



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

February 11, 2021

David Bader
Environmental Health Services, LLC
1721 35th Street
Bellingham, WA 98229

**Re: Request for construction of scale station near closed ash landfill
Recomp of Washington Site, Cleanup Site ID (CSID) 378**

Dear David:

The Washington State Department of Ecology (Ecology) received your request for approval relating to the construction of a scale at the ScrapIt - StowIt facility on the Recom of Washington site (See attached email dated February 9, 2021).

Ecology issued a No Further Action (NFA) letter for the site on January 5, 2005, which is conditioned on the maintenance of the Restrictive Covenant for the property filed with Whatcom County on October 1, 2004 and notarized on September 30, 2004. Approval from Ecology is required for the proposed work, in accordance with the Environmental Covenant.

Applicable Parcels

The Restrictive Covenant (covenant) was recorded for the following tax parcel on October 1, 2004:

Legal Description: LOT 4 RECOMP SHORT PLAT AS RECORDED
BOOK 21 SHORT PLATS PG 93

Tax Parcel ID No. 390233 183094 0000

The covenant also identifies the property address as 1524 Slater Road, Ferndale, Washington located in the SW1/4 of the SW1/4 of Section 33, Township 39N, Range 2E (which includes the clay pit pond).

Ecology reviewed the property address¹, the Whatcom County Parcel Viewer², and a Public Land Survey System (PLSS) map³, and notes that the property location description is not current. The tax parcel appears to have been re-parceled since 2004 and the PLSS coordinate is inaccurate. The closed ash landfill is located in the SE1/4 of the SW1/4 of Section 33, Township 39N, Range 2E.

In preparation for the planned periodic review, Ecology requests that ScrawIt – ScrapIt provide survey records that confirm how the historical parcels associated with the following sites have changed:

- Recomp of Washington site (CSID 378) at 1524 Slater Road, Ferndale, Washington
- Thermal Reduction Landfill site (CSID 2812) at 1524 Slater Road, Ferndale, Washington
- Wilder Landfill site (CSID 947) at North of 1524 Slater Road, Ferndale, Washington

Covenant Restrictions

The covenant includes the following potentially applicable sections:

Section 1. Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create a new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capacity, piercing the surface with a rod, spike or similar items, bulldozing or earthwork.

Ecology approves the proposed scope of work, with the following conditions:

The proposed aboveground scale is located east of the approximate boundary of the closed ash landfill. The June 28, 1989 Design Report states the former ash landfill that was closed in 1989 was constructed with a 24-inch thick cover of compacted clay with a permeability of less than 10^{-6} centimeters per second (cm/sec). A temporary ash storage facility was constructed on top of the closed ash landfill, and this facility operated from 1989 to 2001. The subgrade of the temporary ash storage facility consisted of an 80-mil high density polyethylene (HDPE) liner covered by 18 inches of native compacted soil. The 1996 Annual Report contains a Facility Cross Section by Vasey Engineering that shows the ash landfill extends east of the temporary ash storage facility with an uncertain east boundary, and that the clay cap extends over the ash landfill. An asphalt surface was constructed over the entire closed landfill near the area of the proposed scale.

The proposed scale extends 18-inches into the surface soil. Shallow soil borings should be sampled up to 5-feet deep to confirm that the proposed scale is not constructed above the closed ash landfill. If the proposed scale penetrates into the clay cap above the ash

¹ <https://www.google.com/maps>

² <https://www.whatcomcounty.us/2979/Map-Portal>

³ <https://fortress.wa.gov/doh/swap/index.html>

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fill, a welded, 60-mil HDPE geomembrane should be furnished beneath the scale foundation and the design should ensure that stormwater does not infiltrate to the surface of the geomembrane.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Ecology concurs with the proposed recommendations in the February 9, 2021 request to ensure that stormwater does not infiltrate to the closed ash landfill as a consequence of the planned scale construction.

If you have any questions, please contact me at (425) 213-4803 or by email at alan.noell@ecy.wa.gov.

