



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 8, 2019

Halah Voges
Anchor QEA, LLC
720 Olive Way, Suite 1900
Seattle, WA 98101

**RE: Semi-Annual Groundwater Monitoring Report for the Yakima Spray/U-Haul Facility
September 2017 and March 2018 Semi-Annual Sampling Events**

- **Site Name:** Yakima Valley Spray
- **Site Address:** 1108 S. 1st Street, Yakima
- **Facility Site ID No.:** 445
- **Cleanup Site ID No.:** 3664

Dear Halah Voges:

Washington State Department of Ecology (Ecology) reviewed the Semi-Annual Groundwater Monitoring Report for the Yakima Spray/U-Haul Facility for the September 2017 and March 2018 Semi-Annual Sampling Events, which was submitted on behalf of the Yakima Valley Spray Site Remediation Group (YVSSRG) on April 17, 2019. Site data indicates most of the Indicator Hazardous Substances (IHS) have attained site cleanup goals. Ecology proposes a tiered approach to reach site closure. This approach requires continued performance monitoring for one of the IHS's while allowing YVSSRG to proceed to the confirmational monitoring phase for the IHS's that have achieved and maintained site specific cleanup standards.

WAC 173-340-410 outlines the purpose and use of each type of compliance monitoring. The WAC defines three types of compliance monitoring: protection, performance, and confirmational. Protection monitoring ensures human health and the environment are protected during the interim or cleanup action, and occurs during the remedial action. Performance monitoring confirms that cleanup standards are attained, and occurs for a time after the remedial action. Confirmational monitoring occurs after confirmation that cleanup standards have been attained and confirms the long-term effectiveness of the interim action.

Performance Monitoring

The Compliance Monitoring Plan (CMP) states, "*performance monitoring will be performed for a period of at least two years and will cease when data show that cleanup levels have been maintained at the site.*"



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Based on the agreement outlined in the May 1, 2017 letter titled “Yakima Valley Spray/ U-Haul Site (Facility Site ID No. 445) – Performance Monitoring,” the September 2017 sampling event demonstrated the achievement of site specific cleanup levels for all of the IHS’s except TPH as diesel (TPH-Dx), and the March 2018 event demonstrates maintenance of cleanup levels for the same subset of IHS’s. This demonstration of achievement and maintenance of site specific cleanup standards qualifies the site to proceed to confirmational monitoring for all IHS’s except TPH-Dx.

Performance monitoring will continue for TPH-Dx and analyzed using method NWTPH-Dx, to monitor diesel range hydrocarbon and motor oil concentrations, as outlined by YVSSRG in the “Next Steps” portion of the April 17, 2019 letter report. Ecology requires that performance monitoring continue for TPH-Dx until cleanup levels are achieved and maintained (a minimum of two consecutive sampling events). Once sampling indicates the achievement and maintenance of cleanup levels for TPH-Dx, YVSSRG may propose a confirmational monitoring plan for Ecology’s written approval.

Confirmational Monitoring

The objective of confirmational monitoring is “to confirm the long-term effectiveness of the interim action or cleanup action” (WAC 173-340-410). Section X.B of the Consent Decree (CD) was written with this objective, and requires groundwater monitoring “*for at least five years after groundwater cleanup levels are achieved...*” However, section X.C allows for minor modifications to groundwater sampling. Confirmational monitoring objectives can be accomplished with the following changes.

Begin confirmational monitoring of the following IHS’s for a minimum of four consecutive quarters:

- Method 8080
 - DDT
 - Aldrin
 - Dieldrin
 - Beta BHC
 - Gamma BHC (Lindane)
- Method 8260
 - Benzene
 - PCE
- Method 6010/700
 - Arsenic
- Method NWTPH-Gx
 - TPH as gasoline

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The aforementioned IHS's will be monitored for at least four consecutive quarters. Confirmational monitoring will continue until (1) samples from four consecutive quarters return non-detectable concentrations, or (2) samples from eight consecutive quarters remain below established site-specific cleanup standards. Written approval from Ecology is required before ending confirmational monitoring of any IHS.

Environmental Information Management

Section X.A of the Consent Decree requires submittal of all "*final results of all sampling, laboratory reports, and/or test results generated...*" in a format compatible with Ecology's Environmental Information Management (EIM) system.

If you have any questions regarding this letter, please call me at 509-454-7833.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kyle Parker", with a long horizontal flourish extending to the right.

Kyle Parker
Site Manager
Toxics Cleanup Program
Central Regional Office

cc: Jason Palmer, AECOM
Caroline Cress, Attorney General's Office

