

Octavia Parker

Signed,

January 24, 2023 10:30 A.M. E.S.T

Octavia Parker, Director
Oulwa Research Studio

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Project Title: Yakima Training Center Enforcement Order

Year: January 24, 2023 1:00 P.M. EST

Site Conditions: Unavoidable Daily Activities - Living - Passive Exposures

Company: Oulwa Research Studio

Public Notice Date: January 23, 2023 **Comment Period Ends:** February 23, 2023

The 327,000 acres (510.94sq mi) that make up the Yakima Training Center is mostly shrub-steppe, making the YTC one of Washington State's largest remaining shrub-steppe habitats. The vegetation in the area is typical shrub-steppe consisting mainly of bunch grass, sagebrush and bitter brush. The terrain of the area is one of hills and valleys, dominated by three distinct parallel ridges running east to west, the Manastash Ridge, Umtanum Ridge anticlines and Saddle Mountains. These elevated areas are all part of the Yakima Fold Belt found near the western perimeter of the Columbia River Plateau. Located in Pacific Northwest on the Puget Sound, in Washington State, Joint Base Lewis-McChord is near the city of Lakewood, 10 minutes from Tacoma and 20 minutes from Olympia, the state capitol. JBLM is situated in a key location along Interstate 5, allowing easy access to Sea-Tac Airport and to the deep water ports of Tacoma and Seattle. The completion of RCRA corrective action recommendations at all solid waste management unit (SWMU) and area of concern (AOC) sites at Yakima Training Center (YTC) following the 1995 RCRA Facility Assessment (RFA). In practice Model Toxics Control Act (MTCA) regulations in Chapter 173-340 of the WAC have been used to address actual releases to the environment at YTC per WAC 173-303-646.

Current and Projected Site Use

Thus, the site remedy selected in a 2007 Decision Document (DD) is for JBLM Installation Restoration Program (IRP) to implement and maintain LUC mechanisms to prevent unmitigated future residential land use within the site boundary.

Based on the Findings of Fact and Ecology Determinations, it is hereby ordered that the Army take the following remedial action(s) and that this (these) action(s) be conducted in accordance with WAC 173-340 unless otherwise specifically provided for herein.

The Army shall submit to Ecology for review and approval, an Annual Report. The Annual Report shall contain a description of the previous year's work and preliminary plans for the current year. The Army shall submit the Annual Plan by March 31.



Site: Old MATES Battery Room – Conduct Site Investigation around the former floor drain discharge outlet to the environment;

Significance:

The practice of "greener cleanups" Remediate an environmental concern by removing a contaminant source.

We are interested in the cost, level of detail, time, and scale of remedial action undertaken by the Department of Ecology from 2020-2022 and will further review these documents.

In September 2015, the Installation Restoration Program, Directorate of Public Works for Joint Base Lewis-McChord, submitted a “Final RCRA Corrective Action Completion Report Yakima Training Center, Yakima, Washington.” Based on Ecology’s review of the 2015 Completion Report and supporting appendices that summarize previously conducted evaluations, investigations, and cleanup actions conducted in response to the RFA recommendations, Ecology has concluded that no further remedial action is required at the following SWMUs and AOCs:

Date: September 21, 2015

Final RCRA Corrective Action Completion Report

2015 Report, Yakima Research Station Sewage Lagoons

The National Security Administration operated the Yakima Research Station on property leased from the Department of Defense. Active use of the Yakima Research Station ceased in 2013. As documented in a 2014 completion report (USACE, 2014, Appendix KK), the site was investigated, all drains and lines from the facility were cleaned, and all sediments, liner and associated lagoon structures were removed in 2014. Since there is no remaining contamination at the site, NFA is appropriate for this unit.

Results:

All plans or other deliverables submitted by the Army for Ecology’s review and approval shall, upon Ecology’s approval, become integral to these documents.

B. Based on the Findings of Fact and the administrative record, Ecology has determined that release(s) and potential release(s) of hazardous substances at and/or from the Facility present a threat to human health and the environment.(AO_05-13-2020)

Continue GW Monitoring

Vapor Intrusion Study, two additional sampling events, anticipated in winter 2023 pending rights of entry (ROEs)



Conclusions,

Clear assessment of potential community-level disaster consequences, including characterization of risks, potential failures, and anticipated losses in support of planning and decision making is unclear.

In conclusion, Oulwa Research Group supports the activity and efforts by the Department and appreciates the opportunity to provide these comments. We look forward to working cooperatively with the Washington State Department of Ecology and other stakeholders to support pollution prevention efforts.



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