

**Hidden Valley Landfill
Responsiveness Summary
June 11 – July 13, 2015 Public Comment Period
Draft Periodic Review Report and Consent Decree Amendment**

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The Department of Ecology (Ecology) received comments on the draft periodic review report from the Tacoma-Pierce County Health Department and SCS Engineers. We received no comments on the proposed consent decree amendment.

Comments and responses for the periodic review are below. The periodic review report has been revised as indicated and is now final. Ecology is finalizing the consent decree amendment.

Tacoma-Pierce County Health Department Comments

Comment No. 1

Section 4.0 states that the landfill gas monitoring will be reduced from monthly to quarterly. The Tacoma-Pierce County Health Department does not concur with this reduction in landfill gas monitoring at this site. The currently approved *Landfill Gas Management Plan* (January 2002) for the Hidden Valley Landfill requires monthly monitoring. If LRI and Pierce County Public Works would like to reduce the frequency of the landfill gas monitoring, this modification should be formally proposed by the landfill property owners so that Ecology and the Health Department can properly evaluate the request. Furthermore, the *Landfill Gas Management Plan* for the Hidden Valley Landfill should be updated to reflect modifications in the landfill gas extraction system since the plan was written and to incorporate the post closure care requirements in the new version of WAC 173-351 (November 2012) as it pertains to how landfill gas production rate and composition will be monitored over the post closure care period in order for the landfill to become functionally stable

Ecology Response to Comment No. 1

The landfill gas monitoring has been changed from quarterly to monthly in the final periodic review report.

The response to landfill gas monitoring related to gas production rate and gas composition as stated in WAC 173-351 (November 2012) is provided in response to comment 2, since it relates to functional stability evaluation of the landfill.

Comment No. 2

Ecology's periodic review for the Hidden Valley Landfill should also recommend/require that the *Post Closure Care Plan* (November 2001) for the landfill be updated to address the substantive requirements for Post-closure care requirements in the new version of WAC 173-351-500. The *Post Closure Care Plan* needs to be revised to address what will be evaluated over the post closure care period in order for the landfill to be determined functionally stable as it pertains to leachate quality and quantity, landfill gas production rate and composition, cover system integrity, and groundwater quality.

Ecology Response to Comment No. 2

The information from groundwater, gas and leachate monitoring results show, trending down and stabilizing groundwater and leachate concentrations, and reduction in gas production volume, but the information also shows, the landfill is far away from being functionally stable and has to be monitored for at least another five years. The next periodic review will have a condition that will require evaluation of groundwater, leachate and gas and other landfill parameters to determine if it is time to conduct a functional stability evaluation in accordance with WAC 173-351-500. The next periodic review will be conducted approximately in 2020.

SCS Engineers Comments

Comment No. 3

Section 2.8 Site Maintenance and Repair, page 9. Northwest Linins, Inc. should be changed to Northwest Linings, Inc.

Ecology Response to Comment No. 3

“Linins” has been changed to “Linings”.

Comment No. 4

Section 3.1.2 Groundwater, page 13. In the first paragraph, it appears that the following sentence (or something similar) should be added immediately before the word “However,...” Add “In the lower regional aquifer, the UCL 95 for dissolved iron and manganese exceeded cleanup levels in one of three wells.”

Ecology Response to Comment No. 4

This suggested sentence has been added.

Comment No. 5

Section 4.0 Conclusions, page 15. The first sentence of the bullet regarding Landfill Gas should omit the reference to monitoring wells LG-1, LG-2 and LG-3 (which were installed in 2009 specifically for the purpose of monitoring the subsurface fire area) and be changed to reference the gas control system. Suggested wording is “The landfill gas production is stable and shrinking based on decreasing

methane concentrations and landfill gas recovery rates being extracted by the gas collection and control system.”

Ecology Response to Comment No. 5

This section has been corrected in accordance with comment No. 5.

Comment No. 6

Section 6.9 Photo Log, Photo 3. The word “Former” should be removed (the photo is of the currently in-use landfill gas flare).

Ecology Response to Comment No. 6

The word “Former” has been removed.