



Shelton C Street Landfill Site Responsiveness Summary

Comment Period: November 4 to December 7, 2021

Cleanup Site ID: 2295
Facility ID: 1186
Address: C Street, Shelton, WA 98594
County: Mason

Documents for review and comment

- Remedial Investigation and Feasibility Study (RI/FS) Report
- Draft Cleanup Action Plan (dCAP)
- Agreed Order No. DE 19541
- State Environmental Policy Act (SEPA) Determination of Non-Significance

Background

The site was a City of Shelton (city) landfill from 1928 until the mid-1980s. The landfill received residential solid waste and sludge from the city's wastewater treatment plant. Operators burned waste in the open and in an incinerator. The solid waste and sludge are the sources of contamination. The city is the potentially liable person (PLP) responsible for the cleanup.

The soil is contaminated with dioxins/furans, carcinogenic polycyclic hydrocarbons (cPAHs), and metals. Metals in groundwater are likely from decomposition of the waste, causing low oxygen levels in the landfill. The lack of oxygen causes metals in the soil to move into the groundwater.

The proposed cleanup includes constructing a low-permeability soil cap to cover the landfill waste and reduce rainwater penetrating into the buried waste. Institutional controls will keep people from entering the site and prevent future activities from damaging the cap. The site will be monitored to make sure the remedy continues to be effective in preventing exposure of people and the environment to contamination. After cleanup construction is completed, we will review conditions at the site every five years.

During the comment period, we hosted an online public informational meeting on November 18, 2021, from 6:30 to 7:30 pm. We provided information about the conditions at the landfill, answered questions from the public, and provided information on how to submit comments.

We received two comments during the comment period. We considered the comments and made no changes to the RI/FS report, dCAP, and Agreed Order. The city will finalize the cleanup documents (RI/FS), and we will finalize the Cleanup Action Plan (CAP) and sign Agreed Order DE 19541. After the engineering and design stage is completed, the city will do the cleanup work (see Figure 1).

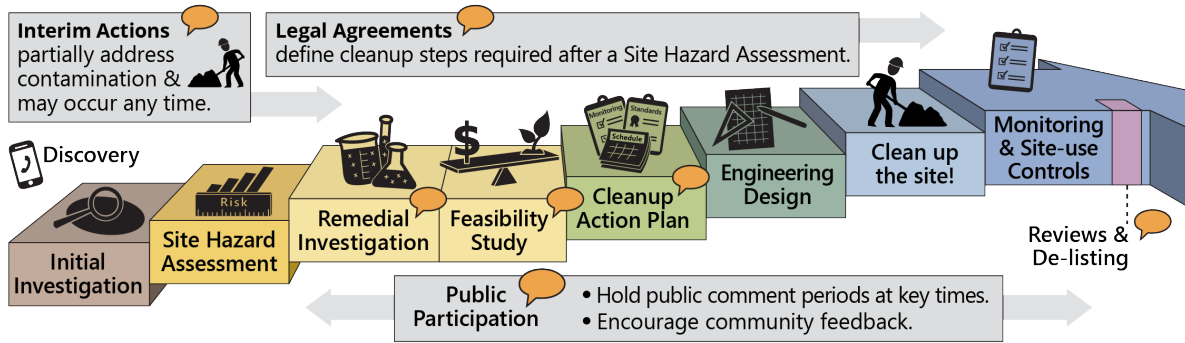


Figure 1. The Model Toxics Control Act (MTCA) is Washington’s cleanup law. There are several steps in the MTCA cleanup process. The comment bubbles indicate major milestones in the process when there is an opportunity for public comment.

You can follow the progress of cleanup at the [Shelton C Street Landfill webpage](https://apps.ecology.wa.gov/gsp/sitepage.aspx?csid=2295).¹

Prepared by

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¹ <https://apps.ecology.wa.gov/gsp/sitepage.aspx?csid=2295>

Comment from Clinton Ferrara

From: Clinton Ferrara <clifer@comcast.net>
Sent: Wednesday, November 3, 2021 7:33 PM
To: Smith, Andrew (ECY) <ansm461@ECY.WA.GOV>
Subject: C street dump

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When I lived in Shelton I talked to a man who worked at Thomas printing who told me that when he was a youngster he and his friends would play at C St. dump. He told me that they saw the Navy drop off boxes at the dump with the Radioactive symbol marked on them.

Thank you
Clinton Ferrara

Sent from my iPhone

Response from Ecology

Thank you for your comment. Based on extensive investigation at the site, there is no suggestion that radioactive material was brought to the C Street Landfill. The landfill received mostly residential solid waste. Other waste included research waste, demolition debris, and sludge from the city's waste treatment plant.

The cleanup action plan describes several actions that will prevent exposure to the landfill waste. These include installation of a low-permeable soil cap, putting in place institutional controls, and conducting on-site monitoring. The cap will prevent contaminants from coming into contact with people and animals. The bottom layer of the cap will consist of a geotextile barrier. At least a 2-foot-thick layer of clean, low permeability cover material will cover the geotextile layer. The top of the cap will be a 1-foot-thick layer of topsoil seeded with grasses and other shallow vegetation. The low permeability of the cap will reduce the amount of rainwater from entering the waste. Monitoring of groundwater wells positioned outside of the lateral extent of the landfill will show if contaminated groundwater moves off the site and additional cleanup work is required. Long term monitoring of groundwater and periodic review of conditions at the site will ensure conditions of the cleanup remains in satisfactory condition through time.

Comment from Constance Ibsen

Shelton C Street Landfill

Please make clear in the new Agreed Order that the proposed Alternative 1 Cleanup Action Plan (low permeable cap) will NOT allow for redevelopment of this property.

Response from Ecology

Thank you for your comment. The town, city, or county has jurisdiction for land use. Ecology has jurisdiction for cleanup at the landfill and protection of the cleanup actions into the future.

Therefore, Agreed Order DE 19541 requires the cleanup action with assurances that the cleanup continues to be effective in the future. However, the agreed order does not contain restrictions for future property redevelopment.

Institutional (non-engineered) controls will be required at the C Street Landfill assuring both the continued protection of human health and the environment and the integrity of the cleanup action. Agreed Order DE 19541 requires institutional controls including a deed restriction (sometimes called an environmental covenant) that the property owner will have recorded with the property deed in Mason County. In the event that the city transfers the property to another owner, the deed restriction will go with the property. The new owner will be responsible for maintaining the integrity of the cleanup required by Agreed Order DE 19541 and by the environmental covenant.

The environmental covenant will require that any development or activity proposed at the site be reviewed and approved by Ecology. The review will evaluate if the proposed activities would cause exposure to the contaminants. Ecology may approve a proposed development or activity that continues to protect human health and the environment.