



INITIAL INVESTIGATION FIELD REPORT

☒ Check this box if you have attached any documents to this form (using the paperclip icon on the left).

ERTS #(s):
Parcel #(s):
County:
FSID #:
CSID #:
UST #:

686719
171027410010
Grays Harbor
4236904
19870

SITE INFORMATION

<u>Site Name (Name over door):</u> Stafford Creek Woodwaste Landfill	<u>Site Address (including City, State and Zip):</u> 41 Constantine Way, Aberdeen WA 98520	<u>Phone</u> (360) 533-8361 <u>Email</u>
<u>Site Contact, Title, Business:</u> Jason Messmer Northwest Rock Inc	<u>Site Contact Address (including City, State and Zip):</u> 642 Newkah Rd, Aberdeen WA 98520	<u>Phone</u> (360) 533-3050 <u>Email</u> jason@nwrock.com
<u>Site Owner, Title, Business:</u> Randy Rognlin	<u>Site Owner Address (including City, State and Zip):</u> 642 Newkah Rd, Aberdeen WA 98520	<u>Phone</u> (360) 533-3050 <u>Email</u>
<u>Site Owner Contact, Title, Business:</u> Jason Messmer	<u>Site Owner Contact Address (including City, State and Zip):</u> 642 Newkah Rd, Aberdeen WA 98520	<u>Phone</u> (360) 533-3050 <u>Email</u>
<u>Previous Site Owner(s):</u>	<u>Additional Info (for any Site Information Item):</u> http://www.nwrock.com/index.php/stafford-creek-landfill/	
<u>Alternate Site Name(s):</u>		

<u>Latitude (Decimal Degrees):</u> 46.9274388
<u>Longitude (Decimal Degrees):</u> -123.90616210000002

INSPECTION INFORMATION

Please check this box if there is relevant inspection information, such as data or photos, in an existing site report for this site.

<u>Inspection Conducted?</u> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<u>Date/Time:</u> 11/29/2018 / 10:00 AM	<u>Entry Notice:</u> Announced <input type="checkbox"/> Unannounced <input checked="" type="checkbox"/>
<u>Photographs taken?</u> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<u>Note:</u> Attach photographs or upload to PIMS	
<u>Samples collected?</u> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<u>Note:</u> Attach record with media, location, depth, etc.	

RECOMMENDATION

<u>No Further Action (Check appropriate box below):</u>	<u>LIST on Confirmed and Suspected Contaminated Sites List:</u> <input checked="" type="checkbox"/>
Release or threatened release does not pose a threat <input type="checkbox"/>	
No release or threatened release <input type="checkbox"/>	
Refer to program/agency (Name: _____) <input type="checkbox"/>	
Independent Cleanup Action Completed (contamination removed) <input type="checkbox"/>	

COMPLAINT (Brief Summary of ERTS Complaint):

2017 Annual Monitoring Report, Stafford Creek Landfill, Grays Harbor County, Washington:
Laboratory analytical results indicated diesel-range organics in groundwater above the MTCA Method A cleanup level. Analytical results also indicated diesel-range and oil-range organics have impacted surface water seeps outside the active area of the landfill and is present in the landfill leachate. Paper mill wastes are disposed of at the landfill and the waste has not been approved by the JHD.

CURRENT SITE STATUS (Brief Summary of why Site is recommended for Listing or NFA):

The unlined landfill is still active and adding material (including exempt material to the landfill). Leachate and mixed storm water are discharged to the ground surface. Groundwater and surface water monitoring reports confirm diesel- and heavy-oil contamination at the landfill (Site); detectable concentrations of PAHs are also present. The monitoring wells are not placed, nor likely screened, to optimally sample the Site for these contaminants. The landfill is accepting unpermitted wastes from a paper mill and mixed domestic solid waste from haulers.

Investigator: Eugene Radcliff

Date Submitted: 1/16/19

OBSERVATIONS ☒ Please check this box if you included information on the Supplemental Page at end of report.

Description (If site visit made, please be sure to include the following: site observations, site features and cover, chronology of events, sources/past practices likely responsible for contamination, presence of water supply wells and other potential exposure pathways, etc.):

Bill Harris, Derek Rockett, and Eugene Radcliff from SWRO/SWM, met Rob King from Grays Harbor Health Department (we) at the Stafford Creek Limited Purpose Landfill November 29, 2018 to conduct a site visit of the landfill. Weather started out as morning clouds and 50 degrees Fahrenheit and the clouds burned off by 12:00PM, no precipitation occurred.

After checking in with the landfill personnel and we began our visit on the top tipping deck of the active working face in Cell 1. It appeared that unsupervised dumping was actively taking place, most of debris material appeared to be construction demolition waste (mostly wood and asphalt shingles). The landfill did not have any active compaction or interim covering operations on-going during our site visit. Two operations personnel were on duty, one at the front gate and our guide. No scales were observed and no active sorting or inspection of the loads were evident. A Royal Heights (RH) Transfer truck was parked on the active tipping deck waiting to off load its two trailers. Upon closer inspection of the tipping deck debris, there were plastics, metal pipes and frames, car parts, PVC pipe, and other types of municipal waste present in the active face and on the top of the landfill. Small amounts of electronic waste and putrescible waste were also present. No perimeter fencing was evident that would impede access to the facility. Anecdotal and observational information indicated that wildlife had unimpeded access to the active landfill.

