

Monthly Progress Report

March 15, 2017

To: Eric Winiecki, U.S. Environmental Protection Agency, Region 10
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cc: Rene Fuentes and Jennifer MacDonald, U.S. Environmental Protection Agency, Region 10
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**Re: Docket No. SDWA-10-2013-0080; Yakima Valley Dairies
February 2017 Monthly Progress Report**

This memorandum provides the monthly progress report for activities performed in compliance with Docket No. SDWA-10-2013-0080 between February 11 and March 10, 2017. This progress report is submitted on behalf of the Yakima Valley Dairies (Dairies), including: 1) Cow Palace Dairy, L.L.C.; 2) D & A Dairy, LLC (also known as D and A Dairy L.L.C.), George DeRuyter & Son Dairy, L.L.C., and George & Margaret, L.L.C.; and 3) Liberty Dairy LLC and its associated dairy facility H&S Bosma Dairy.

1. Major Accomplishments and Issues

- Construction activities have been completed for the lining of the NW Catch Basin at the Cow Palace Dairy by the selected contractor (Hilmes Construction). Water and Environmental Technologies is currently developing the Basis of Design Report for Cow Palace lagoons to be lined during 2017. Water and Environmental Technologies continues to provide regular progress updates to the U.S. Environmental Protection Agency (EPA) during completion of that work.
- Pre-design testing activities were conducted in support of the lining of lagoons at the Liberty and DeRuyter dairies. Development of the 60% design documents is ongoing and consistent with the schedule as approved by EPA.
- The 2017 Annual Report and the revised 2015 Annual Report were completed and submitted to EPA consistent with Administrative Order on Consent requirements and comment letters received from EPA.
- The Fourth Quarter Groundwater Monitoring Report was completed and submitted to EPA consistent with the Administrative Order on Consent requirements.
- First quarter groundwater monitoring field activities were completed during early March.

2. Other Actions Taken to Comply with the Administrative Order on Consent

Per EPA Letter 133 (dated January 3, 2017), Specific Comment 6, Agrimanagement, Inc., is working with the Dairies to repair/replace/upgrade damaged irrigation moisture sensors prior to the 2017 irrigation season. The upgrade involves updating the motherboard, which includes code division multiple access transmission. The Dairies installed high-visibility flagging at each sensor station to help avoid damaging or destroying the sensors in the future.

3. Work in Progress

Table 1 outlines the updated deliverable schedule.

Table 1
Deliverable Schedule

| Deliverable Name or Event | Date of Most Recent EPA Comment Letter (If Any) | Current Due Date (If Any) Established by AOC/Date Indicated in EPA Comment Letter | Anticipated Start/End Date | On Track to Meet Due Date/Start or End Date? (Yes/No; If No, Explain in Item 4) |
|--|---|---|----------------------------|---|
| GROUNDWATER MONITORING (III.E) | | | | |
| Third Quarter 2016 Quarterly Groundwater Monitoring Data Report (Draft) | -- | 11/29/2016 (60 days following data collection) | Complete | Submitted to EPA on 11/30/2016; comments received February 16. Revised report submitted March 16. |
| Fourth Quarter 2016 Quarterly Groundwater Monitoring Data Report (Draft) | -- | 2/14/2017 (60 days following data collection) | Complete | Submitted to EPA on 2/15/2017 |
| IMMEDIATE SOURCE CONTROL ACTIONS (III.F) | | | | |
| 2015 Pre-plant Dairy Application Field Report(s) | 5/9/2016 (Letter 123) | 6/7/2016 (Letter 123) | Complete | Submitted to EPA on 8/11/2016 |
| 2015 Post-harvest Dairy Application Field Report(s) | 5/9/2016 (Letter 123) | 6/7/2016 (Letter 123) | Complete | Submitted to EPA on 8/11/2016 |
| 2016 Pre-plant Dairy Application Field Report(s) | -- | 7/19/2016 (60 days following last day of sample) | Complete | Submitted to EPA on 8/14/2016 |
| 2016 Post-harvest Dairy Application Field Reports | -- | 1/3/2017 (60 days following data collection) | Complete | Submitted to EPA on 1/3/2017 |

| Deliverable Name or Event | Date of Most Recent EPA Comment Letter (If Any) | Current Due Date (If Any) Established by AOC/Date Indicated in EPA Comment Letter | Anticipated Start/End Date | On Track to Meet Due Date/Start or End Date? (Yes/No; If No, Explain in Item 4) |
|------------------------------|---|---|----------------------------|---|
| REPORTING (III.K) | | | | |
| Monthly Progress Report | -- | 15th of each month (AOC) | 15th of each month | Yes |
| 2013 Annual Report (Revised) | 5/5/2016 (Letter 121) | 2/27/2016 (Letters 104, 116, and 128) | Complete | Submitted to EPA on 11/18/2016 |
| 2014 Annual Report (Revised) | 5/5/2016 (Letter 121) | 4/1/2016 (Letters 109, 116, and 128) | Complete | Submitted to EPA on 11/18/2016 |
| 2015 Annual Report (Revised) | 1/3/2017 (Letter 133) | 1/31/2017 (Letter 133) | Complete | Submitted to EPA on 1/31/2017 |
| 2016 Annual Report | -- | 3/1/2017 | Complete | Submitted to EPA on 3/1/2017 |

Notes:

AOC: Administrative Order on Consent

EPA: U.S. Environmental Protection Agency

QAPP: Quality Assurance Project Plan

4. Encountered Issues and Anticipated Actions

Issues encountered and anticipated actions are as follows:

- Per EPA Letter 133 (dated January 3, 2017), Specific Comment 6, Agrimanagement is working with the Dairies to repair/replace/upgrade damaged irrigation moisture sensors prior to the 2017 irrigation season.
- Two groundwater well transducers that were malfunctioning have been repaired during implementation of the first quarter 2017 groundwater monitoring event.

