

# Monthly Progress Report

October 15, 2017

To: Eric Winiecki, U.S. Environmental Protection Agency, Region 10  
From: Mark Larsen and Nicole LaFranchise, Anchor QEA, LLC  
cc: Rene Fuentes and Jennifer MacDonald, U.S. Environmental Protection Agency, Region 10  
Henry Bosma, Liberty Dairy, LLC  
Dan DeRuyter, George DeRuyter & Son Dairy, LLC  
Adam Dolsen, Cow Palace, LLC  
Lori Terry Gregory, Foster Pepper PLLC  
Brendan V. Monahan, Stokes Lawrence, P.S.  
Patrick W. Ryan, Perkins Coie LLP

**Re: Docket No. SDWA-10-2013-0080; Yakima Valley Dairies  
September 2017 Monthly Progress Report**

This memorandum provides the monthly progress report for activities performed in compliance with Docket No. SDWA-10-2013-0080 between September 11 and October 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 is being implemented by the selected contractor (Hilmes Construction, Inc.) consistent with permitting approvals. Physical construction is ongoing and will extend through late October or early November. 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 and approved permits. Construction work began August 21 at Liberty Dairy Consolidated Lagoon No. 15. Work conducted to date includes filling, fine grading, trenching, leak detection installation, and pipe installation. Construction work began September 23 at D&A Dairy Consolidated Lagoon No. 3. Work conducted to date includes filling, compaction, fine grading, and anchor trench work. Both sets of lagoons (Liberty Dairy and D&A Dairy) are expected to be completed by the end of October or early November.
- Liberty/H&S Bosma Dairies and George DeRuyter & Son/D&A Dairies have identified the lagoons to be lined at each dairy in 2018, consistent with the existing approved Lagoon Work

Plans. A letter notifying EPA of which lagoons will be lined, consolidated, or abandoned in 2018 was submitted to EPA on October 3, 2017, in response to EPA Letters 158 and 160.

- Anchor QEA submitted recommendations for potential Quality Assurance Project Plan and reporting format updates for groundwater and application field monitoring work beginning in 2018. The suggestions for consideration are based on findings to date. EPA is currently reviewing the Anchor QEA recommendations

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

Agrimanagement, Inc., continued fall (post-harvest) application field sampling activities at Cow Palace Dairy, Liberty/H&S Bosma Dairies, and George DeRuyter & Son/D&A Dairies.

Third quarter groundwater monitoring began on September 25, 2017, and concluded on September 27, 2017.

## 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)	7/25/2017 (EPA Letter 154)	8/22/2017 (Revised per EPA Letter 154)	Complete	Submitted to EPA on 8/18/2017 (Cover: August 22, 2017)
Second Quarter 2017 Quarterly Groundwater Monitoring Data Report (Draft)	--	--	Complete	Submitted to EPA on 08/07/2017
Third Quarter 2017 Quarterly Groundwater Monitoring Data Report (Draft)	--	11/27/2017 (60 days from last sample collected)	11/27/2017	Yes
<b>REPORTING (III.K)</b>				
Monthly Progress Report	--	15th of each month (AOC)	15th of each month	Yes
2013 Annual Report (Revised)	12/30/2015 (EPA Letter 95)	2/27/2016 (EPA Letters 104, 116, 121, and 128)	Complete	Submitted to EPA on 11/18/2016

<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>
2014 Annual Report (Revised)	2/2/2016 EPA Letter 101	4/1/2016 (EPA Letters 109 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**

<b>Work Product</b>	<b>Submittal Date (Report Cover Date)</b>	<b>Status</b>
<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

<b>Work Product</b>	<b>Submittal Date (Report Cover Date)</b>	<b>Status</b>
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	3/20/2017 (Cover: March 2017)	APPROVED 4/3/2017
QAPP Addendum No. 1	11/10/2016 (Cover: November 2016)	APPROVED 1/13/2017
Fourth Quarter 2016	5/1/2017 (Cover: May 1, 2017)	APPROVED 5/26/2017
<b>IMMEDIATE SOURCE CONTROL ACTIONS (III.F)</b>		
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	1/3/2017 (Cover: January 3, 2017)	APPROVED 3/27/2017
2017 Pre-Plant Dairy Application Field Reports	7/31/2017 (Cover: July 2017)	APPROVED 8/1/2017
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

<b>Work Product</b>	<b>Submittal Date (Report Cover Date)</b>	<b>Status</b>
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 (Cover: November 2016)	APPROVED 1/6/2017
George DeRuyter & Son/D&A Dairies Lagoon Work Plan (III.F.6)	11/10/2016 (Cover: November 2016)	APPROVED 1/6/2017
Final Basis of Design Report, Liberty Dairy Consolidated Lagoon No. 15, 100% Design	7/20/2017 (Cover: July 19, 2017) 08/23/2017 (Mods Cover: August 11, 2017)	APPROVED with Modifications 7/25/2017
Final Basis of Design Report, D&A Dairy Consolidated Lagoon No. 3, 100% Design	7/20/2017 (Cover: July 19, 2017) 08/23/2017 (Mods Cover: August 11, 2017)	APPROVED with Modifications 7/25/2017
Liberty/H&S Bosma Dairies Lagoon Pre-Design Data Collection QAPP (III.F.6)	1/27/2017 (Cover: January 26, 2017)	APPROVED 2/2/2017
George DeRuyter & Son/D&A Dairies Lagoon Pre-Design Data Collection QAPP (III.F.6)	1/27/2017 (Cover: January 26, 2017)	APPROVED 2/2/2017
<b>REPORTING (III.K)</b>		
Monthly Progress Reports (III.K.1)	15th of the following month	Current through September 15, 2017
Health and Safety Plan	9/13/2016 (Cover: September 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