



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

Go East Corp Landfill

4330 108th Street SE, Everett, WA 98208

Facility Site ID: 2708

Cleanup Site ID: 4294

May 2020

Publication and Contact Information

This plan is available on the Department of Ecology's website at:
<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=4294>

For more information contact:

Northwest Regional Office
Alan Noell
3190 160th Ave SE
Bellevue, WA 98008
425-649-7015

Washington State Department of Ecology — www.ecology.wa.gov

- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Olympia 360-407-6300
- Central Regional Office, Union Gap 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

To request Americans with Disabilities Act accommodation, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Public Participation Plan

Go East Corp Landfill

Solid Waste Management Program
Northwest Region
Washington State Department of Ecology
Bellevue, Washington

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with P&GE, LLC (P&GE) for the Go East Corp Landfill site (Site). The purpose of the plan is to promote meaningful community involvement during cleanup activities for the permitted landfill.

The Snohomish Health District approved the Go East Landfill Closure Plan and issued a permit for landfill closure. Snohomish County Planning and Development Services issued a land disturbing activity permit for the initial rough grading (including landfill closure activities), and will issue a second land disturbing activity permit for plat development.

Ecology and P&GE have entered into a legal agreement called an Agreed Order, which addresses cleanup activities during the implementation of the landfill closure plan. The Agreed Order requires P&GE to:

- Implement an interim action work plan (IAWP) to assure that soil beyond the final landfill limits will meet MTCA cleanup standards following the landfill closure. The IAWP provides interim action levels for soil that are conservative and protective of all potential exposure pathways. The IAWP also summarizes landfill-permit-required waste characterization sampling results and describes additional supplemental waste characterization sampling plans. The IAWP includes a Sampling and Analysis Plan and a Quality Assurance Project Plan.
- Develop a Remedial Investigation Work Plan to evaluate potential contamination in environmental media at the Site.
- Prepare a Remedial Investigation/Feasibility Study Report to propose cleanup standards and recommend a compliance groundwater monitoring plan and (if applicable) engineering and institutional controls for areas beyond the final landfill boundary.
- Prepare a preliminary Draft Cleanup Action Plan for the Site.

The public participation plan describes ways Ecology will inform the public about investigations and other remedial actions throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup process.

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the Site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information¹
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

For more information about public participation grants, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov. You may also visit the [Public Participation Grant website](#).²

¹ Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the Site.

² ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

Site contacts

To be included in the Site record, comments about the cleanup process must be submitted during public comment periods. Questions and informal comments or information about the Site's history are welcome anytime.

Ecology

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P&GE

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Site History and Development Plans

The Site address is 4330 108th Street, Everett, WA (Property). The Site is located in unincorporated Snohomish County within the Silver Lake neighborhood south of Everett.



Site history

The 40.9-acre Property sits atop the Vashon advance outwash sand formation, which outcrops where steep slopes are present on the east side of the Property. The Vashon advance outwash sand formation is underlain by low-permeability silt deposits referred to as the pre-Vashon lacustrine silt unit. The pre-Vashon lacustrine silt unit is estimated to be at least 110 feet thick beneath the Property.

In 1969, a conditional use permit was issued for sand excavation. Sand was excavated from a ravine on the northern part of the Property and used as construction fill for nearby construction projects.

Rekoway, Inc. purchased the Property on February 1, 1972 and operated the landfill until 1980. Rekoway obtained a 10-year conditional-use permit from Snohomish County on March 8, 1972 to excavate sand and gravel and to operate a landfill by reclaiming the excavation area with solid waste. The permit authorized the disposal of “wood, mineral, and concrete solid materials, but not garbage or putrescibles.” In 1974-75, Rekoway was approved to accept “cardboard, pallets, large parcel wrappings, shredded paper, and warehousing waste material.”

In 1974, Rekoway accepted approximately 200 cubic yards of baghouse dust containing magnesium, phosphate, and aluminum dust into the landfill. A fire resulted from the oxidation of the buried metal dusts. The material was excavated, spread on the ground, and extinguished, and thereafter covered with soil. Partially burned trees and stumps caused a landfill fire in November 1976 that persisted through 1979. Snohomish Health District suspended the landfill permit in November 1977.

