

July 15, 2021

Alan Noell, PhD, PE  
Solid Waste Management Program  
Washington State Department of Ecology, Northwest Regional Office  
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Bellevue, Washington 98008-5452

Subject: Second Quarter 2021 Progress Report  
Go East Corp Landfill Site  
Snohomish County, Washington  
Agreed Order No. DE 18121  
GeoEngineers Project No. 6694-002-05

Dear Mr. Noell,

GeoEngineers, Inc. (GeoEngineers) has prepared this Second Quarter 2021 Progress Report on behalf of P&GE, LLC for the Go East Corp Landfill Site (Site) pursuant to Agreed Order No. DE 18121 (Agreed Order). This report summarizes actions taken during the second quarter of 2021 to implement the requirements of the Agreed Order and includes the information specified in the Agreed Order.

## **ON-SITE ACTIVITIES**

- Construction began in early- to mid-April 2021. Deep dynamic compaction was performed in late April followed by “wedge area” excavation and consolidation. Wedge area excavation was complete by late June 2021. A relatively small amount of landfill debris remains west of the construction area under “Wetland A.” This area west of the construction area will be addressed through an RI addendum.
- Landfill material observed in the wedge area has been generally consistent with prior test pits and observations (wood, concrete, tires and lesser amounts of other debris).
- There was no field screening evidence of obvious contamination in native soil (i.e., no sheen, odors, elevated photoionization detector [PID] screening results).
- Sixty-eight native soil confirmation samples were collected for chemical analysis. The majority of the samples did not contain constituents at concentrations exceeding interim action screening levels (IASLs). Soil was overexcavated and stockpiled on site where concentrations exceeded IASLs and additional confirmation samples were collected. Approximately 95 tons of stockpiled soil were stockpiled and then disposed offsite. The following are several exceptions where soil was not overexcavated:



- Nickel frequently exceeded IASLs, likely due to elevated background concentrations in native soil. Areas exceeding for nickel were not overexcavated due to the frequency of exceedances and likelihood that concentrations are representative of background conditions.
- Chromium was detected at a concentration of 49 milligrams per kilogram (mg/kg) in one sample that slightly exceeded the IASL of 48 mg/kg. This area was not overexcavated because 49 mg/kg is essentially equal to the screening level of 48 mg/kg.
- The organochlorine pesticide aldrin was detected in one sample at a concentration (24 mg/kg), which is greater than the IASL of 5 mg/kg. The area was not overexcavated for the following reasons:
  - Aldrin was not detected in any other soil confirmation sample during the interim action.
  - Aldrin was not detected in any landfill debris material samples analyzed in June 2020, as part of Pre-Construction Soil Sampling activities.
  - The depth where aldrin exceeds the IASL in soil after backfilling the wedge excavation is greater than 20 feet below ground surface (bgs). The Model Toxics Control Act (MTCA) Point of Compliance for direct contact with soil throughout the site is to a depth of 15 feet bgs. MTCA indicates 15 feet represents “a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of site development activities.”
- Approximately 247 tons of asbestos-containing material (ACM) consisting mostly of roofing material was stockpiled and then disposed offsite.
- A Lot Exploration Plan was executed in the southeast portion of the project, as required by the landfill closure plan. The area was scarified to a depth of 1 foot to observe for hidden or buried landfill debris. No debris was observed.
- The final Remedial Investigation Work Plan (RI WP) was published June 30, 2021.
- Fill was placed on site with all lots graded to within plus or minus 1 foot of grade by June 30, 2021. Approximately 20,000 cubic yards of off-site fill was imported to the site. Sampling of the fill for site constituents indicated no constituents exceeded IASLs<sup>1</sup>.
- Approximately weekly on-site construction meetings were held and attended by combinations of the owner, construction contractor, GeoEngineers and regulatory agencies.

## **DEVIATIONS FROM REQUIRED TASKS NOT OTHERWISE DOCUMENTED IN PROJECT PLANS OR AMENDMENT REQUESTS**

- None.

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<sup>1</sup> The concentrations of zinc were 87 mg/kg and 80 mg/kg, respectively, in one parent/duplicate sample pair. The IASL is 86 mg/kg for zinc. In our opinion, this slight zinc exceedance in the parent sample (i.e., 1 mg/kg greater than the IASL) is not a cause for concern because it is essentially equal to the screening level.



**DEVIATIONS FROM THE AGREED ORDER SCOPE OF WORK AND SCHEDULE**

- None.

**PLANNED DEVIATIONS FROM THE AGREED ORDER SCOPE OF WORK AND SCHEDULE IN THE UPCOMING QUARTER**

- None.

**PLAN FOR RECOVERING LOST TIME AND MAINTAINING COMPLIANCE WITH THE AGREED ORDER SCHEDULE (APPLICABLE IF SCHEDULE DEVIATIONS OCCURRED DURING THE QUARTER)**

- Not applicable – there were no schedule deviations.

**RAW DATA RECEIVED NOT PREVIOUSLY SUBMITTED TO ECOLOGY**

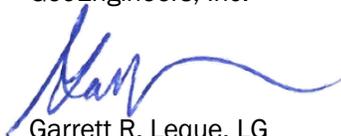
- The following data will be reported in the Interim Action Construction Report:
  - Native soil confirmation sampling results
  - Imported structural fill sampling results
  - Results of ACM testing
- The following data will be reported in the first interim report for the RI:
  - Samples collected in the general area of “Wetland A” where landfill debris remains.

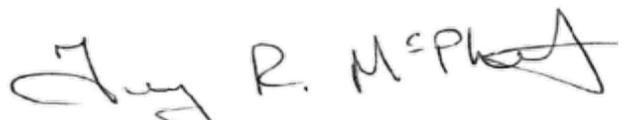
**PLANNED DELIVERABLES FOR THE UPCOMING QUARTER (IF DIFFERENT FROM THE AGREED ORDER SCHEDULE)**

- Interim Action Completion Report, due by September 28, 2021
- RI Addendum for “Wetland A” investigation
- Potential submittal of first interim data report for the RI depending on timing.

GeoEngineers trusts that this report meets Ecology’s needs. Please call us at 206.728.2674 if you have questions.

Sincerely,  
GeoEngineers, Inc.

  
Garrett R. Leque, LG  
Senior Environmental Geologist

  
Terry R. McPhetridge, LG, LHG  
Principal

GRL:TRM:mce

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