



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 9, 2019

Allison Geiselbrecht, Principal
Floyd Snider
601 Union Street, Suite 600
Seattle, WA 98101

**RE: Ecology comments on the practical quantitation limits in the draft report titled:
“*Smith Kem Site, Remedial Investigation*”**

- **Site Name:** Smith-Kem Ellensburg Inc.
- **Site Address:** 200 South Railroad Avenue, Ellensburg
- **FSID No.:** 12832256
- **CSID No.:** 4257
- **Agreed Order:** DE 12908

Dear Allison Geiselbrecht:

On February 14, 2019, the Department of Ecology (Ecology) downloaded from the Floyd Snider file transfer webpage an electronic copy of an Agency Review Draft titled: “*Smith Kem Remedial Investigation Report.*”

In our review, one fundamental issue continues to detract from the totality of the report. This is the issue of practical quantitation limits (PQLs), which Floyd Snider continues to use inappropriately. This is not the first time Ecology has brought up this issue. We raised this issue throughout the investigation, both before and after Floyd Snider shared information with us. Here are some examples:

- In a letter dated September 25, 2017, Ecology stated that the level of resolution of the groundwater analyses for pesticides such as chlordane and dieldrin is insufficient to compare to their respective Model Toxics Control Act (MTCA) groundwater cleanup levels.
- In a letter dated November 2, 2018, Ecology restated disapproval of Floyd Snider’s proposed approach regarding the PQLs. (RE: *Approval of extension for submittal of draft RI/FS Report.*)



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- In a letter dated November 2, 2018, Ecology rejected the Floyd Snider memorandum (RE: *Ecology objection to Floyd Snider memorandum titled: "Summary of Groundwater Results and Recommendations for Continued Groundwater Monitoring"*). We describe our objections in that letter regarding the insufficiency of the PQLs and the implications of that deficiency. Please refer to the content of that letter.
- On March 26, 2019, Ecology provided Floyd Snider with a memorandum written by Arthur Buchan of Ecology's Policy and Technical Support Unit regarding the issue of limits of quantitation. Essentially, the practical quantitation limits (PQLs) listed in the draft Remedial Investigation (RI) report for the contaminants in the water matrix do not meet the requirements of the Model Toxics Control Act (MTCA). This memorandum also provides limits of quantitation that are attainable at our Manchester Environmental Laboratory for many of the same groundwater analytes of interest present at the Smith Kem Site.

In an effort to move this site forward, there are three options:

- 1) Re-run archival samples to the appropriate limits of quantitation (LOQ) including the practical quantitation limits sufficient to compare to the appropriate cleanup levels or appropriate screening levels relative to the cleanup levels. This can occur at the same lab or a different lab, as long as appropriate LOQs are achieved.
- 2) Re-sample and analyze the samples at a laboratory that can reach the appropriate limits of quantification, including the practical quantitation limits sufficient to compare to the appropriate cleanup levels or appropriate screening levels relative to the cleanup levels. Additionally, allow Ecology to collect split samples as provided under Section VIII, E of the Agreed Order.
- 3) Accept that Floyd Snider has not accurately determined the nature and extent of contamination and continue the investigation in accordance with the provisions in the Agreed Order.
 - a. Note that Ecology is invoking Section VII, U of the Agreed Order (page 12). Consider this your written notice that Ecology intends to collect groundwater samples for this site and submit them to Manchester Laboratory for analysis.

Please let us know which option you choose to implement and we will adjust the schedule for deliverables accordingly.

Note that the dispute resolution option is available as outlined in the Order, should you choose to utilize that (Section VIII, H, page 18).

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We will issue another letter with detailed comments regarding our review of the draft RI report.

Sincerely,



John Mefford
Cleanup Project Manager
Toxics Cleanup Program
Central Region Office

JM:rl

cc: Koalani Kaulukukui, Assistant Attorney General
Andrew King, Foster Pepper PLLC
Brian Peters, GHD
Andrea Wing, Shell Oil Products US

