



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to OCE-101

February 16, 2017

Mark Larsen  
Project Coordinator  
ANCHOR QEA, LLC  
1119 Pacific Avenue, Suite 1600  
Tacoma, Washington 98402

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

Dear Mr. Larsen:

EPA has completed our review of:

- Groundwater Monitoring Report - First Quarter 2016 - Yakima Valley Dairies (May 31, 2016)
- Groundwater Monitoring Report - Second Quarter 2016 - Yakima Valley Dairies (September 6, 2016)

Based on our review, in accordance with Paragraph 14 of the Consent Order, EPA hereby approves these Reports.

EPA has also completed our review of:

- Groundwater Monitoring Data Report – Third Quarter 2016 (November 21, 2016)

Based on our review, EPA has developed these comments:

1. **Title Page.** Revise the title so that it is consistent with the titles of the previous quarterly reports. Enlarge the text "Yakima Valley Dairies" to be consistent with the text size of the rest of the title.
2. **Executive Summary.**
  - a. Fourth paragraph, third sentence. Modify the sentence, "Historical nitrate concentrations since 2013 are presented in Figure 16B," to "Historical nitrate concentrations since 2013 are listed in Figure 16B, and charted in Figures 17-22."

- b. Add a few sentences that summarize any problems or deviations from the approved QAPP, and direct the reader to the field parameters section for more information. Modify the Executive Summary to mention the problems with the Horiba unit and the dissolved oxygen (DO) measurements (or lack of them).
  - c. Add a brief summary of the information in the “Summary & Conclusions” section described in comment #3, below.
3. Add a **Summary & Conclusions** section that provides a brief discussion of anything that is new and different in the data, any problem(s) with the overall sampling event, and any other items that should be highlighted for the reader. Describe any information that is significant about the latest report in relation to other reports and the overall project.
4. **Section 3, Investigation Activities, first sentence.** The Consent Order became effective on March 19, 2013. Correct the date.
5. **Appendix B, Groundwater Sampling Records (the field forms).** There are a number of deficiencies in the field forms that must be corrected during future sampling events:
  - a. Many of the fields have been left blank. All blanks must be filled in.
  - b. If DO measurements were not taken, the sampler should have provided notes describing the reason(s) that they were not taken instead of providing dashes on the form. In future sampling events, provide such notes if DO measurements are not taken.
  - c. Groundwater monitoring wells YVD-09, 03, 04, 05, 06, and 07 have much higher DO values than previous sampling events, but this is not discussed in the text or mentioned in comment notes on the form. The purpose of the field parameters measurements is to document and understand that sampling is going as required, so anything unusual that occurs during the event such as these unexpectedly elevated DO levels should be checked and documented at that time. In future reports, provide this documentation.
  - d. It is unclear whether the Horiba U-52 was calibrated prior to using in the field. Require that a field calibration sheet be included in each sampling event and provided in the Groundwater Monitoring Data Report. There is a form of calibration from ARCUS-HAZCO dated 3/2/2016 in Anaheim, CA, but the footnote states that calibration may shift in transit.
  - e. If the Horiba U-52 unit is defective, it must be replaced.
  - f. The sampler(s) must report their name(s) on the field forms for each future sampling event.

Pursuant to Paragraph 14 of the Consent Order, Respondents must revise the Third Quarter 2016 Groundwater Monitoring Data Report to fully address these comments, and submit the revised report to EPA by March 16, 2017. Address these comments in future Reports as well.

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 blue ink, appearing to read "Eric Winiecki".

Eric Winiecki  
EPA Project Coordinator  
Office of Compliance and Enforcement

cc: Jennifer MacDonald  
Rene Fuentes