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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

December 22, 2025

Kevin Terrado
Solid Waste Division
3000 Rockefeller Ave., M/S 607
Everett, WA 98201
(Kevin.Terrado@co.snohomish.wa.us)

Subject: Ecology's Comments on McCollum Park Data Gaps Memorandum

Site Name: McCollum Park

Location: 128th St SE & 4th Dr SE Everett, 98208 Snohomish

CSID: 3992

Facility: 2732

Dear Kevin Terrado:

Thank you for submitting "Landfill Condition Status and Data Gaps Memorandum McCollum Park (former Emander Landfill)", dated November 22, 2025. Ecology has reviewed the memo and is providing the following comments and recommendations:

Direct contact pathway/Landfill cover

1. Ecology records (Notice of Penalty 21623) indicate that in 2022, work was performed on a park & ride which dug through the Emander landfill's liner and cap. Was the liner repaired?
2. "Excavation, Trenching and HDPE Repair Plan", dated 2022, was submitted by CA Carey Corporation, but to my knowledge, no report documenting the repair work was submitted to Ecology.

Landfill Gas

1. Ecology asks County to submit a draft landfill gas work plan. The work plan will provide details of the current landfill gas management, and provide measurements to be taken in investigating any potential landfill gas migration off the landfill perimeter.
2. Ecology expects the draft work plan includes, but not limited to:

- a. A map showing the existing landfill gas collection system
- b. Existing active landfill gas probes
- c. Proposed locations and number of additional landfill gas probes
- d. Sampling analytes and frequencies
- e. Locations of the proposed bar-hole sampling survey

Groundwater

1. Ecology recommends in-situ groundwater treatment for the vinyl chloride exceedances found in the area, where shallow groundwater monitoring well BH-03, BH-05, BH-06 and BH-07 and deep groundwater monitoring well MW-16 and MW-18 are located.
2. It has been 29 years since the cleanup action was implemented, and vinyl chloride in the groundwater continues exceeding MTCA cleanup level (CUL). Without active treatment, the site will fail to meet a reasonable restoration time frame. Ecology recommends active groundwater treatment instead of monitoring alone.
3. In situ oxidation can be effective in treating low concentrations of vinyl chloride in the groundwater. Ecology recommends installing two sets of injection well pairs in the area where vinyl chloride exceeds MTCA CUL. Ecology recommends using the existing monitoring wells for performance and compliance monitoring at this time, and postponing installing the two sets of sentinel well pairs proposed on County property downgradient of the existing well network.

Schedule and Tasks

- The County should submit report on the completed landfill liner or off gas system repair work, immediately.
- If Community Transit and its contractor did not repair any damage caused by the park and ride construction work, the County should conduct further investigation and evaluate whether the damaged liner or off gas system is posing any threat to human health and the environment.
- The schedule submitted to Ecology on September 25, 2025 shows Task 4 as draft SRI Work Plan. The County plans to draft the SRI Work Plan in February and March 2026 and submit the draft SRI work plan by March 31, 2026.
- The draft SRI work plan will now consist of:
 - A landfill gas investigation work plan
 - A groundwater treatment and monitoring work plan
 - A work plan to investigate and evaluate the risks to human health and the environment from the damaged landfill liner or off gas system.

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- The draft SRI work plan will also serve as an interim action work plan. Ecology will conduct a SEPA review of the work plan and submit it for public comment. WAC 197-11-268; WAC 173-340-600(16).

If you have any questions, please contact me at (425) 457-3842 or sunny.becker@ecy.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Sunny Becker".

Sunny Becker, PE
Site Manager
Toxics Cleanup Program, NWRO