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December 9, 2021

Philip Perley Sr. District Manager Environmental Legacy Management Group Waste Management 9081 Tujunga Ave Sun Valley, CA 91352

Notice of Periodic Review Conducted at the following Cleanup Site:

• **Site Name:** Olympic View Sanitary Landfill

• Site Address: 10015 SW Barney White Road, Port Orchard, Washington 98367

Cleanup Site ID: 4217Facility/Site ID: 79649975

Dear Mr. Perley:

The Department of Ecology (Ecology) is required to conduct a periodic review every five years when the cleanup action includes an environmental covenant, in accordance with the Model Toxics Control Act (MTCA), Chapter 70A.305D of the Revised Code of Washington (RCW) and Chapter 173-340 of the Washington Administrative Code (WAC). This letter informs you that Ecology completed a periodic review at the Olympic View Sanitary Landfill (Site).

The periodic review concludes:

- The cleanup actions completed at the Site appear to be protective of human health and the environment; although ongoing natural attenuation processes have not achieved cleanup standards at this point.
- The source control measures and natural attenuation processes have been effective for the VOC indicator hazardous substances.
- Waste Management of Washington (WMW) calculated natural background concentrations of arsenic, iron, and manganese in regional groundwater based on the 95% upper confidence limit (UCL) with 95% coverage. The calculated natural background concentrations are 4.27 μg/L arsenic, 1,900 μg/L iron, and 730 μg/L manganese. The calculated natural background concentration of arsenic is less than the MTCA Method A cleanup level, which is based on a regulatory accepted background concentration. The calculated natural background concentrations of iron and manganese are less than the MTCA Method B cleanup levels, which are based on toxicological risk. Ecology recommended and Kitsap

Philip Perley, Waste Management December 9, 2021 Page 2

Public Health District granted using the natural background concentrations as groundwater quality standards for the landfill permit, as allowed under WAC 173-200-050(b)(ii).

- Ecology prepared a Corrective Action Plan (CAP) Addendum that incorporates the natural background concentrations as revised groundwater cleanup levels for arsenic, iron, and manganese, as allowed under WAC 173-340-720(7)(c) for MTCA cleanup actions. The CAP Addendum was made available for public comment concurrent with this Periodic Review and is now final.
- Arsenic, iron, and manganese are mobilized in anaerobic groundwater. Elevated
 concentrations of arsenic, iron, manganese, and ammonia can be attributed to solid waste
 biodegradations reactions, as well as natural phenomena such as wetland environments. The
 concentrations of these redox-sensitive indicator hazardous substances were compared with
 natural background concentrations and cleanup levels.
- The Site is subject to environmental covenants with restrictions for landfill closure, landfill post-closure care, and corrective action. WMW recorded two environmental covenants in 2011 for different parcels that meet the requirements for municipal solid waste (MSW) landfills under WAC 173-351 and for MTCA cleanups under WAC 173-340. The environmental covenants are protective of human health and the environment. Ecology recommends WMW consider revising the environmental covenants to more accurately prescribe the landfill closure, landfill post-closure, and corrective action restrictions with references to applicable regulations.

A periodic review will continue to be required every five years as long as contamination remains at the Site and an environmental covenant is required to protect human health and the environment.

Thank you for your continued post-closure care and cleanup of the Site. Should you have any questions, please do not hesitate to contact Alan Noell, at 425-213-4803 or alan.noell@ecy.wa.gov, or Tim O'Connor, at 425-389-2695 or tim.oconnor@ecy.wa.gov.

Sincerely,

Steven Williams Section Manager

Ecology Solid Waste Management Program, Northwest Region

Enclosures: Periodic Review Document

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cc: Alan Noell, Ecology
Tim O'Connor, Ecology
Steve Brown, Kitsap Public Health District
Jon Thompson, Office of the Attorney General