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February 28, 2012

Cole H. Carter
Senior Hydrogeologist
Waste 2 Resources Program
Washington State Department of Ecology
Eastern Regional Office
4601 N. Monroe Street
Spokane, WA 99205

Re: Agreed Order No. DE 3810 (AO) Proposed Schedule Change

Dear Cole:

Thank you for your continued engagement in the PLPs' efforts to finish the RI/FS. Delivery of the draft FS is the only remaining AO requirement.

The PLPs have delivered the following important elements of the RI/FS documentation:

- RI Report, September 2010.
- FS technology screening memo, March 2011.
- Draft risk assessment (RA), April 2011.
- Updated draft RA, October 2011.

The RA update was prompted by changes in reference toxicity data that led to an extensive update of the CLARC Database (CLARC update) shortly after the RA was delivered last April. Although progress has not been consistent with the December 2010 AO schedule change, that is due partly to the CLARC update. The PLPs' understanding of the Site has also developed since December 2010. Despite the CLARC update, the PLPs have continued to develop the FS commensurate with our increasing understanding of this complex Site. However, we need to request another schedule extension. Specifically, the PLPs request an extension of the "RI/FS report submitted" AO ACTION to 67 months, or August 2012. The attached schedule shows this request as a change to the December 2010 (last approved) update.

The December 2010 AO schedule update included an extension of the "LNAPL Management Complete" AO ACTION through 2011. You may recall that LNAPL management was addressed following the first detection of LNAPL in 2009. Groundwater pumping from the Hole had previously been expanded to include MW-34p1 and MW-36p1. Groundwater and LNAPL management activities were conducted as planned in 2011, and LNAPL collection with absorbent socks continues. However, the evaporation pond was removed late last year as a condition of DOH approval of the landfill well as a potable water source.

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Longer-term groundwater and LNAPL management will be addressed in the FS. Although LNAPL collection with absorbent socks continues, the PLPs consider the groundwater pumping and LNAPL management AO requirements, as originally conceived and later modified, to be complete. We therefore do not request an extension of the "LNAPL Management Complete" AO ACTION.

Please provide a written response to this schedule extension request for our records. Please contact me (425-458-6370 office, 425-681-3602 cell, bpippin@parametrix.com) if you have any questions.

Sincerely,



Brian Pippin, P.E.

Parametrix

cc: Derek Pohle, Grant County
Leslie Nellermoe, The Wrenn Group
Wes Crago, City of Ephrata
Steve Jones, Marten Law
Meline MacCurdy, Marten Law
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Ephrata Landfill RI/FS and Interim Action Schedule

ACTION	NUMBER OF MONTHS FROM AO EFFECTIVE DATE
Agreed Order Effective Date (at conclusion of public comment period) January 30, 2007	0
Grant Application Submitted	2
Drum Area Exploration Sampling and Analysis Plan (SAP)/Quality Assurance Project Plan (QAPP) /Health and Safety Plan (HSP) Submitted	0
Drum Area Exploration Work Begins	1
Public Participation Plan Developed	5
Drum Removal Bid Documents Revised and Published	12
Drum Removal and Soil Investigation Below Drums (RI Task 2a)SAP/QAPP/HSP Submitted	11
RI/FS SAP/QAPP/HSP (RI Task 3, 4, and 6) Submitted	6
Drum Removal Field Work Begins	14
Pumping from the Hole Begins	14
RI Field Work Begins	7
RI/FS Groundwater Investigation Below Drums SAP/QAPP/HSP (RI Task 2b)	21
RI Field Work Complete	24
Drum Removal Work Complete	19
Remedial Investigation Memo Submitted	26
Phase 2 Field Work Begins	28
Phase 2 Field Work Complete	37
LNAPL Management Complete	59
RI/FS report submitted	67
Landfill Closure Construction begins	As soon as feasible, considering drum removal, weather and other construction constraints and conditions