

# Monthly Progress Report

June 15, 2017

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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  
May 2017 Monthly Progress Report**

This memorandum provides the monthly progress report for activities performed in compliance with Docket No. SDWA-10-2013-0080 between May 11 and June 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

- Anchor QEA, LLC, shared its lagoon design contractors list with Water & Environmental Technologies. Water & Environmental Technologies sent out invitations to bid on Cow Palace Lagoon 2 on June 7, 2017.
- The 90% lagoon lining design documents for Liberty/H&S Bosma Dairies and George DeRuyter & Son/D & A Dairies were submitted to the U.S. Environmental Protection Agency (EPA) on June 2, 2017, following an extension granted by EPA on May 30, 2017 (EPA Letter 150). Anchor QEA and EPA met to discuss EPA's preliminary review of the 90% design on June 8, 2017.
- Agrimanagement, Inc., completed 2017 pre-plant soil sampling activities, in accordance with the requirements of the Administrative Order on Consent, on Wednesday, May 31, 2017, initiating the 60-day period to submit the 2017 Pre-plant Dairy Application Field Reports for the Dairies to EPA by Monday, July 31, 2017.
- EPA comments (EPA Letter 148) were received on the draft first quarter groundwater monitoring report. That report is being revised for resubmittal to EPA prior to June 22, 2017.

- The second quarter groundwater monitoring field activities were completed on June 8, 2017, initiating the 60-day period to submit the Second Quarter 2017 Quarterly Groundwater Monitoring Data Report for the Dairies to EPA by Wednesday, August 9, 2017.

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

The 100% lagoon lining design documents for Liberty/H&S Bosma Dairies and George DeRuyter & Son/D & A Dairies are being prepared and will be submitted to EPA following receipt of final EPA comments on the 90% design. Resubmittal is currently scheduled for July 10, 2017. The bidding process will be initiated on June 19, 2017, with contractor procurement to occur shortly after receipt of bids (bid closing date June 30, 2017).

Per EPA Letter 133 (dated January 3, 2017), Specific Comment 6, Agrimanagement is working with the Dairies to repair and replace damaged irrigation moisture sensors. Agrimanagement is also updating all loggers with new motherboards. Once all motherboards are updated, systems that were completely damaged beyond repair will be replaced. Finally, the sensors that have failed will be repaired. Each week, more loggers are being brought online.

Once all upgrades, replacements, and repairs are complete, Agrimanagement will provide protocol for farming around the sensor stations to help prevent future damage. Agrimanagement will also provide GPS coordinates for the stations to the Dairies. In alfalfa fields where the crop is covering the sensors, Agrimanagement plans to clear the area around the sensors. Agrimanagement will also perform more frequent maintenance checks throughout the season.

## 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)
<b>GROUNDWATER MONITORING (III.E)</b>				
First Quarter 2017 Quarterly Groundwater Monitoring Data Report (Revised)	5/25/2017	6/22/2017 (Revised per EPA Letter 148)	6/22/2017	Yes

