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October 4, 2019

Chuck Gruenfelder, LG, LHG
Project Manager, Toxics Cleanup Program
Washington Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295

Re: *Pasco Landfill*

Dear Mr. Gruenfelder:

This letter provides comments concerning the proposed Consent Decree for implementation of a remedy at the Pasco Sanitary Landfill. As you know, Franklin County was identified as a potentially liable party (PLP) in this matter and has previously responded to protect public health and safety by enactment of institutional controls at the Department's request in order to safeguard against threats from groundwater contamination and other potential pathways.

When Ecology initially proposed a removal option as part of the remedial action, we expressed concern about creating a new exposure pathway by transporting excavated wastes through the community. The FFS identified options that would have transported waste off-site at significantly higher costs than we believed were necessary and appropriate. The remedy proposed by the Consent Decree and Cleanup Action Plan incorporates on-site treatment with removal of drums. The proposal further requires that waste materials disposed of off-site must be characterized to meet requirements for waste packaging, transport, treatment, and/or disposal at an acceptable facility.

We encourage selection of routes that avoid population areas for those materials that are determined to require off-site disposal. We also support strong contingency planning that incorporates local governments into an emergency response protocol in the event of an accident involving hazardous substances, both on-site and during the transportation process.

One of the principal goals of Franklin County has been to support cleanup actions that protect public health and the environment. We have been principally concerned about removal of threats and exposures via groundwater. The proposal continues groundwater remedies that incorporates source control by removing drums of hazardous materials and continuing soil vapor extraction of material that has leaked over the past.

We appreciate Ecology's hard work and efforts to craft a protective remedy at this site given the complex and challenging issues posed by a site closed several decades ago. We also appreciate Ecology's efforts to build a remedy that will be promptly implemented by a coalition of willing PLPs.

We continue to believe that Franklin County's share of responsibility is comparatively insignificant in terms of volume and toxicity of hazardous substances at the site. Despite its minimal role in contributing such substances, Franklin County shares the commitment to the protection the environment in developing remedial actions at the site. The County has supported interim actions including development of institutional controls to protect the public and environment.

We look forward to concluding this process so the remedy can be implemented in a manner that protects public health and the environment and which protects the public's interest in doing so without undue burden on County taxpayers. We believe such a resolution would be consistent with Ecology and the County's shared commitment to protecting the environment.

Very truly yours,



Keith Johnson
County Administrator