Go East Corporation conditionally purchased the Property in 1979 and requested reinstatement of the landfill permit to allow additional filling to level the landfill area for future development. Snohomish Health District issued a permit to operate a wood waste landfill on November 2, 1979. The permit expired on September 18, 1982. Go East Corporation



stopped accepting waste in the summer of 1983 when Snohomish County issued a stop work order. Another landfill fire began in October 1983 and burned out by January 1986.

Snohomish Health District prepared a Site Hazard Assessment under MTCA on May 14, 2004. The assessment recommended that the future residential development of the Property include and implement a landfill closure plan as proposed in 1999. Subsequently, Snohomish Health District issued a No Further Action letter on June 1, 2004 with confirmation from Ecology. P&GE acquired the Property from Go East Corporation in May 2009.

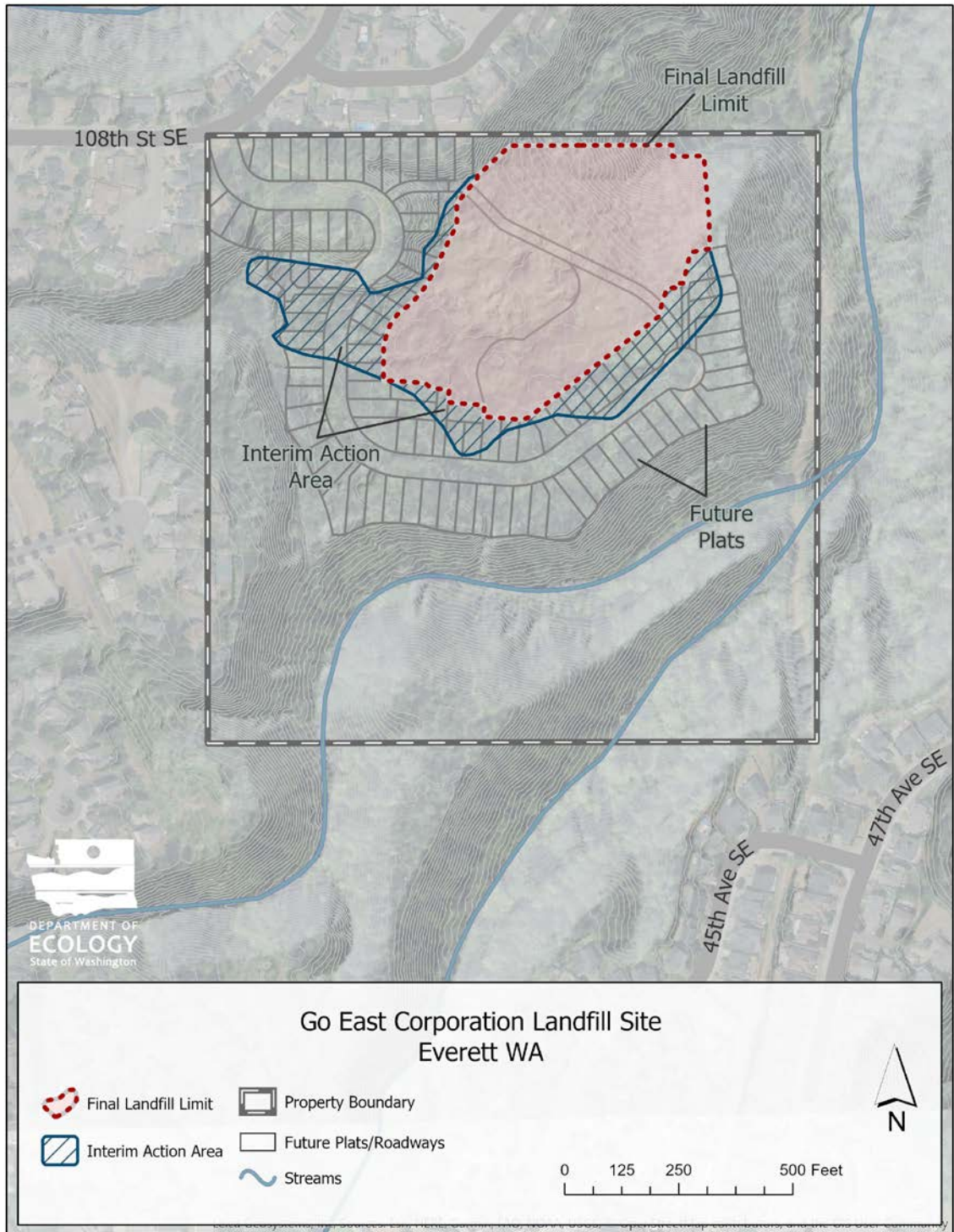
Landfill closure and development plans

P&GE plans to redevelop the Property by consolidating and closing the landfill, and then developing the 97-parcel Bakerview Plat Subdivision on portions of the Property that are beyond the final landfill boundary. The landfill closure plan includes:

- Reducing the landfill area from 9.6 acres to 6.8 acres by excavating the wedge area (an area outside the final landfill boundary where waste material thins out) and any associated contaminated soil, and then consolidating the waste within the final landfill boundary.
- Collecting soil samples from the wedge area to characterize the waste prior to construction.
- Constructing an engineered landfill cap, stormwater facilities, and a perimeter landfill gas control trench within the final landfill boundary.

P&GE will then subdivide the Property, construct a roadway, and provide infrastructure for 97 new residential parcels. The area within the final landfill boundary will be accessible to the general public.

Site map



Permits

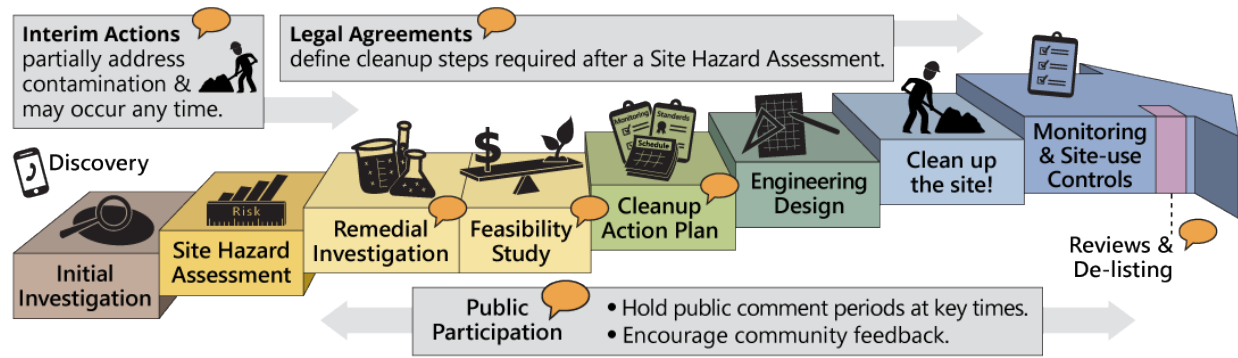
Snohomish Health District issued a landfill permit for the closure of the Go East Corp Landfill in accordance with Chapter 173-350-400 of the Washington Administrative Code. The Health District's approval of the Go East Landfill Closure Plan was affirmed by the state Pollution Control Hearings Board. Snohomish County Planning and Development Services issued a Mitigated Determination of Non-Significance for landfill closure and redevelopment in accordance with the State Environmental Policy Act. Snohomish County Planning and Development Services issued a land disturbing activity permit for the initial rough grading (including landfill closure activities), and will issue a second land disturbing activity permit for plat development.

Contamination

Ecology prepared an initial investigation field report on June 13, 2019 based on available information. The report indicates that metals (commonly associated with anaerobic reducing conditions) were detected at concentrations exceeding Model Toxics Control Act cleanup levels in three groundwater samples collected from monitoring wells in 2009. The report also indicates that elevated concentrations of metals were detected in surface water samples collected from a stream that originates at the base of the landfill's northeastern slope. Additionally, the report refers to the alleged observation of partially buried drums by a third party, although this finding has not been confirmed by follow-up investigations. Based on information presented in the initial investigation field report, Ecology rescinded the 2004 No Further Action letter on June 18, 2019 and issued an Early Notice Letter on September 9, 2019. The Site is listed on Ecology's Confirmed and Suspected Contaminated Sites List; information can be viewed here: <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=4294>

Washington's Solid Waste and Cleanup Laws

The Site is regulated under the state's solid waste handling standards and the state cleanup law, the Model Toxics Control Act or MTCA. MTCA provides guidelines for contaminated site cleanup in Washington state and sets standards to ensure the cleanup protects human health and the environment. This plan is required under MTCA.



