



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 18, 2019

Mr. Phil Perley
Sr. District Manager
Environmental Legacy Management Group
Waste Management
9801 Tujunga Ave.
Sun Valley, CA 91352

Re: Comments on the *Application to Modify Permit (Monitoring Program Reduction) -Olympic View Sanitary Landfill, Kitsap County Washington*, February 5, 2019 and email from Phil Perley (OVSL SAP Questions) dated 2/27/19

Dear Mr. Perley:

The Department of Ecology (Ecology) reviewed the *Application to Modify Permit (Monitoring Program Reduction)-Olympic View Sanitary Landfill, Kitsap County Washington* and the February 27, 2019 email from Phil Perley referenced above; based on the groundwater monitoring frequency and reduced leachate pond leak detection sampling request, Ecology recommends allowing a two year trial reduction in the frequency requirements. If statistically significant changes in groundwater or leachate pond leak detection water quality are noted, sampling should resume as presented in the 2017 SAP.

Based on the above referenced document/email, OVSL is requesting:

- A reduction of the groundwater monitoring frequency for compliance wells MW-15R, MW-34A, MW-34C, MW-39, MW-42, and MW-43 from quarterly to semi-annual.
- A reduction of the groundwater monitoring frequency at downgradient wells MW-29A, MW-32, MW-33A, MW-33C, and MW36A from quarterly to semi-annual (Note that MW-29A, MW-33C, and MW-36A were allowed to be sampled semi-annually in the last request).
- A reduction of the groundwater monitoring frequency at upgradient wells MW-13A, MW-13B, MW-16, and MW-35 from quarterly to annual.
- A reduction of the groundwater level monitoring for all wells included in this program from quarterly to semi-annual.
- A reduction of the leachate pond leak detection sampling location (LP-LCD) from quarterly to semi-annual.



Ecology reviewed the request to reduce groundwater monitoring frequency and concludes:

- Ecology agrees that semi-annual sampling at the compliance and downgradient wells is appropriate. Rational: The overall chemistry observed in groundwater monitoring wells at the site continues to show statistically significantly decreasing trends.
- Ecology does not agree with annual sampling at the upgradient wells, but can accept semi-annual groundwater monitoring. Rational: Per WAC 173-351-450 (2) "all proposed changes in groundwater monitoring frequency must be no less than semiannually." Ecology will allow a reduction in the analytical parameters for one of the semi-annual sampling events; field parameters only for one of the semi-annual sampling events. If there are statistically significant increases at any of the upgradient or performance/compliance/downgradient wells, the sampling would revert to Appendix I and II for both events in these upgradient wells.
- Ecology agrees to the semi-annual groundwater level monitoring for all wells included in this program.
- Ecology agrees to the semi-annual sampling at LP-LCD concurrent with groundwater sampling. Rational: past sampling show consistent analytical results and the May 15, 2018 Technical Memorandum by JMO Consulting indicate no leachate impacts to groundwater at this time. Continue recording monthly pumping volumes and report them in the semi-annual and annual reports.

Ecology also recommends:

- Appendix III sampling continues per the 2017 SAP Table 3.
- Ecology approves reporting quarterly LFG monitoring results in the semi-annual (Q1 and Q2 results) and annual monitoring reports (Q1 through Q4 results).

Additional Comments:

Kitsap Public Health District is in concurrence with Ecology's comments. Please submit a revised SAP documenting all changes to Ecology and Kitsap Public Health District.

Note that 7 days following receipt of analytical data for each sampling event, notification is required if the owner or operator determines there is a statistically significant release for parameters or constituents at any monitoring well at the point of compliance.

Please contact Tim O'Connor at 425-649-7051 or tim.oconnor@ecy.wa.gov or Alan Noell at 425-649-7015 or alan.noell@ecy.wa.gov if you have any questions.

Sincerely,



Peter Christiansen
Solid Waste Management Program

cc: Jan Brower, Kitsap Public Health District
Tim O'Connor, Ecology, Solid Waste Management Program
Alan Noell, Ecology, Solid Waste Management Program