



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to OCE-101

February 28, 2018

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

Re: Updated Groundwater Monitoring Quality Assurance Project Plan
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 Quality Assurance Project Plan (February 2018)

Based on our review, EPA approves this updated quality assurance project plan (QAPP) on the condition that the following comments are addressed:

1. **Section 1.3.1, p. 3:** Change the first paragraph in the "Monitoring Well Installation" bullet to: "A total of 27 monitoring wells have been drilled and installed at locations in the vicinity of the Dairies by EPA, or by the Dairies in accordance with the AOC. Of these, 24 wells were completed in the shallow water-bearing zone of the surficial aquifer, and three wells were completed at deeper depths. One well, YVD-14, was inadvertently destroyed, and had to be decommissioned and replaced with YVD-14R. Table 1, and Figures 3 and 4 document the well construction details and locations of the wells that were installed by EPA, or by the Dairies in accordance with the AOC. Any future monitoring wells added to the existing well network will be drilled, installed, and developed as described in the Groundwater Monitoring Well Installation Work Plan (Appendix A)."
2. **Section 1.5, p. 6:** Add a statement to this section, or a similar section concerning the contract laboratory, that per AOC requirements (Section VII Paragraph 13a), the qualifications of the laboratory contracted to conduct analyses for this portion of the project must be provided to EPA prior to any analytical work being performed. These qualifications at the very least must include the laboratory's certificate(s) of accreditation.
3. **Section 3.2.3, p. 17:** In the first sentence, the phrase "by an independent third party review" has been struck from the end of the first sentence. This phrase must be un-struck and retained.

4. **Section 4.2.1, p. 21:** Adjust this section to state that only analytes applicable to the National Functional Guidelines (e.g., metals) will be validated in accordance with these guidelines, and that other analytes will be validated in accordance with analytical methods or SOPs.
5. **Appendix C and Appendix F:** The chain-of-custody (CoC) document included in these appendices and referenced in the QAPP as an example CoC is from the ALS laboratory group. Since this laboratory will no longer be used for this project, update this document to include a current laboratory CoC or a generic CoC.

Pursuant to Paragraph 14.b. of the Consent Order, Respondents must revise the QAPP to fully address these comments, and submit the QAPP to EPA by April 1, 2018. The revised QAPP must be submitted to EPA prior to performing any field work in accordance with it.

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,



Eric Winiecki
EPA Project Coordinator
Office of Compliance and Enforcement

cc: Jennifer MacDonald
Rene Fuentes