

June 14, 2024

Alan Noell Washington State Department of Ecology 15700 Dayton Avenue North Shoreline, Washington 98133

Subject: Go East Landfill / Alpine Estate Landfill Gas Monitoring Data Update

Dear Mr. Noell:

Since the Landfill Gas Monitoring Readiness at Go East Landfill/Alpine Estates Development Report was finalized in February 2024, we have continued routine landfill gas monitoring at the Go East Landfill/Alpine Estates property and have seen exceedances of 5% methane at most of the perimeter soil gas probes. Per our protocol when there are exceedances of 1% methane at probes, we have been checking the house ventilation trench monitoring stations of nearby homes and we continue to see no detection of methane beneath the Alpine Estates home. Additionally, we've been performing surface monitoring around the perimeter of the landfill and in the area of current home construction. Methane levels have been well below 100 ppm (0.01% methane), which is the indoor air criteria per WAC 173-350-400. See the attached data.

Per the Landfill Gas Monitoring Readiness Report (Herrera 2024), we've performed a number of investigations and contingency measures and have seen fluctuations of methane levels in the probes since we started monitoring in November of 2022. Since removing the soil vapor extraction unit and removing the vacuum extraction from the landfill perimeter collection trench and individual probes in November of 2023 we've seen methane presence rebound at the probes and return to conditions that were observed when monitoring first began at the site in November of 2022. This most recent trend upward is leading us towards additional action to attempt to better control methane presence. The below is an outline of proposed steps we are planning and implementing:

- Reinstall the portable blower unit as it was previously near GP7 and provide a vacuum on the perimeter trench through sump by GP7. Discharge will be routed through the vent connected to sump by GP7. The portable blower unit operates under 200 scfm and therefore does not require a permit. A new electrical service post with meter and outlets is being installed at the lot adjacent to GP7, lot 30, to provide a power source for the blower unit.
 - a. Once pulling on perimeter trench, monitor methane concentrations at probes and sump. Probe reads will be weekly when barometric pressure is declining.

🕈 2200 Sixth Avenue, Suite 1100 | Seattle, WA 98121 🛛 💊 206.441.9080 💮 herrerainc.com

WASHINGTON | OREGON | CALIFORNIA | MONTANA | WYOMING

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- b. Compare methane concentration in sump to methane concentrations at probes.
- c. If methane concentrations at probes do not decline after a month of monitoring (or do not decline significantly), go to Step 2.
- 2. Keep blower installed and cap the other two vent pipe connections at the other sumps to increase vacuum influence to perimeter trench.
 - a. Monitor methane concentrations at probes for a month. Take probe reads weekly when barometric pressure is declining.
 - b. Compare methane concentration in sump to methane concentrations at probes.
 - c. If methane concentrations at probes do not decline after a month of monitoring (or do not decline significantly), go to Step 3.
- 3. Install larger blower unit and keep the other two vent pipes capped. This would require us to take a gas sample and perform loading analysis to get discharge permit.
 - a. Monitor methane concentrations at probes for a month. Take probe reads weekly when barometric pressure is declining.
 - b. Compare methane concentration in sump to methane concentrations at probes.
 - c. If methane concentrations at probes do not decline after a month of monitoring (or do not decline significantly), go to Step 4.
- 4. If perimeter probe methane concentrations have not declined and comparison to methane concentration at sump (in landfill collection trench) suggests methane at probes is not coming from landfill:
 - a. May need to install vertical extraction wells beyond landfill boundary and provide vacuum to them.
 - b. May need to install additional perimeter probes to evaluate extent of methane presence.
 - i. Could install just beyond the former extent of wedge area to determine whether methane observed at existing probes is due to residual gas from previous extents of waste.
- 5. If perimeter probe and sump methane concentrations decline, suggests methane at probes is coming from landfill.
 - a. Extract LFG through vertical wells until probes drop below 5%.
 - b. Turn off blower unit and monitor for rebound.
 - c. If rebound occurs, establish more permanent location for blower unit.
 - d. If no rebound, remove equipment.

With the suggested steps outlined above, Herrera hopes to get answers about the source and extent of methane on the Go East Landfill/Alpine Estates property. Herrera understands that the WAC 173-350-400 lower explosive limit of 5% methane is not being met for gases in soil at the landfill boundary. Monitoring of surface emissions and house ventilation trench monitoring stations has shown that the methane observed in the probes is not migrating to the surface or underneath houses. Herrera believes the environmental controls, monitoring, and contingency response measures installed and performed for the Alpines Estates homes provide safeguards against the

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potential threat of persistent methane outside the landfill. The network of house ventilation trench monitoring stations below each of the 96 houses planned for the Alpine Estates development provides a large footprint for monitoring and evaluating landfill gas migration while additional investigations and contingency measures are done to mitigate the presence of landfill gas in the deep soils of the property.

