Pasco Landfill Cleanup Options

Focused Feasibility Study Comment period 9/12 – 10/12/18

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Toxics Cleanup Program, Eastern Region



Site Location

Dietrich Road near the intersection of Kahlotus Road and U.S. Highway 12











SVE = Soil vapor extraction

Site History & Features

Industrial Wastes (1972 – 1975)

- Zone A: 35,000 40,000 drums mixed industrial waste
- Zone B: Herbicide wastes (~5,000 drums)
- Zone C/D: Various sludges/resins (>3,000,000 gallons)
- Zone E: Chlor-alkali wastes (~11,000 tons)

• Municipal Landfill (1958 – 1993)

- Burn trenches (1958-1971)
- Balefill and Inert Waste Area (1976–1993)
- Septic tank wastes, sewage sludge (1976–1989)
- Offsite Plume (1985 present)

- Groundwater protection ordinance in place





Who are Potentially Liable Persons?

- Current owner and operator with any ownership interest or exercises any control
- Owner and operator at the time of release
- Persons who owned the hazardous substance and arranged for disposal, treatment or transport (generators)
- Persons who transported the hazardous substance (transporters)
- Manufacturers of hazardous substance that cause pollution when used according to their instructions



Pasco Landfill Potentially Liable Persons

- Advance Electroplating
- Basin Disposal Company
- Boeing Company
- Philip Environmental, Inc.
- Burlington Environmental, Inc.
- Chemical Processors, Inc.
- Resource Recovery, Inc.
- Burlington Northern, Inc.
- Carr Aviation
- Collier Carbon and Chemical
- Chempro of Oregon
- Crown Cork and Seal Company, Inc.
- E.I. du Pont de Nemours and Co., Inc.
- Franklin County
- Freightliner Corporation, a Subsidiary of Daimler-Benz of North America Holding Company
- Georgia-Pacific Corporation
- Glidden Corporation, a Subsidiary of ICI Americas, Inc.
- Harbor Oil, Inc.
- ICI Canada, Inc.
- Intalco Aluminum Corporation
- James River Paper Company, Inc.
- Kalama Chemical Company

- Leonard and Glenda Dietrich
- Minnesota Mining and Manufacturing Company
- Morton Chemical Company
- National Service Industries, Inc.
- Pasco Sanitary Landfill, Inc.
- Franklin Land Recovery, Inc.
- Puget Sound Naval Shipyards
- The O'Brien Corporation
- Oregon Cutting Systems Division of Blount, Inc.
- PACCAR, Inc.
- Precision Castparts Corporation
- Piute Energy & Transportation Company
- PPG Industries
- Rhone-Poulenc Company
- Sandvik Special Metals
- Simpson Timber Company
- UARCO Incorporated
- United States Air Force
- United States Department of Agriculture, Forest Service
- United States Department of Interior, Bureau of Reclamation
- Weyerhaeuser Corporation
- Wood Treatment Chemical Company



More than 30 PLPs!!

Selecting a Cleanup Remedy

Threshold requirements

- Protect human health and the environment
- Comply with cleanup standards
- Comply with state and federal laws
- Provide for compliance monitoring

Other significant requirements

- Use permanent solutions to fullest extent practicable
- Provide reasonable restoration time frame
- Consider public concerns





A feasibility study identifies potential cleanup options.

> What does "focused" mean?

The Focused Feasibility Study builds upon the Pasco Landfill Feasibility Study completed in 1999:

- Uses information learned from interim cleanup actions completed over the past 15+ years
- The nature and extent of environmental impacts at the site are similar
- The remedial action objectives are consistent

Washington's cleanup standards have changed since 1999, so we needed to re-evaluate cleanup options.





Cleanup options: Municipal Solid Waste Areas

Municipal Solid Waste (MSW) Landfill





Municipal Solid Waste Landfill

<u>History:</u> Household and commercial garbage, septic sludges

Proposed Action:

- Maintain engineered
 cover
- Landfill gas collection and treatment (flare) system
- Fencing & signs

Cost = \$1.4 million



The flare unit burns off landfill gas



Balefill/Inert Waste Area







Balefill/Inert Waste Area

<u>History:</u> Household waste and construction debris

<u>Proposed Action:</u> Improve and maintain soil cover over waste

Cost = \$500,000



Surface-exposed Balefill Area wastes



Burn Trenches

<u>History:</u> Household and commercial garbage was burned

Proposed Action:

- Regular inspections
- Maintain soil cover
- Fencing & signs

Cost = \$10,000







Cleanup options: Industrial Waste Areas

RCRA C cover systems installed in 2001/2002 at Zones A-E and MSW Landfill





RCRA Cap Cover System



Zone A cover system test pit

Multi-layer covers minimize water infiltration and potential for contact with waste materials



