

Basic American Foods Class II Groundwater Inspection

October 1998

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Basic American Foods Class II Groundwater Inspection

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Abstract

The Washington State Department of Ecology (Ecology) conducted an NPDES Class II inspection of the Basic American Foods (BAF) vegetable processing facility in Moses Lake on April 27-29, 1998. The groundwater portion of the inspection consisted of:

- an audit of BAF groundwater sampling procedures
- evaluation of the BAF groundwater monitoring network
- comparison of Ecology and BAF split samples results
- evaluation of BAF compliance with the NPDES permit effluent limits

BAF land applies an annual average of approximately 1.3 million gallons of wastewater per day to roughly 1,755 acres of agricultural farmland and treatment fields. The wastewater is high in chemical and biochemical oxygen demand, ammonia and organic nitrogen, phosphorous, total solids, and inorganic salts.

The facility groundwater monitoring network consists of 12 dedicated monitoring wells and three irrigation wells. The monitoring well network adequately defines groundwater flow directions and facility impacts to groundwater quality within the sprayfield area. However, the network does not adequately characterize background conditions. All but two of the monitoring wells were constructed in accordance with Washington State well construction standards. BAF groundwater sampling procedures are consistent with current industry protocols.

Differences between Ecology and BAF split sample results were generally within acceptable limits for all parameters except chloride, sulfate, and ortho-phosphate. BAF is complying with permit limits for annual and monthly discharge volumes. BAF wastewater management practices have resulted in degraded groundwater quality within the sprayfield vicinity. Groundwater nitrate+nitrite (N) concentrations exceeded the drinking water standard by more than 400 percent while TDS concentrations exceeded the standard by nearly 200 percent.

Introduction

The Washington State Department of Ecology (Ecology) conducted a National Pollution Discharge Elimination System (NPDES) Class II inspection of the Basic American Foods (BAF) vegetable processing facility in Moses Lake. The inspection was conducted between April 27 and April 29, 1998. It consisted of an engineering evaluation of the facility treatment process, calculation of agronomic rates for wastewater application, and an evaluation of the facility groundwater monitoring network. This report presents results of the groundwater portion of the inspection. The evaluation of facility treatment processes and agronomic rate calculations are contained in a companion report (Golding, 1998).

The groundwater inspection consisted of the following elements:

- an audit of BAF groundwater sampling procedures
- evaluation of the BAF groundwater monitoring network
- comparison of Ecology and BAF split samples results
- · evaluation of BAF compliance with the NPDES permit effluent limits

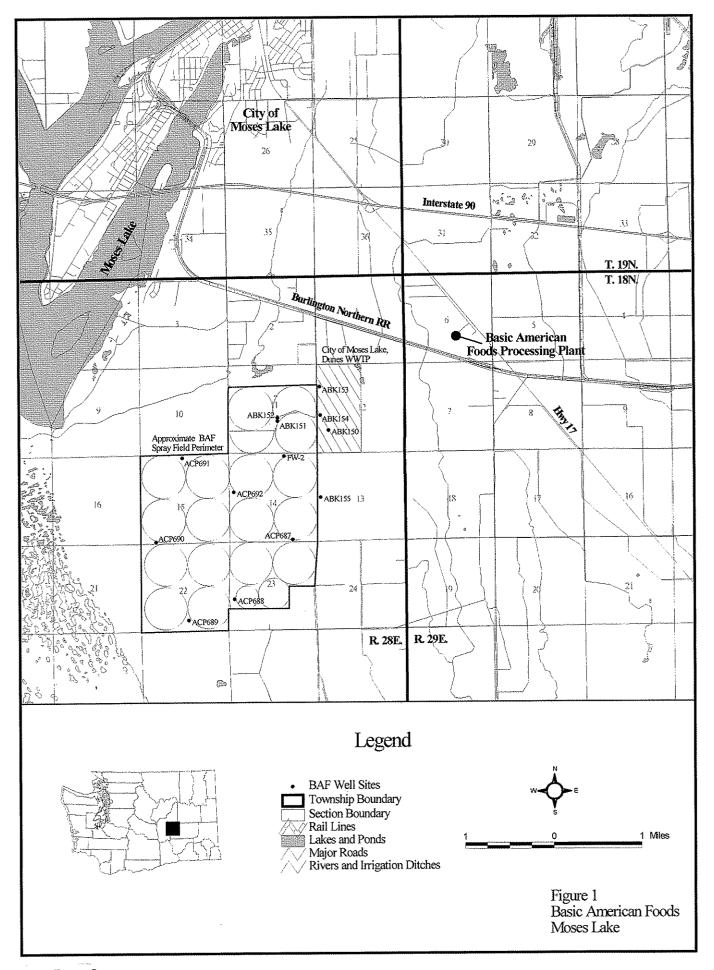
The Ecology groundwater inspection was conducted by Kirk Sinclair of the Environmental Investigations and Laboratory Services Program, with assistance from Wayne Peterson, Ecology Eastern Regional Office site manager for BAF. Dan Nelson, of Soiltest Farm Consultants Inc., and Matt Madden, BAF facility maintenance lead, coordinated sampling for BAF.

Facility Description

The BAF processing plant lies adjacent to State Hwy 17, approximately three miles southeast of the city of Moses Lake (Figure 1). The plant converts an annual average of 1.1 million pounds per day of raw vegetables, primarily potatoes, into dehydrated food products. Process wastewater derives largely from washing and steam peeling potatoes, as well as routine equipment cleaning (Ecology, Fact Sheet, March 1993).

The wastewater generated by BAF is screened to remove grit. It is then land applied year round to 1,755 acres of agricultural farmland and treatment fields situated southwest of the main processing plant. Roughly 455 acres of the irrigated land is owned by BAF and managed for grass hay production. The remaining leased and privately owned land was recently put into service and is farmed in rotational crops including potatoes, corn, and wheat.

