



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

June 20, 2025

Hector Mejia
Deputy Public Works Director
City of Sunnyside
818 East Edison Avenue
Sunnyside, WA 98944

Re: Ecology Comments on Focused Feasibility Study and Draft Cleanup Action Plan for:

- **Site Name:** Sunnyside Municipal Airport Pesticide Spray Shed
- **Site Address:** 3318 East Edison Avenue, Sunnyside
- **Facility/Site ID No.:** 20367
- **Cleanup Site ID No.:** 11423

Dear Hector Mejia:

The Washington State Department of Ecology (Ecology) has reviewed the revised draft Focused Feasibility Study (FFS), received electronically on April 16, 2025, and the draft Cleanup Action Plan (CAP), received electronically on May 8, 2025, and has the following comments:

Draft Focused Feasibility Study

Section 2.5 Applicable or Relevant and Appropriate Requirements

Please include a discussion on how likely vulnerable and overburdened communities were considered when selecting the preferred cleanup action option. In addition, discuss how general public concerns and Tribal Nation's rights and interests were considered.

Section 3.1.2 Institutional Controls

Ecology would require that institutional controls be placed over the entire site and the adjoining parcel that has been impacted by the releases, including the deeper aquifer. Please revise this language throughout this section and Section 4.1.3.

Section 5.2.1 Requirement for a Reasonable Restoration Timeframe

Ecology has concerns about the length of the restoration time frame included in this section. Please provide language to emphasize that this time frame is the most conservative and detail any of the factors that will likely reduce this restoration time frame.

Draft Cleanup Action Plan

Section 1.2 Purpose

Please include a discussion on how likely vulnerable and overburdened communities were considered when developing the draft CAP. In addition, discuss how general public concerns and Tribal Nation's rights and interests were considered.

Section 2.1 Site History

Language regarding screening levels, analytical methods and matrix interferences is somewhat confusing. Please revise.

Instead of using words such as "marginally exceed," please revise to include actual values related to cleanup levels for clarity.

Section 2.2 Constituents of Concern and Cleanup Levels

Please include tables illustrating how cleanup levels were derived, and refer to the part of the rule or a table that is driving the cleanup level decision.

Section 3.1.3 Groundwater Monitoring

Ecology has concerns about the length of the restoration time frame included in this section. Please provide language to emphasize that this time frame is the most conservative, and point out the factors that will likely reduce this restoration time frame.

Tables

The dCAP tables should indicate cleanup levels instead of screening levels. Please describe all of your sources for cleanup levels, and where they deviate from Ecology's Cleanup Level and Risk Calculator (CLARC) values.

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Thank you for providing these drafts for our review in such a short time frame. If you have any questions about these comments, please contact me at 509-571-6661 or Mary.Monahan@ecy.wa.gov.

Sincerely,



Mary Monahan
Site Manager
Toxics Cleanup Program
Central Regional Office

cc: Janet Knox, Mott McDonald