Sincerely,

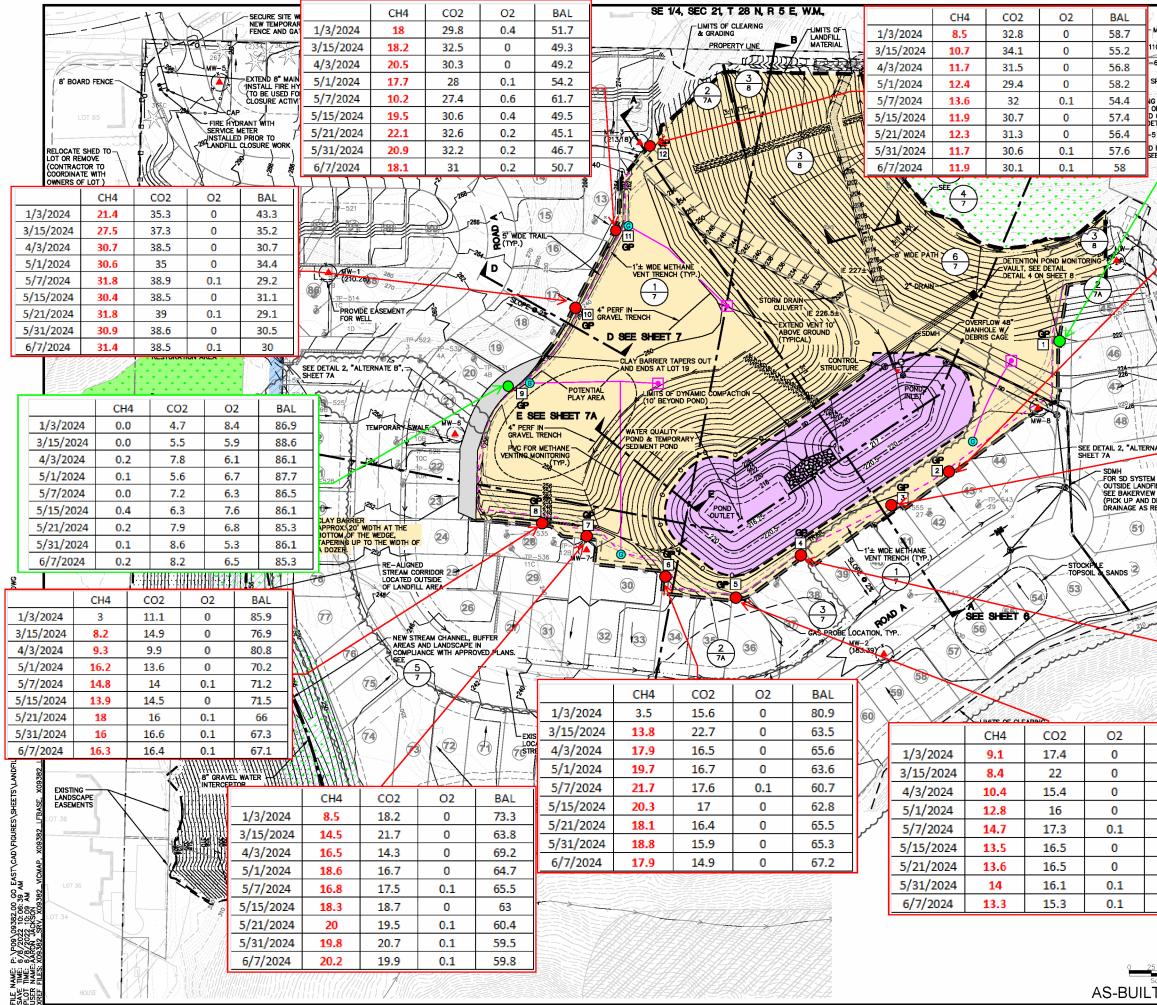
Herrera Environmental Consultants, Inc.