Sincerely,



Alan Noell
Solid Waste Management Program

Attachment: Request for confirmation, February 9, 2021

ecc: Tamara Welty, Ecology
Tim O'Connor, Ecology
Steven Williams, Ecology
Bill Angel, Whatcom County Health Department

From: daveatehs@aol.com
To: [Noell, Alan L. \(ECY\)](#); [Welty, Tamara \(ECY\)](#)
Cc: wangel@co.whatcom.wa.us; DaveAtEHS@aol.com
Subject: Above Ground Scale Installation at ScrapIt StowIt (ADAK-IA Landfill) Site
Date: Tuesday, February 9, 2021 2:50:34 PM
Attachments: [Aerial Location of Proposed Scale and Scale House.png](#)
[Site Layout.png](#)
[Location Relation to Landfill Limit.png](#)
[Pic Looking North of Base Material Placement.png](#)
[Plan Set Sheet 1.png](#)
[Cross Section of Scale Footing for Floating Scale.png](#)

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Hi Allen,

As we discussed, we are planning on putting in an above ground scale at the ScrapIt - StowIt facility near the ADAK-IA landfill. The scale will not be over the landfill limits but will be over the extended cover to the east (see Landfill Limits slide). I am seeking concurrence that the installation, as proposed, will not violate the conditions of the restrictive covenant on the property that you administer for Ecology.

I have put together the attached slides that I believe describes the project and exposes potential concern. The footing has a depth of approximately 18 inches below grade (see Scale Cross Section). We believe the back fill will accommodate this depth (see pic looking north), however, should the depth be lower than the fabric we will be filling the removed soil space with concrete so we will not be creating an avenue for stormwater infiltration. Additionally we will be nearing the crest of potential drainage towards this direction so we will have minimal up-gradient flow in this direction.

Please let me know if you have any questions or concerns with respect to moving forward with this project.

Thank you for your consideration
Dave

David L. Bader R.S.
Environmental Health Services, LLC
1721 35th Street
Bellingham WA. 98229
DaveAtEHS@aol.com
(360) 739-3703