5. List of Completed Administrative Order on Consent Work

Table 2 lists work that has been completed and is approved by EPA.

Table 2
Work Product Status Update

| Work Product | Date | Status |
|--|-------------|---|
| PROVISION OF WATER (III.D) | | |
| Residential Well Sampling QAPP (III.D.2) | 4/26/2013 | APPROVED |
| Residential Well Sampling Report | 12/20/2013 | APPROVED |
| GROUNDWATER MONITORING (III.E) | | |
| Groundwater Monitoring Well Installation Report (III.E.2) | 10/06/2014 | APPROVED |
| Data Usability Report (III.A.3.e.(1)) ¹ | | |
| Third Quarter 2013 | 10/14/2015 | APPROVED |
| Fourth Quarter 2013 | 10/14/2015 | APPROVED |
| First Quarter 2014 | 10/14/2015 | APPROVED |
| Second Quarter 2014 | 10/14/2015 | APPROVED |
| Third Quarter 2014 | 10/14/2015 | APPROVED |
| Fourth Quarter 2014 | 5/21/2015 | APPROVED |
| First Quarter 2015 | 5/21/2015 | APPROVED |
| Second Quarter 2015 | 10/14/2015 | APPROVED |
| Quarterly Groundwater Monitoring Data Report (III.E.3) | | |
| Third Quarter 2013 | 1/14/2016 | APPROVED |
| Fourth Quarter 2013 | 1/14/2016 | APPROVED |
| First Quarter 2014 | 1/14/2016 | APPROVED |
| Second Quarter 2014 | 9/4/2015 | APPROVED |
| Third Quarter 2014 | 1/14/2016 | APPROVED |
| Fourth Quarter 2014 | 1/14/2016 | APPROVED |
| First Quarter 2015 | 1/14/2016 | APPROVED |
| Second Quarter 2015 | 1/14/2016 | APPROVED |
| Third Quarter 2015 | 12/14/2015 | APPROVED |
| Fourth Quarter 2015 | 3/31/2016 | APPROVED |
| First Quarter 2016 | 5/31/2016 | APPROVED |
| Second Quarter 2016 | 9/6/2016 | APPROVED |
| QAPP Addendum No. 1 | 1/13/2017 | APPROVED |
| IMMEDIATE SOURCE CONTROL ACTIONS (III.F) | | |
| Dairy Facility Application Field Management Plan(s) (III.F.1.) | 11/18/2013 | APPROVED; revised DFAFMPs submitted to EPA on 5/31/2016 |
| 2013 Post-harvest Dairy Application Field Report(s) | 8/29/2015 | APPROVED |
| 2014 Pre-plant Dairy Application Field Report(s) | 8/13/2015 | APPROVED |
| 2014 Post-harvest Dairy Application Field Report(s) | 8/14/2015 | APPROVED |
| Irrigation Water Management Plan(s) (III.F.2) | 8/15/2014 | APPROVED |
| Lagoon Review Report(s) (III.F.6) | 8/22/2013 | APPROVED |

| Work Product | Date | Status |
|--|-----------------------------|--|
| Lagoon Evaluation Plans (III.F.6) | 2/6/2015 | NOT REQUIRED; Dairies elected to line lagoons |
| Cow Palace Lagoon Work Plan (III.F.6) | 3/11/2016 | APPROVED |
| Cow Palace Lagoon Quality Assurance Project Plan (III.F.6) | 3/11/2016 | APPROVED |
| Cow Palace NW Catch Basin 100% Design (III.F.6) | 6/20/2016 | APPROVED |
| Liberty and H&S Bosma Dairies Modified Lagoon Work Plan (III.F.6) | 11/10/2016 and 1/3/2017 | APPROVED |
| George DeRuyter & Son and D&A Dairies Lagoon Work Plan (III.F.6) | 11/10/2016 and 1/3/2017 | APPROVED |
| Liberty and H&S Bosma Dairies Lagoon Pre-design Data Collection QAPP (III.F.6) | 2/2/2017 | APPROVED |
| George DeRuyter & Son and D&A Dairies Lagoon Pre-design Data Collection QAPP (III.F.6) | 2/2/2017 | APPROVED |
| REPORTING (III.K) | | |
| Monthly Progress Reports (III.K.1) | 15th of the following month | Current through March 15, 2017 |
| Health and Safety Plan | 9/13/2016 | Current version ² |

Notes:

1. Following second quarter 2015, Data Usability Reports are no longer required as separate deliverables.
 2. This is the current version of the project Health and Safety Plan. EPA does not provide formal review and approval of the Health and Safety Plan, though it is provided for use. The Health and Safety Plan will be updated periodically if applicable to address additional work or field activities.
- DFAFMP: Dairy Facility Application Field Management Plan
EPA: U.S. Environmental Protection Agency