



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

July 27, 2018

Mr. Michael Murray
HDR Inc.
412 E Parkcenter Blvd, Ste 100
Boise, ID 83706-6659

Re: Voluntary Cleanup Program – Work Plan Review Comments:

- Site Name: Simplot Soilbuilders Moxee City
- Site Address: 7528 Postma Road, Moxee
- Cleanup Site ID: 12402
- Facility/Site ID: 84612438
- VCP No.: CE0419

Dear Mr. Murray:

Thank you for submitting your proposed work plan titled “*Additional Site Investigation Work Plan, Simplot Grower Solutions*” for review by the Washington State Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA).

Based on Washington Administrative Code (WAC) 173-340-515, which outlines Independent Remedial Actions, I have reviewed the proposed work plan for the above referenced site submitted by HDR Inc. and dated June 2018. Ecology offers the following general comments:

1. Source investigation. Ecology concurs with the approach of further assessing the storm water drainage system and performing a soil source investigation, including the proposed locations of soil borings intended to identify areas of releases. In addition to the proposed sampling grid, it may be worth performing an operational walkthrough of the property with site personnel to determine whether or not any locations could be selected based on current or past operations or surface runoff patterns. Because the soil contamination is not expected to be amenable to field screening (i.e. visual or olfactory indications), some follow-up may be warranted to further characterize areas of concern identified during the proposed investigation (additional soil investigation may be needed based on the results of the investigation). Since the targeted sampling is at a depth of 6 to 12 inches below ground surface (bgs), hand auguring could be used at locations where Geoprobe access may be limited.



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2. Lithological data. Please include in the work plan that in addition to well completion diagrams, geological boring logs will be prepared for drilled locations. During our cursory file review, Ecology did not find any boring logs for the five monitoring wells installed on the Simplot property to a depth of approximately 15 feet (ft) bgs. Boring logs were prepared for the soil borings constructed on the property to the west, as presented in GeoEngineers' "*Data Gap Investigation Report, Moxee City Shop and STP*", dated April 3, 2014. Those borings were completed to a depth of 12 ft bgs, and all reported lithologies from ground surface to 12 ft bgs as silt. Drilling logs from water wells in the vicinity (on Postma Rd and Beaudry Rd) show the presence of sand and gravel underlying the silt, at a depth as shallow as 12 ft bgs. Delineation of the silt/sand transition may be a critical data need at the site.
3. Extent of groundwater contamination. The work plan proposes two additional monitoring wells, one upgradient monitoring well and one downgradient monitoring well located to the west of the Simplot property. Ecology has identified one potential concern with the proposed approach. In Ecology's experience, many dissolved phase groundwater contamination plumes tend to move deeper as they migrate downstream. This is particularly common in a setting where lithology permeability increases with depth. In some cases where only shallow monitoring wells have been installed, the extent of a contamination plume can appear significantly less than the actual extent. Therefore, Ecology requests that a deeper monitoring well be added at the downgradient monitoring well locations to ensure that this potential migration pathway has been assessed. Such a deeper monitoring well could be screened from 15 to 25 ft bgs, immediately below the shallow monitoring well interval. This is particularly important since shallow domestic wells are located potentially downgradient of the site, based on an initial review of registered water wells in the area.
4. Location of downgradient monitoring well. Groundwater flows to the west-southwest (WSW) in three of four potentiometric surface maps presented with the work plan. Therefore, to the extent possible, the downgradient monitoring wells should be located WSW of the part of the property with highest nitrate concentrations in shallow groundwater. During the January 2018 round, the highest concentrations were at MW-4 (105 mg/L), MW-5 (124 mg/L), and CS-6 (118 mg/L). These monitoring wells are all located in the southwest quarter of the site, therefore the downgradient monitoring wells should be located WSW of this area. Ecology suggests shifting the proposed downgradient monitoring well roughly 70 feet to the SSE, to the vicinity of the tree located just north of the railroad tracks. With this shift, the monitoring well location would be slightly south of west relative to monitoring well CS-6.
5. Analytical result tables. The work plan presents water level, soil, and groundwater results from previous investigations in tables in the report. The tables present results in a "by event" format. To the extent possible, Ecology prefers analytical data to be presented in a format that facilitates assessment of changes over time. For groundwater monitoring data, for example, a table format that has each monitoring well then date as rows, analytes as column headers, and results as values facilitates assessment of concentrations changes over time. Please provide data in this table format in future submittals.

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6. Site constituents of concern. As previously discussed, Ecology advises a review of processes (current and past) at the site to determine whether or not other site constituents of concerns (e.g. pesticides or herbicides) may be present at the site. Please note that the potential presence of other site constituents of concern could affect the appropriate selection of remedial alternatives for cleanup at the Site.

Ecology also has the following specific comments:

7. Page 2-4, Section 2.2.3. The text states "...groundwater flow is generally to the southwest." Ecology suggests changing this to read "...groundwater flow is generally to the west-southwest."

Ecology does not require revision and reissue of the work plan. None of the above comments should delay implementation of the work plan.

The opinions presented by Ecology in this letter are made only with respect to this site, and based on the information provided and discussed above.

Please contact me at (509) 454-7835 if you have any questions or would like clarification of any portion of this letter.

Sincerely,



Frank P. Winslow
Site Manager
CRO Toxics Cleanup Program

cc:

Site File

Andrew Hutchinson, J R Simplot Company

