



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

April 19, 2019

Charlotte Mitchell, PE  
City of Wenatchee  
Parks, Recreation and Cultural Services  
1350 McKittrick Street  
Wenatchee, WA 98801

**RE: Conditional Approval of Revised Preliminary Design Report:**

- **Site Name:** Gold Knob Prospects
- **Site Address:** 1200 Circle Street, Wenatchee
- **Cleanup Site ID:** 11610
- **Facility/Site ID:** 22496
- **Agreed Order No:** DE 15823

Dear Charlotte Mitchell:

The Washington State Department of Ecology (Ecology) has received “*Revised Interim Removal Action, Preliminary Design Report, Saddle Rock Park*,” prepared by GeoEngineers and received by Ecology March 22, 2019. The Preliminary Design Report (PDR) was originally submitted to Ecology as a draft document on March 11, 2019. The Draft PDR was revised based on comments from Ecology provided via email on March 13, 2019. Responses to Ecology’s March 13, 2019 comments were provided in a memorandum from GeoEngineers dated March 18, 2019.

Ecology hereby conditionally approves the revised PDR. The condition of this approval is that the following corrections/clarifications are satisfactorily incorporated into the Final PDR:

- Section 2.4.1, Bullet #3. The bullet states “If dust control is necessary at the permitted disposal facility (e.g. during dump truck offloading), these activities will be at the discretion and responsibility of the landfill personnel.” This statement is repeated in Section 2.7.2, Bullet #5. The disposed soil will be from a contamination cleanup site and will contain arsenic and heavy metals. Landfill personnel may not have complete HAZWOPER training or sufficiently understand such dust concerns. Therefore, putting management of potential fugitive dust solely on the landfill personnel is not considered to be appropriate. Please revise both bullets to state “**Mitigation and prevention of potential exposure to fugitive dust during dump truck offloading at the permitted disposal facility will be the sole responsibility of the Contractor, in coordination with landfill personnel.**”



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- Section 2.4.1, Bullet #4. Please revise the bullet as follows: “The Contractor shall be prepared to elevate PPE requirements (in accordance with their project HASP) to Level C, if dust suppression activities are not actively controlled to control air emissions discharges and creating a potential exposure inhalation hazard for **onsite** personnel. **No offsite fugitive dust migration will be allowed.**”
- Section 3.1, first sentence. Please revise the sentence as follows: “Our field screening and sampling program is specific to arsenic, since this is the **primary** constituent of concern for the Site.”
- Ecology has not yet received the revised design sheets. Those design sheets will be included with the final design, therefore further review of these sheets by Ecology can await submittal of the Draft Final Design Report.
- Some elements of the Agreed Order, Scope of Work, Task 1, may not be complete to Ecology’s satisfaction, but could be further addressed within the Final Design Report. In preparing the Final Design Report, please confirm that all components listed for Task 1 as well as Task 3 are sufficiently included. Examples of Task 1 components that may need additional discussion within the Final Design Report include:
  - Bullet 5 – details of post IRA reclamation and revegetation requirements, materials and procedures.
  - Bullet 7 – defined routes of dump trucks.
  - Bullet 8 – dust control procedures.
  - Bullet 11 – appropriate cost basis for bidding.

If you have any questions about these corrections/clarifications, please contact me by phone at (509) 454-7835 or e-mail at [frank.winslow@ecy.wa.gov](mailto:frank.winslow@ecy.wa.gov).

Sincerely,



Frank P. Winslow  
Site Manager  
Toxics Cleanup Program  
Central Regional Office

cc: Nick Rohrbach, GeoEngineers