HDPE = High-density polyethylene RCRA = Resource Conservation & Recovery Act

Zone A Drum Repository





Zone A Drum Repository

<u>History:</u> ~35,000 drums containing a variety of industrial wastes disposed in 1970s

FFS alternatives that include the following core cleanup components can satisfy all the threshold requirements:

- Excavate Zone A wastes
- Proper waste disposal
- Residual SVE treatment
- New engineered cover
- Robust H&S requirements and monitoring program



Drums of industrial waste being readied for burial - 1973

Cost = \$56 – 128 million



H&S = Health & safety SVE = Soil vapor extraction

Zone A waste & conditions

- Impacted cover system performance
- Elevated underground temperatures and combustion concerns
- Liquid chemicals have leaked from drums and reached groundwater
- SVE alone cannot achieve remedial objectives and cleanup timeframes

*Alternatives A1-4 and A-8 are not considered adequately protective given these conditions



Zone A cleanup alternatives that meet threshold requirements A-5 A-6

- Excavate drums, debris and impacted soil to depth of ~27 feet
- Solids (bulked drums, debris, soil) moved to a new on-site lined disposal cell
- Off-site treatment and/or disposal of liquids/intact drums
- New cover & SVE

Cost = \$56 million



*All options include groundwater monitoring, fencing and warning signs.

Same as A-5 plus:

 Soil below excavation would be heated to enhance removal and treatment of contaminants

Cost = \$62.1 million

Zone A cleanup alternatives that meet threshold requirements A-7

Same as A-5 plus:

- Excavate drums, debris and impacted soils deeper than 27 feet
- Solids (bulked drums, debris, soil) moved to a new on-site lined disposal cell
- Off-site treatment and/or disposal of liquids/intact drums
- New cover & SVE

Cost =\$60.3 million



*All options include groundwater monitoring, fencing and warning signs.

A-9

- Excavate drums and impacted soil down to ~42 feet
- Off-site disposal of all excavated materials (drums-waste-soils)
- New cover and SVE

Cost =\$128.1 million

Zone B Herbicide-Manufacturing Residue Drum Repository





Zone B

<u>History:</u> 5,000 drums of herbicide-manufacturing waste disposed offsite in 2002 (incineration)

Proposed Action:

- Maintain cover over contaminated soil
- Monitor groundwater
- Maintain fencing/signs



Zone B Removal Action February 5, 2002

Cost = \$2.2 million



Zone C and D Industrial Waste Evaporation Ponds





Zone C/D

<u>History:</u> Bulk liquid waste residues (paint, solvents, etc.)

Proposed Action:

- Maintain engineered
 cover over wastes
- Maintain fencing/signs
- Monitor groundwater

Cost = \$700,000



Zone C/D vapor monitoring



Zone E Chlor-Alkali Waste Disposal Area





Zone E

<u>History:</u> 11,000 tons of paper manufacturing sludge

Proposed Action:

- Maintain engineered cover over wastes
- Maintain fencing/signs
- Monitor groundwater



Landfilling toxic sludges into Zone E in 1973 or 1974

Cost = \$800,000



Central Area: On-property groundwater

<u>History:</u> Low-level VOC contamination in groundwater

Proposed Action:

 Focused SVE treatment if concentrations increase and require cleanup

Cost = \$1.5 million





SVE = Soil vapor extraction VOC = Volatile organic compounds

Summary of PLPs' Preferred Alternatives

Area	Preferred Remedial Alternative	Total NPV Cost (\$ million)
MSW Landfill	MSW-1	\$1.4
Balefill Area and Inert Waste Disposal Areas	BA-1	\$0.5
Burn Trenches	BT-1	\$0.01
🛨 Zone A	A-2	\$18.3
Zone B	B-1	\$2.2
Zones C/D	CD-1	\$0.7
Zone E	E-1	\$0.8
On-property Ground Water (Central Area)	ONP-1	\$1.5

*PLPs' preferred alternative for Zone A (A-2) is not adequate to satisfy threshold criteria and requirements



Effective Public Comments

- 1. Review all documents available for public comment
- 2. Before drafting comments, contact Ecology or other technical experts listed on the fact sheet, as needed, to address questions/concerns
- 3. Be specific when writing comments
 - Could they be interpreted multiple ways?
 - Explain your reasoning with examples
 - Refer to document pages, paragraphs, etc.
- 4. Ensure Ecology could enact your ideas within the framework of existing laws

TIP: Coordinate your comments with others!



After the comment period

We will:

- Respond to all comments
- Use public input, the FFS documents, and Ecology experience to prepare a draft cleanup action plan (dCAP)
- Hold a public comment period for the draft cleanup action plan



Project Contacts

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