Trailer Scale House

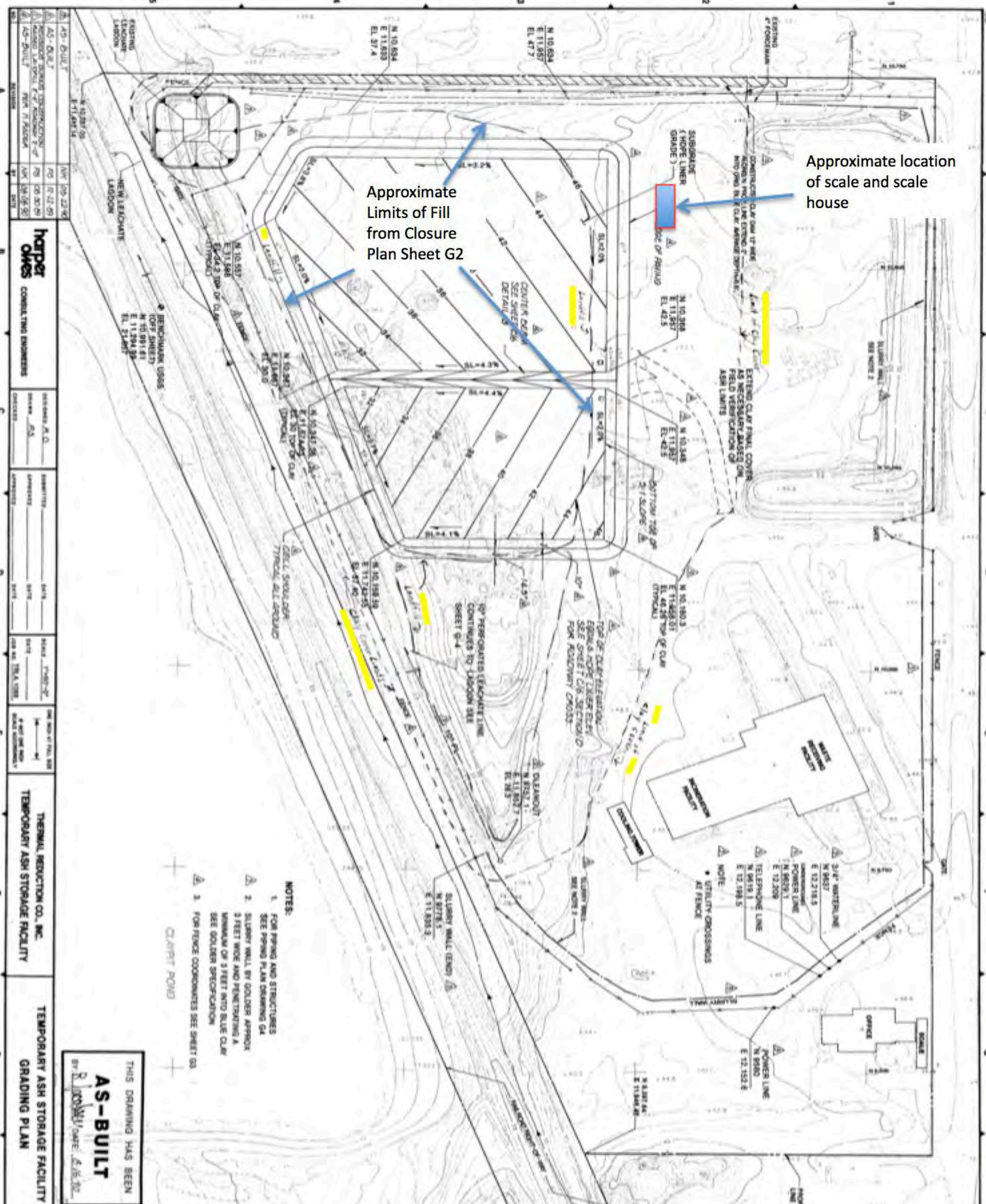
80' above ground Scale

@ 130' from Bldg

1524 Slater Rd

Slater Rd





Approximate Limits of Fill from Closure Plan Sheet G2

Approximate location of scale and scale house

- NOTES:
1. FOR PILING AND STRUCTURES SEE PILING PLAN DRAWING GA
 2. SLURRY WALL BY GOLDER APPROX 3 FEET WIDE AND PENETRATING A MINIMUM OF 3 FEET INTO BLUE CLAY SEE GOLDER SPECIFICATION
 3. FOR FENCE COORDINATES SEE SHEET GD