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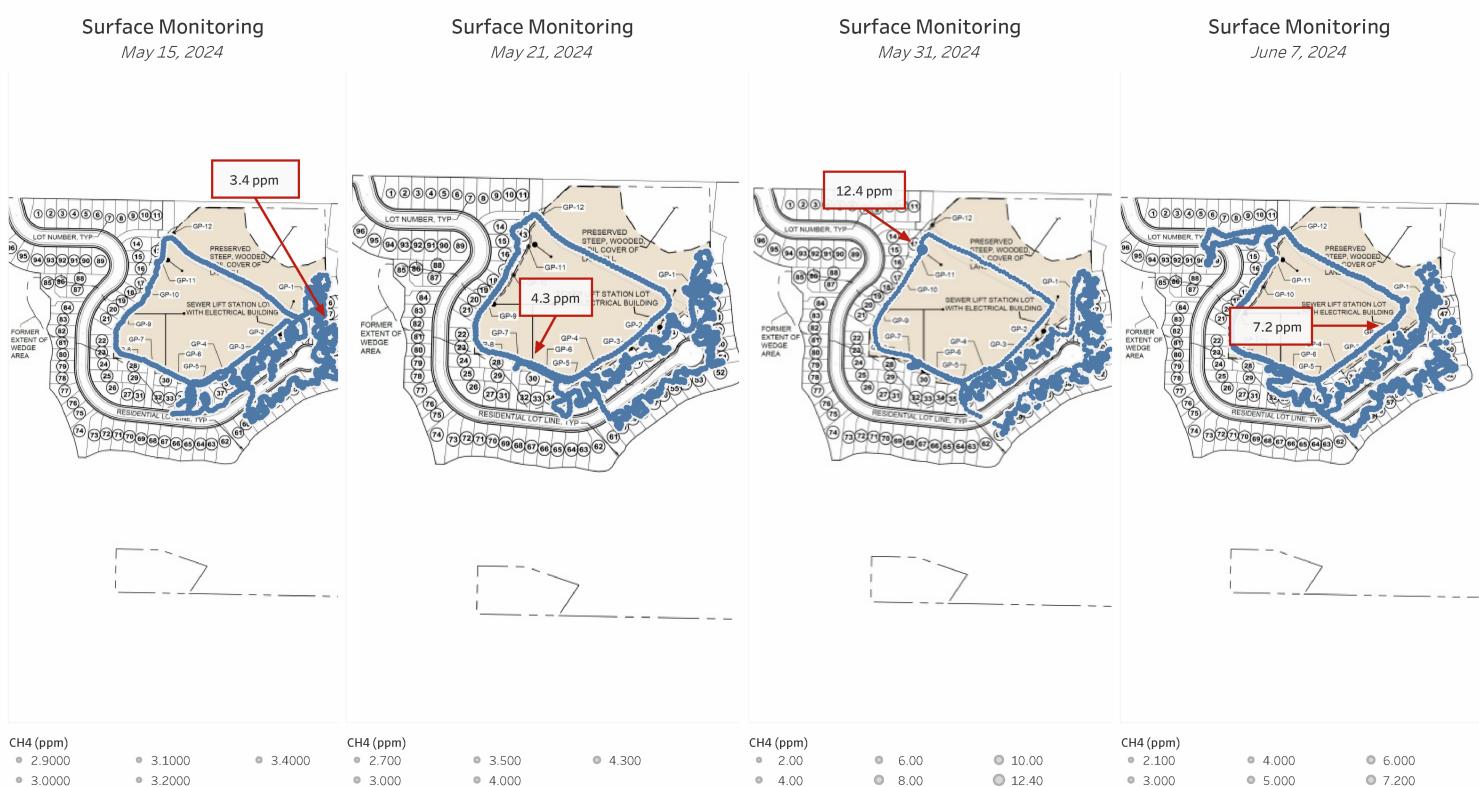
Tyson Wright, P.E. Senior Engineer

Enclosure: Landfill gas probe and surface monitoring data

cc: Stacia Bloom, P.E., Century Communities; Megan Bertolacci, Snohomish Health Department



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6		358	17.9	D	16.5	3				
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Note: If need	ed, attach add	itional data fo	rms.							

General Comments: FOLLOWED LONGING ProtoCol per figure (-) of MCP for prote methode Certification: General Comments: FOLLOWED LONGING Gradenie General Comments: FOLLOWED LONGING FOLLOWED LONGING Gradenie General Comments: FOLLOWED LONGING FOLLOWED LONGING FOLLOWED

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LEG MONITORING FORM

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3		186%	9.3	18.54		b					
4		282°6	14.1	0	17.9	3					
5		256%	12.8	0	16	2					
6		394%	19.7	0	16.7	3					
7		37206	18.6	0	16.7	54					
8		324-6	16.2	May 1000	13.6	9					
9		2.10	0.1	6.7	5.6	0					
10		6/2%	30.6	6	35		Checked lot 16-19 >0%.				
11		354%	17.7	0.1	28	9	checked lots \$2000 15-16.				