BAF wastewater disposal is subject to regulation under the State Waste Discharge Permit program (WAC 173-216). Permits issued under the program are intended to satisfy the requirements of state and federal water pollution control acts. BAF is regulated under permit number 5213 which restricts land application of wastewater to an average annual



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discharge of 1.35 million gallons per day (mgd) and a monthly average of 1.66 mgd or less. The wastewater is high in chemical and biochemical oxygen demand, ammonia, phosphorous, total suspended solids, and inorganic salts (Table 1).

Table 1. Average effluent concentration for Basic American Foods, Moses Lake, for April 1, 1993 to December 1, 1997 (Luce, 1998)

Parameter	Average Effluent Concentration
Conductivity (umhos/cm)	1,036
Total Suspended Solids	1,910
BOD, 5-day (20 C°)	1,090
Chemical Oxygen Demand	2,026
Total Ammonia, as N	29.5
Nitrate + Nitrite as N	0.78
Total Kjeldahl Nitrogen *	81
Ortho-phosphate as P	8.6
Total Sodium	119
Total Calcium	15
Total Magnesium	14
Total Potassium	153
Chloride	84

All concentrations are reported as mg/L unless otherwise noted.

Groundwater Monitoring Network

The BAF groundwater monitoring network consists of 12 dedicated monitoring wells, six of which were installed in 1997 to replace or supplement previously installed wells (Figure 1 and Table 2). During routine sampling BAF also monitors three on-site irrigation wells. Four wells – ABK150, ABK153, ABK154, and ABK155 – are considered upgradient wells with respect to BAF sprayfield activities (Figure 1).

^{*} The reported value is the average of mean monthly values for the reporting period.

Table 2. Basic American Foods, monitoring well construction details (Cascade Earth Sciences, Ltd., 1996)

Cased Well Depth (feet)	125	114	33.4	46.2	54.1	40.5	80	73	70	74	47	44
Filter Pack Interval (feet below land surface)	попе	none	20-33.4	28-46.2	36-55	27 5-40 5	57-80	50-73	47-70	51-74	24-47	31-44
Screen/perforation Interval (feet below land surface)	111-116	104-111	23.4-33.4	31,2-46,2	39.1-54.1	30,5-40,5	08-09	53-73	50-70	54-74	27-47	34-44
Grout Interval (feet)	0-35	0-25.5	0-20	0.28	0-36	0-27.5	0-57	0-50	0-47	0-51	0-24	0-31
Completed Casing Diameter (mehes)	5	Ħ	2	2	2	2	2	2	2	2	2.	2
Measuring Point Height Above Land Surface Heet)	2.4	1.7	1.84	2.08	2.27	2.02	2.5	2.5	2.5	2.5	2.5	2.5
Land Surface Elevation at Well (feet above mean	1,156.6	1,149	1,153.92	1,158.18	1,151.42	1,143.97	1,140.6	1,114.94	1.097.53	1,113.65	1,122.08	1,110.08
Facility Well ID No	Al	A2	MW-1	MW-2	MW-3	MW-6	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13
Unique Well ED Tag No	ABK150	ABK151	ABK153	ABK154	ABK155	ABK152	ACP687	ACP688	ACP689	ACP690	ACP691	ACP692

Site Conditions

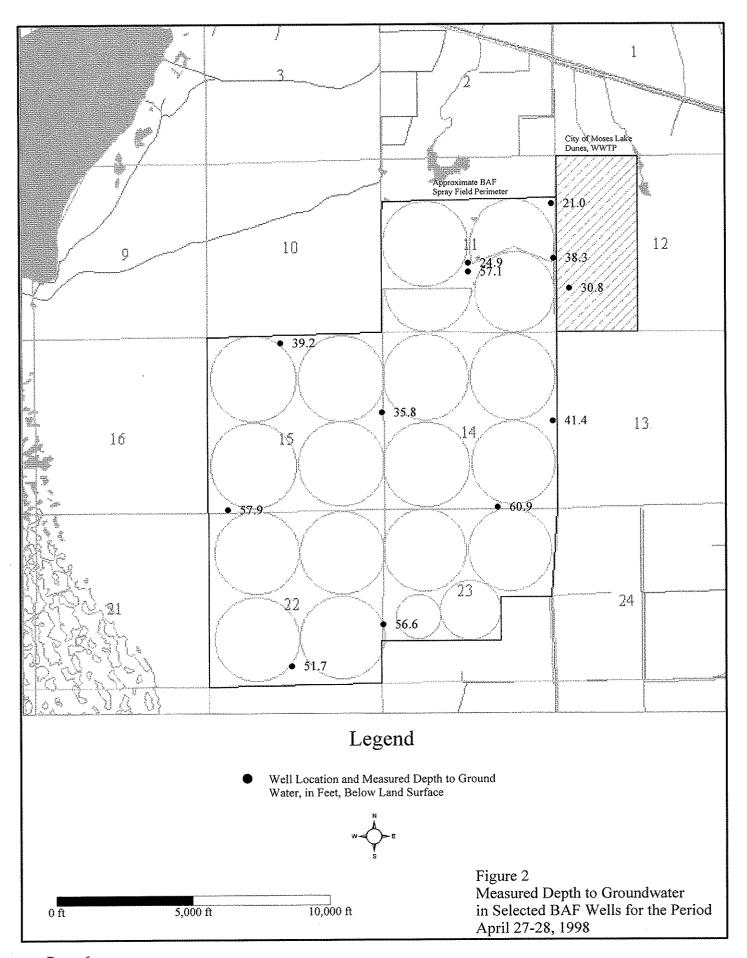
Hydrogeology

The BAF sprayfields lie within the interior of the Columbia River Plateau, an area formed through repeated extrusions of flood basalt during the Tertiary period. The basalts and interbedded sediments were subsequently folded and warped into a broad structural basin/subbasin complex. During the Pleistocene epoch, glaciofluvial deposits of gravel, sand, silt, clay, and wind-borne deposits of sand and silt accumulated on the basalt. These deposits were later reworked and scoured during catastrophic outburst floods of the late Pleistocene epoch. Eolian deposits of sand and silt continue to accumulate within the basin (Walters and Grolier, 1960).

