



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 1, 2018

Monty Johnson
J.R. Simplot Co.
P.O. Box 912
Pocatello, ID 83204

Re: Status Update Request on the following Site:

- **Name:** Simplot Soilbuilders Sunnyside
- **Address:** 300 1st Avenue, Sunnyside
- **Facility Site No.:** 76742139
- **Cleanup Site No.:** 2558
- **VCP No.:** CE0209

Dear Monty Johnson:

The above-referenced Site was enrolled in the Voluntary Cleanup Program (VCP) on May 19, 2009. Since that time, site characterization, a limited source removal, and groundwater monitoring have taken place. **Ecology does not consider the cleanup progress on the Site to be sufficient, and is considering terminating the VCP agreement, due to both a lack of progress and the complexity of the contamination.** Our next course of action would be an Agreed Order for the Site. However, if Simplot, over the course of a year, can demonstrate real progress and a commitment to cleanup, we are willing to allow the Site to remain in the VCP.

The following is a summary of the Site status, and discussion of progress at the Site.

Summary of Site Activities

Activities performed at the Site to date include:

- Soil and groundwater sampling (Preliminary Site Investigation) in 2009.
- Installation of monitoring wells in 2011.
- Source removal at the MW-5 (155 cubic yards of soil in the rinsate area in 2012).
- A drain evaluation in 2012.
- Additional monitoring wells installed in 2012.



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- Supplemental drain evaluation in 2013.
- Quarterly groundwater monitoring between 2011 and 2018.

The last document received by Ecology was the Monitoring Well Sampling Update dated June 2018. That report presented results and data analysis from sampling of seven monitoring wells in April of 2018. The recommendations from that report are presented below:

“Simplot conducted soil removal in 2012 at the former rinse area. They have implemented site control measures where any fertilizers stored on site are in containment areas or under roof. Furthermore, off-site downgradient wells MW-6 and MW-7 are not elevated in nitrate-N compared to on-site wells. For the remainder of 2018, HDR recommends that Simplot continue to sample groundwater in the late fall and continue assessing trends. With the removal of the rinse area soil, it is anticipated that concentrations of nitrate-N will decline over time.”

Ecology provided advisory comments on that monitoring report in an email from Frank Winslow dated July 11, 2018. One of the comments in that email was as follows:

“Overall, the Site is currently enrolled in the Voluntary Cleanup Program (VCP). Under this program, there is an expectation from Ecology that efforts be ongoing to continually move closer toward achieving a No Further Action (NFA) determination. Currently, continued monitoring alone does not appear to be making sufficient progress toward this objective. We recommend that HDR and Simplot assess remedial options for this purpose. Ecology would be happy to meet to discuss this further, if needed.”

The July 11, 2018 email also provided other concerns from Ecology regarding the ongoing monitoring at the Site. At this time, it does not appear that Simplot intends to perform cleanup activities at the Site other than continued monitoring. Ecology does not consider this approach to be sufficient.

Site Contaminants of Concern

The June 2018 monitoring report discusses time trends for nitrates in groundwater. Ecology does not concur that nitrates are the primary contaminant of concern at the Site. Although nitrates have greater mobility than some of the other Site contaminants, the high toxicity of other Site constituents are of significant concern. The Site groundwater constituents of concern from the 2018 monitoring report included:

- 1,2-dichloroethane
- 1,2-diochloropropane
- Arsenic

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- Benzene
- Cadmium
- Dinoseb
- Diesel range organics
- Gasoline range organics
- Lead
- Nitrate
- Selenium

Additional constituents of concern were identified in the 2009 Preliminary Site Investigation Report. A letter from Laura Klasner of Ecology dated June 4, 2010 stated: *“Site groundwater samples shall be analyzed for all soil and groundwater contaminants which exceeded MTCA Method B cleanup levels in September 2009, plus any products in the above bullet, and any other contaminants which had an historical presence at the Site but had not analyses last September.”*

As noted in an email from Norm Hepner of Ecology dated March 6, 2013, *“The Method B cleanup levels included in the report did not include soil protective of groundwater cleanup values.”* The soil results were also not compared with Method A cleanup levels. Because soil results were not compared with all applicable cleanup levels, and other components of Ecology’s 2010 letter have not been addressed, Site contaminants of concern have not yet been confirmed.

Ecology suggests that for future groundwater monitoring, in addition to the current analysis for VOCs, RCRA Metals, Nitrate+Nitrite, and Ammonia, that all monitoring wells be sampled for NWTPH-Gx, and NWTPH-Dx, and Chlorinated Herbicides by EPA Method 8151. Please ensure that all detection limits are lower than Ecology’s cleanup levels. Once Ecology has provided concurrence on what the Site’s groundwater contaminants of concern are, then future monitoring parameters can potentially be adjusted, provided Ecology concurs.

Sources of Contamination

The rinsate area that was excavated was characterized via soil and groundwater samples collected at location B-1 in 2009. This included soil samples collected at a depth of 3.0 to 5.0 feet below ground surface (ft bgs) and 5.0 to 7.0 ft bgs, and a groundwater sample collected at 9.9 to 12.0 feet bgs. Many of the contaminants detected in groundwater at this location were not detected in soil samples collected at the same location. Therefore, the source of the groundwater contamination at B-1 (and subsequently MW-5) does not necessarily originate from the rinsate area where soil was excavated. Therefore, sampling of groundwater upgradient of the rinsate area excavation is needed to assess whether or not the source of the groundwater contamination in this area has been removed.

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In addition, other contamination sources have yet to be identified, for example for the 1,2-DCP in groundwater found at B03, B12, MW-4 and at location OP-VP-011 (sampled by SECOR in 2007 for the Bee-Jay Scales Site). The source for nitrates in groundwater at B05 also remains undetermined. Additional groundwater investigation is warranted to identify the sources of groundwater contamination at the Site.

The Path Forward

The Model Toxics Control Act (MTCA) includes expectations of cleanup of soil and groundwater that is contaminated above cleanup levels. Ecology does not concur that Site data support monitored natural attenuation is an appropriate cleanup approach for this Site. Therefore, we suggest that we meet to discuss the appropriate next cleanup steps at the Site. For more information about the VCP and the cleanup process, please visit our web site: <https://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.

In preparation for implementing the Agreed Order option, if necessary, Ecology will be proceeding with issuance of Potentially Liable Person (PLP) letters under separate cover.

If you have any questions about this letter, please contact me by phone at (509) 454-7835 or e-mail at frank.winslow@ecy.wa.gov.

Sincerely,



Frank P. Winslow
Site Manager
CRO Toxics Cleanup Program

cc: Michael R. Murray, HDR