



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 10, 2018

Marisa Kaffenberger, P.E.
Senior Engineer
Stantec Consulting Services, Inc.
2321 Club Meridian Drive, Suite E
Okemos, MI 48864

Re: Groundwater Remedy Compliance Monitoring Plan for the Bee-Jay Scales Site

Site Name:	Bee Jay Scales
Site Address:	116 N 1 st Street, Sunnyside
Facility/Site ID No.:	504
Cleanup Site ID No:	3641

Dear Marisa Kaffenberger,

The Washington State Department of Ecology (Ecology) has reviewed your most recent submittal in response to our comments on the Groundwater Remedy Compliance Monitoring Plan for the Bee-Jay Scales Site. Our responses are below:

2.1 Soil Sampling for Laboratory Analysis

Do you plan to collect 30 soil samples during the installation of the Phase I EISB injection wells, or collect samples only if the saturated zone is located at the depths between 10-15, 15-20 and 20-25 feet below ground surface (bgs)? Please be more clear about your plan to sample soils during the well installation as well as the type of reductant demand you will be measuring (i.e., soil reductant demand associated with in-situ groundwater treatment?)

2.2 Grain Size Analysis

Will grain size analysis samples also be collected from the saturated zone only? Please add this information.

2.3 Slug Testing

How will you be reporting the results of the slug testing? Please advise.



3.1.1 Air Monitoring Equipment Maintenance

This section states: "Air monitoring equipment will not be used if the unit is displaying an error code," but makes no mention of any substitution or a work stoppage. Please advise.

3.2.2 Groundwater Remedy Performance Monitoring

This section states that only quarterly or semi-annual groundwater monitoring will be active at any time. Ecology does not agree. The different groundwater monitoring regimes will be monitoring different plume processes, and should be active concurrently. CHEMetrics field test kits can still be used for the quarterly groundwater monitoring, and Ecology requires laboratory analysis of nitrate, manganese, ferrous iron, sulfate, ammonia and phosphorus for the semi-annual groundwater monitoring. Please revise accordingly.

3.2.2.2 Semi-Annual Groundwater Remedy Performance Monitoring

Ecology has some concerns about whether MW-20 is actually downgradient or crossgradient. Based on this site's proximity to the Simplot site immediately to the south of the Bee Jay Scales site, there is the potential that more monitoring wells will be needed to the south of MW-19.

Monitored Natural Attenuation Performance Monitoring

Please review Ecology's guidance for use of Monitored Natural Attenuation (MNA) for Groundwater. One of the requirements for use of MNA is a stable or shrinking groundwater plume. It is unclear to Ecology that this groundwater plume is either stable or shrinking. Please provide more information and/or revise accordingly.

3.3.2 Conclusion of Remediation Activities

General comment: Why are you switching between Upper Tolerance Limits for confirmation of cleanup for each well, and Upper Confidence Limits for Arsenic Remediation Levels and 3-year Upper Confidence Level for all IHSs? Please explain.

3.2.4 Institutional Controls Performance Monitoring

In addition to verifying that no new buildings have been constructed without vapor mitigation, please verify that no buildings have been demolished without some type of site assessment.

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4.2.1 Soil Sampling Methods

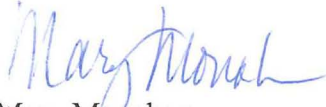
Ecology requires use of EPA Method 5035 for collection of soil samples to be analyzed for VOCs. Please edit this section to include use of this method.

4.4.3 Duplicates

Please collect duplicates at a rate of at least 1 per batch of 20 samples.

Ecology thanks you for your excellent responses to the comments on the latest iteration of this Groundwater Remedy Compliance Monitoring Plan. It is our belief that once these last few comments are addressed, this document will be ready to be finalized.

Regards,



Mary Monahan
Site Manager
Toxics Cleanup Program
Central Regional Office