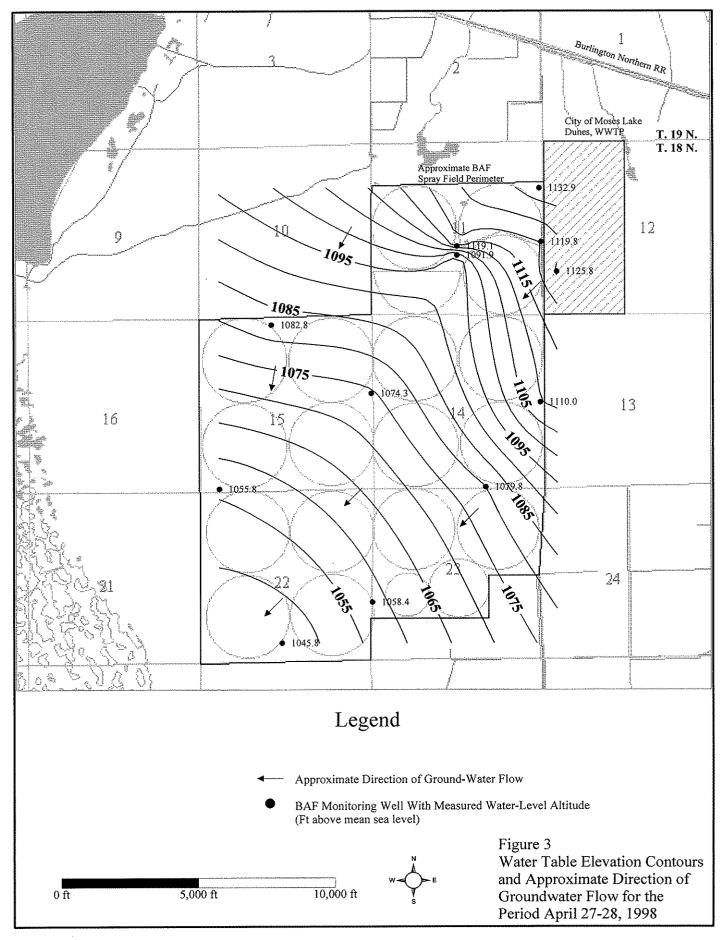
Within the BAF spray field area, this complex assortment of bedrock and sediments can be grouped into three hydrogeologic units: Columbia River Basalts, Ringold Formation, and Glaciofluvial sand and gravel (Cascade Earth Sciences, 1996).

- 1. The Columbia River Basalt group, which comprises area bedrock, underlies the site at depths ranging from 15 feet below ground surface at well ABK152 to greater than 90 feet at well ACP687. Depth to bedrock generally increases to the south/southwest within the spray field area. The Columbia River Basalts consist of numerous layered lava flows ranging from a few feet to 100 feet or more in thickness. The lava is typically a dense, dark, fine-grained basalt that often exhibits prominent vertical jointing. The upper surface of individual flows is commonly porous and vesicular. Sedimentary interbeds consisting of tuffaceous material, volcanic ash, sand, and clay separate individual basalt flows in some areas (Walters and Grolier, 1960).
- 2. The Ringold Formation directly overlies bedrock in some areas of the site. This unit is comprised of Pleistocene age deposits of fine sand, silt, clay, volcanic ash, and caliche. Locally, this unit may impede the downward movement of groundwater owing to its abundance of fine-grained sediments (Cascade Earth Sciences, 1996).
- 3. Where present, the Ringold Formation is overlain by fine to coarse-grained glaciofluvial sand and gravel and wind-blown dune sand. The combined thickness of the Ringold Formation and overlying glaciofluvial sediments varies from 15 feet at well ABK152 to more than 90 feet at well ACP687.

Based on the water levels measured during this inspection, groundwater lies at depths of approximately 20 to 60 feet below ground surface within the BAF sprayfield area. Depth to groundwater is shallowest in the northeastern corner of the site and increases toward the south and west (Figure 2). At the time of this inspection groundwater beneath the sprayfield was moving generally toward the west/southwest (Figure 3).



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Soils

The BAF sprayfields are underlain by soils belonging to the Burbank and Quincy series. Burbank soils are characterized as very deep, excessively drained soils that formed on terraces from gravelly glacial outwash and eolian sand. These soils consist of variously colored fine sand and gravelly sand extending to depths of 60 inches or more. Below a depth of 36 inches, the gravel may be weakly cemented but does not prevent root penetration (Nelson, 1997).

Quincy soils are also very deep and somewhat excessively drained. They are found on terraces and active dunes, and formed in sand derived from mixed sources (Gentry, 1984). Both soil types are highly permeable, generate little runoff, and have low available water capacity (Gentry, 1984).

Methods

Groundwater-Sampling Procedures

We observed BAF sampling procedures, as described below, during the collection of split samples. We collected samples from the 12 dedicated monitoring wells and one irrigation well (Figure 1).