Note: If needed, attach additional data forms.

General Comments:

for Fig. c-1 of CMCP for probes w/ wethave exceedances + rearby occurred houses 010 (onti Enl **Certification:**

TITLE: Engineer II SIGNATURE:



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General Comments: Followic whitingung proposed per Figure (-1 of MCP for probe withan excurcance

Certification:

SIGNATURE: My At TITLE: ENglicer II	
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			LFG MO	NITORING	FORM					
acility Name	e: 60 E	ist Land	£11	Facility A	Facility Address: 4330 Jobt St SE Event, V					
Permit Numl	ermit Number: SW-027				ampling: Star					
Date of Sam	ate of Sampling: 5/15/2024				ext Full Calib	ration:	Apr	1/2025		
Gas Meter T	ype and Serial		ŝ.	Last Field	Calibration D	ate:	6/1	hozy		
	GEMSDOU							metric Pressure nes or mm Hg): <u>30.0</u>)		
Monitoring Personnel:				•	uly,			n Temperature: SK		
Camper Steven				N	N19 202			ther/Soil Conditions:		
Gas Meter S	ample Pump I	Rate:		Sample P	ump Time			Volume (cc):		
3	300 cc/mm				in): -/0.2 MIN		15	812-4474		
Results:				5-1-	-10.2 1911	1				
Perimeter Probe No.	Initial Percent LEL	Stabilized Percent LEL	Percent CH₄ (volume)	Percent O ₂ (volume)	Percent CO ₂ (volume)	H (pp	₂S mV)	NOTES		
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2		120	6.0	0.1	17-8	D				
3		218	10.9	0-1	20.7	2				
4		300	15.0	0.1	19.1	2				
5		270	13.5	Ð	16.5	1				
6		406	70.3	D	17	2				
7		366	18.3	0	18.7	3-	1			
8		278	13.9	0	14.5	8				
9		8	0.4	7.6	6.3	0		checked 10 t3 16-19.		
10		608	30.4	0.4	38.5	7		checicles 10+3 15-1		
10										
11		390	19.5	0.1	7.65	1		checked lot 15->		

General Comments: Followed withighny protocol per Figure C-1 of CMCP for probes above 1% wetlane Certification:

SIGNATURE: TITLE: Engineer TT



			LFG MO	NITORING	FORM					
Facility Nam	e: Alpin	e Estates	60 East	Facility A	ddress: 433	0 1084	h s	ASE, Everett, WA		
Permit Num	ber: SW-1	120	- Cancelli	Time of S	Time of Sampling: Start 1075 Finish 1190					
Date of Sam	pling: 5/	21/202	1 .	Date of N	ext Full Calibi	ration:	EX R R	MN April Zozs		
Gas Meter T	ype and Seria			Last Field	Calibration D		- 1	2024		
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Monitoring	Personnel:	(1,11	1,51°	n	Mean	Temperature: 51°				
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	Sample Pump	(sec or m	ump Time in): イール.て		Volume (cc):					
Perimeter	Initial	Stability al	D							
Probe No.	Percent LEL	Stabilized Percent LEL	Percent CH₄ (volume)	Percent O ₂ (volume)	Percent CO ₂ (volume)	H₂S (ppm		NOTES		
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2		128	10.4	0.1	18	00	70			
3		778	11.4	0.01	20.9	Ũ				
4		308	15.4	Ö	19.3	2				
5		272	13.6	Ó	16.1	1				
6		362	1801	()	16.4	L.				
7		400	20	0-1	19.5	40				
8		360	18	0.	16	7		-		
9		Ч	0.2	6-8	7.9	1				
10		636	31.8	0]	39	0		checked lots 16-19-0%		
11		442	2201	0.2	32.6	1		Unclud 1sts 15-16-50%		
12	9	246	12.3	0	31.3			Checked 10+ 15->0% (
Note: If need	ded, attach ado	ditional data fo	orms.				gar e'			
General Con	nmonts.									