THIS DRAWING HAS BEEN
AS-BUILT
 BY R. L. [Signature] DATE 5/16/05

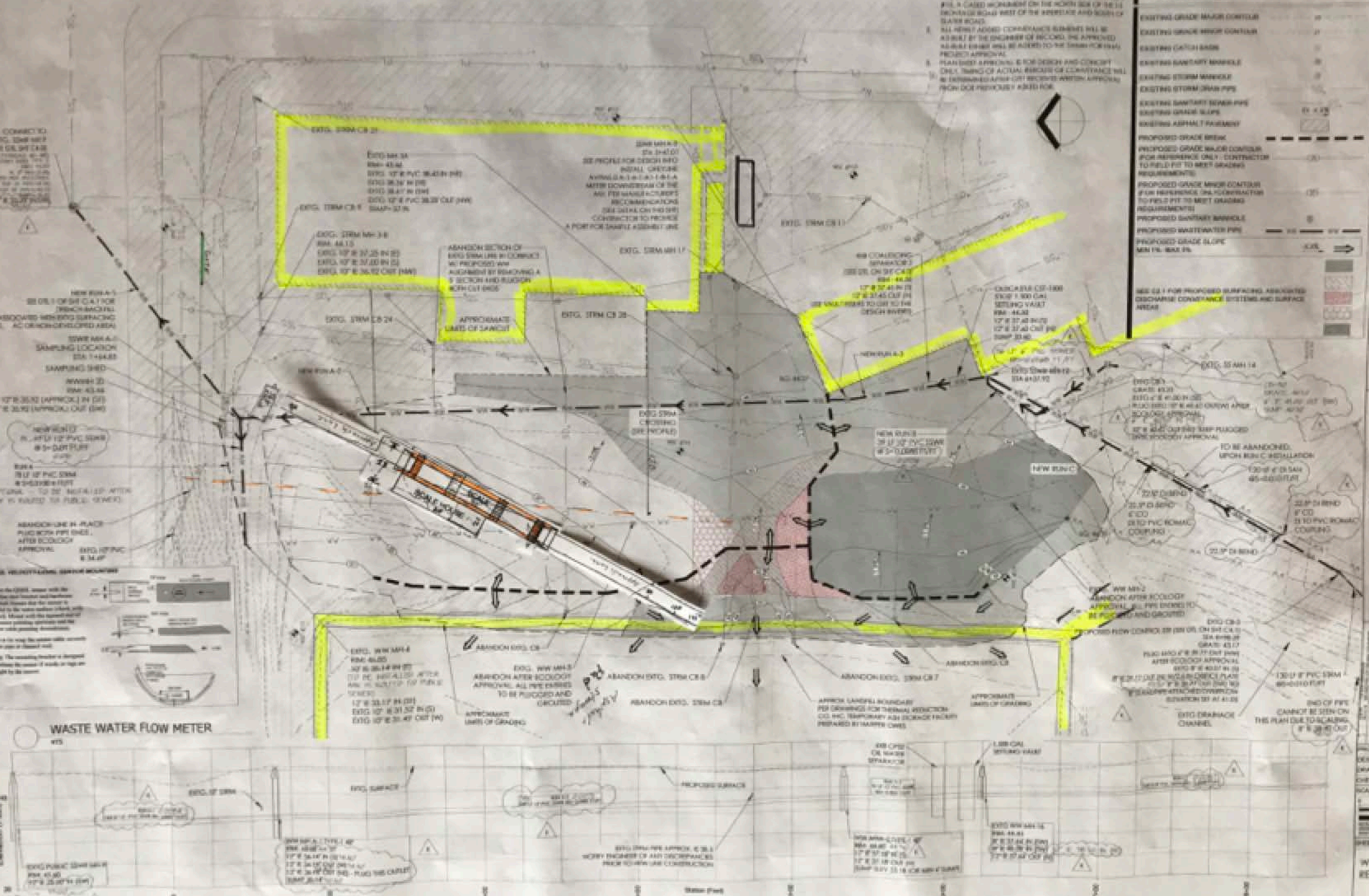
harper omes CONSULTING ENGINEERS		DESIGNER: A. O. DRAWN: J.A. CHECKED: [Blank] APPROVED: [Blank]
PROJECT: TEMPORARY ASH STORAGE FACILITY SHEET: GRADING PLAN DATE: 5/16/05	CLIENT: TEMPORARY ASH STORAGE FACILITY	SCALE: AS SHOWN DATE: 5/16/05



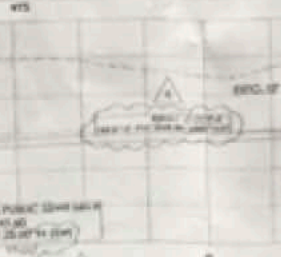
LEGEND

- EXISTING GRADE MAJOR CONTOUR
- EXISTING GRADE MINOR CONTOUR
- EXISTING CATCH BASIN
- EXISTING SANITARY MANHOLE
- EXISTING STORM MANHOLE
- EXISTING STORM DRAIN PIPE
- EXISTING SANITARY SEWER PIPE
- EXISTING GRADE SLOPE
- EXISTING ASPHALT PAVEMENT
- PROPOSED GRADE BREAK
- PROPOSED GRADE MAJOR CONTOUR (FOR REFERENCE ONLY - CONTRACTOR TO FIELD FIT TO MEET GRADING REQUIREMENTS)
- PROPOSED GRADE MINOR CONTOUR (FOR REFERENCE ONLY - CONTRACTOR TO FIELD FIT TO MEET GRADING REQUIREMENTS)
- PROPOSED SANITARY MANHOLE
- PROPOSED WASTEWATER PIPE
- PROPOSED GRADE SLOPE (MIN 1% MAX 5%)
- SEE C2.1 FOR PROPOSED SURFACING ASSOCIATED DISCHARGE CONFORMANCE SYSTEMS AND SURFACE WEAR

