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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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May 19, 2025

Barbara Lary
SCS Engineers
15940 SW 72nd Avenue
Portland, OR 97224
BLary@scsengineers.com

Re: **Support for Eliminating LB-6S from the Monitoring Network at Leichner Landfill**

Site name: Leichner Brothers Landfill
Site address: 9411 NE 94th Ave, Vancouver, Clark County, WA 98662
Facility/Site ID: 1017
Cleanup Site ID: 3019

Dear Barbara Lary:

The Washington State Department of Ecology (Ecology) received your email on April 24, 2025, submitting a memorandum, on behalf of Clark County Public Works, providing additional information and reasoning behind your request to eliminate monitoring well LB-6S from the monitoring well network for the above referenced Site. Monitoring well LB-6S is proposed for decommissioning to accommodate development of the City of Vancouver's Operations Center.

I have reviewed the memorandum, dated April 23, 2025, and other available Site documents. My review indicated the following:

- In the "Work Plan for Groundwater and Landfill Gas Monitoring Network Modifications," dated April 15, 2024, the following rationale was provided for decommissioning monitoring well LB-6S and not replacing it with a new well:
 - LB-6S is located in the northwest corner of the property, near NE 94th Avenue and construction traffic will likely damage the well in its current location. Rather than risk damaging the well, it will be decommissioned just prior to construction.

- A replacement well is not being proposed. This is because LB-6S is located along the east side of NE 94th Avenue and downgradient of the landfill where there are four additional shallow groundwater monitoring wells for interpreting groundwater flow conditions and monitoring groundwater quality.
- In a letter from Ecology, dated May 29, 2024, Ecology approved the “Work Plan for Groundwater and Landfill Gas Monitoring Network Modifications.” However, Ecology indicated in this letter that we would prefer monitoring well LB-6S be replaced because it appears to be strategically located for monitoring downgradient groundwater flowing from the landfill.
- During a meeting on June 14, 2024, between Ecology, Clark County Public Works and their consultant, SCS Engineers, it was proposed by SCS Engineers that LB-17S and LB-17I be included as compliance wells and part of the monitoring well network instead of replacing LB-6S. LB-17I is part of the current monitoring well network at the Site. However, LB-17S is not part of the current monitoring well network and prior to recent sampling events in 2024 and 2025, LB-17S had not been sampled for 35 years.
- LB-6S, LB-17S, and LB-17I are all within the unconfined alluvial water-bearing zone on the Site. The combination of both LB-17S and LB-17I well screens encompass the screened interval monitored by LB-6S.
- Based on the data collected from the 2024 and 2025 sampling events, concentrations of inorganic parameters in LB-6S and LB-17S are not identical, and in some cases are an order of magnitude different. However, concentrations in both these wells are generally below the cleanup levels with the exception of nitrate detected at 13.1 milligrams per liter (mg/L), above the cleanup level of 10 mg/L, in LB-17S during the August 2024 sampling event. Also, concentrations of dissolved iron and manganese in LB-17I are substantially higher compared with concentrations detected in LB-6S and LB-17S and have consistently exceeded the cleanup levels since groundwater monitoring started in 1989.

Based on the above information, Ecology does not feel that conditions at LB-17S and LB-17I are representative of conditions at LB-6S. However, based on the distance between these wells and the landfill waste, this is not unexpected. Ecology **approves** of your request to decommission monitoring well LB-6S without replacing the well and to incorporate LB-17S into the current monitoring well network, along with LB-17I to provide data in absence of LB-6S. However, it should be noted that if conditions change in LB-17S showing an increasing trend in

concentrations or consistent exceedances of cleanup levels, additional monitoring wells may need to be installed downgradient.

If you have any questions, please contact me at (360) 409-6164 or danielle.gibson@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle R. Gibson", with a long horizontal flourish extending to the right.

Danielle Gibson
Site Manager/UECA Coordinator
Toxics Cleanup Program
Southwest Region Office

cc by email: Tina Kendall, Clark County Public Works, tina.kendall@clark.wa.gov
Mike Davis, Clark County Public Works, mike.davis@clark.wa.gov
Joelle Loescher, Clark County Public Works, joelle.loescher@clark.wa.gov
Louis Caruso, SCS Engineers, icaruso@scsengineers.com
Greg Helland, SCS Engineers, ghelland@scsengineers.com
Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File

References:

SCS Engineers. 2024. Work Plan for Groundwater and Landfill Gas Monitoring Network Modifications, Closed Leichner Landfill, Clark County, Washington. April 15.

SCS Engineers. 2025. Memorandum, Support for Eliminating LB-6S from the Monitoring Network at Leichner Landfill. April 23.

Washington State Department of Ecology (Ecology). 2024. Approval of Work Plan for Groundwater and Landfill Gas Monitoring Network Modifications, Leichner Brothers Landfill, Clark County, Washington, Facility/Site ID: 1017, Cleanup Site ID: 3019. May 29.