- Depth to groundwater was measured twice at each well with an electronic well probe: once prior to initiating purging, and again immediately after the pump had been shut off following sampling. The well probe was rinsed with deionized water before and after each measurement.
- Each well was purged just prior to sample collection using the well's dedicated pump. BAF monitoring wells are equipped with one of two pump types. Wells ABK150 and ABK151 (facility wells A1 and A2) are equipped with submersible pumps. The remaining monitoring wells are equipped with WaterraTM inertial pumps.
- Wells were purged for a minimum of three casing volumes, or until field parameters (temperature, pH, and conductivity) had stabilized for a minimum of one casing volume. Field meters for pH and conductivity determinations were calibrated at the start of each sampling day and again in the afternoon to verify calibration. A calibrated plastic drum was used to measure the volume of water purged over time.
- 4. Split samples were collected by triple rinsing a one-gallon Teflon container with well water and then filling the container with water from the well. Ecology and BAF sample bottles were in turn incrementally filled from the Teflon container. Following sample collection, the Teflon container was triple rinsed with deionized water and capped for use at the next well. Ecology sample bottles were supplied by the Ecology/EPA Manchester Environmental Laboratory.
- Samples were labeled and stored on ice until delivery to the laboratory. Ecology ortho-phosphate samples collected on April 27 were shipped to the Manchester Laboratory via air freight in order to meet sample holding time requirements. The remaining samples were transported to the laboratory by the sampling team and the Ecology courier service. Chain-of-custody procedures were maintained for all Ecology samples.

Table 3 is a list of target parameters, test methods and quantitation limits for the Ecology samples.

Table 3. Parameters, test methods, and practical quantitation limits

Parameter	Test Method	Quantitation Limit
Water Level	Electric Well Probe	0.1 feet
pH (Field) Temperature Specific Conductance (Field)	Orion Model 290A Orion Model 290A Orion	0.1 Std Units 0.1 °C
Specific Conductance (Lab) Total Dissolved Solids Total Alkalinity Nitrate+Nitrite as N Ammonia as N Total Kjeldahl Nitrogen Ortho-Phosphate Chloride Sulfate	EPA120.1 EPA160.1 EPA310.2 EPA353.2 EPA350.1 EPA351.2M EPA365.3M EPA300.0 EPA300.0	1 umhos/cm at 25 °C 1 mg/L 1 mg/L 0.1 mg/L 0.1 mg/L 0.5 mg/L 0.1 mg/L 0.1 mg/L 0.5 mg/L
Metals: Calcium (Total) Magnesium (Total) Potassium (Total) Sodium (Total)	EPA200.7 EPA200.7 EPA200.7 EPA200.7	50 ug/L 50 ug/L 1000 ug/L 50 ug/L

Quality Assurance

The quality assurance methods and criteria employed during this inspection are discussed in detail in Appendix A. Based on the quality assurance results, the Ecology water quality data may be used without qualification.

Results and Discussion

Results for the four primary elements of this inspection are described below.

BAF Groundwater Sampling Procedures

BAF groundwater-sampling procedures are consistent with accepted sampling protocols as described by Barcelona, et al, 1985. No deficiencies in sampling procedures were noted during this inspection. The BAF written sampling plan requires removal of three casing volumes of well water prior to sample collection. BAF's present sampling procedure relies upon achieving stabilized field parameters (temperature, pH, and conductivity) to define the appropriate purge volume for an individual sampling event. The sampling plan should be updated to reflect this procedural change.

Adequacy of the BAF Monitoring Well Network

A properly installed and operated monitoring well network should be capable of providing sufficient high-quality information about the groundwater environment to enable Ecology and a regulated facility to track and modify, as necessary, the environmental effects of facility operations. In evaluating the BAF groundwater monitoring network, we considered the following factors:

- ♦ Is the monitoring network capable of defining the background or upgradient groundwater conditions over time? "Background" refers to groundwater conditions unaffected by BAF waste disposal practices.
- Ones the monitoring network adequately characterize the horizontal/vertical direction of groundwater movement and depth to groundwater over time?
- Are the individual wells properly placed and constructed to enable early detection of possible groundwater problems associated with BAF waste disposal practices?
- Are background and downgradient wells screened over the same saturated zone? Is the screened zone appropriate for the site conditions and contaminants of interest?
- Are individual wells constructed in a manner that precludes the inadvertent cross contamination of aquifers or distinct groundwater zones penetrated during well construction?
- Are any of the wells downgradient from other facilities or activities that are known or suspected to have affected groundwater conditions?

The BAF monitoring network is generally adequate to characterize groundwater conditions beneath the sprayfield area. Noted deficiencies in the monitoring network are described below.

Well Construction

With the exception of wells ABK150 and ABK151 (facility wells A1 and A2), BAF monitoring wells are properly constructed and screened to detect constituents of interest. Wells ABK150 and ABK151 are screened within the upper portion of the Columbia River Basalt group, significantly below the water table at their respective locations. In addition, these wells are not constructed in accordance with current minimum well construction standards (WAC 173-160). Neither well is adequately sealed to preclude downward migration of contaminants along the well casing.

Well Placement

Wells ABK150, ABK153, ABK154, and ABK155 (BAF wells A-1, MW-1, MW-2, and MW-3 respectively) are considered upgradient wells with respect to BAF sprayfield operations. However, these wells are also immediately down gradient from infiltration basins at the city of Moses Lake wastewater treatment plant. Accordingly, these and other BAF wells are likely affected, at times, by on-site migration of infiltrated wastewater from the Moses Lake treatment plant. Based on the distribution of existing BAF monitoring wells, it is impossible to reliably determine actual background water quality conditions (i.e., water quality unaffected by either BAF or Moses Lake). Although BAF upgradient wells provide an indication of groundwater conditions at the northeast edge of the sprayfield, additional information on background conditions is needed for the area north and west of the present upgradient wells.

Ecology and BAF Split Sample Results

The water quality results for Ecology and BAF split samples are summarized in Appendix C. Variations are apparent between Ecology and BAF sample splits for several conventional parameters, in particular sulfate, chloride, and ortho-phosphate.

BAF sulfate determinations are consistently lower than those obtained by Ecology, by a factor of 2 or more. The relative percent difference¹ (RPD) between Ecology and BAF sulfate determinations ranged from 64 to 105 percent and averaged 94 percent for the 12 split samples (Table 4). Ecology internal duplicate analyses are in good agreement (as are other QA/QC measures). This consistent discrepancy between sample splits suggests a systematic error in BAF sulfate analyses.

