



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 28, 2018

Meseret C. Ghebreslassie
Installation Restoration Program Manager
Department of the Army
Headquarters, Joint Base Lewis-McChord
1010 Liggett Avenue – Box 339500, Mail Stop 14A
Joint Base Lewis-McChord, WA 98433-9500

**Subject: Correction to Ecology Letter dated February 12, 2018: U.S. Army
Yakima Training Center - RCRA Corrective Action Completion Report**

Dear Ms. Ghebreslassie:

Thank you for bringing to my attention the errors in my recent letter dated February 12, 2018. The errors occurred on Page 6 of the letter. Paragraph 2 on Page 6 of the letter read:

Thank you again for the submitting the Final RCRA Corrective Action Completion Report for Ecology review. Based on our review, **Ecology has determined that of the 117 SWMUs and AOCs identified at YTC, 96 require no further Action, 18 require further action, and 3 will be addressed at the time of facility or range closure.**

Paragraph 5 should have read:

Thank you again for submitting the Final RCRA Corrective Action Completion Report for Ecology review. Based on our review, **Ecology has determined that of the 117 SWMUs and AOCs identified at YTC, 93 require no further Action, 21 require further action, and 3 will be addressed at the time of facility or range closure.**

I have attached a corrected letter with my signature.

I apologize for any inconvenience.

Sincerely,

Thomas L. Mackie, LHG
Hydrogeologist - Site Manager
Hazardous Waste and Toxics Reduction Program
Central Regional Office



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1010 Liggett Avenue – Box 339500, Mail Stop 14A
Joint Base Lewis-McChord, WA 98433-9500

**Subject: U.S. Army Yakima Training Center - RCRA Corrective Action
Completion Report**

Dear Ms. Ghebreslassie:

Thank you for the submitting the **Final RCRA Corrective Action Completion Report Yakima Training Center, Yakima, Washington** (Completion Report) dated September 21, 2015, for Ecology review. Ecology has reviewed the summary report and its 36 supporting appendices. The Completion Report summarizes 20 years of RCRA Corrective Action Investigations and Remedial Actions undertaken at YTC in response to the recommendations made in the 1995 Yakima Training Center RCRA Facility Assessment (RFA)¹. The 1995 RFA described 77 Solid Waste Management Units (SWMUs) and 40 Areas of Concern (AOCs) at YTC.

Based on Ecology's review and after considering the recommendations made in the Completion Report, Ecology has divided the SWMUs and AOCs into the following three categories: 1. Those requiring no further action, 2. Those that require further action, 3. Those that will be addressed at the time of facility or range closure. Of the 77 SWMUs identified in the RFA, Ecology has determined that 69 require no-further-action and 8 require further action. Of the 40 AOCs identified in the RFA, Ecology has determined that 24 require no further action, 13 require further action, and 3 will be addressed at the time of facility of range closure.

Ecology would like to commend the US Army for over two decades of investigations and remedial actions undertaken in response to the recommendations made in the 1995 Yakima Training Center RCRA Facility Assessment (RFA). The numerous

¹ Science Applications International Corporation, September 1995. Final RCRA Facility Assessment Report U.S. Army Yakima Training Center Yakima, Washington EPA I.D. No. WAD 821405 3995.

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investigations and remedial actions undertaken by the US Army has greatly improved the quality of the air, water, and soil at YTC.

Given the determinations made in this letter, it is the goal of the Washington Department of Ecology to address the remaining SWMUs and AOCs that require further action at YTC in an Ecology Dangerous Waste Management Permit for Corrective Action (aka: Permit Lite) and Ecology/US Army Agreed Order.

The RFA concluded and Ecology concurs, that the following 25 SWMUs require **No Further Action:**

1. SWMU 2 (Dip Tanks)
2. SWMU 9 (Building 810 Baghouse)
3. SWMU 10 (Former Building 810 Paint Booth)
4. SWMU 11 (Former Building 951 Paint Booth)
5. SWMU 15 (Former Army Reserve Stoddard Solvent Wash Tank)
6. SWMU 17 (Main Motor Pool Former Waste Battery Acid Container)
7. SWMU 20 (Mobilization and Training Equipment Site (MATES) Waste Oil Tank)
8. SWMU 21 (MATES Oil Filter Press)
9. SWMU 23 (National Guard Battery Room)
10. SWMU 24 (National Guard Underground Oil Tank)
11. SWMU 30 (Range Control Battery Room)
12. SWMU 35 (Building 319 Underground Storage Tank (UST))
13. SWMU 36 (Building 319 UST)
14. SWMU 37 (Building 319 UST)
15. SWMU 38 (Building 323-1 UST)
16. SWMU 39 (Building 323-2 UST)
17. SWMU 40 (Building 323-3 UST)
18. SWMU 41 (Building 339 UST)
19. SWMU 42 (Building 845-2 UST)
20. SWMU 45 (Building 845-5 UST)
21. SWMU 46 (Building 845 UST)
22. SWMU 47 (Building 805/806 UST)
23. SWMU 48 (Building 951-4 UST)
24. SWMU 49 (Building 970-1 UST)
25. SWMU 50 (Building 970-2 UST)

