



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

April 25, 2016

Kevin Freeman
Project Coordinator
Inland Earth Sciences
8704 E. Dalton Avenue
Spokane, WA 99212

Re: Groundwater Monitoring Data Reports
Administrative Order on Consent ("Consent Order")
Docket No. SDWA-10-2013-0080
Yakima Valley Dairies, Washington

Dear Mr. Freeman:


EPA has completed our review of these documents which were transmitted to EPA on a disk that was enclosed with your April 7, 2016 letter:

- Quarterly Groundwater Monitoring Data Report, Third Quarter 2013 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, Fourth Quarter 2013 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, First Quarter 2014 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, Second Quarter 2014 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, Third Quarter 2014 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, Fourth Quarter 2014 (January 14, 2016)
- Quarterly Groundwater Monitoring Data Report, First Quarter 2015 (January 12, 2016)
- Quarterly Groundwater Monitoring Data Report, Second Quarter 2015 (January 13, 2016)
- Quarterly Groundwater Monitoring Data Report, Third Quarter 2015 (March 1, 2016)

Based on our review, it appears that Comment 3 from EPA's February 22, 2016, letter (enclosed) regarding the quarterly groundwater monitoring data reports was not addressed in these reports. Comment 4 was addressed in some reports but not all. In accordance with Paragraph 14 of the Consent Order, EPA has modified these Quarterly Groundwater Monitoring Data Reports to address these two comments, and hereby approves the documents as modified.

You may contact me at (206) 553-6904, or your legal counsel may contact Jennifer MacDonald at (206) 553-8311, if you have any questions regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Winiecki". The signature is fluid and cursive, with a prominent initial "E".

Eric Winiecki
EPA Project Coordinator
Office of Water and Watersheds

Enclosure

cc: Jennifer MacDonald
Rene Fuentes



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND WATERSHEDS

February 22, 2016

Kevin Freeman
Project Coordinator
Inland Earth Sciences
8704 E. Dalton Avenue
Spokane, WA 99212

Re: Quarterly Groundwater Monitoring Data Reports
Administrative Order on Consent ("Consent Order")
Docket No. SDWA-10-2013-0080
Yakima Valley Dairies, Washington

Dear Mr. Freeman:

EPA has completed its review of the following documents ("Reports"):

- Quarterly Groundwater Monitoring Report, Third Quarter 2013, January 14, 2015
- Quarterly Groundwater Monitoring Report, Fourth Quarter 2013, January 14, 2015
- Quarterly Groundwater Monitoring Report, First Quarter 2014, January 14, 2015
- Quarterly Groundwater Monitoring Report, Second Quarter 2014, January 14, 2015
- Quarterly Groundwater Monitoring Report, Third Quarter 2014, January 14, 2015
- Quarterly Groundwater Monitoring Report, Fourth Quarter 2014, January 14, 2015
- Quarterly Groundwater Monitoring Report, First Quarter 2015, January 14, 2015

Based on our review, EPA approves these Reports on the condition that the following comments are addressed in all Reports:

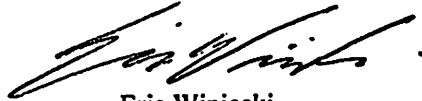
1. Figure 1. Comment number 5 from EPA's July 2, 2015 letter has still not been addressed. This comment, in part, directs the Respondents to label all seasonal or non-seasonal creeks and streams in Figure 1. Address the comment. This is the third time EPA has communicated this comment.
2. Appendix E, Ion Balance Sample Summary. Some of the Conversion factor explanations are truncated. Revise the tables so that the complete explanations are visible in all Reports.
3. Section 1.1, Purpose and Scope. The sentence, "The higher nitrate concentrations observed in the downgradient groundwater monitoring wells compared to the upgradient wells indicate that significant nitrate loading from Dairy sources to the aquifer has occurred," has not been added as directed in EPA's November 4, 2015 letter. Add the sentence.

4. **Section 7.10, Water Type Classifications.** The sentence, "Piper diagrams, stiff patterns and concentration trends for these monitoring wells indicate that groundwater chemistry has remained relatively consistent between sampling events," was not deleted as directed in EPA's November 4, 2015 comment letter. However, upon further review of the Reports and all of the data that has been collected to date, EPA has reconsidered this comment. EPA agrees that that the sentence is an appropriate assessment of the available data. Retain the sentence.

Pursuant to Paragraph 14.b. of the Consent Order, Respondents must revise the Reports to fully address these comments, and submit the revised Reports to EPA by March 21, 2016.

Address these comments in future Reports. EPA may have additional comments on future reports. You may contact me at (206) 553-6904, or your legal counsel may contact Jennifer MacDonald, Assistant Regional Counsel, at (206) 553-8311, if you have any questions regarding this letter.

Sincerely,



Eric Winiecki
EPA Project Coordinator
Office of Water and Watersheds

cc: Jennifer MacDonald
Rene Fuentes