

Monthly Progress Report

August 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
July 2017 Monthly Progress Report**

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

1. Major Accomplishments and Issues

- The lagoon lining project for Cow Palace Lagoon No. 2 will be implemented by the selected contractor (Hilmes Construction, Inc.) following final permitting approvals. Physical construction is expected to begin during early September. Additional updates will be provided directly to the U.S. Environmental Protection Agency (EPA) by Water & Environmental Technologies.
- Lagoon lining projects for Liberty/H&S Bosma Dairies and George DeRuyter & Son/D&A Dairies are proceeding in accordance with the anticipated schedule. Construction work is expected to begin during August (likely the week of August 21). As discussed with EPA, the selected contractor (Ag Pro Repair & Fabrication, Inc.) will implement construction in series, beginning with Liberty Dairy Consolidated Lagoon No. 15 and proceeding to D&A Dairy Consolidated Lagoon No. 3 in September. Additional information will be provided as part of our weekly progress meetings with EPA.
- EPA comments and conditional approvals on the Liberty/H&S Bosma Dairies and George DeRuyter & Son/D&A Dairies 100% lagoon lining design documents (EPA Letters 155 and 156) were received. The 100% lagoon lining design documents are being updated and resubmitted to EPA by August 23, 2017, consistent with Letters 155 and 156.

- The First Quarter Groundwater Monitoring Data Report was revised in response to comments received from EPA (EPA Letter 148) and resubmitted on June 22, 2017. EPA comments were received on that revised draft (EPA Letter 154), and edits are being made for a resubmittal of the Revised First Quarter Groundwater Monitoring Data Report by August 22, 2017.
- The 2017 Pre-Plant Dairy Application Field Reports for Cow Palace Dairy, Liberty/H&S Bosma Dairies, and George DeRuyter & Son/D&A Dairies were approved by EPA on August 1, 2017 (EPA Letter 157).

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 were submitted to EPA on July 19, 2017 and July 20, 2017, respectively.

The Second Quarter 2017 Quarterly Groundwater Monitoring Data Report was submitted to EPA on August 7, 2017.

Per EPA Letter 133 (dated January 3, 2017), Specific Comment 6, Agrimanagement, Inc., 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)
GROUNDWATER MONITORING (III.E)				
First Quarter 2017 Quarterly Groundwater Monitoring Data Report (Revised)	7/25/2017	8/22/2017 (Revised per EPA Letter 154)	8/22/2017	Yes
Second Quarter 2017 Quarterly Groundwater Monitoring Data Report (Draft)	--	--	Complete	Submitted to EPA on 08/07/2017
IMMEDIATE SOURCE CONTROL ACTIONS (III.F)				
Basis of Design Report, D&A Dairy Consolidated Lagoon No. 3, 90% Design	6/22/2017	--	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	6/21/2017	--	Complete	Submitted to EPA on 06/02/2017; Reviewed with EPA on 6/8/2017
Final Basis of Design Report D&A Dairy Consolidated Lagoon No. 3, 100% Design	--	8/23/2017	8/23/2017	Yes
Final Basis of Design Report, Liberty Dairy Consolidated Lagoon No. 15, 100% Design	--	8/23/2017	8/23/2017	Yes
2017 Pre-Plant Dairy Application Field Reports	--	7/31/ 2017 (60 days following last day of sampling)	Complete	Submitted to EPA on 7/26/2017; EPA approved 8/1/2017
REPORTING (III.K)				
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

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)
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

No new issues were encountered.

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	Submittal 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

Work Product	Submittal Date	Status
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
Third Quarter 2016	3/16/2017	APPROVED
QAPP Addendum No. 1	1/13/2017	APPROVED
Fourth Quarter 2016	5/26/2017	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 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
2017 Pre-Plant Dairy Application Field Reports	7/26/2017	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/H&S Bosma Dairies Modified Lagoon Work Plan (III.F.6)	11/10/2016 and 1/3/2017	APPROVED
George DeRuyter & Son/D&A Dairies Lagoon Work Plan (III.F.6)	11/10/2016 and 1/3/2017	APPROVED

Work Product	Submittal Date	Status
Liberty/H&S Bosma Dairies Lagoon Pre-Design Data Collection QAPP (III.F.6)	2/2/2017	APPROVED
George DeRuyter & Son/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 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