

Strata Geosciences

September 25, 2026

Luke LeMond, LHG
Washington Department of Ecology, Central Regional Office
1250 West Alder Street
Union Gap, WA 98903

Re: Schedule Extension Request: Snipes Mountain Landfill Agreed Order No. DE 22514
Remedial Investigation Data Collection

Dear Luke:

Strata Geosciences (Strata) serves as the Consultant for Yakima County Public Services (County) for the Remedial Investigation at the Closed Snipes Mountain Landfill (Snipes Landfill) as required by the Agreed Order (AO) DE 22514, effective February 29, 2024. The completion times for each of the Remedial Investigation (RI) and Feasibility Study (FS) deliverables are defined in Exhibit B of the AO. As Mott MacDonald, Strata staff submitted the Data Summary Report, approved by Ecology on August 19, 2024, and the RI Work Plan, approved by Ecology on January 17, 2025. In the AO, the completion schedule for RI field work is defined as “730 days following Agency approval of the RI Work Plan; or as described in approved RI Work Plan if different.” The RI Work Plan did not describe a schedule different from what was presented in the AO, therefore, the RI field work is currently scheduled to be completed by January 17, 2027. This letter requests an extension to schedule for the RI field work completion and the following RI deliverables as discussed further below and serves as a formal record of conversations between Strata and Ecology.

Schedule extension requests are discussed in Section 8.10 of the AO and the required elements are listed along with Strata responses below.

- The deadline that is sought to be extended.
 - The Completion of RI Field Work deliverable.
- The length of the extension sought.
 - Strata is requesting an extension of 1 year (365 days) until January 17, 2028 for the Completion of RI Field Work deliverable.
- The reason(s) for the extension.

- The Groundwater Monitoring Well Network Expansion Work Plan (Mott MacDonald, 2025) that was approved by Ecology on August 19, 2025 anticipated that drilling and initial groundwater sampling at the new monitoring wells would occur between October and November 2025. In an effort to reduce the well install cost for the County and have more consistent pump styles across the site, potentially further reducing the upfront cost, Strata has explored the feasibility of installing 2-inch monitoring wells instead of the originally scoped 4-inch monitoring wells. To field test the feasibility, rental pumps were acquired in 2026 Q1, Q2, and Q3 for the existing 2-inch wells SMW-5s and SMW-5d, which are currently without dedicated pumps.
- **2026 Q1:** The 2-inch Geosub pump with drop tubes, rented as an alternative to Hydrasleeves for SMW-5S and SMW-5D, was incapable of lifting water from the screen intervals for sample collection. The pump also became lodged below the water surface in SMW-5D.
- **2026 Q2:** The rental Redi-Flo2 worked during decontamination but malfunctioned after deployment in SMW-5D. A replacement unit was shipped overnight to the site; it operated but was unable to produce sufficient lift in either well.
- **2026 Q3:** The rental Redi-Flo2 worked during decontamination and for approximately 10 minutes of controlled purging at <1 gpm at SMW-5D before malfunctioning.

The insufficient performance of the rental pumps in SMW-5s and SMW-5d has limited the number of pump options for 2-inch monitoring wells for the depths required at Snipes Landfill. To avoid limiting Yakima County's options for future pump replacement, the Technical Specifications scope 5-inch monitoring wells capable of accepting 4-inch submersible pumps.

- These circumstances constitute good cause for the requested extension under Section 8.10.2.1 of the AO, as the pump performance failures at SMW-5s and SMW-5d were unforeseen and occurred despite Strata's due diligence in equipment selection and field testing. The resulting need to revise the well construction specifications from 4-inch to 5-inch diameter was a direct and necessary response to these failures, undertaken to avoid limiting the County's long-term operations and maintenance options at the Site. Because the requested extension of 365 days exceeds the 90-day threshold identified in Section 8.10.4, Strata further requests that Ecology find these circumstances to be "exceptional or extraordinary" within the meaning of Section 8.10.4.2, given that: (1) the pump failures were not reasonably foreseeable based on the original 4-inch well design; (2) resolving the issue required an iterative, multi-quarter field-testing process (2026 Q1 through Q3) rather than a single corrective action; and (3) the resulting design revision necessitates additional time for Technical Specification finalization, contract approval, and driller mobilization before field work can proceed.
- The draft Technical Specifications for the monitoring well network expansion, as well as the septage lagoon soil sampling, have been sent to Yakima County for review. It is estimated that, once the Technical Specifications are finalized, it will take approximately 3 months for contract approval. The resulting estimated drilling date would be between December 2026 and February 2027, depending on driller availability. Extending the Completion of RI Field Work deliverable date to January 2028 would

- accommodate approximately one year of groundwater sampling from the new monitoring wells.
- Strata staff have discussed the ongoing pump issues and decision-making with Ecology on June 23, 2026 and September 22, 2026. Strata staff identified Anchor line of Blackhawk piston pumps for SMW-5s and SMW-5d as a capable pump for collecting water quality samples but will prevent the measurement of water levels. As a result Ecology and Strata agree to prioritize water level measurements in these wells over collecting water samples until sufficient data has been collected from SMW-5s and SMW-5d concurrently with the new monitoring wells described in the Monitoring Well Expansion Plan (Mott MacDonald, 2025). After sufficient data has been presented to Ecology for review Strata will meet with Ecology to discuss the installation of the previously identified the Anchor line of Blackhawk piston pumps. The RI analytes that continue to be collected at SMW-5s and SMW-5d, and should be collected for two to three quarters following installation of the new pumps, are alkalinity, TSS, TDS, dioxins/furans (SMW-5s only), PFAS, and SVOCs.
 - Any related deadline or schedule that would be affected if the extension were granted.
 - If the extension were granted, the following deliverables would additionally be delayed by one year:
 - Agency Review Draft RI Report (90 days following receipt of validated laboratory data),
 - Public Review Draft RI Report (45 days following receipt of Ecology comments on Agency Review Draft RI Report),
 - Agency Review Draft FS (90 days following completion of Public Review Draft RI Report), and
 - Public Review Draft FS (45 days following receipt of Ecology comments on Agency Review Draft FS).

Respectfully submitted,



Travis Klaas
Principal Hydrogeologist
Strata Geosciences
travis@stratageosciences.com
M: 206-293-7896



Ashley Parkhurst
Staff Engineer
Strata Geosciences
ashley@stratageosciences.com
O: 206-408-8202

REFERENCES

Mott MacDonald, 2025. *Groundwater Monitoring Well Network Expansion Work Plan, Closed Snipes Mountain Landfill*. Prepared for Yakima County Public Services. August 2025.