- NOTES
- PROJECT CONTROL POINT #100 IS LOCATED AT 3446.1 AND NEARLY SOUTH OF CITY OF PARRERY SURVEY MONUMENT #11. A CASE MONUMENT ON THE NORTH SIDE OF 18.11 INCHES IS LOCATED WEST OF THE MONUMENT AND SOUTH OF BLAKE ROAD.
 - ALL NEWLY ADDED CONFORMANCE SYSTEMS WILL BE AS BUILT BY THE OWNER OF RECORD. THE APPROVED AS-BUILT DRAWING WILL BE ADDED TO THE DRAWING FOR FINAL PROJECT APPROVAL.
 - PLAN SHEET APPROVALS FOR DESIGN AND CONCEPT ONLY. BASIS OF ACTUAL EXECUTION OF CONSTRUCTION WILL BE DETERMINED AFTER CITY RECEIVES WRITING APPROVAL FROM DOE PREVIOUSLY ASKED FOR.



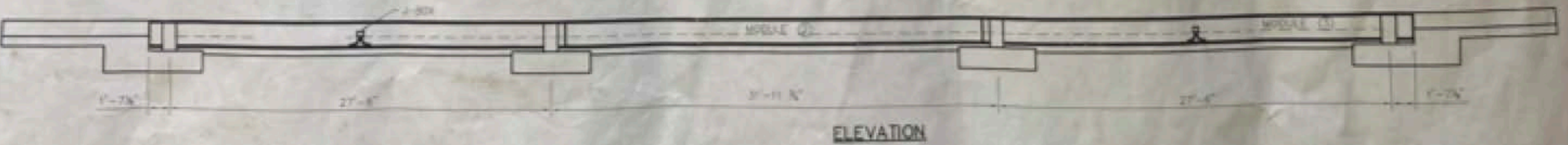
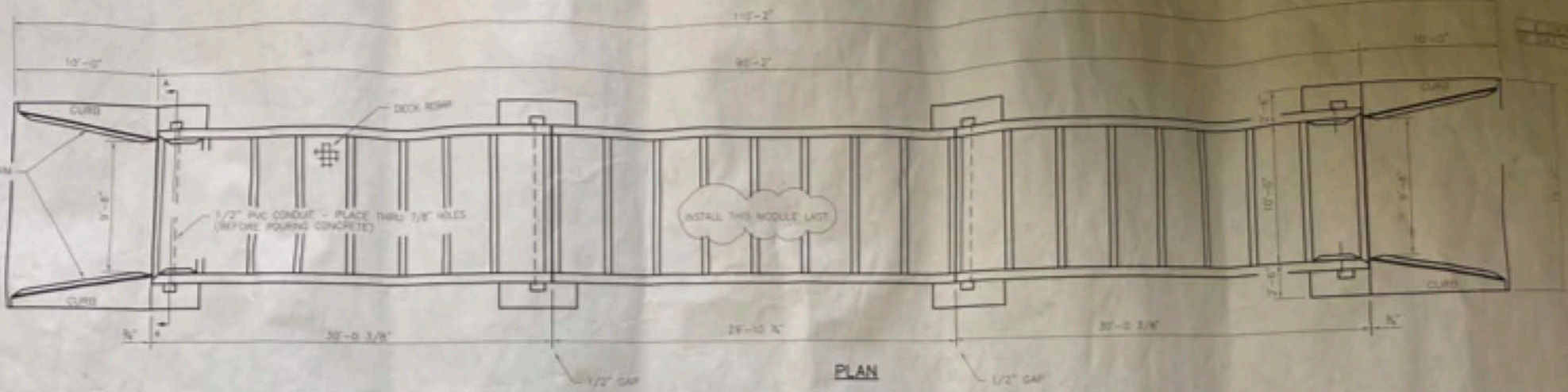
WASTE WATER FLOW METER



