
WFS Walla²

HWT RP

Admin Order

No. DE 95HS-E933 (7/31/95)

and

Amendment (10/13/95)

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN)
ADMINISTRATIVE ORDER)
AGAINST:)
Western Farm Service, Inc.)

ORDER No. DE95HS-E933

To: Ms. Nancy Bishop
Western Farm Service, Inc.
Post Office Box 1168
3705 Beechwood Avenue
Fresno, CA 93715

This Administrative Order, issued under the authority of RCW 70.105, requires Western Farm Service (WFS) to comply with the Washington Dangerous Waste Regulations (Chapter 173-303 WAC) by taking the actions described below. Ecology is issuing the Order because the Department has determined that violations of the regulations have occurred at the WFS Walla Walla facility. The Department's determination is based on the following facts:

- WFS has owned and operated the company's agricultural chemical distribution facility in Walla Walla, Washington since 1969. WFS sells agricultural chemicals and leases applicators to farmers for the application of pesticides and fertilizers to agricultural fields.
- In November, 1980, WFS submitted a Resource Conservation and Recovery Act (RCRA) Part A hazardous waste treatment, storage, and disposal (TSD) permit application for the Walla Walla facility. Upon submittal of the application, the WFS Walla Walla facility became an *interim status* TSD facility, which was permitted only for the *storage* of hazardous wastes. In July, 1991, the U.S. Environmental Protection Agency (EPA) conducted a RCRA Preliminary Assessment (PA) at the Walla Walla facility to evaluate the current (in 1991) waste management practices at the facility and to gather data regarding historical releases of dangerous constituents to the environment. From the information collected, EPA concluded that from the 1950s until 1987 (including the permitted period between 1980 and 1987), applicators containing pesticide and fertilizer residues were rinsed inside and out at the Walla Walla facility. The rinsates were washed onto a concrete pad, located on the northeast side of the facility, and drained to an unlined collection pit approximately 52 feet long, 18 feet wide, and 4 feet deep. When the collection pit became full, the rinsates overflowed into an unlined 200' x 18'

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ditch located west of the collection pit, and onto a field to the north. The rinsates either infiltrated into the ground or evaporated. Because WFS was not permitted to *dispose* hazardous wastes at the Walla Walla facility, the discharges of waste pesticides to the environment between 1980 and 1987 were violations of the federal hazardous waste regulations (40 CFR Subpart 265) and the state Dangerous Waste Regulations [specifically WAC 173-303-170 (3) and WAC 173-303-145 (2)].

Groundwater beneath and downgradient of the WFS Walla Walla facility contains several pesticides which were historically managed at the facility. The pesticide-contaminated groundwater plume extends at least 600 feet downgradient of the former pesticide rinsate collection pit, and is at least 60 feet deep. The concentration of at least one of these pesticides, dinoseb, currently exceeds the groundwater cleanup level established for RCRA *interim status* TSD facilities. Lindane, simazine, and 2,4-D have also exceeded their respective groundwater cleanup levels in the recent past. As a result of the groundwater contamination at the Walla Walla facility, RCRA clean closure performance standards for *interim status* TSD facilities have not been met at this time, and post-closure care of the facility is required.

Therefore, in accordance with RCW 70.105, it is ordered that Western Farm Service implement the May, 1995 version of the company's "*Post-Closure Groundwater Monitoring Plan*", which is given formal approval by Ecology in the cover letter for this Order. The post-closure plan requires WFS to collect groundwater samples twice a year from ten monitoring wells (MW-1, MW-3, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12 and well 41) located both on and off WFS property. The groundwater samples from all wells must be analyzed for dinoseb and nitrate. Groundwater samples collected from wells MW-1, MW-3, MW-7, and MW-8 during summer, 1995 and winter, 1996 must also be analyzed for lindane and simazine. Sampling and analysis must continue until at least two years of groundwater geochemistry data demonstrate that groundwater cleanup levels [established in the "*Model Toxics Control Act Cleanup Regulations*" (MTCA) (Chapter 173-340 WAC)] have been achieved *at all designated post-closure monitoring wells* at the facility. If the concentrations of pesticides in groundwater at the facility are not below MTCA groundwater cleanup levels after five years, Ecology will review the data and evaluate the need for additional groundwater monitoring and/or remediation at the facility. Either a second administrative order or a RCRA *final status* dangerous waste treatment, storage, and disposal (TSD) permit would be issued at that time.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

This Order may be appealed. Your appeal must be filed with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, Washington 98504-0903 within thirty (30) days of your receipt of this Order. At the same time, your appeal must also be sent to the Department of Ecology c/o The Enforcement Officer, P.O. Box 47600, Olympia, Washington 98504-7600.

