



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 13, 2020

Joan Davenport  
City of Yakima  
129 North 2<sup>nd</sup> Street  
Yakima, WA 98901

**RE: Interim Action Work Plan and Next Steps at the following site:**

- **Site Name:** Interstate 82 Exit 33A Yakima City Landfill
- **Site Address:** 805 North 7<sup>th</sup> Street, Yakima
- **Agreed Order:** DE 15861
- **Facility/Site ID No.:** 1927
- **Cleanup Site ID No.:** 3853

Dear Joan Davenport:

*“Interim Action Work Plan – Roadway Project, Closed City of Yakima Landfill Site Yakima, Washington,”* prepared by Landau Associates, and dated July 29, 2019 has now completed the public review period and can be considered Final.

The Department of Ecology (Ecology) understands the uncertain schedule for the Interim Action is dependent on the new road construction project. As new documents are generated in moving forward, Ecology expects the following to be submitted as they are generated, in order to keep our record complete:

- Plans and approvals for dewatering effluent management;
- Health and safety plans for implementation of the interim action; and
- Other necessary permits and regulatory approvals that are needed to execute the interim action.

After completion of the Interim Action, the updated Conceptual Site Model (CSM) is required, once the following are complete:



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- The Groundwater-Surface Water Interaction Memo (completed);
- The Boise Cascade Site Remedial Investigation Report (currently under Ecology review);  
and
- The Interim Action Report (to be prepared after execution of the Interim Action).

Ecology has currently identified two data gaps that must be filled prior to Ecology making a cleanup action decision at this Site. Ecology encourages the City to fill these data gaps now rather than awaiting completion of the Updated Conceptual Site Model (CSM) task. By addressing these data gaps now, Ecology anticipates that this will save both time and expense. The two data gaps, Updated Groundwater Data, and Verification Sampling for the Groundwater-Surface Water Pathway are further discussed below.

#### **Data Gap #1 - Updated Groundwater Data**

The Yakima Landfill RI Report included four quarters of groundwater monitoring data starting in September 2014 and ending June 2015. Typically, groundwater monitoring continues at a site after completion of an RI on a quarterly or semi-annual basis, since groundwater conditions commonly change over time. The execution of the Interim Action may not take place in 2020 and the timeframe from when the RI data were collected continues to widen. Ecology notes that at least two additional rounds of updated groundwater data should be collected prior to completion of the CSM task. If these data are not collected prior to the CSM update, they will be required after the CSM is updated and would then need to be integrated into the CSM. The two additional rounds must be consistent with seasons with high and low groundwater levels.

#### **Data Gap #2 - Verification Sampling for the Groundwater-Surface Water Pathway**

The groundwater-surface water pathway continues to be a concern to Ecology because potential ecological receptors in the Yakima River are a primary potential receptor of concern at the Site. The groundwater-surface water technical memorandum provided geochemical modeling data that suggests that significant impacts to the Yakima River are unlikely. Ecology had no further comments on the technical memorandum, but noted "Once more data is collected from other sources, the geochemical modeling may be refined to further inform this interaction." Further field verification of potential impacts to the river is warranted and there is a data gap that needs to be filled. As stated above, the optimal time for filling this gap is prior to completion of the CSM task. It will otherwise be required to be filled after that task is completed.

There is nothing precluding work being performed to fill the identified data gaps prior to the CSM task, and there is advantage to the City in doing so.

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Ecology is ready to work with the City in developing work plans to fill these data gaps. Please feel free to call me at (509) 454-7835 or email me at [Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov) with any questions or concerns.

Sincerely,



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

cc: Piper Roelen, Landau Associates  
Jeff Cutter, City of Yakima  
Kurt Peterson, PKG Law, P.S.  
Andy King, PKG Law, P.S.  
Andrew Fitz, Attorney General's Office

