



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

December 17, 2018

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

**Re: Status of cleanup on the following site:**

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

Dear Monty Johnson:

This letter is in follow-up to our letter dated November 2, 2018 and our meeting with Michael Murray (and you via telephone) on December 3, 2018. During our December 3, 2018 meeting, Ecology presented two options for continuing remedial actions at the Site. The first option was continuing under the Voluntary Cleanup Program, but with Ecology expecting a few deliverables within the next twelve months. The second option was shifting to an Agreed Order for formal management of the Site. Under either option, Ecology is requesting that a work plan be prepared for additional remedial investigation at the Site. Such investigation is needed to supplement existing data to:

- 1) Identify and characterize contamination sources at the site.
- 2) Determine what contamination is migrating off-property as groundwater contamination.
- 3) Determine the extent of off-property groundwater contamination.
- 4) Assess potential exposure pathways.

Contamination Sources

One contamination source was identified during previous investigations and a remedial excavation was performed. Additional contamination sources are suggested by groundwater data from the 2009 Preliminary Site Investigation, and include eight locations where groundwater was sampled (see Table 1).



**Table 1: Groundwater Contamination from the Preliminary Site Investigation**

Compound	Units	Cleanup Level	B01	B03	B05	B09	B10	B11	B12	B13
1,2-DCP	µg/L	5	37	14	--	--	9.4	--	220	--
1,2-DCA	µg/L	5	90	20	--	--	7.4	--	--	490
2,4-D	µg/L	70	--	--	--	71	--	--	--	490
Benzene	µg/L	5	750	--	--	8300	490	--	--	6900
1,2,4-TMB	µg/L	NS	550	--	--	2100	210	650	41	2600
Nitrate	mg/L	10	1100	12	400	--	--	37	--	39

If operational data do not suggest where the sources of these groundwater contamination are, then Ecology suggests that they be found via groundwater investigation. Direct push groundwater sampling is an effective method of finding groundwater contamination sources in shallow alluvial groundwater systems such as found in Sunnyside. Options for directing a field investigation real time and thus minimizing investigation mobilizations can include use of field screening data, use of a tool such as Membrane Interface Probe (MIP), and/or use of a field gas chromatograph. Once the location of a source area has been found based on groundwater data, then soil sampling is warranted in order to assess potential remedial options for each source.

Contamination Migrating in Groundwater Off-Property

Currently two monitoring wells have been installed and monitored on the downgradient (eastern) property boundary, MW-4 and MW-5R. The eastern property boundary is approximately 350 feet long. Until source areas have been identified and delineated, appropriate locations for boundary monitoring wells will not be known. In addition, MW-5R was apparently installed at a distance south of MW-5 and thus does not constitute a replacement for MW-5. MW-5 was reportedly near the source that was excavated near B01; however, existing maps do not have sufficient detail to allow Ecology to determine whether or not MW-5 was appropriately located to monitor this source. Ecology requests that boundary monitoring well locations be proposed to Ecology after contamination sources have been delineated.

Extent of Off-Property Contamination

Two monitoring wells were installed at a distance downgradient of the Site. The appropriateness of these locations cannot be assessed by Ecology until after sources have been identified, and locations of contamination migrating offsite have been determined. Ecology recognizes that the area between 2<sup>nd</sup> and 3<sup>rd</sup> Streets is full of residences and commercial operations. During the December 3, 2018 meeting, Ecology mentioned that assuring these properties are not using domestic wells is of highest concern. Michael Murray stated that use of city potable water at these properties was demonstrated during a previous investigation. Ecology requests reference to where we can find the documentation of this finding or that such information be sent to us.

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Potential Exposure Pathways

In addition to use of domestic wells discussed above, potential exposure pathways include:

- Potential direct contact with contaminated soil.
- Potential inhalation of dust from contaminated surface soil.
- Potential vapor intrusion into site buildings.
- Potential discharge of groundwater to drains, and on to surface water receptors.

The last pathway has been assessed via various drain studies conducted at the Site. Ecology will be examining these studies further in the future, as contamination at the Site is better understood.

Source characterization via soil sampling is anticipated to be an appropriate first step to assess the direct contact, dust inhalation, and vapor intrusion exposure pathways.

Next Steps

During the December 3, 2018 meeting, a question was raised regarding addressing the Site with conditional points of compliance along the site boundary. Ecology considers it premature to consider points of compliance at this time, until the nature and extent of contamination at the Site are better understood.

Under either the VCP or an Agreed Order, Ecology will expect a Supplemental Remedial Investigation Work Plan as a next step. We cannot stipulate a schedule that would take place under an Agreed Order at this time. If continuing under the VCP, Ecology expects to have a Work Plan and a completed Remedial Investigation Report within one year (by the end of 2019).

Please let us know before the close of this year (2018) which path (VCP or Agreed Order) that you wish to proceed on. We are sending a Final Determination of PLP Status letter concurrent to this letter in case you select the Agreed Order option.

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  
Toxics Cleanup Program  
Central Regional Office

cc: Michael R. Murray, HDR