<b>Deliverable Name or Event</b>	<b>Date of Most Recent EPA Comment Letter (If Any)</b>	<b>Current Due Date (If Any) Established by AOC/Date Indicated in EPA Comment Letter</b>	<b>Anticipated Start/End Date</b>	<b>On Track to Meet Due Date/Start or End Date? (Yes/No; If No, Explain in Item 4)</b>
Second Quarter 2017 Quarterly Groundwater Monitoring Data Report (Draft)	--	8/9/2017 (60 days following last day of sampling)	8/9/2017	Yes
<b>IMMEDIATE SOURCE CONTROL ACTIONS (III.F)</b>				
Basis of Design Report, D & A Dairy Consolidated Lagoon No. 3, 90% Design	--	--	Complete	Submitted to EPA on 06/02/2017; Reviewed with EPA on 6/8/2017
Basis of Design Report, Liberty Dairy Consolidated Lagoon No. 15, 90% Design	--	--	Complete	Submitted to EPA on 06/02/2017; Reviewed with EPA on 6/8/2017
Basis of Design Report D & A Dairy Consolidated Lagoon No. 3, 100% Design	--	--	7/10/2017 (Pending receipt of final EPA comments on 90% design)	Yes
Basis of Design Report, Liberty Dairy Consolidated Lagoon No. 15, 100% Design	--	--	7/10/2017 (Pending receipt of final EPA comments on 90% design)	Yes
2017 Pre-plant Dairy Application Field Reports	--	7/31/ 2017 (60 days following last day of sampling)	7/31/2017	Yes
<b>REPORTING (III.K)</b>				
Monthly Progress Report	--	15th of each month (AOC)	15th of each month	Yes
2013 Annual Report (Revised)	5/5/2016 (EPA Letter 121)	2/27/2016 (EPA Letters 104, 116, and 128)	Complete	Submitted to EPA on 11/18/2016
2014 Annual Report (Revised)	5/5/2016 (EPA Letter 121)	4/1/2016 (EPA Letters 109, 116, and 128)	Complete	Submitted to EPA on 11/18/2016
2015 Annual Report (Revised)	1/3/2017 (EPA Letter 133)	1/31/2017 (EPA 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

## 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 and replace damaged irrigation moisture sensors, as described in Section 2 of this progress report. On May 16, 2017, T-Mobile discontinued supporting 2G service in the Yakima Valley, which means data loggers operating on the old T-Mobile system now need new motherboards.

## 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
<b>PROVISION OF WATER (III.D)</b>		
Residential Well Sampling QAPP (III.D.2)	4/26/2013	APPROVED
Residential Well Sampling Report	12/20/2013	APPROVED
<b>GROUNDWATER MONITORING (III.E)</b>		
Groundwater Monitoring Well Installation Report (III.E.2)	10/06/2014	APPROVED
Data Usability Report (III.A.3.e.(1)) <sup>1</sup>		
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

<b>Work Product</b>	<b>Date</b>	<b>Status</b>
Fourth Quarter 2015	3/31/2016	APPROVED
First Quarter 2016	5/31/2016	APPROVED
Second Quarter 2016	9/6/2016	APPROVED
Third Quarter 2016	3/16/2017	APPROVED
QAPP Addendum No. 1	1/13/2017	APPROVED
Third Quarter 2016	4/3/2017	APPROVED
Fourth Quarter 2016	5/26/2017	APPROVED
<b>IMMEDIATE SOURCE CONTROL ACTIONS (III.F)</b>		
Dairy Facility Application Field Management Plan(s) (III.F.1.)	11/18/2013	APPROVED; Revised DAFAMPs submitted to EPA on 5/31/2016
2013 Post-harvest Dairy Application Field Reports	8/29/2015	APPROVED
2014 Pre-plant Dairy Application Field Reports	8/13/2015	APPROVED
2014 Post-harvest Dairy Application Field Reports	8/14/2015	APPROVED
2015 Pre-plant Dairy Application Field Reports	3/27/2017	APPROVED
2015 Post-harvest Dairy Application Field Reports	3/27/2017	APPROVED
2016 Pre-plant Dairy Application Field Reports	3/27/2017	APPROVED
2016 Post-harvest Dairy Application Field Reports	3/27/2017	APPROVED
Irrigation Water Management Plan(s) (III.F.2)	8/15/2014	APPROVED
Lagoon Review Report(s) (III.F.6)	8/22/2013	APPROVED
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 QAPP (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
<b>REPORTING (III.K)</b>		
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 <sup>2</sup>

Notes:

1. Following the second quarter of 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.

Dairies: Yakima Valley Dairies

DFAFMP: Dairy Facility Application Field Management Plan

EPA: U.S. Environmental Protection Agency

QAPP: Quality Assurance Project Plan