A similar pattern is evident in the Ecology/BAF chloride analyses. The BAF results are consistently lower than Ecology results, which suggests a systematic error in BAF analytical procedures. For the 11 chloride sample splits, the RPD between Ecology and BAF samples averaged 20 percent, and ranged from 12 to 38 percent.

¹ Relative percent difference is the numeric difference between sample pairs divided by their mean, expressed as a percentage, i.e., RPD= (S2-S1)/[(S2+S1)/2] x100

The RPD between Ecology and BAF ortho-phosphate determinations ranged from 19 to 155 percent and averaged 104 percent for the five sample splits. There is no consistent pattern to the noted discrepancies.

Analyses for total metals, total dissolved solids, and nitrate+nitrite-N are generally consistent for the Ecology and BAF sample splits. The RPD between Ecology and BAF analyses for these constituents is generally less than the recommended maximum of 10 percent (Table 4 and Appendix C).

The BAF method detection limits for TKN and ammonia are quite high at 3.0 mg/L. While both constituents were below Ecology's detection limit of 0.5 mg/L, during this sample event, this may not be true at other times of the year. The BAF detection limit for these parameters should be lowered to 0.5 mg/L to provide more reliable early detection of these constituents.

Table 4. Summary of relative percent differences between Ecology and BAF split samples

Conventional Parameters (mg/L)	Number of Duplicate Analyses	Approximate Range in RPD (%)	Number of Split Samples Exceeding 10% RPD	Average RPD (%)	Median RPD (%)
Total Alkahmty	12	2-10	1	4.95	465
Total Dissolved Solids	12	0-14	3	5	3.15
Nuraic-Nunic as N	12	09-51	į	8 97	5.85
Ammonia as N	0 *	****************	, 100 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
Total Kieldahl Nitrogen	**		•		
Ortho-Phosphate	5	19-155	5	103.5	133
Chloride	11	12438	11	19.9	17
Sulfate	12	64-105	12	93.7	94.3
Sunate					
Total Metals (ug/L)					
Calcium	1 7	0.140.5	4	5.5	6.45
Magnesium	12	0-6	0	3.45	3.4
Potassium	10	0.4-21	•	6.38	335
Sodium	12	0.9-7	0	4.38	5.15

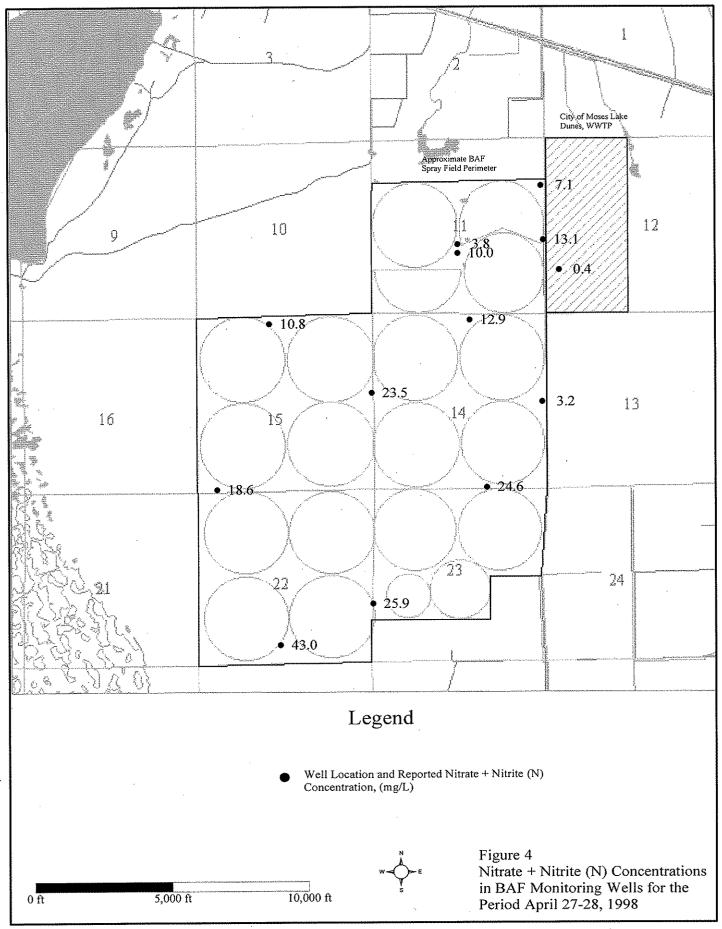
^{*} Relative percent differences were not calculated when one or both laboratories failed to identify an analyte at concentrations that exceeded their respective method detection limit. The number of duplicate analyses refers only to those samples where both splits yielded a value in excess of the method detection limit.

BAF Compliance with NPDES Permit Limitations

The present BAF discharge permit does not prescribe limitations for parameters other than discharge volume. However, BAF is mandated to manage its wastewater in a manner that protects existing and future beneficial uses of groundwater.

Monitoring data for the period January 1995 to December 1997 indicate BAF discharged an annual average of 1.26 mgd with a peak monthly average of 1.58 mgd (Luce, C., 1998). These values are below the maximum permitted discharge volumes.

BAF wastewater disposal practices have degraded groundwater quality in the vicinity of its sprayfields. Of the 12 wells sampled, nearly two-thirds exceeded drinking water standards for nitrate+nitrite-N (10 mg/L) and total dissolved solids (500 mg/L). Nitrate concentrations, in particular, tend to increase along groundwater flow lines beneath the sprayfield (Figure 4). The addition of significant new croplands this past year may help reduce impacts to groundwater over time. To realize this objective, BAF should consider developing a numerical model to help quantify the waste load that can safely be applied to the new croplands without further impacting groundwater quality.