Based on Ecology's review of the Completion Report and supporting appendices that summarize previously conducted evaluations, investigations, and cleanup actions conducted in response to

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the RFA recommendations, Ecology has concluded that **No Further Action** is required at the following SWMUs and AOCs:

26. SWMU 1 (Satellite Accumulation/Other Temporary Storage Areas)
27. SWMU 3 (90-Day Accumulation Area)
28. SWMU 4 (Former Hazardous Waste Storage Area)
29. SWMU 6 (Former Transformer Storage Area)
30. SWMU 7 (Former Containers Next to Fence)
31. SWMU 8 (Contaminated Soil North of Building 810)
32. SWMU 12 (silver recovery machine at the medical clinic)
33. SWMU 13 (x-ray developing machine at the dental clinic)
34. SWMU 14 (former x-ray developing machine at the dental clinic)
35. SWMU 16 (Marine Reserve POL Storage Building)
36. SWMU 19 (MATES Hazardous Waste Storage Area)
37. SWMU 22 (Former PCS Stockpile Area)
38. SWMU 25 (Old POL Yard)
39. SWMU 26 (Ammunition Storage Point)
40. SWMU 28 (Former Wire Storage Area)
41. SWMU 29 (Current Wire Storage Area)
42. SWMU 31 (Multi-Purpose Range Complex Septic/ Drain Field)
43. SWMU 32 (Multi-Purpose Range Complex Collection Drum)
44. SWMU 33 (Multi-Purpose Range Complex Above Ground Waste Oil Storage Tank)
45. SWMU 34 (Waste Oil Tanks)
46. SWMU 52 (Soil Stockpile Area)
47. SWMU 53 (Transfer Station)
48. SWMU 54 (Pre-1954 Landfill)
49. SWMU 55 (small landfill pit located near SWMU 57)
50. SWMU 56 (small landfill pit located near SWMU 51)
51. SWMU 58 (Former Bivouac Landfill Pits)
52. SWMU 60 (White Phosphorus Pit)
53. SWMU 61 (Range 14 UMTU Area)
54. SWMU 62 (Main Vehicle Wash Rack)
55. SWMU 63 (Building 319 Oil Water Separator [OWS], discharge to sanitary sewer)
56. SWMU 64 (Marine Reserve "tank rack" OWS, discharge to drain field)
57. SWMU 65 (Army Reserve Shop OWS, discharge to drain field)
58. SWMU 66 (Building 845 OWS, discharge to surface drainage)
59. SWMU 67 (Building 845 OWS, discharge to sanitary sewer)
60. SWMU 68 (Building 301 OWS, discharge to surface drainage)
61. SWMU 69 (Building 951 OWS, discharge to sanitary sewer)
62. SWMU 70 (Building 323 OWS, discharge to sanitary sewer)

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63. SWMU 71 (New National Guard Facility OWS, discharge to sanitary sewer)
64. SWMU 72 (Petroleum, Oil, Lubricant 1 [POL 1], discharge to surface drainage)
65. SWMU 73 (POL 1 OWS, discharge to surface drainage)
66. SWMU 74 (Sanitary Sewer System)
67. SWMU 75 (Wastewater Treatment Plant)
68. SWMU 76 (Yakima Research Station Sewage Lagoons)
69. SWMU 77 (Surface Water Drainage System)
70. AOC 1 (Former Central Vehicle Wash Rack)
71. AOC 2 (Former Main Motor Pool Wash Rack)
72. AOC 3 (Former Building 812 Wash Rack)
73. AOC 4 (POL Fuel Point)
74. AOC 5 (Hazardous Materials Storage Area)
75. AOC 8 (Cobra Range AST)
76. AOC 9 (Building 223 UST#1)
77. AOC 10 (Building 223 UST#2)
78. AOC 11 (Building 223 UST#3)
79. AOC 12 (Building 223 UST#4)
80. AOC 13 (Building 223 UST#5)
81. AOC 21 (Building 434 UST)
82. AOC 22 (Building 810 UST#1)
83. AOC 23 (Building 810 UST#2)
84. AOC 28 (Former Building 1470 UST #1)
85. AOC 29 (Former Building 1470 UST#2)
86. AOC 30 (Former Building 2020 UST #1)
87. AOC 31 (Former Building 2020 UST #2)
88. AOC 32 (Former Building 2020 UST #3)
89. AOC 33 (Building 450 Fuel Bladder Storage Area)
90. AOC 34 (Downrange Fuel Bladder Storage Area)
91. AOC 35 (Downrange Fuel Bladder Storage Area)
92. AOC 36 (Downrange Fuel Bladder Storage Area)
93. AOC 39 (Former Small Arms Range)

