



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
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March 16, 2016

MR. CARL BACH
THE BOEING COMPANY
P.O. BOX 3707
SEATTLE, WASHINGTON 98124-2207

Re: Opinion pursuant to WAC 173-340-515(5) on Geotechnical Work Plan for the following Hazardous Waste Site:

- **Name:** Eastgate Landfill
- **Address:** 2805 160th Avenue SE, Bellevue, WA 98008
- **Facility/Site No.:** 2017
- **VCP No.:** NW0471
- **Cleanup Site ID No.:** 4425

Dear Mr. Bach:

Thank you for submitting a document regarding your proposed investigation of the **Eastgate Landfill** facility (Site) for review by the Washington State Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding a review of submitted documents/reports pursuant to requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the following release(s) at the Site:

- Methane, benzene, vinyl chloride, and dichlorofluoromethane in Air
- Benzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, and dieldrin in Landfill Refuse
- Arsenic, iron, manganese, benzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene and dieldrin in Soil and Ground Water



Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.

Ecology's Toxics Cleanup Program has reviewed the following information regarding your proposed remedial investigative actions:

1. Landau Associates, 2016. *Work Plan Geotechnical Exploration Program, Bellevue Airfield Park Development (Former Eastgate Landfill), Bellevue, Washington*. March 1.

The reports listed above will be kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Appointments can be made by calling the NWRO resource contact at (425) 649-7235 or sending an email to: nwro_public_request@ecy.wa.gov.

The Site is defined by the extent of contamination caused by the following releases:

- Methane, benzene, vinyl chloride, and dichlorofluoromethane in Air
- Benzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, and dieldrin in Landfill Refuse
- Arsenic, iron, manganese, benzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene and dieldrin in Soil and Ground Water

Based on a review of supporting documentation listed above, pursuant to **requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing the releases at the Site, Ecology has determined:**

- Ecology has determined that the geotechnical investigation described in the work plan is likely to aid in confirming the lateral and vertical boundaries of landfill waste materials estimated previously using surface geophysical techniques. Information from the geotechnical investigation will also aid in landfill cap design.

- The geotechnical field investigation program consists of the following elements:
 - Eighteen soil borings to be advanced using hollow stem auger drilling methods to depths of 20 to 40 feet below the ground surface (bgs) with soil samples at 2.5- and 5-foot intervals and analyzed for geotechnical parameters. Ground water conditions will be noted.
 - Excavation of 15 shallow test pits (3 to 5 feet bgs) to verify horizontal landfill limits of landfilled materials.
 - Nine hand auger borings in the northwest wooded area to collect geotechnical data.
 - Soil samples will be analyzed for geotechnical parameters only.
 - The above explorations will be backfilled in accordance with WAC 173-160 or as specified in the work plan. Disturbed areas will be restored to original grade and reseeded.
- No piezometers or monitoring wells will be installed as part of the geotechnical exploration activities described in the work plan.
- The Site is accessible to the public. The work plan needs to include a section on air monitoring and exclusion zone delineation to be conducted that will assure protection of the public during the subsurface investigative activities. This protection is considered separate and in addition to what will be covered in the Site-specific health and safety plan which is prepared primarily for the protection of workers. Please send a revised version of the work plan that includes a section describing these protective measures.
- Provisions in a 2008 Environmental Covenant placed on the Property allow Ecology to authorize specific uses and activities on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the remedial action, or creates a new exposure pathway. **This opinion letter serves as written approval for the activities described in the work plan to be conducted as specified.** Ecology requests written notification of any modifications to the work plan that occur prior to field implementation or during field work based on conditions encountered.

This opinion does not represent a determination by Ecology that a proposed remedial action will be sufficient to characterize and address the specified contamination at the Site or that no further remedial action will be required at the Site upon completion of the proposed remedial action. To obtain either of these opinions, you must submit appropriate documentation to Ecology and request such an opinion under the VCP. **This letter also does**

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not provide an opinion regarding the sufficiency of any other remedial action proposed for or conducted at the Site.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion. Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (425) 649-7064 or hvic461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Vick". The signature is fluid and cursive, with the first name "Heather" written in a larger, more prominent script than the last name "Vick".

Heather Vick
NWRO Toxics Cleanup Program

cc: Pam Fehrman, City of Bellevue
Kent Wiken, Laudau Associates
Madeline Wall, Ecology
Sonia Fernandez, VCP Coordinator, Ecology