



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

February 26, 2019

Charlotte Mitchell, PE
City of Wenatchee
Parks, Recreation and Cultural Services
1350 McKittrick Street
Wenatchee, WA 98801

Re: Approval of Revised Sampling and Analysis Plan:

- **Site Name:** Gold Knob Prospects
- **Site Address:** 1200 Circle Street, Wenatchee
- **Cleanup Site ID:** 11610
- **Facility/Site ID:** 22496
- **Agreed Order No:** DE 15823

Dear Charlotte Mitchell:

The Washington State Department of Ecology (Ecology) has received "*Sampling and Analysis Plan, Interim Remedial Action Design and Remedial Action, Saddle Rock Natural Area,*" prepared by GeoEngineers and dated February 20, 2019. The Sampling and Analysis Plan (SAP) was originally submitted to Ecology as a draft document on February 8, 2019. The Draft SAP was revised based on comments from Ecology provided via email on February 13, 2019. The revised SAP also accompanied responses to Ecology's February 13, 2019 comments.

Ecology hereby approves the revised SAP with the following comments and clarifications:

- Ecology's Comment #3 requested analysis of selected confirmation samples for arsenic, barium, iron, lead, manganese, mercury, selenium and silver. The revised SAP, Table 2 included proposed analysis of these metals in all collected soil samples. Ecology's intent with this comment was to confirm the effectiveness of arsenic as an indicator hazardous substance at the site, such that cleanup of arsenic will also result in cleanup of the other metals. Previous analytical data suggest that arsenic will serve well as a surrogate, but some corroborative data are needed. Ecology suggests selecting samples for laboratory confirmatory analysis based on the following criteria: field XRF arsenic results are in the range of expected arsenic cleanup level(s). An appropriate number to target for such laboratory analysis would be approximately twenty percent (20%) of the samples analyzed onsite using the field XRF.



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- Ecology's Comment #10 pertained to use of performance standards for validation of field XRF performance. The revised SAP stated, "*The XRF value should be within +/- 20 percent of the stated value of the standard.*" This percent difference, commonly used for assessment of field duplicates, may be overly restrictive for arsenic analysis by field XRF, as field XRF data can be considered EPA level II data. Ecology suggests that field XRF data be compared with all available laboratory results, including both field samples and performance standard samples. This analysis can include both reporting of relative percent difference, and presenting scatter plots along regression analysis. The usability of the field XRF results should be discussed based on this data analysis.
- It is Ecology's understanding that the only changes between the February 8, 2019 SAP and the February 20, 2019 SAP were the changes made in response to Ecology's comments on the draft SAP. Ecology should be notified if this understanding is not correct.

No further revision of the SAP is needed. Please proceed with execution of the SAP, with consideration to the above comments/clarifications.

If you have any questions about this letter, please contact me 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: Nick Rohrbach, GeoEngineers