



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

January 25, 2019

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

RE: 45 Day Extension for Updated Draft Interim Action Work Plan

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 ID No.:	3853

Dear Piper Roelen:

This letter documents Ecology's agreement with a proposed extension to the schedule for delivery of an updated Draft Interim Action Work Plan as discussed in the attached email to Ecology dated January 24, 2019. This extension provides for an additional 45 days starting February 1, 2019 for delivery of the updated draft work plan.

Please contact me at 509-454-7837 or cwen461@ecy.wa.gov with any questions.

Regards,

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

By certified mail: 7018 0360 0000 1740 9015



Piper Roelen
Landau Associates
January 25, 2019
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cc: Joan Davenport
Jeff Cutter
Andy King
Andy Fitz
Kurt Peterson

Wend, Christopher (ECY)

From: Piper Roelen <proelen@landauinc.com>
Sent: Thursday, January 24, 2019 4:05 PM
To: Wend, Christopher (ECY)
Cc: Davenport, Joan; Cutter, Jeff; kurt.peterson@foster.com; Andy King
Subject: Reponses to Ecology comments on Yakima LF IAWP and Request for Extension

Chris,

Thanks for meeting with us on January 22 and participating on the January 23 follow-up phone call to discuss Ecology's December 21, 2018 comment letter on the Yakima Landfill Interim Action Work Plan (IAWP). As we discussed, the following provides a summary of the items we discussed and our tentative plan for moving forward:

- General – Ecology now understands that the interim action (IA) work will not be performed as a separate and distinct phase of work (as suggested on Page 1 of the comment letter), but will be done concurrently with the rest of the roadway construction, and that consequently the IA design components will be integrated into the complete roadway construction designs and specifications. Therefore, any issues identified in the Ecology letter are understood to apply only to the portion of the roadway construction work that is directly related to the IA work.
- General – The intent of most of Ecology's comments on Page 2 and the top of Page 3 of the comment letter is to have the IAWP identify and acknowledge each of the items related to the IA that should be addressed and/or included in the designs and specifications package prior to construction and implementation beginning. The intent was not to include each of these items within the actual IAWP submittal. Ecology is requiring that the final designs/specs be provided to Ecology, but understands that they will not be incorporated into the IAWP (or by reference into the Agreed Order).
- Items Already in IAWP - Ecology acknowledges that a number of the items listed in the comment letter are already included in the IAWP (e.g., site description and overview, site conditions, stormwater management, excavation and materials management, disposal, landfill gas barrier installation, soil gas management, sampling and analysis plan, health and safety plan); they are just listed in the comment letter for completeness and do not need to be revised.
- Specific Items to Revise or Add – The following items will be added or revised in the final version of the IAWP to address Ecology's general or specific technical comments:
 - A new section will be added to identify how the IA design elements will be integrated into the roadway project design package and identify project requirements that Ecology identified in the comment letter that are not specifically required by MTCA (e.g., cultural resources, stormwater permitting, sediment and erosion control).
 - A new section will be added to discuss contaminated groundwater management, particularly in the area of the roadway project that could potentially encounter petroleum-contaminated groundwater originating from the Mill Site (a figure will be also added or modified to specifically identify this area).
 - A new section will be added to describe the requirement for, and the contents of, the Interim Action Report (e.g., as-built survey results for IA related work, as-built drawings, construction and performance monitoring results, inspection results, disposal documentation).
 - A new section will be added to identify groundwater and landfill gas monitoring wells located within the proposed roadway right-of-way (ROW) that will require decommissioning, summarized decommissioning procedures/requirements, and if applicable, will discuss installation of new or replacement monitoring wells for post-construction groundwater quality monitoring, if necessary.
- Other Technical Comments – The following address Ecology's specific technical comments on Page 3 and Page 4 of the comment letter (in same order as Ecology's comments):
 1. The landfill gas collection system/barrier will be protected per manufacturer's specifications; a comment will be added to the IAWP to this effect.

2. Additional information will be added to the IAWP more specifically define the slope of the MSW and wood debris excavation and the slope of the bedding layer for the landfill gas barrier/collection layer.
3. The excavated materials management plan (EMMP) already addresses potentially encountering asbestos-containing materials.
4. It is anticipated that the Mill Site remedial investigation (RI) work will be far enough along such that data will be available to inform roadway excavation and soil management activities. If it is not, the Mill Site RI work plan will serve as a “road map” to determining where contamination may be encountered and what analysis will be required for investigation and/or waste disposal characterization prior to and/or during roadway excavation activities. Additionally the EMMP and sampling and analysis plan (SAP) will also be used to inform decision making as necessary.
5. Prior site characterization at the Landfill Site during the RI is sufficient to understand the known and potential contaminants of concern at the Site. Field screening and potential contaminant identification and characterization procedures provided in the EMMP and SAP are sufficient to identify contaminants in the excavated material that would require special management and disposal.
6. Figure C-3 will be revised to explicitly include consultation with Ecology related to discovery and management of unanticipated/unknown releases.
7. A new section will be added to the IAWP, as indicated above, to address the area of petroleum-contaminated groundwater.
8. A new section will be added to the IAWP, as indicated above, to address groundwater monitoring wells in the construction ROW. As requested by Ecology, plans for pre- and post-construction groundwater performance monitoring will be considered and added to the IAWP as appropriate.
9. A table will be added to the SAP with a list of screening levels for those contaminants of concern identified in the Landfill Site RI. The pertinent section of the Mill Site RI that includes contaminants of concern and screening levels will be referenced in the SAP to cover potential sampling requirements on the Mill Site.
10. Ecology meant “eastern portion” of the site (not western) in this comment. The location of other infrastructure (e.g., sanitary sewer lines and stormwater lines) that is planned to be installed outside of the roadway ROW will be shown on site maps and discussed in the IAWP as applicable in relationship to performance of excavation and soil management activities in these areas.

If there are any other items related to the comment letter or our discussions that Ecology feels should be mentioned here, please let us know.

In addition the items discussed above, because the meeting to discuss Ecology’s comments on the IAWP was delayed until January 22, the City requests an extension and submission of the Final IAWP to Ecology until March 1, 2019. No other deadlines specified in the Agreed Order will be affected by this extension.

We appreciate your time and attention to this matter.

Regards,

Piper Roelen, PE, CHMM

Principal - Environmental Engineer

Landau Associates

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