



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

December 10, 2020

Sent via email and hard copy

Shane DeGross
BNSF Railway Company
605 Puyallup Avenue
Tacoma, WA 98421

RE: Ecology response to modification of groundwater monitoring request

- **Site Name:** BNSF Track Switching Facility aka Wishram Railyard
- **Site Address:** 500 Main Street, Wishram, Klickitat County
- **FSID No.:** 1625461
- **CSID No.:** 230
- **Agreed Order:** DE 12897

Dear Shane DeGross:

Thank you for your proposal requesting modifications to groundwater monitoring. Unfortunately, the Department of Ecology (Ecology) does not approve any changes to the current monitoring.

The best time to submit such a proposal would be within the next deliverable, the Feasibility Study (FS). Development of the cleanup standards (cleanup levels and points of compliance) will occur in the FS, including further evaluation of the surface water pathway. Ecology allows treatability studies to help inform the remedial alternatives offered in the FS, as well as acquisition and submittal of other supplemental supportive information.

The DCAP will provide the cleanup standards for each hazardous substance and for each medium of concern at the site, per WAC 173-340-380.

You may resubmit your proposal by incorporating portions of your request within the larger FS deliverable. However, you must submit other portions of the requested changes as part of the Compliance Monitoring Plan that will be a component of the Cleanup Action Plan (CAP).



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December 10, 2020
Page 2

Note that the compliance plan must address the three categories of monitoring as outlined in WAC 173-340-410. These categories include protection monitoring, performance monitoring, and confirmational monitoring.

Here are other suggestions to help:

- Follow the requirements described in WAC 173-340-720(9). That section contains more specificity regarding the 3-part statistical test for compliance monitoring.
- You can apply direct comparison in certain cases, e.g., Stage 1 or all samples below the practical quantitation limit (PQL). In general, confirmational compliance monitoring by direct comparison (Stage 2 or 3) requires at least a minimum of four quarters of favorable groundwater results. However, the proximity of the surface water receptor elevates the risk so we will account for this factor when evaluating compliance.
- And of course, we have several guidance documents, including “*Guidance on Sampling and Data Analysis Methods*” (Ecy Publ. No 94-49) and “*Statistical Guidance for Ecology Site Managers*” (Ecy Publ. No. 92-54). For determining compliance, the “*Guidance on Remediation of Petroleum Contaminated Site*” (Ecy Publ. No. 10-09-057) refers to the collection of three years of quarterly data or twelve events.

We look forward to reevaluating your proposed changes when submitted within the proper context.

As always, we appreciate your commitment to cooperation and cleanup.

Sincerely,



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

cc: Allyson Bazan, AGO Ecology Division
Matthew Wells, Tupper Mack Wells PLLC, Counsel to BNSF