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DEPARTMENT OF ECOLOGY

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December 20, 2019

Craig Gregory, P.E.  
Public Works Director  
City of Shelton  
525 W. Cota St.  
Shelton, WA 98584

**Re: Department of Ecology Comments on Draft Remedial Investigation/Feasibility Study**

- **Site Name:** Shelton C Street Landfill
- **Site Location:** Shelton, Mason County, WA.
- **Facility Site ID:** 1186
- **Cleanup Site ID:** 2295

Dear Craig Gregory:

Thank you for submitting the Draft Remedial Investigation/Feasibility Study (RI/FS) for the Shelton C Street Landfill site, dated August 2019. The Department of Ecology (Ecology) appreciates the hard work you and Aspect Consulting have put into this document. I have reviewed the report and have the following comments.

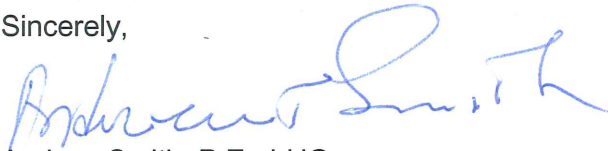
***Ecology's Comments***

1. Upon review, it appears that the 6 to 10 foot thick cap over the portion of the landfill not containing the sludge material was not characterized. I realize that it was not in the original RI work plan, however, it does appear that having an idea of the condition of those soils would be helpful for the long term plan for this landfill. Please provide a plan to characterize these cover soils and include this information in the RI/FS report. In my conversation with Carla, she indicated that they reviewed past reports and there does not appear to be any indication of the origin of this material. If there is some information that indicates the origin of this cover material, please also include that information in the RI/FS report.
2. Please provide an additional cross section somewhat perpendicular to A-A', maybe along Line 2 of the geophysical survey to try to better represent the thickness of sludge and landfill material.

3. Because this is a landfill and the cap is only a few feet thick, the institutional controls for this site should also include a fence around the landfill cap to prevent disturbance and exposure to the contaminated soils.
4. Please include the last round of GW monitoring in the RI/FS so all of the information is in one document?
5. Will the City be able to use the stockpiled fines material located along the access road to this site? If so, how will that affect the cost of the selected alternative?
6. Comply with the requirements for closure of landfills, RCW 173-304-460, specifically permeability of cover material to be at least  $1 \times 10^{-6}$  cm/s.

If you would like to discuss any of these comments, please give me a call at (360) 407-6316.

Sincerely,



Andrew Smith, P.E., LHG  
Unit Supervisor UST/Technical Support Unit  
Toxics Cleanup Program  
Southwest Regional Office

cc: Carla Brock, Aspect Consulting