Conclusions

- BAF groundwater-sampling procedures are consistent with current industry protocols.
 No deficiencies in sampling procedures were noted during this inspection. BAF's
 written Sampling and Quality Assurance Plan should be updated to accurately
 describe their present sampling procedures. An up-to-date Sampling and Quality
 Assurance Plan will help ensure consistency in sample collection and analysis during
 future staff changes.
- BAF's present monitoring well network is sufficient to characterize groundwater conditions throughout most of the sprayfield area. The monitoring network could benefit from the installation of additional upgradient wells near the north/northwest property boundary to help define background water quality conditions. All wells, with the exception of ABK150 and ABK151, are properly constructed and screened to detect parameters of concern. Wells ABK150 and ABK151 are not constructed in accordance with current well construction standards and are screened far below the water table at their respective locations.
- BAF is complying with effluent discharge limitations for annual and monthly discharge volumes. Their wastewater disposal practices have degraded groundwater quality to the extent that groundwater in the vicinity of their sprayfield fails to meet drinking water standards for nitrate+nitrite-N and total dissolved solids.
- Differences between Ecology/BAF split sample results for nitrogen, total metals, and
 most conventional parameters were generally small and within acceptable limits.

 Large differences between Ecology and BAF analyses for ortho-phosphate, chloride,
 and sulfate suggest a systematic error in BAF's analytical and/or sample handling
 procedures for these analytes.

Recommendations

Wells ABK150 and ABK151 (Facility wells A-1 and A-2) should be abandoned. Neither well is constructed in accordance with Washington State well construction standards.

BAF should consider installing at least one additional upgradient monitoring well to help define background conditions as they exist prior to the effects of waste disposal practices at the City of Moses Lake treatment plant. Such information would help differentiate the effects of the two waste streams. The well(s) should be constructed in accordance with Washington well construction standards (WAC 173-160). Ecology review and approval of potential well locations and designs should be obtained prior to construction, to ensure that the wells are appropriately located and designed to detect contaminants of interest.

BAF's laboratory analytical procedures for chloride, sulfate, and ortho-phosphate should be evaluated to determine the reason(s) for the disparity between Ecology and BAF sample results. Following corrective action, BAF should split samples with three accredited laboratories to verify the problem has been corrected. Ecology should be kept informed of the split sample results and the actions taken to resolve the problem.

The BAF detection limit for ammonia and TKN should be reduced to 0.5 mg/L to ensure the early detection of these constituents.

Careful attention should be paid to BAF wastewater management over the next few years to determine whether the substantial additional acreage added this year is sufficient to assimilate the facility wasteload without further adverse impacts to area groundwater quality.

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- Washington Department of Ecology, March 1993, Fact Sheet for State Waste Discharge Permit No. 5213. 18 p.
- Washington Department of Ecology, January 1994, Manchester Environmental Laboratory, Laboratory Users Manual, Fourth Edition. 354 p.
- Washington Department of Ecology, State Waste Discharge Permit No. 5213, issued to Basic American Foods, Moses Lake on March 30, 1993. 15 p.

Appendices

Appendix A: Sampling Procedures and Quality Assurance for Ecology Analyzed Samples

We followed standard quality control procedures during the collection, transport, and analysis of Ecology split samples as specified in Barcelona and others, 1985. Samples were collected in pre-cleaned bottles supplied by the Manchester Environmental Laboratory (MEL). Samples for ammonia as N, nitrate + nitrite as N, and TKN were collected in pre-acidified bottles. Samples for metals analysis were acidified, in the field, with ultra-pure concentrated nitric acid. Filled sample bottles were labeled and stored on ice prior to being delivered to the laboratory. Chain of custody procedures were followed throughout sample collection and handling (Washington Department of Ecology, 1994). All samples arrived at the laboratory in good condition.

Internal quality control checks performed by laboratory staff included verification standards for instrument calibration, procedural blanks, laboratory control samples, and spiked/duplicate samples.

Field quality control checks consisted of a metals transfer blank and blind duplicate samples collected from well ACP692 (BAF well No. MW-13). The duplicate samples were collected as splits from the same sample and submitted to the laboratory under different sample numbers. The metals transfer blank was prepared using reagent grade water supplied by the MEL. The reagent grade water was poured from the laboratory supplied container into an empty metals container, at the sampling site, and then acidified in the same manner as other metals samples.

The data quality for this project met all quality control/assurance criteria and can be used without qualification. The following comments were included in the laboratory data submittal:

- Potassium recovery for the laboratory control sample was 121% -slightly higher than the control limit of 120%. Other potassium quality control results were acceptable.
- Sodium was found in the procedural blank at a concentration of 98 ug/L. The sodium level in samples are greater than 10 times that of the blank, so the data may be used without qualification.
- Calcium was found in the metals transfer blank at a concentration of 57 ug/L slightly above the method detection limit of 50 ug/L. This difference is not significant. No other constituents were detected in the transfer blank.

Laboratory and field duplicate analyses were compared by determining the relative percent difference (RPD) between sample pairs. Relative percent difference is the numeric difference between sample pairs divided by their mean, expressed as a percentage. The RPD values for duplicate samples were less than 10% for all samples with the exception of one laboratory duplicate for ortho-phosphate (12.3%) (Table A-1) and one field duplicate for potassium (15.2%) (Table A-2).

Appendix A

Table A-1 Laboratory Duplicate Analyses and Relative Percent Difference (RPD) for Ecology Samples

	Specific								
	Conductance (umhos/cm @	Total Dissolved	Ortho-Phosphate	Total Alkalinity	Total Kieldahl			Nitrate + Nitrite	Ammonia
Well No.	25 U)	200	(ng/L	(mg/L	NITrogen (mg/L)	Cilionde (mg/L)	Sulfate (fillg/L)	(III)	(Jiām)
A DV 150			0.069	355	0 \$00[]	79.0	101	0.357	0.010 U
I ab diminate			0.00	347	0.50011	78.7	100	0.364	0.010 U
Lao Gupinan			7000	0.787	0.00	1 0/	701	1 0 0/	70 0
RPD	***************************************		17.5 %	0.0 %	0%0	1 %	I 70	1.9 70	0 / 0
ABK154			0.010 U						
Lab duplicate			0.010 U						
RPD			%0						
ABK155				325					
Lah dunlicate				326					
				/0 (0					
O-S				0.5 %					
ACP689						54.2	52.9	43	0.010 U
Lab duplicate						54.2	53.1	43	0.010 U
RPD				***************************************		0.%	0.4 %	%0	%0
ACP691		- Company	0.017		orthological designation of the state of the				
Lab duplicate			0.016		**************************************				
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ACP692	504								
Lab duplicate	505								
RPD	0.2 %								
FW-2		527							
Lab duplicate		526							
RPD		0.2 %			-				
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 $\mathrm{U}-\mathrm{The}$ alalyte was not detected at or above the reported value.

