

Benton-Franklin Health District

From: Rick Dawson
Sent: Tuesday, October 9, 2018 7:39 AM
To: Gruenenfelder, Charles (ECY)
Subject: Pasco Landfill NPL Site - Focused Feasibility Study

Dear Mr. Gruenenfelder:

Thank you for the opportunity to review and comment on the above referenced study. Upon review of the documents BFHD has no comment regarding the proposed actions with the exception of those activities being considered for Zone A. BFHD has no preference in the proposed options that meet Ecology's minimum criteria, specifically options A-5 through A-7 and A-9. BFHD has concerns for the potential health and safety ramification for each of the options as follows:

1. Detailed safety plans will be necessary to insure worker safety while removing the existing waste from Zone A. These plans must be developed to prevent spontaneous combustion and insure that all employees are provided the appropriate protective equipment.
2. Detailed safety plans with approval from local emergency management and EMS agencies to insure public safety from any potential fire/explosion occurring as a result of this work.
3. Plans to address free product on the groundwater surface below Zone A seem insufficient to prevent further degradation of groundwater.
4. Multiple options include removal of soil below Zone A to differing depths yet no consideration appears to exist to remove contaminated soil to the groundwater surface. Excavating and removing all waste and contaminated soils would seem to be most protective of human health and groundwater.

Choosing a final remediation plan is imperative to addressing the increasing degradation of the waste in Zone A. Concerns with elevated temperatures, and the inability of the current treatment system to capture waste products prior to reaching groundwater must be addressed. It should be noted that contamination of groundwater originating from this site has been going on for decades and the selection of a final remediation plan is long overdue. Upon selection of a final remedy, implementation should be required within 180 days with major milestones identified and timelines attached to each. The continuation of the status quo at this site cannot be tolerated in the interest of public health and safety.

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