



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

June 28, 2019

Karma Suchan
Manager, Solid Waste Division
Yakima County
7151 Roza Hill Drive
Yakima, WA 98901

Re: No Further Action (NFA) Determination for:

- **Site Name:** Yakima Old City Landfill
- **Site Address:** S 18th St and Yakima R Mile 112, Yakima
- **Facility/Site No.:** 463
- **Cleanup Site ID No.:** 3666

Dear Karma Suchan:

The Department of Ecology (Ecology) has reviewed existing file documents for the above-referenced cleanup site. The following is our opinion, based on that review.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively “substantive requirements of MTCA”). The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:

- Lead into groundwater.



The Site is a former landfill that reportedly closed in the 1960s. The Site was placed on the Confirmed and Suspected Contaminated Sites List (CSCSL) and the Hazardous Sites List (HSL) based on investigation activities that were conducted in May 1997. **Enclosure A** presents a map showing the location of the site.

Basis for the Opinion

This opinion is based on the information contained in the following document:

1. Letter from Yakima Health District to City of Yakima, RE: “*Yakima Old City Landfill Site Hazard Assessment*,” dated July 25, 1997.

This document is kept at the Central Regional Office of Ecology (CRO) for review by appointment only. You can make an appointment by calling the CRO resource contact at (509) 575-2490 or emailing RecordsOfficer@ecy.wa.gov.

This opinion is void if any of the information contained in that document is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site.

The conclusion that no further remedial action is necessary is based on the following analysis:

1. **Characterization of the Site.**

Ecology has determined that characterization of the Site is sufficient to establish cleanup standards and determine appropriate cleanup actions. Groundwater was sampled in 1997 down gradient of the formal landfill. Groundwater samples were analyzed for heavy metals and volatile organic compounds. Of the analytes, only lead exceeded applicable cleanup levels. Lead was detected in groundwater at a concentration of 8 µg/L, above the historical Method A cleanup level of 5 µg/L.

It should be noted that lead is generally not particularly mobile in groundwater except for under low pH conditions. Such low pH conditions are not expected to be encountered at the site. Lead is; however, commonly detected in unfiltered monitoring well samples that have elevated turbidity as a consequence of insufficient well development.

It is Ecology's opinion that the detected lead was likely attributable to turbidity in the monitoring well and likely not representative of groundwater conditions that would be appropriately characterized using a properly developed water supply well.

2. Establishment of cleanup standards.

Groundwater Cleanup Levels

The current Method A cleanup level for lead in groundwater is 15 µg/L. Therefore, the historical detection of 8 µg/L is below the current applicable cleanup level.

Point of Compliance (POC): Standard, throughout the Site.

Ecology has determined the cleanup levels and points of compliance established for the Site meet the substantive requirements of MTCA.

3. Cleanup.

Because no contaminants were found at concentrations above applicable cleanup levels, no cleanup of the site is considered to be warranted.

Listing of the Site

Based on this opinion, Ecology will remove the Site from the Hazardous Sites List and the Confirmed and Suspected Contaminated Sites List. This process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdrawal this opinion.

Limitations

1. This opinion does not settle liability with the state. Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resources damages resulting from the release or releases of hazardous substances at the site. This opinion does not:
 - Change the boundaries of the site.
 - Resolve or alter a person's liability to the state.
 - Protect liable persons from contribution claims by third parties.

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To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. This opinion does not constitute a determination of substantial equivalence. To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not address whether the actions taken at this site are substantially equivalent. Courts make that determination. See RCW 70.105D080 and WAC 173-340-545.
3. The state, Ecology and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

If you have any questions about this opinion, please contact me phone at (509) 454-7835 or by email at frank.winslow@ecy.wa.gov.

Sincerely,



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

Enclosure (1): A - Site Location

Enclosure A

Site Location

