STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

May 31, 2019

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

RE: Practical Quantitation Limits issue

- **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:

In our letter dated April 9, 2019, the Department of Ecology (Ecology) outlined three options to move the site forward. Thank you for your email of May 23, where you selected the second option of resampling.

Ecology's expectation is that Floyd Snider will sample at those locations where the Practical Quantitation Limits have not been sufficient to compare to the applicable Method B cleanup levels. We will also collect split samples. The laboratory certification from PAL already states that this laboratory cannot reach the expected limits of quantitation. Ecology suggests you retain another accredited laboratory.

Note that Ecology intends to collect our own samples, per our authority under Section VII, U and Section VIII, E of the Agreed Order (pages 12 & 16).

A comparison table is enclosed for clarity. Note that the PQL issue does not refer solely to groundwater but also extends to the soil medium.

We would still hope the sampling could take place the week of June 17, given our own availability. However, as long as the sampling occurs before the end of June, we can accommodate another schedule.

We expect that Floyd Snider will facilitate access per Section VIII, D of the Agreed Order (page 15).

Ecology will require access to the property controlled by the MacGregor Company (parcel no. 226833), the former McNeight property (parcel no. 246833) or its adjacent Right-of-Way, the Stephen Carter property (parcel no. 256833), and BNSF Railway property (parcel no. 216833).

Promptly notify Ecology if you cannot secure access with sufficient time for sampling to occur before the end of June or if another condition exists that prevents sampling within that period.

You can reach me at (509) 454-7836 if you have further questions.

Sincerely,

John Mefford

John Mefford
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

JM/rl

Enclosure (1)

cc: Arthur Buchan, Toxics Cleanup Program, Policy & Technical Support
Koalani Kaulukukui-Barbee, Office of the Attorney General
Andrew King, Foster Pepper PLL
Mary Monahan, Toxics Cleanup Program, Central Regional Office
Brian Peters, GHD
Andrea Wing, Shell Oil Products US

EXAMPLE OF GROUNDWATER MONITORING WELL ANALYTES AND COMPARISON OF ASSOCIATED LIMITS OF QUANTITATION

WELL MW-7 11/15/2016 sampling date

Groundwater Analyte	SW 846 Method in PAL report	PQL expected according to Floyd Snider workplan	PQL actually achieveable according to the PAL Lab Certification	Actual Detection Limit achieved by PAL	Method used by Manchester Laboratory	Reporting Limits achievable by Manchester Lab (detection limits are lower)	Method B CUL
ORGANOCHLORINATED PESTICIDES		ug/L	ug/L	ug/L			ug/L
HCH-alpha	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.0139**
HCH-beta	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	0.00486
HCH-delta	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	
Lindane	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.0795**
Aldrin	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.00257**
Heptachlor	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.0194**
Heptachlor Epoxide	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.00481**
Chlordane	EPA Method 8081B	0.06	0.06	0.6	EPA Method 8081B	0.0025 ug/L	**0.25**
Dieldrin	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.00547**
Endrin	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	4.8
Endosulfan I	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	96
Endosulfan II	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	
4, 4'-DDD	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	0.365
4,4'-DDE	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	0.257
4,4'-DDT	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	0.257
Hexachlorobenzene	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	**0.0547**
Methoxychlor	EPA Method 8081B	0.06	0.06	0.12	EPA Method 8081B	0.0025 ug/L	80
Toxaphene	EPA Method 8081B	0.06	0.06	6	EPA Method 8081B	0.0025 ug/L	**0.0795**
CHLORINATED HERBICIDES							
2,4-D	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	160
2,4-DB	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	
2,4,5-TP	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	
2,4,5-T	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	
Dicamba	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	480
Dinoseb	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	16
MCPA	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	
MCPP	EPA Method 8151 A	0.08	0.08	0.08	EPA Method 8270E	60 ng/L	
PCP	EPA Method 8151 A	0.08	0.16	0.16	EPA Method 8270E	60 ng/L	0.219
OTHER HALOGENATED PESTICIDES							
Atrazine	EPA Method 8081 B	0.06	0.06	0.06	EPA Method 8081 B	0.0025 ug/L	
Simazine	EPA Method 8081 B	0.06	0.06	0.06	EPA Method 8081 B	0.0025 ug/L	

RED Exceeds expected PQL
BOLD PQL higher than CUL