



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

July 28, 2023

Bill Preston
City of Yakima
129 N. 2nd Street
Yakima, WA 98901

Re: Ecology Comments on the Interim Action Work Plan (IAWP) for Post-Construction Groundwater Sampling (Revision 1):

- **Site Name:** Interstate 82 Exit 33A Yakima City Landfill
- **Site Address:** 805 N. 7th Street, Yakima
- **Facility/Site ID No.:** 1927
- **Cleanup Site ID No.:** 3853
- **Agreed Order No.:** DE 15861

Dear Bill Preston:

The Washington State Department of Ecology (Ecology) has the following comments and questions on the *“Work Plan (Revision 1) for Post-Construction Groundwater Sampling, Interim Action – Roadway Project, Closed City of Yakima Landfill Site, Yakima, Washington”* dated March 2, 2023.

So that construction of monitoring wells for groundwater sampling can move forward, please proceed with the activities related to the sampling event (ex., scheduling, fieldwork, etc.) concurrent with your final revisions to this work plan.

Ecology revision of comments on the earlier (1st) draft of the Work Plan

COPCs and PCULs

After further consideration, Ecology is retracting and revising our comments on the first revision of the Work Plan (received October 5, 2022), per our letter dated January 17, 2023. The three comments under **Contaminants of Potential Concern (COPCs) and PCULs Preliminary Cleanup Levels (PCULs)** are retracted in full. All other comments in the January 17, 2023, letter remain unchanged. In retrospect, the post-construction groundwater sampling event is not the venue to revise the COPCs and PCULs. To avoid confusion, and ensure consistency of collected data, the list of analytes from the Pre-Construction Groundwater Monitoring Data Report should be used.

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Ensure the relevant text, tables, and appendices reflect these revisions.

Outstanding Ecology comments not addressed in Revision 1 of this work plan.

Nature and Extent of Contamination and Groundwater Monitoring

1. Several of Ecology's comments were related to the distinction, differentiation, and significance of the Boise Cascade Mill Site (FSID: 450) in relationship to the Interstate 82 Exit 33A Yakima City Landfill Site.

These comments have not been adequately addressed in this work plan; however, Ecology issued an Amendment Letter to the Interstate 82 Exit 33A Yakima City Landfill - Agreed Order DE15861 on May 4, 2023. The amendment letter requires the City to "submit an Amendment Memorandum to the IAWP detailing new or updated information regarding the Boise Cascade Mill Cleanup Site (FSID 450, CSID 12095) or Interstate 82 Exit 33A Yakima City Landfill, that may affect the IAWP as currently written. The new information includes but is not limited to the Boise Cascade Mill Revised Draft Remedial Investigation Report dated December 3, 2021." The bulk of the discussion regarding these two (2) sites can be reserved for inclusion in the Amendment Memorandum to the IAWP.

Monitoring Wells

1. Ensure consistency within the text for the number of wells to be replaced and naming conventions.
2. Section 2.4 Groundwater Monitoring: Arrange the list of wells included in the sampling network by up-gradient Boise Cascade Mill wells, wells within the boundary of the Yakima Landfill Municipal Solid Waste (MSW), and wells located down-gradient of the MSW.

Sincerely,



Jennifer Lind
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

