



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 2, 2019

Piper Roelen, PE, CHMM
Principal – Environmental Engineer
Landau Associates
130 2nd Avenue South
Edmonds, WA 98020

RE: Final Interim Action Work Plan – Roadway Project Closed City of Yakima Landfill Site

- **Site Name:** Interstate 82 Exit 33A Yakima City Landfill
- **Site Address:** Interstate 82 Yakima, 98901 Yakima
- **Agreed Order:** DE 15861
- **Facility Site ID No.:** 1927
- **Cleanup Site No.:** 3853

Dear Piper Roelen:

Ecology received several comments from a preliminary review that need to be addressed prior to public comment.

- 1) Appendix D, SAP Section 2.1.1. It is unclear whether the table represents discrete or composited samples. For example, for 0-100 cubic yards are 1 composited (3 discrete) or 3 composited (9 discrete) samples required? Ecology recommend the latter.
- 2) For the waste stream (2.1.5), it is unclear how field decisions will be made to analyze for the other analytes listed and Ecology suggests adding detail or a decision framework to guide field personnel. In addition, pesticides are not included in the list in section 2.1.5. Ecology recommends requiring analysis for pesticides produced through 1970 where warranted (e.g. EPA 8081).



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- 3) Ecology will need to receive confirmation of concurrence regarding cultural resource reports and plans from all stakeholders prior to going out for public comment. Please work with the stakeholders to comply with this request.

Thank you very much for consideration of these comments and once changes have been made please reissue the Final IAWP for use in the public comment period and SEPA.

If you have any questions, please contact Valerie Bound at 509-454-7886 or Valerie.Bound@ecy.wa.gov.

Regards,



Chris Wend, PhD, PE
Toxics Cleanup Program
Central Regional Office

cc: Joan Davenport, City of Yakima
Jeff Cutter, City of Yakima
Kurt Peterson, Foster Pepper, PLLC
Andy King, Foster Pepper, PLLC
Andy Fitz, Attorney General's Office