Crossing the top of the landfill on closed cells 3 and 11, there was ample visual evidence observed and anecdotal discussions that elk had traversed over these two cell tops (as well as other open cells). In cells 2, 4, and 5, there were piles of what appeared to be ash (knots) and creosote timbers were mixed into the debris layer of Cell 2. Across the top of the paper mill knots were multiple puddles that presented strong rainbow sheens on their surface, air bubbles were observed to form on the puddle surfaces, and eddy features in the water had white colorations that contrasted with the dark opaque puddle water. On the west-side slope of Cell 11, there were indications that the final and interim covers were thin and areas where landfill debris were exposed. On the west-side of Cell 2, wood debris appeared to be pushed over the top edge of the cell and over the top of the final-slope cover of the cell and there was a washout of the side cover that transported soil in the perimeter bushes and trees.

Crossing the west-side perimeter road to inspect the surface water and leachate ponds we observed sand and soil from the washout in Cell 2 crossing onto the roadway and continuing on down the slope into Canyon 1. The storm water pond was overgrown with trees and the ditch leading into the pond had a 12" outflow pipe (source unknown) that was filled to the top with sediment.

The leachate manifold and valve assembly were in the closed position, and when opened, the leachate pipe discharged to an open, unlined ditch. The ditch continued in a northern direction to the unlined leachate pond and had at least one tributary pipe that discharged liquid into the ditch and appeared to be coming from the direction of the landfill. In the area across from the leachate valve, recent significant soil reworking had been done and reseeded.

The leachate pipeline appeared to daylight into an unlined, rip-rapped ditch before discharging to the unlined leachate pond; it was difficult to determine its entirety because of the vegetation overgrowth. All ponds and the ditch contents discharge to the ground surface and infiltrate. The leachate pond was connected to a storm water pond by a ditch; no liquids were present in either pond. There was a pipe that appeared to lead down to Seep No. 3., its purpose unknown.

Upon returning to the tipping deck of Cell 1, we observed the same RH truck begin to tip their load. After unloading we observed the contents of the load. It contained metal, galvanized pipe, PVC, potential dangerous waste, kitchen sink, and assorted other wastes not permitted for this landfill.

Photographs can be found at: <http://ecyapfass/plmsWeb/Results.aspx?programId=&keywords=stafford>

Continued on last page...

Documents reviewed:

**2nd Quarter 2018 Groundwater Monitoring Report,
Stafford Creek Landfill, Grays Harbor County, Washington.**

**2017 Annual Monitoring Report,
Stafford Creek Landfill, Grays Harbor County, Washington.**

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Non-Halogenated Organics	Phenolic Compounds			1			Compounds containing phenols (Examples: phenol; 4-methylphenol; 2-methylphenol)
	Non-Halogenated Solvents	S	S	S	S		Organic solvents, typically volatile or semi-volatile, not containing any halogens. To determine if a product has halogens, search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is not a Cl, I, Br, F in the formula, it's not halogenated. (Examples: acetone, benzene, toluene, xylenes, methyl ethyl ketone, ethyl acetate, methanol, ethanol, isopropanol, formic acid, acetic acid, stoddard solvent, Naptha). <i>Use this when TEX contaminants are present independently of gasoline.</i>
	Polynuclear Aromatic Hydrocarbons (PAH)	S	Q S	Q S			Hydrocarbons composed of two or more benzene rings.
	Tributyltin						The main active ingredients in biocides used to control a broad spectrum of organisms. Found in antifouling marine paint, antifungal action in textiles and industrial water systems. (Examples: Tributyltin; monobutyltin; dibutyltin)
	Methyl tertiary-butyl ether						MTBE is a volatile oxygen-containing organic compound that was formerly used as a gasoline additive to promote complete combustion and help reduce air pollution.
	Benzene	S	S	S			Benzene
	Other Non-Halogenated Organics						TEX
	Petroleum Diesel	S	C	C			Petroleum Diesel
	Petroleum Gasoline						Petroleum Gasoline
	Petroleum Other	S	C	C			Oil-range organics
Halogenated Organics (see notes at bottom)	PBDE						Polybrominated di-phenyl ether
	Other Halogenated Organics						Other organic compounds with halogens (chlorine, fluorine, bromine, iodine). search HSDB (http://toxnet.nlm.nih.gov/cgi-bin/sis/htmlgen?HSDB) and look at the Chemical/Physical Properties, and Molecular Formula. If there is a Cl, I, Br, F in the formula, it is halogenated. (Examples: Hexachlorobutadiene; hexachlorobenzene; pentachlorophenol)
	Halogenated solvents						PCE, chloroform, EDB, EDC, MTBE
	Polychlorinated Biphenyls (PCB)	S	S	S			Any of a family of industrial compounds produced by chlorination of biphenyl, noted primarily as an environmental pollutant that accumulates in animal tissue with resultant pathogenic and teratogenic effects
	Dioxin/dibenzofuran compounds (see notes at bottom)	S	S	S			A family of more than 70 compounds of chlorinated dioxins or furans. (Examples: Dioxin; Furan; Dioxin TEQ; PCDD; PCDF; TCDD; TCDF; OCDD; OCDF). <i>Do not use for 'dibenzofuran', which is a non-chlorinated compound that is detected using the semivolatile organics analysis 8270</i>
Metals	Metals - Other	S	C	C			Cr, Se, Ag, Ba, Cd
	Lead	S	S	S			Lead
	Mercury	S	S	S			Mercury
	Arsenic	S	S	S			Arsenic
Pesticides	Non-halogenated pesticides						Pesticides without halogens (Examples: parathion, malathion, diazinon, phosmet, carbaryl (sevin), fenoxycarb, aldicarb)
	Halogenated pesticides						Pesticides with halogens (Examples: DDT; DDE; Chlordane; Heptachlor; alpha-beta and delta BHC; Aldrin; Endosulfan, dieldrin, endrin)