Appendix A

Table A-2 Field Duplicate Analyses and Relative Percent Difference (RPD) for Ecology Samples.

odium mg/L)	16.3	16.3	%0
Potassium (Cmg/L)		2.9	
Magnesium (mg/L)		22.2	%0
Calcium (mg/L)	44.4	44.2	0.5 %
Ammonia (mg/L)	0.010 U	0.010 U	%0
Nitrate + Nitrite (mg/L)	23.5	23.8	1.3 %
Sulfate (mg/L)	20.9	20.9	%0
Chloride (mg/L)	26.0	26.2	%8.0
Total Kjeldahl Nitrogen (mg/L)	0.5.0	0.5 U	%0
Total Alkalinity (mg/L	123	122	%8.0
Ortho- Phosphate (mg/L	0.010 U	0.010 U	%0
Total Dissolved Solids (mg/L)	326	331	1.5%
Specific Conductance (umhos/cm @25/C)	504	511	1.4 %
Well No	ACP692	Field Dup.	RPD

 $[\]mathbf{U}$ – The analyte was not detected at or above the reported value.

Appendix B: Ground-Water Level Measurements

Well Status at Time of WL measurement													recently pumped	recently pumped	recently pumped
WL Altitude (Feet Above Mean Sea level)	1,125.8	1,091.9	1,119.1	1,132.9		1,110,0	1,079.8	1,058.4	1,045.8	1,055.8	1,082.8		THE OIL THE CONTRACT OF THE CO	AND CAMPAGE AND AND THE CAMPAGE AND THE CAMPAG	A A A A A A A A A A A A A A A A A A A
Water Level Below Measuring Point (Feet)	33.2	58.8	26.9		A 0 4	28.7	and the conference developes and the conference of the conference	59.1	54.2	60.4		2888	manufactured operation of the state of the s	59.5	89.3
Measurement Time	1:34 PM	3:48 PM	4:31 PM	5;37 PM	7:19 AM	8:35 AM	9:45 AM	11:45 AM	1:05 PM	2.07 PM	3:18 PM	4.26 PM	11:18 AM	11:27 AM	11:18 AM
Measurement Date	4/27/1998	4/27/1998	4/27/1998	4/27/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998	4/28/1998
Facility Well No.	A1	A2	MW-6	WW-1	MW-2	MW-3	WW-8	MW-9	MW-10	WW-11	WW-12	WV-18	FW-1	FW-2	FW-3
Unique Well ID Tag No.	ABK150	ABK151	ABK152	ABK153	ABK154	ABK155	ACP687	ACP688	ACP689	ACP690	ACP691	ACP692	remented armende difference filtrate technical per tandents objected in the effective meny property.	4.10.40.10	

Note: All water levels were measured using an electric well probe or "E-tape". Measured values were rounded to the nearest 0.1 foot for reporting purposes.

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

RPD (%)*	**************************************		64.4 64.4 69.8 98 	6.9 3.2 5.4 5.4
R	1 1		6 4 1 2 2 5 1	6 8 8
BAF	7.3 15.1 950		628 0.04 3.85 3.0 U 42 18 9.6	79 48 5.4 68
ABK151 (Well A-2) 04/27/1998 Ecology		970	648 0.078 401 0.5 U 52.1 52.6 9.97 0.01 U	73.7 46.5 5.21 64.4
RPD (%)*			1.8 5.5 13.5 92.8 56.8	6.7 4.5 6.7 5.6
BAF	7.7 14.5 1000		656 0.03 U 336 3.0 U 69 37 37 3.0 U	72 36 5.77, 96
ABK150 (Well A-1) 04/27/1998 Ecology		986	668 0.069 355 0.5 U 779 0.357	67.3 34.4 5.33 90.8
Analyte	Field Measurements pH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)	Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	Conventionals (mg/L) Total Dissolved Solids Ortho-Phosphate Total Alkalinity Total Kjeldahl Nitrogen Chiloride Sulfate Nitrate-Nitrite Ammonia	Total Metals (mg/L) Calcium Magnesium Potassium Sodium

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

*	KPD (%)"				
a a	Z		1	11.0 19.2 ————————————————————————————————————	5.8 5.5 3.4 6.3
Ç	BAF	8.1 15.5 410		254 0.04 148 3.0 U 3.0 U 6.8 3.0 U	41 13 18
ABK153 Well MW-1 04/28/1998	Ecology		3778	259 0.033 145 0.5 U 4.46 23.7 7.06 0.01 U	38.7 12.3 5.07 16.9
	RPD (%)*			4.7 4.7 17 94.3	4.4 2.3 6.4 0.9
	BAF	7.3 14.7 1524		937 0.03 U 565 3.0 U 86 46 4.0	138 51 7.7 114
ABK152 Well MW-6 04/27/1998	Ecology		1480	977 0.075 592 0.528 102 128 128 3.75	132 52.2 722 113
	Analyte	Field Measurements pH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)	Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	Conventionals (mg/L) Total Dissolved Solids Ortho-Phosphate Total Alkalinity Total Kjeldahl Nitrogen Chloride Sulfate Nitrate-Nitrite Ammonia	Total Metals (mg/L) Calcium Magnesium Potassium Sodium

