



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*

March 11, 2021

David Bader  
Environmental Health Services, LLC  
1721 35<sup>th</sup> 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) provided a conditionally approval on February 11, 2021 for the construction of a scale at the ScrapIt - StowIt facility on the Recom of Washington site.

Environmental Health Services, LLC (EHS) submitted a letter on March 5, 2021 that documents the sampling of test pits TP #1 and TP #2 to 5.5-feet and 6-feet below grade level, respectively, near the proposed scale location. The test pits revealed about 3 feet of cover material, which includes 15 to 22-inches of an extended landfill cap. The test pits did not penetrate the old ash landfill, but did penetrate a sandy loam soil with wood and metal materials.

EHS indicated that concrete footings, up to 18-inches deep, will be constructed in portions of the extended landfill cap. EHS indicated that the annual space left after removal of the concrete forms will be filled with recovered excavated clay and compacted in lifts, or filled with controlled density fill. Additionally, the scale will be located in a topographically high area where stormwater will not accumulate. EHS asserts that the surface area near the proposed scale will be functionally equivalent to the existing extended cap, the proposed scale will not interfere with the integrity of the Remedial Action, and extended landfill cap will continue to be protective of human health and the environment.

Ecology concurs the proposed construction of the scale is consistent with the terms of the environmental covenant. Ecology approves the proposed construction of the scale.

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

David Bader  
March 11, 2021  
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Sincerely,

A handwritten signature in black ink, appearing to read 'Alan Noell', with a long horizontal flourish extending to the right.

Alan Noell  
Solid Waste Management Program

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



3/5/21

Department of Ecology  
Mr. Alan Noell  
Solid Waste Management Program  
3190 160<sup>th</sup> Ave SE  
Bellevue, WA 98008-5452  
Via: Alan.noell@ecy.wa.gov

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

Dear Alan,

As per your request of February 11, 2021 to conduct shallow soil borings near the area of the proposed scale station, I hereby provide the finding of that exploration and seek conformation to proceed with the project as described herein.

On March 4, 2021 we excavated two shallow test pits within 10'+/- of the proposed scale station to a depth of 5+ feet on the westerly side of the scale location, (side closest to the ash landfill). The test pits were to "confirm that the proposed scale is not constructed above the closed ash landfill". The finding revealed that the scale station will not be installed above the closed ash landfill although will be located above a strata that contains metal and wood debris previously identified as "demolition debris" in geological reports we have discussed.

The proposed scale station will not 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. The remedial action included a clay cap that extends from the landfill area easterly to the asphalt surface near the building. This clay cap extension is intended to direct surface runoff from the landfill area to the existing asphalted impervious surfaces to avoid ground infiltration. This proposal includes methods for maintaining the integrity of this clay layer.

To maintain the purpose and function of the clay cap, the vast majority of the removed portion of the clay cap that is required to facilitate the footings will be replaced with concrete for the footing(s). The annular space left after removal of concrete forms will be filled with recovered excavated clay and compacted in lifts or, filled with controlled density fill (CDF). In either case, the cap will remain functionally equivalent.

Additionally, to reduce the chances of infiltration in the subject area, we propose to direct surface runoff around the project area. The scale location is near the topographical high

point of the area, therefore there will be minimal run-on into the area and that run-on will be directed around the project area with minor shallow surface modification.

The proposed location of scale station and the test pit locations are shown on the attached site map. The test pits indicate consistent strata across the area of interest. Both test pits showed surface cobble/gravel underlain by a filter fabric that sits atop of a clay cap layer that was placed on an imported sand layer that was placed on top of the existing surface at the time.

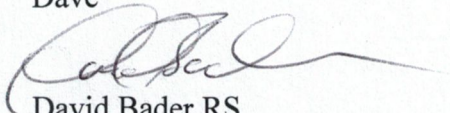
Exploratory Test Pit Findings

Test Pit	Depth of surface layer cobble / gravel	Fabric material below surface layer	Depth of clay-silty clay-loam layer (Extended landfill cover cap)	Depth of imported sand layer	Depth of dark grayish brown loamy with sand with wood and metal materials	Depth to silty-sand Layer	Depth of Test Pit
TP #1	0 -12"	Yes	12 - 27"	27 - 35"	35 - 59"	59 - 66"	66"
TP #2	0 -8"	Yes	8 - 30"	30 - 36"	36 - 72"	?"	72"

As stated, the scale will not be located above the ash landfill but will be above a layer that does contain sporadic wood, metal and other incidental non-putrescible debris. When viewing the attached pictures, this layer may appear to contain ash but it does not appear to be ash when visually examined nor does it have an odor or contain other items typically associated with garbage ash like; tin cans, glass or glass bottles, partially burnt paper, plastic bottles remnants and/or other burnt or decaying debris.