NO.	DESCRIPTION	DATE	BY	CHECKED
1	DESIGNED	10/1/2018	J. M. H.	
2	DRAWN	10/1/2018	J. M. H.	
3	CHECKED	10/1/2018	J. M. H.	
4	SCALE			

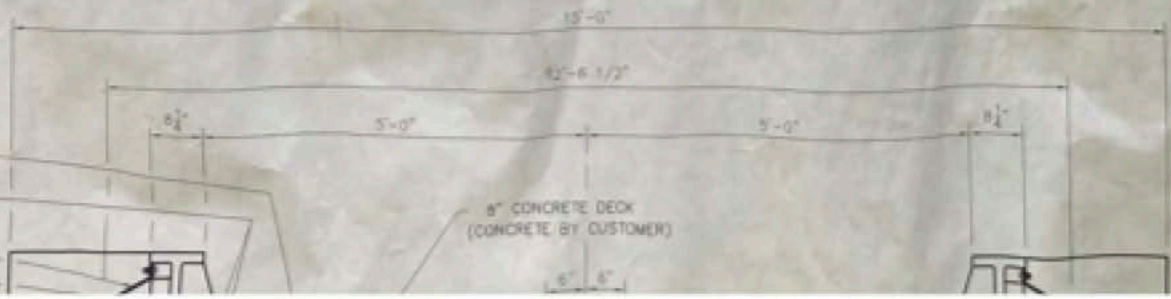
PROJECT: WASTEWATER REROUTING
 DESIGNED: 10/1/2018
 DRAWN: J. M. H.
 CHECKED: J. M. H.
 SCALE:
 SHEET TITLE:
WASTEWATER REROUTING PLAN
 SHEET: C2.0
 RECORD DRAWING

Scale Plan Set Sheet 1



ITEMS SUPPLIED BY UNITEC CORP

- 1/2" PVC CONDUIT
- #4 BAR 6" C/C WAY
- REMOVABLE COVER
- LINK



- NOTES:**
1. SCALE MUST BE INSTALLED LEVEL, PLUMB AND IN A STRAIGHT LINE WITH ITSELF AND THE FOUNDATION.
 2. LOADCELL STRAINS (ONCE LEVELS) MUST BE CHECKED USING A HIGH QUALITY, NONMETALLIC, NONSHRINKING TYPE GROUT.
 3. SET AND MAINTAIN THE BUMPER BOLTS TO 1/4" CLEARANCE.
 4. A STRAIGHT APPROACH OF 1/2 THE SCALE BOX LENGTH MUST BE PROVIDED WITH THE FIRST 10' AT BOTH ENDS OF THE SCALE. A CONCRETE APRON LEVEL WITH THE BOX.
 5. ALL STRUCTURAL STEEL TO BE ASTM A-36 MINIMUM.
 6. SITE-POURED DECK: SCALE MODULES MUST BE CENTER SUPPORTED WITH POURING DECK CONCRETE. CONCRETE SHALL HAVE A NOMINAL 28 DAY COMPRESSIVE STRENGTH OF 6000 PSI. 4" MAX SLUMP. W/C RATIO=0.44. MAX. AIR CONTENT 5% +/- 1% MIXTURE PER ASTM CONG. CONCRETE. MIXTURE MUST INCLUDE A FIBER REINFORCEMENT PRODUCT SUCH AS "INFORCE 43" BY SI CONCRETE SYSTEMS (1 1/2 # PER YARD OF "INFORCE 43" BY SI CONCRETE SYSTEMS) SIZE SHALL BE 3/4" TO #4 CONCRETE. MIXTURE TO BE PLACED APPROXIMATELY 6" IN EACH DECK SCOMB

Cross section of Pads for Scale Showing @ 18" Deep.

