UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

September 4, 2019

Mark Larsen
Project Coordinator
ANCHOR QEA, LLC
1119 Pacific Avenue, Suite 1600
Tacoma, Washington 98402

Re: Lagoon 6 Basis of Design Report
Administrative Order on Consent ("Consent Order")
Docket No. SDWA-10-2013-0080
Yakima Valley Dairies, Washington

Dear Mr. Larsen:

EPA has completed our review of:

- H&S Bosma Dairy Lagoon No. 6 Basis of Design Report 100% Design Submittal (August 30, 2019)

Based on our review, EPA has this comment:

1. In an August 2, 2019 letter, EPA provided comments to you regarding an earlier draft of this Report. Comment number 4 from EPA's August 2, 2019 letter stated: "Add the Lagoon 6 Operations and Maintenance Plan as an appendix to the Basis of Design Report."

   Your subsequent August 30, 2019 submittal of the Report includes an Operations and Maintenance (O&M) Plan in Appendix E, but it appears to be an incorrect version of the O&M Plan. The O&M Plan, entitled, "H&S Bosma Dairy Lagoon No. 6 and Consolidated Lagoon No. 10 Operations, Maintenance, and Monitoring Plan" (August 30, 2019), states on page 4:

   > "While in operation, Lagoon No. 6 and Consolidated Lagoon No. 10 will be periodically tested for leaks using a Permanent Electrical Leak Monitoring (PELM) System that will be installed beneath the FML/GCL system."

   It is EPA's understanding that neither the Lagoon 6 nor the Lagoon 10 liner designs include a PELM leak detection system because the Bosma Dairy has elected to utilize a puddle leak detection method instead for all their lagoons.

   Delete the O&M Plan in Appendix E and replace it with the correct version.

Pursuant to Paragraph 14 of the Consent Order, the report must be modified to address this comment and re-submitted to EPA by October 2, 2019.

You may contact me at (206) 553-6904, or your legal counsel may contact Jennifer MacDonald at (206) 553-8311, if you have any questions regarding this letter.

Sincerely,

Eric Winiecki
EPA Project Coordinator
Enforcement and Compliance Assurance Division

cc: Jennifer MacDonald
Rene Fuentes

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