Certification:

C.W

tolloved contrugency protocol Fig C-1 of CMCP for methane exceedances + ourpred homes

SIGNATURE:	He .	TITLE: ENGINEER	I

			LFG MC	NITORIN	G FORM				
Facility Nan	ne: Go E	ast Lno	4671	Facility A	ddress: 433	30	logh	+ St SE Erwett, VA	
Permit Nun		Time of S	Time of Sampling: Start 0730 Finish $1/30$						
Date of Sampling: $5/31/2024$					lext Full Calib	ration:	Ay	en) zozs	
Gas Meter T	ype and Seria	Last Field	l Calibration D	ate: 🤤	5/1/	2024			
GEM SODO					1			metric Pressure nes or mm Hg): Z9.96 V	
Monitoring	Personnel:			SUMM	1, 202		Mear	n Temperature:	
Cann	jn Ste	Nigi	V 202			SMNN WA			
Gas Meter S	ample Pump	Rate:			ump Time		Pore	<u>МИУ, WA</u> Volume (cc):	
300	· co/m	-	(sec or min): $5.7 - 10.2 m \mu$			1812-4474			
Results:									
Perimeter Probe No.	Initial Percent LEL	Stabilized Percent LEL	Percent CH₄ (volume)	Percent O ₂ (volume)	Percent CO ₂ (volume),		₂S mV)	NOTES	
1		Not real	I abre to	1015tr	for Hol	lage			
2		1360	6-8	0-1	17.9	5)		
3		250	12.5	0.1	21.1	0			
4		308	15.4	0.1	19.2	3			
5		280	14	0.1	16.1	1	4		
6		376	18.8	0	15.9	2			
7		396	19.8	200 0.1	20.7	32			
8		320	16	0.1	16.6	12		· · · ·	
9		2.	0.1	5.3	53.6	0		11-1-1-1-10-00/	
10		618	30.9	0	38.6	D		dreaced 1013/6-19->0%.C	
11	~	418	20.9	0.2	32.2	5		checked lots 15-16->0%. (1	
12		\$\$\$234	11.7	0.1	20.6	1		ducked 107 15 -> 0% C	
Note: If need	led, attach ado	litional data fo	rms.	3 					
General Con	nments: 0 01	ved confing	enaj ylar	~ Fig (-1 of cm	CPf	or 1	methave exceedances	

Certification:

To the best of my knowledge, the information reported and statements made on this data submittal and attachments are true and correct. I am aware that there are significant penalties for making any false statement, representation, or certification.

TITLE: SIGNATURE: Ph9, ver



LFG MONITORING FORM										
Facility Nam	ne: (an Kas	11	Facility A	Facility Address: 4330 108th St SE, Everch, WA						
Permit Number: SW-027				Time of S	Time of Sampling: Start <u>140</u> Finish <u>1750</u>					
Date of Sampling: $\frac{4}{7}$				Date of N	Date of Next Full Calibration: April 2025					
Gas Meter Type and Serial Number:				Last Field	Last Field Calibration Date: 5/1/2124					
GEMSDOO				Weather:		(inc	arometric Pressure inches or mm Hg): 30.01			
Monitoring Personnel:				SMN	y, high l	OS Me	an Temperature: 67 °			
Camryn Stemen						We	eather/Soil Conditions: SVMNY, Mosfly Jvy			
Gas Meter Sample Pump Rate:					ump Time		e Volume (cc):			
300 ce/m				(sec or m	in): /0.2 MIV	18	12-4474			
Results:	00/11				10. 6 10/10	- 10				
Perimeter Probe No.	Initial Percent LEL	Stabilized Percent LEL	Percent CH₄ (volume)	Percent O ₂ (volume)	Percent CO ₂ (volume)	H₂S (ppmV)	NOTES			
1		Not rea	d dre	to const	within b	lockage				
2		148	7.4	0.1	17.5	0				
3		246	12.3	0.1	20.9	0				
4		302	15.1	1.0	18.6	4	P			
5	4	266	13.3	0.1	15.3	<u> </u>				
6		358	17.9	0.0	14.9	2				
7		404	20.2	0.1	17.9	35				
7 8		326	16.3	0-1	16.4	35				
		326	16.3	0.1	16.4	13 0				
8		326 4 628	16.3 0.2 31.4	0-1	16.4 8.2 38.5	13 0	Chucked 10+5 16-19-> 0%			
8		326	16.3	0.1	16.4	13 0	Chucked 10ts 16-19-> 0%. Ancked 10ts 15-16-0% Undud 10ts 15-20%.			

General Comments: Folloved antinguny proposol for Figure C-1 of MCP for probe methode excuedance

Certification:

SIGNATURE:	man t	K	TITLE:	Engineer	I	
	1					