Based on Ecology's review of the 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 ***Further Action*** is required at the following SWMUs and AOCs:

1. SWMU 5 (Former Pesticide Handling Area) ***Continue with Institutional Controls (IC) as outlined in the Joint Base Lewis-McChord (JBLM) Comprehensive Land Use Control (LUC) Plan***

2. SWMU 18 (MATES Battery Room) – *Conduct Site Investigation around the former floor drain discharge outlet to the environment*
3. SWMU 27 (Former Ammunition Storage Point Burn Pits) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan*
4. SWMU 43 (Tracked Vehicle Repair (TVR)/Old MATES Site) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan and Long Term Groundwater Monitoring until cleanup goals are achieved*
5. SWMU 44 (Tracked Vehicle Repair (TVR)/Old MATES Site) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan and Long Term Groundwater Monitoring until cleanup goals are achieved*
6. SWMU 51 (1969-1994 Landfill) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan*
7. SWMU 57 (1954-1968 Landfill/Burn Pits) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan and conduct additional data gap investigation to properly assess human health and ecology risk pathways*
8. SWMU 59 (Former Fire Training Pit) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan and Long Term Groundwater Monitoring until cleanup goals are achieved*
9. AOC 7 (Building 218 Buried Munitions) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan*
10. AOC 14 (Building 310 UST) *Continue with IC as outlined in the JBLM Comprehensive LUC Plan*
11. AOC 15 (Building 319 USTs) *Conduct Site Investigation*
12. AOC 16 (Building 319 USTs) *Conduct Site Investigation*
13. AOC 17 (Building 323 USTs) *Conduct Site Investigation*
14. AOC 18 (Building 323 USTs) *Conduct Site Investigation*
15. AOC 19 (Building 321 USTs) *Conduct Site Investigation*
16. AOC 20 (Building 321 USTs) *Conduct Site Investigation*
17. AOC 24 (Building 833 USTs) *Conduct Site Investigation to properly delineate petroleum contamination migration into surrounding soil and groundwater*
18. AOC 25 (Building 833 USTs) *Conduct Site Investigation to properly delineate petroleum contamination migration into surrounding soil and groundwater*
19. AOC 26 (Building 833 USTs) *Conduct Site Investigation to properly delineate petroleum contamination migration into surrounding soil and groundwater*
20. AOC 27 (Building 845-1 UST) *Conduct Site Investigation*
21. AOC 40 (Centralized Fuel Facility) – *Continue with IC as outlined in the JBLM Comprehensive LUC Plan*

Based on Ecology's review of the Completion Report and supporting appendices that summarize previously conducted evaluations, investigations, and cleanup actions conducted in

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response to the RFA recommendations, Ecology has concluded that the following AOCs will be **Addressed at the Time of Facility or Range Closure:**

1. AOC 6 (Dud Areas)
2. AOC 37 (Pistol Range)
3. AOC 38 (Pistol Range)

Thank you again for the submitting the Final RCRA Corrective Action Completion Report for Ecology review. Based on our review, **Ecology has determined that of the 117 SWMUs and AOCs identified at YTC, 93 require no further Action, 21 require further action, and 3 will be addressed at the time of facility or range closure.**

Ecology would like to commend the US Army for the over two decades of investigations and remedial actions undertaken in response to the recommendations made in the 1995 Yakima Training Center RCRA Facility Assessment (RFA). The numerous investigations and remedial actions undertaken by the US Army has greatly improved the quality of the air, water, and soil at YTC.

If you have any questions regarding the comments, please contact me at (509) 575-2803.

Sincerely,



Thomas L. Mackie, LHG
Hydrogeologist - Site Manager
Hazardous Waste and Toxics Reduction Program
Central Regional Office
Washington State Department of Ecology