



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

March 20, 2025

Mark Ziegler, City Manager  
City of Shelton  
525 Cota Street  
Shelton, WA 98584  
[mark.ziegler@sheltonwa.gov](mailto:mark.ziegler@sheltonwa.gov)

**Re: Requirement for PFAS Evaluation in Groundwater**

- **Site Name:** Shelton C Street Landfill
- **Site Address:** C Street, Shelton, Mason County
- **Agreed Order:** DE 19541
- **Facility/Site ID:** 1186
- **Cleanup Site ID:** 2295

Dear Mark Ziegler:

The Department of Ecology (Ecology) recently published guidance for investigating and remediating per- and polyfluoroalkyl substances (PFAS) contamination in Washington State.<sup>1</sup> According to the Interstate Technology Regulatory Council (ITRC, 2022), landfills can be sources of PFAS to the environment.<sup>2</sup> Also, on April 10, 2024, the U.S. Environmental Protection Agency (EPA) finalized Maximum Contaminant Levels (MCLs) for selected PFAS.<sup>3</sup>

Therefore, PFAS will need to be included as constituents of concern for groundwater sampling. To begin the investigation of PFAS at the Site, please prepare a sampling and analysis plan (SAP) for collecting groundwater samples for PFAS at site monitoring wells beginning with the Fall 2025 sampling event. As you prepare the SAP, please ensure that the plan includes the following items:

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<sup>1</sup> Ecology, 2023, *Guidance for Investigating and Remediating PFAS Contamination in Washington State*, Toxics Cleanup Program Publication No. 22-09-058, June.

<sup>2</sup> Interstate Technology Regulatory Council (ITRC), 2022, *Technical Resources for Addressing Environmental Releases of Per- and Polyfluoroalkyl Substances (PFAS)*, <https://pfas-1.itrcweb.org/> June.

<sup>3</sup> <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>

1. Please refer to Ecology's PFAS guidance document as you prepare the SAP.
2. The SAP shall include quality assurance and quality control (QA/QC) measures specific for PFAS sampling.
3. **Analytical Method.** EPA Method 1633 shall be used for PFAS analyses with the full list of 40 available analytical constituents. As noted by Eurofins (2022), the full list is more suitable to wider environmental surveillance (including landfill leachates) rather than the smaller list traditionally used for fire-fighting training area investigations.<sup>4</sup>
4. If positive displacement pumps will be used, please confirm that they do not contain Teflon® or polytetrafluoroethylene (PTFE). We assume that no dedicated pumps or tubing are in use. If there are dedicated pumps/tubing, then special decontamination procedures would need to be used.

**Please submit the SAP for Ecology review and approval within 60 days of the date of this letter.**

If you have any questions regarding this letter, please contact me at 360-890-0059 or [steve.teel@ecy.wa.gov](mailto:steve.teel@ecy.wa.gov).

Sincerely,



Steve Teel, LHG  
Cleanup Project Manager/Hydrogeologist  
Toxics Cleanup Program  
Southwest Region Office

cc by email: Brooke Kilts, City of Shelton, [brooke.kilts@sheltonwa.gov](mailto:brooke.kilts@sheltonwa.gov)  
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Ali Cochrane, Aspect Consulting, [ali.cochrane@aspectconsulting.com](mailto:ali.cochrane@aspectconsulting.com)  
Ecology Site File

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<sup>4</sup> Eurofins, 2022, PFAS – draft EPA Method 1633, EnviroNote 1123, October. Available at:  
<https://cdnmedia.eurofins.com/apac/media/614958/1123-enviro-note-pfas-draft-epamethod-web.pdf>