



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

September 6, 2018

Mr. Keith Woodburne
TRC
19874 141st Place NE
Woodinville, WA 98072

Re: Ecology Review of Draft-Final Supplemental Groundwater Data Collection Work Plan:

- Site Name: Michael Irrigation (aka John Michael Lease Site)
- Address: 5640 Sunset Highway, Cashmere, WA
- Facility/Site No.: 3154383
- Cleanup Site ID No.: 2149
- Agreed Order No.: DE 15684

Dear Mr. Woodburne:

Thank you for submitting your proposed revised work plan titled "*Draft-Final Supplemental Groundwater Data Collection Work Plan*" for review by the Washington State Department of Ecology (Ecology). This submittal, dated August 18, 2018, also included a comment-response matrix table in which you provided your responses to Ecology's comments.

Ecology requests that you proceed with finalization and execution of the work plan. Ecology does not need to review the final version of the work plan provided no changes have been made from this Draft-Final version.

While executing the work plan, please consider Ecology's Comment #2, which stated: "Similarly, if a monitoring well cannot be installed downgradient of this source area on the west side of the tracks, it would be appropriate to install a monitoring well within this source area." Ecology suggests making MW-7 a source area monitoring well (near TP2, TP3, and TP41) if Site constraints prohibit installing the well downgradient of the apparent source area (between TP28 and TP29). Otherwise, Ecology anticipates that groundwater quality in this area would likely be considered a Remedial Investigation (RI) data gap during the next phase of the project.



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Ecology notes that there is some disagreement between Ecology and BNSF/TRC, notably on whether or not Site data support potential release mechanisms other than a train derailment. Further refinement of the Site conceptual model is anticipated during the RI. In addition, Ecology disagrees with the statement within the response to Comment #3 that "If Ecology wants to investigate potential impacts related to dumping on or adjacent to the property, additional PRPs must be considered for the Site." Additional Potentially Liable Persons (PLPs) can be considered at any time provided credible evidence is available to name such additional PLPs.

Ecology wishes to be onsite during both drilling and well sampling to observe and collect split samples. Please let me know a minimum of two weeks prior when these activities are planned so we can schedule accordingly.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Frank P. Winslow".

Frank P. Winslow
Site Manager
Toxics Cleanup Program
Central Regional Office

Enclosure

cc:

Site File

Shane DeGross, BNSF Railway Company