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August 31, 2017

VIA Federal Express and the Project Portal

Mr. Chuck Gruenenfelder, LG, LHG
Project Manager, Toxics Cleanup Program
Washington Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295

Re: Pasco Landfill NPL Site—Submittal of Draft Final Focus Feasibility Study Report
Pursuant to Ecology Agreed Order No. DE 6240

Dear Mr. Gruenenfelder:

This letter is submitted to the Washington Department of Ecology (Ecology) on behalf of the Industrial Waste Area Group III (IWAG)¹ transmitting the Draft Final Focused Feasibility Study Report (FFS) for the Pasco Landfill NPL Site (Site) pursuant to the above-referenced agreed order. This FFS was developed in accordance with the Model Toxics Control Act (MTCA) and its implementing regulations (Chapter 173-340 of the Washington Administrative Code [WAC]), and responds to Ecology comments on the Draft FFS.

¹ The members of IWAG are PPG-Architectural Coatings Canada, Inc.; The Boeing Company; Crown Beverage Packaging, LLC; Daimler Trucks North America LLC; Georgia Pacific, LLC; Goodrich Corporation on behalf of Kalama Specialty Chemicals, Inc.; Intalco Aluminum Corporation; 3M Company; PACCAR Inc.; PCC Structurals, Inc.; Pharmacia LLC; Simpson Timber Company; Union Oil Company of California; Blount, Inc.; and Weyerhaeuser NR Company.

We understand from the August 25, 2017, letter sent to you by Mr. Peter Bannister on behalf of the Landfill Group² that the Landfill Group members will submit a separate “revised FFS report that addresses just the Municipal Solid Waste (MSW) disposal areas of the [Site].” Consequently, the FFS and the responses to Ecology’s comments on the draft FFS dated June 13, 2016 (RTCs) being transmitted with this letter are hereby submitted on behalf of the IWAG and Bayer CropScience (BCS). As Mr. Bannister noted in his August 25 letter, the IWAG and Landfill Group members exchanged drafts of the Draft Final FFS report on August 1, 2017, and attempted to collaborate and coordinate on the FFS. The IWAG took the laboring oar in this process and good progress was made on Sections 1 and 2 of the FFS. Sections 1 and 2 of the FFS submitted here thus incorporate text and materials provided and/or approved by the Landfill Group members. Information related to Zone B in Sections 1 and 2 (and throughout the document) was provided by BCS.

The IWAG was ultimately unable to reach consensus with the Landfill Group on Sections 3 and 4 of the FFS. These sections thus consist of text and materials prepared by the IWAG and BCS, though the information provided in these sections regarding the MSW areas reflects Landfill Group input. Similarly, no consensus was reached regarding Sections 5, 6, and 7. Nevertheless, the portions of these sections relating to the MSW disposal incorporate text and materials provided by the Landfill Group, with limited non-substantive IWAG changes for consistency and formatting purposes. With respect to the enclosed RTCs, these were developed respectively by the IWAG and BCS, as indicated in the RTCs. The Landfill Group parties declined to provide written responses to Ecology’s comments in the RTC document.

As communicated to Ecology previously, and discussed with Ecology at the “All-PLP” meeting held by teleconference on August 15, 2017, the IWAG continues to have many questions, and some concerns, regarding the upcoming FFS public review process. We look forward to discussing with Ecology how that process will occur, and the content of

² In discussions regarding the FFS preparation, the LFG Parties identified themselves as Pasco Sanitary Landfill, Inc., Basin Disposal, Inc., and BNSF Railway Company. Other entities and persons previously affiliated, or believed to be affiliated, with the LFG did not participate in any efforts to produce the FFS transmitted with this letter.

communications to be issued by Ecology to the public. As in the past, the IWAG will be available to support Ecology in providing any supplemental information that may assist the public with its review, and in participating in all related public engagement activities.

Sincerely,



Michael Riley, PhD
Anchor QEA, LLC

cc:

Peter Bannister, Aspect Consulting, LLC

Sean Gormley, Amec Foster Wheeler Environment & Infrastructure, Inc.

Jennifer Sanscrainte, IWAG

Robb Bakemeier, IWAG

Will Ernst, IWAG

Carol Wiseman, IWAG

John Level, Washington State Attorney General's Office