Please let me know if you have any objection to moving forward with the placement of this scale station as described above or if you have any additional questions.

Thank you for your consideration,  
Dave



David Bader RS  
Environmental Health Specialist  
[DaveAtEHS@aol.com](mailto:DaveAtEHS@aol.com)

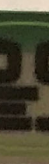
Attachments:

Site Plan showing approximate scale location and test pits

TP#1 profile and TP#1 demo layer

TP#2 profile and TP#2 demo Layer

Cc ADAK-IA

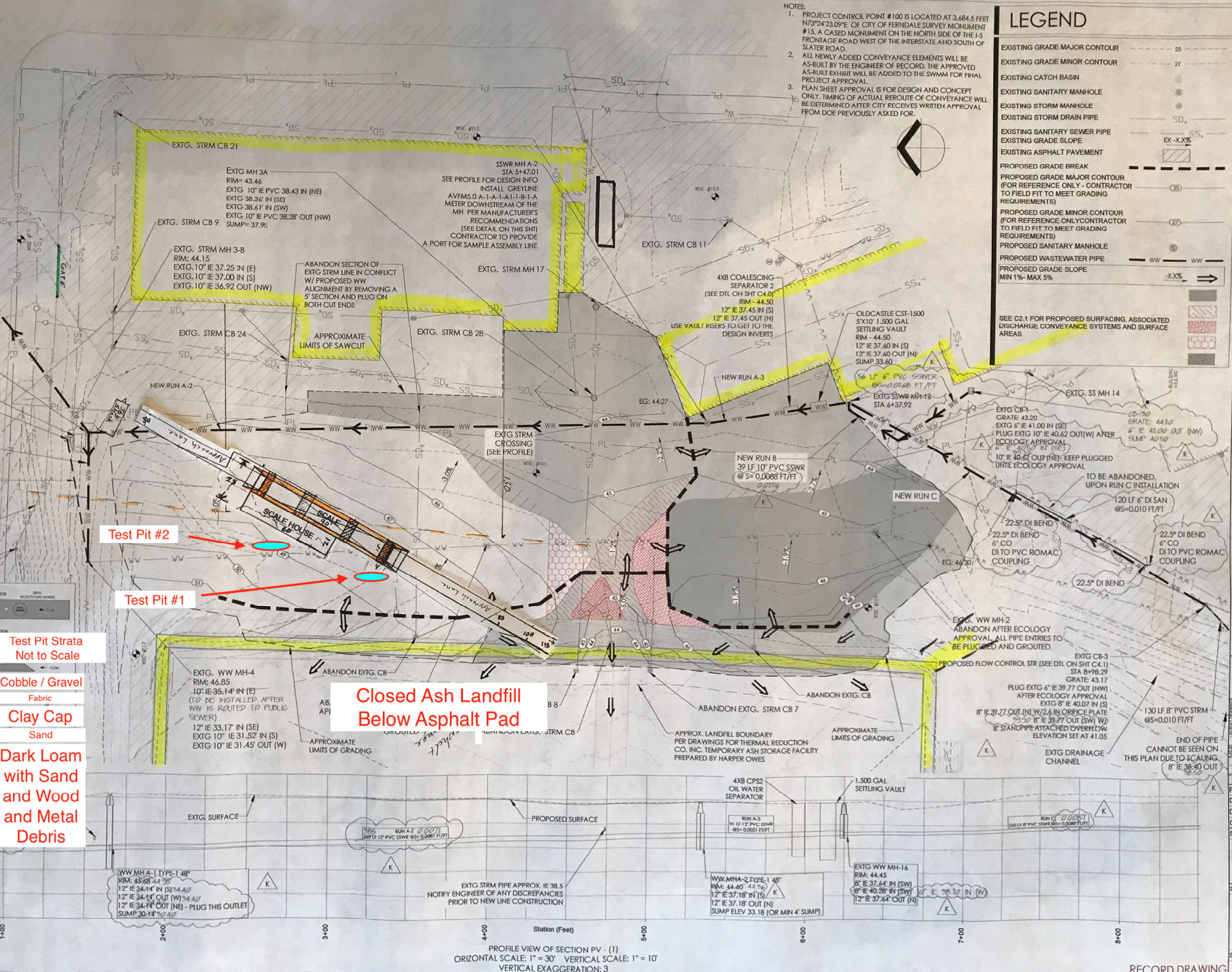


### LEGEND

EXISTING GRADE MAJOR CONTOUR	25
EXISTING GRADE MINOR CONTOUR	27
EXISTING CATCH BASIN	(Symbol)
EXISTING SANITARY MANHOLE	(Symbol)
EXISTING STORM MANHOLE	(Symbol)
EXISTING STORM DRAIN PIPE	SD <sub>x</sub>
EXISTING SANITARY SEWER PIPE	SS <sub>x</sub>
EXISTING GRADE SLOPE	EX -X.X%
EXISTING ASPHALT PAVEMENT	(Symbol)
PROPOSED GRADE BREAK	(Symbol)
PROPOSED GRADE MAJOR CONTOUR (FOR REFERENCE ONLY - CONTRACTOR TO FIELD FIT TO MEET GRADING REQUIREMENTS)	25
PROPOSED GRADE MINOR CONTOUR (FOR REFERENCE ONLY CONTRACTOR TO FIELD FIT TO MEET GRADING REQUIREMENTS)	27
PROPOSED SANITARY MANHOLE	(Symbol)
PROPOSED WASTEWATER PIPE	WW
PROPOSED GRADE SLOPE	-X.X%
MIN 1% - MAX 5%	(Symbol)

SEE C2.1 FOR PROPOSED SURFACING, ASSOCIATED DISCHARGE, CONVEYANCE SYSTEMS AND SURFACE AREAS

- NOTES:
- PROJECT CONTROL POINT #100 IS LOCATED AT 3,484.5 FEET N73°24'23.09"E OF CITY OF FERDALE SURVEY MONUMENT #15. A CASED MONUMENT ON THE NORTH SIDE OF THE I-5 FRONTAGE ROAD WEST OF THE INTERSTATE AND SOUTH OF SLATER ROAD.
  - ALL NEWLY ADDED CONVEYANCE ELEMENTS WILL BE AS-BUILT BY THE ENGINEER OF RECORD. THE APPROVED AS-BUILT EXHIBIT WILL BE ADDED TO THE SWMM FOR FINAL PROJECT APPROVAL.