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

RPD (%)*			·	·
RPD		į	3.8 	6.6 2.6 7.5 4.6
BAF	7.7 14.9 1030	1 1 2	643 0.03 U 313 3.0 U 63 35 32 3.0 U	69 27 - 8.4 1111
ABK155 Well MW-3 04/28/1998 Ecology		8003	643 0.027 325 0.5 U 71/6 112 3.23	. 26.3 . 26.3 . 170
RPD (%)*			3.6 15 105	6.3 1.6 5.4 5.8
BAF	7.5 14.0 11.66	ı.	7.47 0.03 U 3.0 U 63 3.8 3.0 U 3.0 U	85 32 125
ABK154 Well MW-2 04/28/1998 Ecology			760 0.010 U 365 0.5 U 73.2 122 122 133.1	79.8 31.5 5.8 118
Analyte	Field Measurements PH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)	Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	Conventionals (mg/L) Total Dissolved Solids Ortho-Phosphate Total Akalinity Total Kjeldahl Nitrogen Chloride Sulfate Nitrate-Nitrite Ammonia	Total Metals (mg/L) Calchum Magnesium Potassium Sodium

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

RPD (%)*	2001 BAN 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	\$50 7\$ 30 5	28.4 63.6 1.3.5	0 0 0 2.4
~	1 1 1	1	- 1 4 1 2 9 % I	0 0
BAF	8.0 16.0 516	•	394 0.03 U 125 3.0 U 6 6 6 3.0 U 3.0 U	50 21 27 17
ACP688 Well MW-9 04/28/1998 Ecology		511	341 0.010 U 131 0.5 U 11.6 25.9 0.01 U	
RPD (%)*			11 15.3 103	1.8 2.9 21 7.1
BAF	7.7 15.4 699	•	509 0.04 120 3.0 U 7 7 7 22.7	68 27 4.4 22
ACP687 Well MW-8 04/28/1998 Ecology		989	456 0.010 U 12.5 0.5 U 81.6 21.9 24.6 0.01 U	66.8 27.8 5;43 20.5
Analyte	Field Measurements pH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)	Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	Conventionals (mg/L) Fotal Dissolved Solids Ortho-Phosphate Total Alkalinity Total Kjeldahl Nitrogen Chloride Sulfate Nitrate-Nitrite Ammonia	Total Metals (mg/L) Calotum Magnesium Porassum Sodium

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

RPD (%)*			operations.	
RPI			155 155 6.4 102 9	3.6
BAF	7.9 14.7 8 52	!	568 0.16 289 3.0 U 21 21 17.0 3.0 U	90 37 5.8 37
W-11 998				
ACP690 Well MW-11 04/28/1998 Ecology		\$35	562 0.020 308 0.5 U 26.9 64.6 18.6	81.8 35.7 5.3 35.2
RPD (%)*		•	4.3 1.133 4.6 20.8 94.3	0.1 5.2 3.6
			414:000	2 8 2
4	.8 **		6.07 0.07 1148 3.0 U 44 19 40.5 3.0 U	
0 BAF	8.0 15.8 81.4		577 0.0 3.0 44 40 3.0 3.0	71 28 54 40
ACP689 Well MW-10 04/28/1998 Ecology			7 A	
ACI Wel 04/2 Eco		918	0.014 0.014 1.55 0.5 U 54.2 52.9 43	70.9 29.5 5.21 40.9
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	ments C) ctance m @ 25	nalyses ctance m @ 25	Solids Solids e	mg/L)
ite .	Field Measurements pH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)	Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	Conventionals (mg/L) Total Dissolved Solids Ortho-Phosphate Total Alkalinity Total Kjeldahl Nitrogen Chloride Sulfate Nitrate-Nitrite	Total Metals (mg/L) Calcium Magnesium Potassium Sodium
Analyte	Field N pH Temper Specific	Laborz Specifi (micr	Convention Total Dissolution Ortho-Pho Total Kiel Chloride Sulfate Nitrate-Ni Ammonia	Total Meta Calcum Magnesium Potassium Sodium

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

• • • • • • • • • • • • • • • • • • •	ACP691 Well MW-12 04/28/1998	£	*//e/ Culu	ACP692 Well MW-13 04/28/1998	, <u>1</u>	*(70) u aa
Analyte	Ecology	BAF	KPD (%)"	Ecology	BAF	KFD (%)"
Field Measurements PH Temperature (°C) Specific Conductance (micromhos/cm @ 25 °C)		7.9 15.5 73.2			7.9 15.3 \$19	
Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)	212			204		
Conventionals (mg/L) Total Dissolved Solids Ortho-Phosphate Total Alkalinity Total Kjeldahl Nitrogen Chloride Sulfate Nitrate-Nitrite Ammonia	296 0.5 U 147 108 0.01 U	463 0.11 280 3.0 U 10 19 10.5 3.0 U	3.2 146 5.6 38 87.2 2.8	326 0.010 U 123 0.5 U 26.0 20.9 23.5 0.01 U	372 0.08 1.11 3.0 U 22.2 3.0 U	13.2 12.2 89.3
Total Metals (mg/L) Calcium Magnesium Potassium Sodium	73.7 28.7 4.6 31.3	81 30 4.8 33	9,4 4,4 4.3	44.4 22.2 2.49 16.3	44 21 2.5	0.9 5.6 0.4 1.9

U - The analyte was not detected at or above the reported value. RPD - The relative percent difference between Ecology and BAF sample split results expressed as a percentage

Appendix C: Ecology and BAF Split-Sample-Water-Quality Results

Irrigation Well No. 2 04/27/1998

Ecology

Analyte

ements	66.7	°C) 15.7	luctance 900	/cm @ 25 °C)
Field Measurements	He He	remperature (°C)	Specific Conductan	(micromhos/cm @ 25 °C)

Laboratory Analyses Specific Conductance (micromhos/cm @ 25 °C)

Conventionals (mg/L)

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