



October 10, 2024

Connie Groven
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 2024
Facility ID No. 1611
City of Shelton Agreed Order No. DE 19541
Project No. AS150074

Dear Connie:

This progress report was prepared by Aspect Consulting (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 2024 to implement the requirements of the AO.



Activities During the Reporting Period

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

- The fall 2024 semi-annual groundwater monitoring event occurred on September 23, 2024, in accordance with the post-construction monitoring requirements in the Compliance Monitoring Plan.¹ Results will be presented in the Annual Groundwater Monitoring Report, to be prepared after the spring 2025 event.
- The Second Quarter Progress Report was submitted to Ecology on July 15, 2024.

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

There were no deviations from the scope of work or schedule during the reporting period.

Raw Data Received from the Laboratory

Analytical data from the fall 2024 semi-annual groundwater monitoring event was received from the laboratory and is in the process of being validated. Validated data will be transmitted to Ecology with the Annual Groundwater Monitoring Report, following completion of the spring 2025 event.

Work Planned for the Next Reporting Period

The next reporting period will cover October 1 through December 31, 2024. The actions planned for the next reporting period include the following:

- The first Annual Groundwater Monitoring Report and the first surveyor's settlement report will be submitted to Ecology.

Sincerely,

Aspect consulting



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cc: Brooke Kilts, City of Shelton

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¹ Appendix A to the Engineering Design Report, C Street Landfill prepared for City of Shelton by Aspect Consulting, dated July 11, 2022.