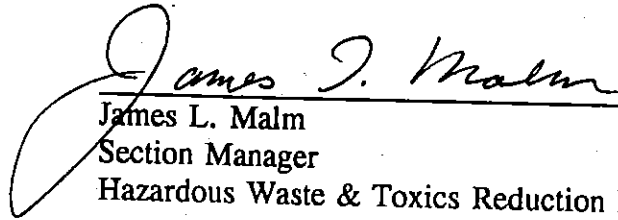
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Your appeal alone will not stay the effectiveness of this Order. Stay requests must be submitted in accordance with RCW 43.21B.320. These procedures are consistent with Ch. 43.21B RCW.

DATED this 31st day of July, 1995 at Spokane, Washington.



James L. Malm
Section Manager
Hazardous Waste & Toxics Reduction Program

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF AN)
ADMINISTRATIVE ORDER AGAINST)
Western Farm Service, Inc.

AMENDMENT OF
ORDER No. DE95HS-E933

To: Ms. Nancy Bishop
Western Farm Service, Inc.
P.O. Box 1168
3705 Beechwood Avenue
Fresno, CA 93715

On July 31, 1995, the Department of Ecology (Ecology) issued Administrative Order No. DE95HS-E933 to Western Farm Service (WFS). This order requires WFS to implement the "Post-Closure Groundwater Monitoring Plan" for the Walla Walla facility, which was formally approved by Ecology in a letter to WFS dated July 31, 1995. The principal components of the groundwater monitoring plan are:

- Semi-annual collection of groundwater samples from ten monitoring wells on or adjacent to the facility (MW-1, MW-3, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12 and well 41);
- Analysis of all water samples for *dinoseb* and *nitrate*s; and
- Analysis of water samples collected from wells MW-1, MW-3, MW-7, and MW-8 during summer, 1995 and winter, 1996 for *simazine* and *lindane*.

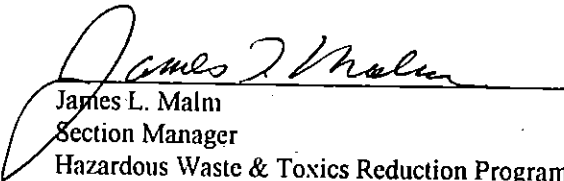
Dinoseb, *lindane*, *simazine*, and *nitrate*s were chosen as analytes, because they have been detected (at least one time) in facility groundwater at concentrations exceeding Model Toxics Control Act Cleanup Regulation (MTCA) (Chapter 173-340 WAC) Method B *groundwater cleanup levels*. *Dinoseb*, *lindane*, and *simazine* have also been detected in facility soils at concentrations exceeding MTCA Method B soil cleanup levels for *groundwater protection*. The concentrations of *nitrate*s in soils at the WFS facility have not been measured.

Several other compounds, which were detected in soil samples at concentrations exceeding MTCA Method B soil cleanup levels for *groundwater protection*, were not included in the list of analytes because these compounds have not been detected in groundwater at concentrations exceeding MTCA Method B *groundwater cleanup levels*. During a recent review of soil and groundwater geochemistry data for the WFS facility, Ecology discovered that six of these compounds (*aldrin*, *heptachlor*, *toxaphene*, *PP-DDD*, *PP-DDE*, and *PP-DDT*) were never detected in groundwater because they were never analyzed for. Because the concentration of these six compounds exceed MTCA soil cleanup levels for *groundwater protection*, and because groundwater is very shallow (< 10 feet deep) at the facility, it is essential for WFS to demonstrate that groundwater at the facility does not contain any of these compounds at concentrations exceeding MTCA Method B *groundwater cleanup levels*.

Therefore, Administrative Order No. DE95HS-E933 is hereby amended as follows:

- Groundwater samples must be collected semi-annually from the following monitoring wells on or adjacent to the WFS Walla Walla facility: MW-1, MW-3, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12 and well 41;
- All water samples must be analyzed for *dinoseb* and *nitrates*; and
- Water samples collected from monitoring wells MW-1, MW-3, MW-7, and MW-8 must also be analyzed for *lindane*, *simazine*, *aldrin*, *heptachlor*, *toxaphene*, *PP-DDD*, *PP-DDE*, and *PP-DDT*.
- The collection and analysis of water samples must continue until at least two years (four sampling rounds) of groundwater geochemistry data demonstrate that MTCA *groundwater cleanup levels* have been achieved at all groundwater monitoring wells designated above. If the concentrations of pesticides in groundwater at the facility still exceed MTCA groundwater cleanup levels after five years, Ecology will reevaluate the need for additional groundwater monitoring and/or soil/groundwater remediation at the facility. In the event that additional work must be conducted, Ecology will issue either a second administrative order or a RCRA *final status* dangerous waste treatment, storage, and disposal (TSD) permit.

Dated this thirtieth day of October, 1995 at Spokane, Washington.


James L. Malm
Section Manager
Hazardous Waste & Toxics Reduction Program