

October 26, 2018

Charles Gruenenfelder, Site Manager  
Pasco Landfill NPL Site  
Washington State Dept. of Ecology

Subject: Pasco Landfill NPL Site - Focused Feasibility Study

Dear Mr. Gruenenfelder:

### Introduction

On September 12, 2018, the State of Washington Department of Ecology (“Ecology”) invited the public to comment on the draft Focused Feasibility Study (“FFS”) reports submitted by parties comprising the Industrial Waste Area Group III (“IWAG) and the Landfill Group (“LFG”). Specifically, Ecology is seeking input on final cleanup remedy for each waste area at the Pasco Sanitary Landfill NPL Site (“Site”). According to Ecology, information from public input along with the draft FFS reports and interim cleanup actions will be considered in preparing the final cleanup plan for the Site.

In response to Ecology’s invite for public comment, following are my comments on the cleanup alternatives in general and to Zone A more specifically. Primarily, my comments intend to convey my concern as a member of the public and a resident of the Pasco community that Ecology select a cleanup remedy that brings finality to the cleanup of the Site to the fullest extent practicable, in accordance with federal and state law.

### Final cleanup remedy to meet thresholds under federal and state law

My understanding is that under the federal law, Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), and its state equivalent Model (“MTCA”), protecting human health is a primary cleanup threshold. Also, compliance with cleanup standards is an additional statutory requirement.

In addition, in selecting a cleanup remedy, Ecology must meet the following significant requirements: 1) select and use permanent solutions to fullest extent practicable; 2) provide a reasonable restoration time frame; and, 3) consider public concerns.

Therefore, compliance with cleanup standards is the minimum requirement for a cleanup remedy. The overarching objective in selecting a cleanup remedy is to protect human health through a permanent solution to the fullest extent practicable that is implemented in a reasonable time frame.

## Concerns with selecting cleanup alternatives

As a member of the public and a resident of the Pasco community, my overarching concern is that the selected cleanup remedy for each waste area will not only meet cleanup standards but will be a remedy that protects human health. My concern is that groundwater contamination has been a long-term issue at the Site and could remain an issue if sources of groundwater impacts remain at the Site. In fact, according to Ecology, groundwater impacts were first observed in 1985 and have been observed as late as this year. Therefore, to protect human health from future groundwater contamination, Ecology will have to select a remedy that eliminates the potential for groundwater contamination.

Also, to eliminate the threat of potential groundwater contamination, Ecology will have to select a remedy that offers a permanent solution. My concern is that the cleanup alternatives for Zone A (A-5 through A-7) will allow some existing sources of groundwater contamination to be repackaged (for example, drums with liquid waste wrapped in plastic) and relocated at a facility on the Site. For a source of potential groundwater contamination to remain at the Site allows for future releases to groundwater as the packaging and the on-site facility infrastructure degrade over time. It does not seem to be a permanent solution for a site that has had issues with groundwater contamination for several decades. Ecology should consider a remedy that does not repackage existing sources of potential groundwater contamination and allows them to remain at the Site. In other words, I am concerned that a selected remedy is not a permanent solution if it allows existing sources of groundwater contamination to remain on Site.

In addition, Ecology should select a cleanup remedy that provides a reasonable restoration time frame. My concern is whether it is possible to achieve a reasonable restoration time frame at the Site if a cleanup remedy allows the sources of groundwater contamination to remain at the Site? Would the Site ever be restored, much less in a reasonable time, if the sources of groundwater contamination remain at the Site? After all, Zone A was closed in 1975 and yet after decades of interim actions to address groundwater contamination and trying to remediate potential sources, groundwater continues to be impacted by contamination at the Site – to this day.

In summary, I want Ecology to select a cleanup remedy that is the most reliable, effective, permanent solution that is protective of the human health.

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