



DEPARTMENT OF
ECOLOGY
State of Washington

RESPONSE TO COMMENTS

**Eldridge Municipal Landfill Site
Bellingham, Washington**

First Amendment to the Agreed Order

August 2011

ISSUED BY:

WASHINGTON STATE DEPARTMENT OF ECOLOGY

TOXICS CLEANUP PROGRAM

1. Introduction

On June 6, 2011, the proposed First Amendment to the Agreed Order (Amendment) for the Eldridge Municipal Landfill site (Site) in Bellingham was issued for a 30-day public comment period. Public involvement activities related to this public comment period were:

- Distribution of a fact sheet describing the site and the documents through a mailing to 1,185 people, including neighboring businesses and other interested parties;
- Publication of a paid display advertisement in The Bellingham Herald on June 5, 2011;
- Publication of notice in the Washington State Site Register on June 2, 2011;
- Announcement of the public comment period and posting of the documents on the Ecology web site; and
- Providing copies of the documents through information repositories at Ecology's Bellingham Field Office and Northwest Regional Office, and at the Bellingham Public Library- downtown branch.

A total of two comments were received by e-mail regarding the Amendment.

Section 2 of this document provides background information on the Site and Site cleanup activities, and Section 3 presents anticipated next steps. Section 4 includes the comments received and Ecology's responses.

2. Background

The Eldridge Municipal Landfill site is about 19,000 square feet in Little Squalicum Park in Bellingham, west of the Bellingham Technical College campus parking lot.

The Site is one of 12 cleanup sites in the Bellingham Bay Demonstration Pilot, a multi-agency initiative integrating sediment cleanup, control of pollution sources, habitat restoration and land use bay wide.

The landfill was discovered and investigated in 2005/2006 as part of the Little Squalicum Park cleanup site, which is now considered a separate site. (The U.S. Environmental Protection Agency took over the regulatory lead for cleanup of the creek area. Ecology maintained oversight authority for the landfill as a separate state cleanup site.) The Site is on property owned by Whatcom County and managed by the city as a park.

In the mid- to late 1930's, the city of Bellingham used the area, now part of the park, as a landfill for burning and burying local municipal solid waste. The landfill operated only a few years.

The landfill area contains municipal garbage, metal scraps, drywall, charcoal, ash, ceramics, glass bottles, and contaminated soil. Surface soil samples show low levels of polycyclic aromatic hydrocarbons (PAHs), benzoic acid, phthalates, pentachlorophenol (PCP), and metals (cadmium, copper, lead, mercury, and zinc). Higher levels of metals were detected in subsurface soils. Contaminants are present at concentrations that exceed standards under the state's cleanup law. As a result, the site is subject to the investigation and cleanup requirements of the state environmental cleanup law, the Model Toxics Control Act (MTCA).

In November 2010, Ecology and the City of Bellingham signed an agreed order requiring the city to complete an environmental study of the site (called a remedial investigation) and evaluate cleanup options (called a feasibility study).

The Amendment was proposed in advance of completing the remedial investigation and feasibility report because the city has funding available to implement an interim cleanup action to remove municipal solid waste and contaminated soils and dispose of them in an approved upland landfill.

3. Next Steps

Ecology has not made significant changes to the Amendment based on the public comments it received during the comment period. Therefore, it will be signed by the city and Ecology and the interim cleanup action will move forward into design.

An Engineering Design Report (a required deliverable under the Amendment) will then be completed as well as design plans and specifications. Construction of the interim cleanup action is expected to begin in August 2011 and end in September 2011.

The interim action and post-construction monitoring results will be incorporated into a remedial investigation and feasibility report (RI/FS) which is anticipated to be issued for public review and comment in 2012.

4. Comments Received and Ecology Responses

Comment # 1 – Terra Heilman (e-mail)

From: Terra Heilman [mailto:TerraH@WasteConnections.com]

Sent: Monday, June 27, 2011 12:47 PM

To: O'Herron, Mary (ECY)

Subject: Eldridge landfill site cleanup-request for info

Mary,

Greetings! I'm interested in the clean up process for the landfill site in Bellingham. Specifically, I'm interested to see if any study will be done of levels of decomposition of different materials in that landfill. Often, I see things such as "it takes X amount of years for glass to break down in a landfill" and I am constantly trying to educate the public about what actually happens in a landfill (as are all the other educators I'm sure.) I've also heard of studies being done on landfills in which the way to date the landfill is by reading the newspaper coming out of it. However, I've never seen any pictures of this type of thing, so I have a healthy skepticism of any data I'm quoted about decomp in landfills. To this end, I was wondering if there are any plans for anyone to study (or even just photograph?) the types of things that come out of this landfill from the 30s. I'm very interested to hear if anyone is planning anything like this or if not, if there's still time to do some study or photos of the process?

