



RESPONSIVENESS SUMMARY

**SUDBURY ROAD LANDFILL SITE
AGREED ORDER FOR RI/FS**

Prepared by:

WASHINGTON DEPARTMENT OF ECOLOGY

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SUDBURY ROAD LANDFILL SITE RESPONSIVENESS SUMMARY

The Washington Department of Ecology (Ecology) held a 30-day public comment period from April 11 through May 11, 2011 for a proposed Agreed Order. The Agreed Order requires completion of a Remedial Investigation and Feasibility Study at the Sudbury Road Landfill (Site). The City of Walla Walla (City) owns and operates the Site. The Remedial Investigation will determine where and how much contamination is present in groundwater. The Feasibility Study will explore cleanup options.

The purpose of this Responsiveness Summary is to document Ecology's responses to comments submitted to Ecology during the public comment period. Based on the comments received, no changes will be required to the Agreed Order, including its exhibits.

Ecology would like to thank those who provided comments.

Ecology received comments from two individuals. Comments and responses as follows:

I. Letter from Ronald McAdams, McAdams, Ponti, Wernette & Van Dorn, P.S. – received April 14, 2011

Comment 1: "I reside on 30 acres off Old Highway 12 (230 Bunchgrass Lane), south of the City of Walla Walla's Landfill. I send this letter in response to your notification requesting comments.

Specifically, my family home, built by my great grandfather in 1870, has been and continues to be serviced by a shallow domestic well. I thus have real concerns about the notice that volatile organic compounds and other contaminants linked to the landfill have been found in ground water near the landfill. Because of this finding, it would seem to me that the State and the City should be doing more than simply checking their test wells.

More specifically, it is clear that the State and the City should be testing the domestic wells in the area to determine whether or not these organic compounds and other contaminants have traveled beyond the test wells. It would further appear that this testing should be continued on some kind of routine schedule until the City corrects the problem...

..." I trust that any agreement entered into with the City will require the City to immediately take proactive steps to periodically test adjacent domestic wells to assure its neighbors in the immediate area that the drinking water is safe. Thank you."

Response 1: Ecology appreciates and shares your concerns. The City installed and has regularly tested groundwater wells around the landfill for many years as required by solid waste regulations. These requirements are in place to detect any impacts to groundwater from the landfill. Impacts have been detected so the City now must assess where and how far off site contaminants have flowed. This will involve installation and regular testing of new monitoring wells outside the landfill boundary and possible testing of domestic wells in the path of contaminated groundwater flow.

Testing of domestic wells will not likely include testing of all adjacent wells as many are not in the path of groundwater flow from the Site. Because of the network of groundwater wells at the Site and nearby facilities, much is known about groundwater flow in the area. Information from these wells shows that groundwater flows to the west-southwest. If the City's investigation finds that groundwater contaminants flow to the south toward your home, it is possible wells in your area may be tested. The City will look into any risks to residents near the site.

For a number of years, the City has independently and periodically tested three domestic wells located west of the Site in the path of groundwater flow. Contaminants are present in groundwater from two wells, but it has not been proven that the landfill is the source of this contamination. Other potential sources of contamination are present in the area. The City's Remedial Investigation will further assess these wells.

Comment 2: "The obvious correction is to remove the garbage from the unlined areas so that it can be re-deposited over proper liners as should have been the case to begin with."

Response 2: The City will assess cleanup options in a Feasibility Study. Partial or total waste removal may be one of the options considered, though unlikely. Due to the volume and mixture of wastes in most municipal solid waste landfills, other cleanup technologies may be more efficient in cleaning up groundwater contamination. Removal may be impractical.

Remedies for municipal landfill sites usually include containment of the landfill mass and collection and treatment of landfill gas. In addition, measures to control landfill leachate, affected groundwater at the landfill boundary, or water that may be causing saturation of the landfill mass are applied. The City completed Interim Actions in 2010 that included some of these remedies. They diverted stormwater, installed gas and stormwater controls, and capped some of the unlined areas.

In the Feasibility Study, the City will propose cleanup actions. After that, Ecology will develop a Cleanup Action Plan to ensure the City remedies current and potential risks to human health and the environment from the Site. The public will get a chance to comment on the proposed Cleanup Action Plan.

For clarification, the City disposed of waste into unlined landfill cells legally and in accordance with solid waste regulations in place at the time disposal occurred.

II. Email from Casey Goodwin – received May 9, 2011

Comment 1: "My name is Casey Goodwin, I live at 3192 Heritage Rd. near the Sudbury Landfill. I spoke with Frank Nicolson today and I'm wondering if there is any reason that I need to be concerned about contamination in my well?"

Response 1: Thank you for sharing your concerns. The network of groundwater wells at the Site and nearby facilities provide good information about groundwater flow in the area. Information from these wells shows that groundwater flows to the west-southwest. As we discussed on the phone, your home lies directly south of the Site, so Ecology does not expect it to be in the direction of groundwater flow. If the City finds during its investigation that groundwater contaminants flow to the south, it is possible wells in your area may be tested. The City will investigate any risks to residents and propose cleanup options.

Comment 2: “Will there be any testing of residential wells near the Sudbury Landfill?”

Response 2: The Agreed Order will require the City to completely investigate the extent of groundwater contamination from the Site. The City must assess where and how far off site contaminants have flowed. This will involve installation and regular testing of new monitoring wells outside the landfill boundary and possible testing of domestic wells in the path of contaminated groundwater flow.

For a number of years, the City has independently and periodically tested three domestic wells located west of the Site in the path of groundwater flow. Contaminants are present in groundwater from two wells, but it has not been proven that the landfill is the source of this contamination. Other potential sources of contamination are present in the area. The City’s Remedial Investigation will further assess these wells.

Comment 3: “Another concern I have is, I understand the Washington State Penitentiary has a ground water contamination issue that could impact my well. Should I be concerned about that?”

Response 3: The Washington State Penitentiary is scheduled to complete a Remedial Investigation of potential contamination from its facility this summer. Please contact Sandy Treccani, Ecology’s Site Manager for the Penitentiary, at (509)329-3412 or sandra.treccani@ecy.wa.gov for information about your concerns.