Solid Waste Handling Standards

The Go East Corp Landfill began operations in 1972, concurrent with the implementation of state solid waste handling standards in WAC 173-301 in 1972. The landfill stopped receiving waste in 1983, before the state repealed WAC 173-301 in 1985 and implemented revised solid waste standards in WAC 173-304. The landfill will be closed as a limited purpose landfill in accordance with current regulations in [WAC 173-350-400](#), which were implemented in 2003.

Snohomish Health District permits the landfill in accordance with state and county regulations. Ecology’s Solid Waste Management Program provides technical assistance to Snohomish Health District.

Model Toxics Control Act (MTCA)

Remedial actions at landfills are regulated by MTCA, in accordance with solid waste regulations in WAC 173-350-900. Ecology oversees landfill remedial actions. Snohomish Health District may participate in the cleanup process and must exercise its permit authority for solid waste handling that is not addressed in the implementation of remedial actions under MTCA.

MTCA began as a grassroots citizens’ initiative in 1988, and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The MTCA regulations are found in [WAC 173-340](#).³ Ecology investigates reports of property contamination. If the contamination is determined to be a




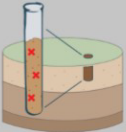





³ <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

significant threat to human health or the environment, the contaminated property is placed on the [Confirmed and Suspected Contaminated Sites List](#), and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, non-government organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

As shown below, the MTCA cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.

Steps in Washington’s Cleanup Process

 <p>Interim Action</p>		<p>If contaminants pose an immediate risk to people or the environment, action can be taken at any point in the cleanup process to reduce the risk. Interim actions may also be used to progress cleanup when only a brief opportunity is available.</p>
 <p>Remedial Investigation (RI)</p>		<p>Environmental investigation to identify the nature, extent, and magnitude of pollution at a site, and how people, plants, and animals may be exposed to the pollution.</p>
 <p>Feasibility Study (FS)</p>		<p>Uses information gathered during the Remedial Investigation to develop cleanup alternatives, and then evaluates them through an environmental benefit vs. cost analysis. This process determines a preferred alternative.</p>
 <p>Cleanup Action Plan (CAP)</p>		<p>Ecology identifies a cleanup plan based on information in the RI/FS and public input. The CAP includes cleanup standards, a schedule for design and construction work, and requirements for monitoring, operation, and maintenance.</p>
<p>Cleanup & Monitoring</p>		<p>The CAP is used to clean up the site. After construction is complete, monitoring occurs. Environmental covenants prohibit or restrict activities that would expose any remaining contamination or adversely affect the cleanup.</p>

 Opportunities for public comment

At the Go East Corp Landfill Site, the public will have opportunities to provide comments on the:

- Draft Agreed Order and Draft Interim Action Work Plan
- Draft Remedial Investigation/Feasibility Study Report and Draft Cleanup Action Plan

State Environmental Policy Act

At some cleanup sites, SEPA is followed during review and development of cleanup plans. Snohomish County Planning and Development Services issued a Mitigated Determination of Non-Significance for landfill closure and redevelopment at the Go East Corp Landfill Site in accordance with SEPA.

Area Community

The Site is located in unincorporated Snohomish County. The Property is bound by the [108th Street Point Subdivision](#) north of the Property, the [Kings Ridge Subdivision](#) west of the Property, the [Waldenwood West Subdivision](#) southwest of the Property, and the [Pinehurst at Waldenwood Subdivision](#) southeast of the Property. The Bakerview Plat Subdivision will be developed on portions of the Property.

Ecology will keep the 108th Street Point Homeowners Association and the Kings Ridge Homeowners Association informed regarding remedial activities at the Site.

Ecology's outreach will follow federal guidance and include contacting cultural community organizations and providing information in non-English languages as appropriate.⁴ According to census data, less than 5% of the population in this area speaks English "less than very well." The non-English language most widely spoken in this area is Spanish. When appropriate, Ecology will provide outreach in Spanish. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach nearby communities.

If you request materials translated or interpreters for the Go East Corp Landfill cleanup site please send an email to nancy.lui@ecy.wa.gov or call 425-649-7117.