CONTAMINANT GROUP	CONTAMINANT	SOIL	GROUNDWATER	SURFACE WATER	AIR	SEDIMENT	DESCRIPTION
Other Contaminants	Radioactive Wastes						Wastes that emit more than background levels of radiation.
	Conventional Contaminants, Organic		C	C	S		Unspecified organic matter that imposes an oxygen demand during its decomposition (Example: Total Organic Carbon)
	Conventional Contaminants, Inorganic						Non-metallic inorganic substances or indicator parameters that may indicate the existence of contamination if present at unusual levels (Examples: Sulfides, ammonia)
	Asbestos	S					All forms of Asbestos. Asbestos fibers have been used in products such as building materials, friction products and heat-resistant materials.
	Other Deleterious Substances	S	S	S			Other contaminants or substances that cause subtle or unexpected harm to sediments (Examples: Wood debris; garbage (e.g., dumped in sediments))
	Benthic Failures						Failures of the benthic analysis standards from the Sediment Management Standards.
	Bioassay Failures						For sediments, a failure to meet bioassay criteria from the Sediment Management Standards. For soils, a failure to meet TEE bioassay criteria for plant, animal or soil biota toxicity.
Reactive Wastes	Unexploded Ordnance						Weapons that failed to detonate or discarded shells containing volatile material.
	Other Reactive Wastes						Other Reactive Wastes (Examples: phosphorous, lithium metal, sodium metal)
	Corrosive Wastes						Corrosive wastes are acidic or alkaline (basic) wastes that can readily corrode or dissolve materials they come into contact with. Wastes that are highly corrosive as defined by the Dangerous Waste Regulation (WAC 173-303-090(6)). (Examples: Hydrochloric acid; sulfuric acid; caustic soda)

(fill in contaminant matrix above with appropriate status choice from the key below the table)

Status choices for contaminants	
Contaminant Status	Definition
B— Below Cleanup Levels (Confirmed)	The contaminant was tested and found to be below cleanup levels. (Generally, we would not enter each and every contaminant that was tested; for example if an SVOC analysis was done we would not enter each SVOC with a status of "below". We would use this for contaminants that were believed likely to be present but were found to be below standards when tested)
S— Suspected	The contaminant is suspected to be present; based on some knowledge about the history of the site, knowledge of regional contaminants, or based on other contaminants known to be present
C— Confirmed Above Cleanup Levels	The contaminant is confirmed to be present above any cleanup level. For example—above MTCA method A, B, or C; above Sediment Quality Standards; or above a presumed site-specific cleanup level (such as human health criteria for a sediment contaminant).
RA— Remediated - Above	The contaminant was remediated, but remains on site above the cleanup standards (for example—capped area).
RB— Remediated - Below	The contaminant was remediated, and no area of the site contains this contaminant above cleanup standards (for example— complete removal of contaminated soils).

Halogenated chemicals and solvents: Any chemical compound with chloro, bromo, iodo or fluoro is halogenated; those with eight or fewer carbons are generally solvents (e.g. halogenated methane, ethane, propane, butane, pentane, hexane, heptane or octane) and may also be used for or registered as pesticides or fumigants. Most are dangerous wastes, either listed or categorical. Organic compounds with more carbons are almost always halogenated pesticides or a contaminant or derivative. Referral to the HSDB is recommended if you are unfamiliar with a chemical name or compound, as it contains useful information about synonyms, uses, trade names, waste codes, and other regulatory information about most toxic or potentially toxic chemicals.

Dibenzodioxins and dibenzofurans are normalized to a combined equivalent toxicity based on 2,3,7,8-tetrachloro-p-dibenzodioxin as set out in WAC 173-340-708(8)(d) and in the Evaluating the Toxicity and Assessing the Carcinogenic Risk of Environmental Mixtures using Toxicity Equivalency Factors Focus Sheet (<https://fortress.wa.gov/ecy/clarc/FocusSheets/tef.pdf>). Results may be reported as individual compounds and isomers (usually lab results), or as a toxic equivalency value (reports).