Tull Road site and six (6) or more groundwater monitoring wells at the North Hicks Road site. The number and location of the wells shall be sufficient to determine the horizontal and vertical extent of groundwater contamination at each and any other site within the facility boundary. Groundwater monitoring well construction and water quality monitoring shall begin as specified in Attachment "C". Groundwater samples shall be collected and analyzed according to the following schedule: monitoring wells YCR-2, YCR-3, YCR-4, YCR-6, YCR-8, YCR-9, YCR-12, YCR-14, YCR-15, YCR-16, YCR-19, YCR-20, the Mendosa residential well, and the Sanchez residential well shall be sampled quarterly with the months of sampling being April, July, October, and January; monitoring wells YCR-1, YCR-5, YCR-10, YCR-13, YCR-17, YCR-18, and the Meyers residential well shall be sampled monthly. The collection and analysis of groundwater samples from monitoring well YCR-11 shall be at your discretion unless directed to do so by Ecology.

Section IV, paragraph 8. Section IV; paragraph 8, which currently reads as follows:

8. In accordance with WAC 173-340-840(5), all IA and RI/FS groundwater and soil sampling data shall be submitted according to Attachment "B": GROUNDWATER SAMPLING DATA SUBMITTAL REQUIREMENTS. These submittals shall be provided to Ecology on paper and in electronic format no more than 20 days after each groundwater and/or soil-sampling event. Attachment "B" is hereby incorporated into this Order by reference and is an integral and enforceable part of the Order. The results and analyses from the IA and RI/FS shall be submitted to Ecology for acceptance in accordance with "Schedule for Interim Action and Remedial Investigation/Feasibility Study Deliverables" in Attachment "C".

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As of the date of this letter, Section IV, paragraph 6 shall read as follows:

8. In accordance with WAC 173-340-840(5), all IA and RI/FS groundwater and soil sampling data shall be submitted according to Attachment "B": GROUNDWATER SAMPLING DATA SUBMITTAL REQUIREMENTS. These submittals shall be provided to Ecology on paper no more than 20 days after each groundwater and/or soil-sampling event. These submittals shall be provided to Ecology in electronic format no more than 50 days after each groundwater and/or soil-sampling event. Attachment "B" is hereby incorporated into this Order by reference and is an integral and enforceable part of the Order. The results and analyses from the IA and RI/FS shall be submitted to Ecology for acceptance in accordance with "Schedule for Interim Action and Remedial Investigation/Feasibility Study Deliverables" in Attachment "C".

Section IV, paragraph 9. Section IV; paragraph 9, which currently reads as follows:

9. The Defendant shall provide, to the Ecology project coordinator, written status reports of activities pertaining to work or progress toward providing work plans for work at the site weekly. Status reports shall be submitted on the Monday following the week summarized in the report.

As of the date of this letter, Section IV, paragraph 6 shall read as follows:

9. The Defendant shall provide, to the Ecology project coordinator, written status reports of activities pertaining to work or progress toward providing work plans for work at the site monthly. Status reports shall be submitted the first week following the month summarized in the report.

If you have any questions regarding this amendment, please call Tom Morrill, Assistant Attorney General, at (360) 459-6159.

Sincerely,



Donald Abbott
Section Supervisor
Toxics Cleanup Program
Central Regional Office

cc: Bill Gowey, WSI
Tom Morrill, AAG