El Departamento de Ecología del Estado de Washington y P&GE se entrarán en una orden acordada para el relleno sanitario Go East Corp (Sitio). El Sitio está ubicado en 4330 108th Street, Everett, WA 98208 (Propiedad). Para obtener más información en español, comuníquese con Coleman Miller al 509-454-4246 o por correo electrónico a preguntas@ecy.wa.gov.

Ecology will ensure that the Stillaguamish and Tulalip tribes will be engaged with any decision-making process for this Site and have ample opportunities to be involved throughout the process on a government-to-government basis.

⁴ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share Site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal Site record, comments about the Site investigation, cleanup alternatives, and cleanups must be submitted during formal comment periods. In addition, the public is invited to review Site documents before they become final. This process is the most direct and influential way to learn more about the Site and be involved in decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the Site. The mailing list area will vary depending on the type of contamination and where it is located, but the list will at least include addresses within a 1-mile radius of the Site and other interested organizations and individuals. These notices will provide general information about the Site, how to submit comments, times and locations of public meetings or hearings, and information about how to request a public meeting.

Ecology may also develop documents outside of comment periods to keep the community updated on the Site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other Site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

Postal mailing list

Ecology maintains a mailing list of addresses within a 1.25-mile radius of the Site that includes relevant local, state, and federal government contacts that will receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this Site, please contact Nancy Lui at 425-649-7117 or nancy.lui@ecy.wa.gov and in the subject line indicate "Go East Corp Landfill Mailing List".

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).⁵ Subscribe online to receive the *Site Register* by email, or contact Marcus Humberg at marcus.humberg@ecy.wa.gov or 360-407-7213.⁶

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the local newspaper (*Everett Herald*). We will also publish notices on our [Public Input & Events Listing](#).⁷

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, please contact Nancy Lui at (425) 649-7117 or nancy.lui@ecy.wa.gov and in the subject line indicate "Go East Corp Landfill email list".

Ecology's website and social media platforms

We maintain a website for the Go East Corp Landfill Site.⁸ The website provides Site information, and you may download cleanup documents.

<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=4294>

We may also share information about cleanup sites through [news releases, our ECOconnect blog, and social media](#).⁹

Document repositories

During public comment periods, you can find print documents at the following locations:

Mill Creek Library
15429 Bothell Everett Highway
Mill Creek, WA 98012

Washington Department of Ecology
Northwest Regional Office
3190 160th Ave S.E.
Bellevue, WA 98008

⁵ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

⁶ <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siterregister&A=1>

⁷ ecology.wa.gov/Events/Search/Listing

⁸ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=4294>

⁹ ecology.wa.gov/About-us/Get-to-know-us/News

Washington State’s coronavirus response While Washington’s Stay Home, Stay Healthy order is in effect, Ecology is not hosting in-person public meetings or supporting physical document repositories. Documents for review will be available online only. If you need access to a hard copy document or have other questions, please contact Nancy Lui at 425-649-7117.

To schedule an appointment to review print documents at Ecology’s Northwest Regional Office, please contact Sally Perkins at 425-649-7190 or nwro_public_request@ecy.wa.gov.

Signs around the cleanup site

We may also install signs displaying information about the project status, traffic impacts, construction status, and potential health risks around the Site.

How to share information with us

We hold public comment periods to solicit concerns and information during the cleanup process. We may also meet with and solicit information from interested community members and organizations. To collaborate with us about this Site, please contact Alan Noell at 425-649-7015 or alan.noell@ecy.wa.gov.

Public comment periods

Formal, 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks that may extend to 30 days or more when additional cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we receive and respond to comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. Cleanup documents become final if comments do not result in significant changes.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if 10 people request it. Adding a public meeting to the schedule may cause us to extend a public comment period.

Public events are held at locations close to the Site that meet Americans with Disabilities Act (ADA) standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods as described above. If you need assistance with accommodations at Ecology's public meetings, please email nancy.lui@ecy.wa.gov or call 425-649-7117 in advance regarding your request.

Americans with Disabilities Act

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup process progresses and amend it as necessary. You may suggest amendments to Alan Noell, Site Manager at 425-649-7015 or alan.noell@ecy.wa.gov.

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this plan reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the Site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented with or without amending this plan.