



Response to Comments

Enforcement Order Amendment for Pasco Landfill NPL Site

Public comment period held Nov. 20, 2024 – Jan. 20, 2025
Facility Site ID: 575, Cleanup Site ID: 1910

Toxics Cleanup Program

Washington State Department of Ecology
Spokane, Washington

January 2025

Document Information

This document is available on the Washington Department of Ecology's [Pasco Landfill NPL Site cleanup webpage](#).¹

Related Information

- Facility site ID: 51358721
- Cleanup site ID: 16994

Contact Information

[Toxics Cleanup Program](#)²

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¹ <https://apps.ecology.wa.gov/cleanupsearch/site/1910>

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites>

³ <https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility>

Toxics Cleanup in Washington State

Accidental spills of dangerous materials and past business practices have contaminated land and water throughout the state. The Washington Department of Ecology (Ecology) Toxics Cleanup Program (TCP) works to remedy these situations through cleanup actions. TCP cleanup actions range from simple projects requiring removal of a few cubic yards of contaminated soil to large, complex projects requiring engineered solutions.

Contaminated sites in Washington are cleaned up under the [Model Toxics Control Act](#)⁴ (MTCA, Chapter 173-340 Washington Administrative Code [WAC]), a citizen-mandated law passed in 1989. This law sets standards to ensure toxics cleanup protects human health and the environment and includes opportunities for public input.

Public Comment Period Summary

Ecology held a comment period November 20, 2024, through January 20, 2025, for the amended Enforcement Order that includes the Cleanup Action Plan, scope of work, and schedule for completing the new cleanup activities at the Pasco Landfill. The amendment requires the parties responsible for cleanup to:

- Increase groundwater monitoring and treat recent groundwater contamination to contain it
- Protect air quality in nearby buildings by assessing whether contaminant levels in groundwater could cause unsafe levels of contaminants to build up indoors

From April 2021 – June 2022, over 35,000 drums of hazardous waste were removed from Zone A of the closed Pasco Landfill and taken to Grand View, Idaho, and Arlington, Oregon, for safe disposal. Since April 2024, underground thermal treatment has removed and destroyed about 9,100 pounds of chemicals from contaminated soil around the area where the drums were buried.

In early November 2024, we discovered some chemicals being removed from the treatment process were not fully captured by the system and traveled to groundwater. Work began immediately to control contamination, and it effectively stopped chemicals from moving into groundwater.

The project team installed soil gas samplers where groundwater contamination was recently increasing to assess whether contaminant levels in groundwater could cause unsafe levels of contaminants to build up indoors. These soil gas samplers remained in the ground for about 12 days to collect data and were sent to a laboratory for testing after they were retrieved. The samples from early December showed groundwater does not pose a risk to air quality in nearby

⁴ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

buildings. The parties responsible for cleanup are working on restarting groundwater treatment.

Ecology appreciates the comments we received from four people. We address them in the Response to Comments section below.

Site Background

The Pasco Landfill is approximately 1.5 miles northeast of the City of Pasco and covers nearly 200 acres. The landfill opened in 1958. Waste was burned in trenches until 1971, when the site became a sanitary landfill. From 1972 to 1975, the landfill accepted industrial waste.

The Environmental Protection Agency added the site to the National Priorities List in 1990. Ecology took oversight responsibility in 1991, and the landfill closed in 2001. Ongoing cleanup over the past two decades has reduced groundwater contamination at the landfill property and in off-property areas. Removing the buried drums and thermally treating remaining contaminated soil will continue to ensure people and the environment are protected.

Cleanup activities at the Pasco Landfill began in the early 2000s, and significant work has been completed at several industrial waste zones and municipal solid waste disposal areas within the site. The responsible parties began the waste removal work in Zone A of the landfill in fall 2020 under Ecology's oversight, with all drums removed by early June 2022. In total, about 23,500 tons of waste were safely removed and hauled to out-of-state facilities designed to dispose of hazardous materials.

Following the completion of thermal treatment in the second area, a final cover system will be placed on Zone A, and the site will continue to be restricted with fences, signs, and limitations on how the property is used.

Groundwater monitoring and the maintenance of landfill covers will continue beyond the completion of active cleanup. The groundwater protection area around part of east Pasco will stay in place until Ecology determines it is no longer necessary.

Response to Comments

The comment letters are printed verbatim. Ecology's responses follow the comments. The letters are in alphabetical order based on the commenter's last name. The first two comment letters raised similar concerns, so we provided one response to both.

Index of comments received

Everyone who submitted comments is listed in Table 1 in alphabetical order by their last name, followed by the date we received their comments and the page on which their comments are

printed as received. Contact information (postal and email addresses and phone numbers) has been omitted.

Table 1. Index of comments received

Name	Organization	Date received	Page
Sonia Ayala	None	December 5	5
Harry Bundesmann	Hilltop Environmental Solutions	December 4	5
Stacy Kidwell	None	December 2	6
Ken Reynolds	None	October 15	6

Sonia Ayala, received online December 5

This is terrible complacent incompetence!

Pure being Neglectful incompetence.

You go to work and punch your time card knowing you should be finding new technology to stay on top of things.

This Management needs to be held accountable.

Ecology's response

Thank you for sharing your concerns. Ecology shares your frustration that chemicals were not fully captured by the vapor control system and traveled to groundwater. Once Ecology was made aware of the situation, we required the responsible parties to immediately begin work to control the spread of contamination, which effectively stopped chemicals from moving into groundwater. The response actions Ecology required in the amendment to the Enforcement Order are designed to remedy the situation by containing the current release to the maximum extent possible.

Harry Bundesmann, Hilltop Environmental Solutions, received online December 4

A permanent solution to the Hazardous soil contaminated with TCE/PCE and VOCs is quite simplyTEVET. Hilltop Environmental Solutions Hazardous Soil Treatment technology called TEVET. www.hilltopes.com/tevet/

It is the end of the road for Hazardous TCE/PCE, VOC contaminated soil.

Please call me for further info.

Ecology's response

Thank you for providing information regarding an ex-situ thermal treatment technology. Due to adjacent infrastructure and the depth of contamination, we selected and have begun in-situ thermal treatment as the remedy for deep soil contamination in this area of the site.

Stacy Kidwell, received online December 2

We live adjacent to this site. My family has farmed here for over 40 years.

We are very concerned about the contamination as 2 of my sisters have ended up with cancer and my mother with extreme neurological problems. We have no history of any of this in our families.

Please keep us updated as what we can do to protect our families health during this clean up effort.

Ecology's response

Thank you for sharing your concerns. We are sorry to hear about your family's health issues. We are confident the low-level concentrations of contaminants in groundwater immediately south-southwest of the landfill property do not pose a risk to human health or the environment. The response actions Ecology required in the amendment to the Enforcement Order are designed to remedy the situation by containing the current release to the maximum extent possible.

Ken Reynolds, received online December 2

What is being done for the affected home owners that have had their well condemned and city of Pasco is refusing to provide city water without a huge water line installation bill?

Ecology's response

Thank you for your question. Wells inside the City of Pasco's Groundwater Protection Area (GPA) are not allowed to use groundwater for domestic purposes and most of the existing groundwater supply wells in that area have been or are being decommissioned. The City of Pasco completes an annual survey of wells within the GPA; we were unable to identify your well as being within the that area. Please contact Jeremy Schmidt at jeremy.schmidt@ecy.wa.gov or 509-724-1164 if you believe your well is within the GPA.

In the late 1990s, water service connections were provided to homes within the GPA along East Lewis Place; however, the extension of City of Pasco water infrastructure is not part of the Pasco Landfill NPL Site cleanup.