



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

July 24, 2018

City of Sunnyside
C/O Shane Fisher, Public Works Director
818 East Edison Avenue
Sunnyside, WA 98944

Re: Ecology Comments on Technical Memorandum for Interim Paving Action:

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 Mr. Fisher,

The Washington State Department of Ecology (Ecology) has received a Technical Memorandum for a proposed Interim Paving Action at the Sunnyside Municipal Airport Pesticide Spray Shed Site in Sunnyside, WA, and has the following comments:

According to the Sunnyside Municipal Airport Remedial Investigation Figure 2-6: Extent of Contamination, the proposed interim action is in an area where soils exceeding screening levels extend from zero to five feet below ground surface (bgs). The area proposed to be paved is currently unpaved and covered with gravel, easily accessible for excavation of impacted soils. The proposed interim action would only excavate soils to one foot bgs, leaving the bulk of soils exceeding screening levels left in place beneath the pavement. While the paving action will prevent direct contact with impacted soils and reduce infiltration and leaching of underlying soils, it is Ecology's opinion that it does not, according to WAC 173-340-430(2) meet the definition of an interim action. However, source removal of all contaminated soils prior to paving this area **would meet** the definition of an interim action.

In fact, source removal of all contaminated soils is likely the best option for cleanup, although Ecology realizes the Feasibility Study is still in progress and a Cleanup Action Plan for this site has yet to be developed.



Paving of this portion of the site is allowed as long as it is understood that the paving is not part of an interim or cleanup action. Since there is known pesticide contamination in the soils at the paving site, special precautions will have to be taken during the project to ensure containment of contaminated dust and soils.

Before any construction takes place at this site, a plan must be submitted detailing dust control measures, soil containment measures, and any actions that will be taken to keep contaminated soil from leaving the area via truck tires, etc., as well as plans for soil analytical methods prior to disposal and intended landfill for disposal. Ecology will also expect a report detailing these items post-construction.

Please feel free to contact me with any questions.



Mary Monahan

Cleanup Project Manager

Department of Ecology Central Regional Office

Mary.Monahan@ecy.wa.gov

509-454-7840

cc: Glen Wallace, Pacific Groundwater Group