



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 5, 2019

Michael Murray
HDR Engineering
412 E. Parkcenter Blvd., Suite 100
Boise, ID 83706

Re: Comments and Conditional Approval of Draft RI Work Plan

- **Site Name:** Simplot Soilbuilders Sunnyside
- **Site Address:** 300 S. 1st Street, Sunnyside
- **Facility Site No.:** 76742139
- **Cleanup Site No.:** 2558
- **VCP No.:** CE0209

Dear Michael Murray:

Ecology has received a draft Remedial Investigation Work Plan, Sampling and Analysis Plan (SAP), and Quality Assurance Project Plan (QAPP) dated October 2019 for the above-reference site. Ecology appreciates the thorough work done by HDR Engineering in preparing these documents. Ecology hereby approves these plans with the following modifications/clarifications:

Remedial Investigation (RI) Phases

The SAP presents proposed Phase 1 groundwater sampling. One outcome of the Phase 1 work is identification of appropriate locations for further assessment (e.g., soil sampling) during a Phase 2 investigation. During the execution of the Phase 1 groundwater sampling, Ecology recommends that further inquiry into site current and historical operations take place, as well as field observations, that, coupled with the Phase 1 groundwater data, may inform development of Phase 2 soil sampling locations.

Laboratory Analysis

Ecology concurs with the proposed Phase 1 RI analytical suite with the addition of two analytes, sulfate and chloride. Although sulfate and chloride do not have health-based cleanup levels (they have secondary Maximum Contaminant Levels [MCLs]), analysis of these constituents is anticipated to support conceptual site model development.

Whether or not these constituents are to be regulated under the Model Toxics Control Act (MTCA) at this site has not yet been established (Ecology will make inquiries into this question).



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Please ensure, to the extent possible, that reporting limits of all constituents are less than potentially applicable cleanup levels.

Direct Push Groundwater Sampling

Ecology notes that previous investigations at the site identified subsurface lithologies in the vicinity of the water table as clayey silt or silty sand. Ecology notes that groundwater recovery via direct push can be challenging in this lithological setting. Successful direct push groundwater sampling was conducted in 2009; however, it is unclear if the groundwater sampling may have been facilitated by soil coring that was already done via direct push. Direct push groundwater sampling can include slotted rod, retractable screens, and temporary installations with pre-packed screens. Use of the slotted rod technique can result in clayey silt clogging the slots. Ecology recommends discussing details of direct push sampling methods with the Geoprobe contractor prior to mobilizing to the site.

Sample Location Designations

In order to avoid potential confusion regarding sample locations in the future, Ecology recommends that the sample location numbers be different from the historical locations. For example, instead of location BH-01, Ecology recommends starting with location designated BH-101.

Reporting

In reporting the Phase 1 groundwater sampling results, please ensure that tables are prepared that include both historical and current data (including data collected by others at the site). Please also prepare maps showing the results of site constituents in groundwater that also show historically collected data from the site. Inclusion of the month and year of sampling on these maps would be appropriate.

Please feel free to call me at (509) 454-7835 or email me at frank.winslow@ecy.wa.gov with any questions.

Sincerely yours,



Frank Winslow
Cleanup Site Manager
Toxics Cleanup Program
Central Region Office

cc: Monty Johnson, J.R. Simplot Co.