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WA State Department
of Ecology (SWRO)

October 11, 2022

Andrew Smith
Washington State Department of Ecology
Southwest Regional Office
300 Desmond Drive
Olympia, Washington 98504-7775

Re: Progress Report, Shelton C Street Landfill Site, Third Quarter 2022

Facility ID No. 1611
City of Shelton Agreed Order No. DE 19541
Project No. 150074

Dear Andrew:

This progress report was prepared by Aspect Consulting, LLC (Aspect) on behalf of the City of Shelton (City) for the C Street Landfill Site (Site), a former municipal solid waste landfill, located at the west end of West C Street just west of the overpass across U.S. Highway 101, in Shelton, Mason County, Washington. A cleanup action for the Site is being conducted in accordance with the Model Toxics Control Act (MTCA), Chapter 70.105D Revised Code of Washington (RCW), and the MTCA Cleanup Regulation, Chapter 173-340 WAC.

This progress report was prepared as a condition to Agreed Order (AO) No. DE 19541 between the City and the Washington State Department of Ecology (Ecology) for the Site, executed December 20, 2021. Per the AO, "City of Shelton shall submit to Ecology written quarterly Progress Reports that describe the actions taken during the previous quarter to implement the requirements of this Order." The Progress Reports shall include the following:

1. A list of activities that have taken place during the reporting period in compliance with the AO.
2. Detailed description of any deviations from required tasks not otherwise documented in project plans or amendment requests.
3. Description of all deviations from the AO Scope of Work and Schedule during the reporting period and any planned deviations in the upcoming reporting period.
4. For any deviations in schedule, a plan for recovering lost time and maintaining compliance with the schedule.
5. All raw data (e.g., including laboratory analyses) received during the previous reporting period (if not previously submitted to Ecology), together with a detailed description of the underlying samples collected.

The following describes the actions taken during the Third Quarter of 2022 to implement the requirements of the AO.

Activities during the Reporting Period

The activities completed during the reporting period in compliance with the AO consist of the following:



- The final Engineering Design Report (EDR), including the final Compliance Monitoring Plan, the Inspection, Monitoring and Maintenance Plan, and 100 percent construction plans, and the draft environmental covenant (attachments) were submitted to Ecology on July 12, 2022.
- An Access Agreement between the City and the south-adjointing property owner, Miles Sand & Gravel Co. allowing the City's contractors to conduct cleanup activities on the south-adjointing property was executed on July 9, 2022. And, an Exemption of Land Modification Permit for the C Street Landfill cleanup activities was received from Mason County on August 26, 2022. Both documents will be submitted to Ecology as addendums to the final EDR in early Fourth Quarter 2022.
- The Second Quarter 2022 Progress Report was submitted to Ecology on July 11, 2022.

Deviations from Required Tasks Not Otherwise Documented

There were no deviations from the required tasks during the reporting period.

Deviations from Scope of Work or Schedule and Plans for Recovering Lost Time

The final EDR and attachments were submitted approximately one week behind the AO schedule of 30 days following receipt of Ecology's written comments on the draft submittal (received from Ecology on June 4, 2022). This is not anticipated to result in additional delays to the schedule for subsequent AO tasks or activities.

Raw Data Received from the Laboratory

No raw data was received during the reporting period.

Work Planned for the Next Reporting Period

The next reporting period will cover October 1 through December 31, 2022. The actions planned for the next reporting period include the following:

- Cleanup action construction bidding and contractor selection.
- Prepare to initiate cleanup action construction.

Cleanup action implementation will be dependent on contractor selection and administration, which is in progress by the City.

Sincerely,

Aspect consulting, LLC



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cc: Brooke Kilts, City of Shelton