

January 7, 2025

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, Fourth 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 Fourth 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 2023-2024 annual soil cap inspection occurred on December 10, 2024, in accordance with the Inspection, Monitoring, and Maintenance Plan dated November 28, 2023. Results will be documented in the Annual Soil Cap Inspection Field Report, currently being prepared for submission to Ecology in First Quarter 2025.
- The 2023-2024 Annual Groundwater Monitoring Report for post-cleanup construction groundwater compliance monitoring was submitted to Ecology on October 14, 2024.
- The 2023-2024 Annual Settlement Survey Report for post-cleanup settlement monitoring of the cap was submitted to Ecology on October 14, 2024.
- The Third Quarter 2024 Progress Report was submitted to Ecology on October 14, 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

There were no data received from the laboratory during the reporting period.

Work Planned for the Next Reporting Period

The next reporting period will cover January 1 through March 31, 2025. The actions planned for the next reporting period include the following:

- The 2023-2024 Annual Soil Cap Inspection Field Report will be submitted to Ecology in First Quarter 2025.
- The next post-construction groundwater compliance monitoring event will occur in February 2025.
- Following receipt and validation of the analytical groundwater data from the February 2025 event, the 2024-2025 Annual Groundwater Monitoring Report will be prepared to present the results of the September 2024 event and the February 2025 event.

Sincerely, Aspect consulting

Callothe

Carla Brock, LHG Sr. Principal Geologist carla.brock@aspectconsulting.com

Ali Cochrane, LG Senior Geologist ali.cochrane@aspectconsulting.com

cc: Brooke Kilts, City of Shelton

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