

Farrallon Consulting for CHS, Inc.

Subject: Public Comment – Periodic Review CENEX Supply & Marketing Inc Rinsate

Dear Kristin,

CHS Inc. (CHS) would like to provide comments on the Second Periodic Review, CENEX Supply & Marketing Inc. Rinsate (the Site), 300 Division St. East, Quincy, Grant County, Facility Site ID No. 33599645, Cleanup Site ID No. 370 (Second PR) dated October 2022, prepared by the Toxics Cleanup Program, Eastern Region, Washington State Department of Ecology (Ecology).

CHS requests that Ecology remove the recommendation provided on page 31 of the Second PR regarding amendment of the Cleanup Action Plan (CAP) to include cleanup level (CUL) adjustments based on a new groundwater laboratory practical quantitation limit (PQL) of 0.2 micrograms per liter ($\mu\text{g}/\text{l}$) for 1,2-dibromoethane (EDB), 1,2-dichloropropane (1,2-DCP), and 1,2,3-trichloropropane (1,2,3-TCP). The current CUL for these analytes for the Site is 1 $\mu\text{g}/\text{l}$, which was based on the laboratory PQL established in the Final Cleanup Action Plan, Cenex/Quincy Site, Quincy, WA dated February 22, 2001, Exhibit B of Consent Decree No. DE-00TCPER-1815 dated February 22, 2001 entered into by the Ecology and Cenex Harvest States Cooperatives (Consent Decree).

The recommendation to lower the current CUL for 1,2-DCP to a new groundwater PQL of 0.2 $\mu\text{g}/\text{l}$ is inconsistent with established MTCA regulations, which establish the MTCA Method B CUL for 1,2-DCP at 1.2 $\mu\text{g}/\text{l}$. The recommendation to lower the CUL for EDB, 1,2-DCP, and 1,2,3-TCP to 0.2 $\mu\text{g}/\text{l}$ is also inconsistent with the discussion of Site CULs in the 2022 PR public review draft, which states that a “decision to potentially lower the current cleanup levels based on laboratory PQLs must consider the ability of existing remedial systems and contaminant reductions process to effectively achieve and sustain the lower IHS concentrations.” Here, the 2022 PR public review draft indicates that Ecology will not require CHS to analyze EDB, 1,2-DCP, and 1,2,3-TCP using improved analytical techniques (e.g., EPA Method 8011), noting that the PQL for the currently used laboratory method satisfies the remedial objectives at the Site. Furthermore, evaluation of alternative technologies has previously demonstrated that there are no viable, cost-effective options that would achieve CULs faster than the current remedy.

Under the circumstances, amending the CAP to adjust the PQL downward is not justified and will not promote further or faster reduction in IHS concentrations. Therefore, CHS requests that Ecology remove the recommendation on page 31 of the Second PR regarding adjustments to the groundwater PQLs at the Site.

Thank you for your consideration, Tracey Mulhern, L.G. (WA), Associate Geologist