Thank you very much in advance.

Sincerely,

Terra

Terra Heilman

Waste Reduction Specialist

[Please note: new address and phone number:](#)

12115 NE 99th St., Ste. 1830

Vancouver, WA 98682

360-449-8395

Response to Comment #1:

No study is planned to assess the levels of decomposition of different materials. This is not a typical landfill with layers of intact debris. At the time of its operations, it was a state-of-the-art "sanitary landfill" which burned all of the waste. Test pits have revealed

mostly stained soils, charcoal and ash from the brief operations of the facility in the mid-30's. The materials appear to lie 0.5 to 4 feet in thickness and are buried beneath from 2 to 4.5 feet of more recent fill.

Some general photos may be taken during the course of the excavation work and Ecology would be happy to share these with you electronically. Please notify the Ecology project manager (Mary O'Herron) if you would like to receive excavation photos and specify which e-mail address you would like them sent to.

Comment # 2 – Heather Trim (e-mail)

From: Heather Trim [mailto:htrim@pugetsound.org]

Sent: Wednesday, July 06, 2011 10:09 PM

To: O'Herron, Mary (ECY)

Cc: Dave Peeler; Tom Bancroft; Tom Winter; Rein Attemann; Bruce Wishart

Subject: People For Puget Sound Comment Letter - Eldridge Landfill

Dear Mary,

Please accept the attached comment letter on the proposed Eldridge Landfill cleanup action.

Thank you so much.

Best,
Heather

Heather Trim
Urban Bays and Toxics Program Manager
People For Puget Sound
911 Western Ave, Suite 580
Seattle, WA 98104
tel: (206) 456-3809
fax: 206 382-7006
htrim@pugetsound.org
www.pugetsound.org



July 6, 2011

Mary O'Herron
Site Manager, Eldridge Municipal Landfill
WA Department of Ecology
1440 10th St, Ste 102
Bellingham, WA 98225-7028
Via E-mail: mary.oherron@ecy.wa.gov

RE: Draft Interim Cleanup Action, Eldridge Municipal Landfill site (CS ID #1897)

Dear Mary,

Thank you for the opportunity to comment on the proposed interim cleanup action, announced this month for the Eldridge Municipal Landfill site (CS ID #1897) dated June 2011. The facility is located within Little Squalicum Park in Bellingham, WA.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore the health of Puget Sound and the Northwest Straits. We view the landfill cleanup action from the perspective of restoring the Sound's long-term characteristics. The potential flow of toxic chemicals from the landfill to the creek, groundwater and the sound must be reduced.

Background: Environmental investigations of the landfill surface and subsurface soils have confirmed the presence of hazardous substances, presumably from municipal garbage, including polycyclic aromatic hydrocarbons (PAHs), benzoic acid, phthalates, pentachlorophenol (PCP) and metals (cadmium, copper, lead, mercury and zinc).

We support the work of Ecology and the City of Bellingham to contribute to recovering the health of Puget Sound by removing this landfill's solid wastes and contaminated soils to an approved upland landfill. We particularly commend your plans to initiate this removal this coming August. Expedited work for an environmental benefit is an excellent model to be followed for other part of the Puget Sound region.

Our comments follow:

- **Removal process.** Ensure all feasible safeguards are implemented during the removal process to prevent any residue from escaping into the creek area or Bellingham Bay.
- **Confirmation monitoring.** We would like to see a date certain established for when the confirmation monitoring will occur. The current proposal leaves this as open-ended.

Thank you for your consideration. You can reach me at (206) 382-7007 X172/htrim@pugetsound.org or Tom Winter at (206) 723-5311/t2winterjr@yahoo.com if you have any questions or concerns.

Sincerely,

Heather Trim
Urban Bays and Toxics Program Manager

Response to Comment #2:

Regarding protection of surface waters during the removal process, the city will be required to properly manage excavated materials and any waters from the Site to protect adjacent surface water, ground water and soils. Required actions will be described in an Engineering Design Report (a required deliverable under the Amendment) and the subsequent design plans and specifications. These documents will be posted on Ecology's web page for the Site at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=1897> within the next few weeks.

With regard to confirmation monitoring, it will be done subsequently as part of finishing the RI/FS and cleanup for the Site. Confirmation monitoring may show that no additional actions are necessary to achieve Cleanup Standards (CUS) for this Site, and in that case the interim action will become the final action. If additional actions are necessary, they will be incorporated into a final cleanup that will be performed under a subsequent AO amendment or a consent decree.