



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 16, 2019

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

**RE: Ecology comments on draft document, Smith-Kem Site Remedial Investigation 2019 Work Plan Addendum**

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

Dear Allison Geiselbrecht:

Thank you for submitting the above-referenced draft work plan in accordance with Agreed Order DE 12908. Below are the Department of Ecology's (Ecology) comments on the draft work plan. Please review and incorporate edits for Ecology's review and final approval.

### Specific Comments

#### Comment 1, Introduction, 2<sup>nd</sup> paragraph of document:

We understand there may be differences in Practical Quantitation Limits (PQLs) between laboratories using the same analytical method for samples collected from the medium of interest.

Restate that the objective of the sampling effort is to focus on achieving the lowest attainable PQLs consistent with the selected method and WAC 173-340-707 for the nine organochlorine pesticides at the Site. The primary purpose of this effort is two-fold. First, to obtain analytical resolution sufficient to compare the quantified values of these hazardous substances to applicable cleanup values under the Model Toxics Control Act (MTCA) and second, to adequately characterize the areal and vertical distribution and concentrations of these hazardous substances in the media of interest per WAC 173-340-350(7)(c).

#### Comment 2, same section, 4<sup>th</sup> paragraph:

Ecology has selected Analytical Resources Inc. (ARI) to perform analysis of the split samples. ARI will perform Method 8081B low-level analysis.



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**Comment 3, Proposed Additional Groundwater Characterization, 7<sup>th</sup> paragraph:**

You state: *“These wells will be sampled in a separate event, assuming renewed access is granted to this property as described below.”*

This course of action is unacceptable. Ecology requires an event that consists of consecutive field days for sampling the twenty wells. Secure access to the BNSF property before mobilization. Replace the wording with similar language as stated: *“Sampling will be postponed until access is granted to all property with monitoring wells. Then, all twenty (20) permanent resource protection wells will be sampled.”*

**Comment 4, same section, 8<sup>th</sup> paragraph:**

Ecology will be collecting two 1-liter split samples from each point of compliance or monitoring point. This is the required volume for ARI to run Method 8081B low-level analysis.

**Comment 5, Field Methodology, 10<sup>th</sup> paragraph:**

You state: *“It is assumed that Floyd Snider will perform the collection of all groundwater samples and will provide split samples to Ecology for distribution to a laboratory, to be determined, under the chain of custody procedures specified in the RI Work Plan, **unless Ecology personnel are present on-Site and intend to handle shipping to the laboratory themselves.**”*

Change this wording to state that access will be coordinated with Ecology so that its personnel will be present to collect the split samples and to maintain control of the samples. Ecology will collect these split samples using the same tubing and sampling apparatus that Floyd Snider used to collect their samples.

**Comment 6, Laboratory Analytical Program, 12<sup>th</sup> paragraph:**

See comment 4 regarding the analytical method and the sample volume to be collected for that method. We are not requesting analysis using standard Method 8081.

**Comment 7, same section, same paragraph:**

Add information to the work plan regarding the extract cleanup methods to be used on the samples per Method 8081. ARI will use Florisil<sup>®</sup> and Resprep<sup>®</sup> CarboPrep<sup>®</sup> SPE cleanup cartridges as the extract cleanup methods for the groundwater samples.

**Comment 8, same section, 13<sup>th</sup> paragraph:**

Ecology provided to Floyd Snider ARI's reporting limits for low-level Method 8081 in an email dated August 8, 2019. The volume requirement for that method is stated above.

**Comment 9, Quality Control Samples, 14<sup>th</sup> paragraph:**

We will collect four additional 1-liter bottles of sample for the matrix spike/matrix spike duplicate. We will request ARI to run all of the samples in one batch so that only one pair of samples is required for the MS/MSD. We will not be submitting a field duplicate.

**Comment 10, Data Validation, 15<sup>th</sup> paragraph:**

Manchester Environmental Laboratory (MEL) will perform USEPA Stage 4 data validation.

**Comment 11, same section, 17<sup>th</sup> paragraph:**

Floyd Snider can request the raw data for the method blanks and spiked samples used to determine the MDLs from ARI.

**Comment 12, same section, 18<sup>th</sup> and 19<sup>th</sup> paragraphs:**

You state: *“Any required corrective action based on the evaluation of the analytical data will be determined by the laboratory Project Manager in consultation with the Floyd Snider QA Manager and may include qualification or rejection of the data.”*

*“Ecology will communicate these requirements for the data package deliverable to the laboratory of their choosing to complete the full validation, as described above.”*

Ecology does not agree to this condition as part of the Agreed Order. Ecology must approve in writing any decisions regarding the handling and management of data.

**Comment 13, Access to Monitoring Wells, 20<sup>th</sup> paragraph:**

As stated in comment 3, secure prior access to allow sampling of all twenty wells in one event of successive days.

**Comment 14, Health and Safety, 21<sup>th</sup> paragraph:**

The railroad spur is approximately 50 yards from the mainline tracks. Ecology rejects the condition expressed in this paragraph. Floyd Snider will negotiate access with BNSF to provide to that area near the railroad spur without the restrictions listed herein, even if that means that BNSF personnel will have to be present to observe the sampling.

**Comment 15, Table 1, Organochlorine Pesticides Selected for Analysis, Screening Criteria, Methods, and Target Method Detection Limits and Reporting Limits:**

Footnote 4 for Table A.3 in the initial RI Work Plan states that the laboratory will make every effort to obtain LOQs that are less than the applicable soil or groundwater cleanup standards in that table using the indicated method. Floyd Snider should state in a footnote to Table 1 which steps will be taken to obtain LOQs less than the applicable cleanup standard as well as what steps were taken in the previous analyses by Pacific Agricultural Lab (PAL)

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Ecology notes that quantification of toxaphene at a sufficient analytical resolution to compare to applicable cleanup levels presents an obstacle even when using the low-level Method 8081.

**Comment 16, Table 2, Data Quality Assurance Criteria:**

The values stated for precision, accuracy and completeness differ from that stated in the RI Work Plan. Precision has changed from +/- 20% to +/-30%, accuracy from +/- 20% to variable values depending the analyte (+/- 40% to +/-72.5%), and completeness from 95% to 100%. Explain why you changed these criteria.

Reduce the criterion of completeness from 100% to a lower percentage due to possible situations such as sample container breakage during transport.

Note, I acknowledge receipt but will not comment on the companion letter to the technical memorandum dated August 21, 2019. In lieu of a formal response, I will place an internal memorandum in the site file to address the contents of this letter.

You can reach me at (509) 454-7836 if you require any clarification of these comments or have further questions.

Sincerely,



John Mefford, LHG  
Cleanup Project Manager  
Toxics Cleanup Program  
Central Region Office

JM:rl

cc: Koalani Kaulukukui, Office of the Attorney General  
Andrew King, Foster Pepper PLLC  
Mary Monahan, Department of Ecology  
Brian Peters, GHD  
Andrea Wing, Shell Oil Products US