



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 20, 2019

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: Comments – Draft Final Remedial Investigation/Feasibility Study at the Former Landfill Complex including Solid Waste Management Unit (SWMU) No. 57

Dear Meseret:

Thank you for the submitting the Draft Final Remedial Investigation/Feasibility Study (RI/FS) for the Former Landfill Complex Joint Base Lewis-McChord Yakima Training Center, Washington. This draft RI/FS was prepared by EA Engineering Science, and Technology, Inc., PBC for Joint Base Lewis McChord Public Works – Environmental Division, dated September 30, 2019, and received by Ecology on October 7, 2019. Under the Washington State Model Toxics Control Act (Revised Code of Washington (RCW) 70.105D), this RI/FS is considered an independent remedial action not conducted under an order, agreed order, or consent decree.

Ecology's review has resulted in the following comments:

1. Page 2-4, Section 2.3.2.3 – Thallium was a common ingredient in rat poison at the time the former landfill complex (FLC) was in operation. Since rats are a common issue at landfills, might explain the relationship between thallium and the FLC?
2. Page 2-4, Section 2.3.2.4, paragraph 6 - Ecology would like to discuss the conclusion made in sentence #2 which reads, "*Thallium concentrations exceeded the cleanup levels in 12 samples; however, the report concluded that thallium concentrations were not indicative of a release because all concentrations were less than the detection limit for the State of Washington background metals concentrations in soil.*" Please list the reference and let us discuss this conclusion.
3. Page 2-6 and 7, Section 2.4.3 - It is my understanding that when the Army no longer needs to use the land upon which YTC sits, it reverts to the Yakama Indian Nation. Has the Army considered future land use by the Yakama Nation when considering the proposed remedial actions?

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4. Page 2-7, Section 2.5.1 – The average annual precipitation in the vicinity of YTC is 8 inches (8.35 according to usclimatedata.com) which includes snowfall. Please correct and provide a reference.
5. Page 2-8, Section 2.5.3, paragraph 2 – It is unclear what is meant by “the depth of the fold belt is predicted to be approximately 100 ft bgs...”. Section 2.4.1.1 states, “*the top of the Pomona Basalt is 3-5 feet bgs.*”. The Pomona Basalt is folded in the vicinity of YTC and is part of the Yakima Fold Belt. Please explain or delete the sentence describing the top of the Fold Belt as being 100 ft bgs.
6. Page 2-9, Section 2.5.4, paragraph 6 – A current search for domestic wells within one mile of the FLC should be conducted and included in the next draft of the RI/FS.
7. Page 3-7, Section 3.4 – If the Army used rat poison at the FLC, thallium should be included as a site COC.
8. Page 3-8, Section 3.5 – Exposure pathways for post Army development should be included here.
9. Page 4-7 thru 4-16, Section 4.4 – In regards to “*Community Acceptance*” under all of the remedial action alternatives, and due to a staffing shortage of Ecology’s public outreach staff, the subject draft RI/FS will not be going out for public notice until March 2020 at the earliest. Addressing public comments pertaining to the RI/FS will be necessary before the RI/FS is approved, and a remedy is selected.
10. Page 4-7 thru 4-16, Section 4.4 – When discussing “permanence” under each of the remedial action alternatives, post-Army ownership should be included and discussed.
11. Page Section 4.4 – Please include an additional remedial action alternative identical to Alternative 2 that includes the possibility of additional cleanup prior to the Army vacating the property.

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

Sincerely,



Thomas L. Mackie, LHG
Hydrogeologist - Site Manager
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