

Washington Department of Health

STATE OF WASHINGTON

DEPARTMENT OF HEALTH
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TO: Charles Gruenfelder, Site Manager
Pasco Landfill NPL Site
Washington State Dept. of Ecology

FROM: Lenford O'Garro, Toxicologist
Washington State Dept. of Health

SUBJECT: DOH recommendations for the Pasco Landfill

The Industrial Waste Area Group III and Bayer Crop Science, and the Landfill Group, have each submitted a Draft Focused Feasibility Study (FFS) of cleanup alternatives for the Pasco Landfill NPL Site to the Washington State Department of Ecology (Ecology). Ecology is seeking public comments and input on the various cleanup options presented in the FFS to help determine which future actions will be taken. As part of this process, the Washington State Department of Health (DOH) conducted a review and provided recommendations with regards to health risk reductions expected from the various cleanup alternatives. Uncertainties exist and must be noted with any large and complex project. It is difficult to model the effectiveness of soil removal, soil treatment, capping, and enhanced and monitored natural recovery, as well as make predictions on environmental conditions spanning decades. Alternatives that rely on a combination of technologies without reliance on a single technology would likely have the greatest flexibility responding to unforeseen or changing conditions.

In determining a recommendation for a particular cleanup alternative, DOH first considers whether threshold criteria would be met to protect human health. Given that all cleanup scenarios achieve some public health protection, additional considerations were given to the long term effectiveness, permanence of the solution, amount of reduction in toxicity and mobility, volume of soil to be treated or removed, practicality in implementation, and uncertainties associated with the various alternatives. While costs were considered, they were not a determining factor in DOH's recommendation.

After reviewing the FFS on the Pasco Landfill NPL Site, DOH recommends that for Zone A no action alternative, alternatives A-1 through A-4 and A-8 not be considered because these alternatives leave the drums in place, and we are concerned about the potential for thousands of these drums to leak and future increase groundwater contamination. From a health perspective, DOH recommends alternatives A-5, A-6, A-7, and A-9 as the approaches most protective of future

groundwater contamination.

DOH recommends for Zone B no action alternative, alternatives B-1 and B-2, not be considered because of our concern about the potential for future groundwater contamination. From a health perspective DOH recommends Zone B alternatives B-3, B-4, and B-5 to be the approaches most protective of future groundwater contamination.

DOH recommends for Zone C/D no action alternative and alternative CD-1, not be considered because of our concern about the potential for future groundwater contamination. From a health perspective DOH recommends Zone C/D alternatives CD-2 and CD-3 to be the approaches most protective of future groundwater contamination.

DOH recommends for Zone E no action alternative and alternative E-1, not be considered based because of our concern about the potential for future groundwater contamination. From a health perspective DOH recommends Zone E alternatives E-2, and E-3 to be the approaches most protective of future groundwater contamination.

DOH recommends for on-property groundwater no action alternative not be considered based on time period. From a health perspective DOH recommends Zone on-property groundwater alternative ONP-1 to be the most reasonable approach.

DOH recommends for MSW Landfill from a health perspective alternatives MSW-1, MSW-2, and MSW-3 to be reasonable approaches. DOH recommends for balefill and inert waste areas from a health perspective alternative BA-1 to be reasonable approach. DOH recommends for Burn trenches from a health perspective alternatives BT-A, BT-B, and BT-C to be reasonable approaches.