  - PLAN SHEET APPROVAL IS FOR DESIGN AND CONCEPT ONLY. TIMING OF ACTUAL ROUTE OF CONVEYANCE WILL BE DETERMINED AFTER CITY RECEIVES WRITTEN APPROVAL FROM DOE PREVIOUSLY ASKED FOR.

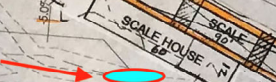


- Test Pit Strata Not to Scale
- Cobble / Gravel
- Fabric
- Clay Cap
- Sand
- Dark Loam with Sand and Wood and Metal Debris

**Closed Ash Landfill Below Asphalt Pad**

Test Pit #2

Test Pit #1



EXTG. WW MH-4  
 RIM: 46.85  
 12" IE 36.14" IN (E)  
 (TO BE INSTALLED AFTER WW IS ROUTED TO PUBLIC SEWER)  
 12" IE 33.17" IN (SE)  
 EXTG 10" IE 31.52" IN (S)  
 EXTG 10" IE 31.45" OUT (W)

EXTG STRM PIPE APPROX. IE 38.5  
 NOTIFY ENGINEER OF ANY DISCREPANCIES PRIOR TO NEW LINE CONSTRUCTION

APPROX. LANDFILL BOUNDARY PER DRAWINGS FOR THERMAL REDUCTION CO. INC. TEMPORARY ASH STORAGE FACILITY PREPARED BY HARPER OWES

EXTG. WW MH-2  
 ABANDON AFTER ECOLOGY APPROVAL ALL PIPE ENTRIES TO BE PLUGGED AND GROUTED

END OF PIPE CANNOT BE SEEN ON THIS PLAN DUE TO SCALING  
 8" IE 38.40 OUT

TO BE ABANDONED, UPON RUN C INSTALLATION  
 120 LF 6" DI SAN @S=0.010 FT/FT

EXTG CB-3  
 GRATE: 43.20  
 EXTG 6" IE 41.00 IN (SE)  
 PLUG EXTG 10" IE 40.62 OUT (W) AFTER ECOLOGY APPROVAL  
 10" IE 40.62 OUT (NE) - KEEP PLUGGED UNTIL ECOLOGY APPROVAL

OLDCASTLE CST-1500  
 5'X10' 1,500 GAL SETTLING VAULT  
 RIM - 44.50  
 12" IE 37.40 IN (S)  
 12" IE 37.40 OUT (N)  
 SUMP 33.60

4X8 COALESCING SEPARATOR 2  
 (SEE DTL ON SHIT C4.0)  
 RIM - 44.50  
 12" IE 37.45 IN (S)  
 12" IE 37.45 OUT (N)  
 USE VAULT RISERS TO GET TO THE DESIGN INVERTS

SSWR MH A-2  
 STA 5+47.01  
 SEE PROFILE FOR DESIGN INFO  
 INSTALL GREYLINE AVEMCO A-1-A-1-A-1-B-1-A METER DOWNSTREAM OF THE MH PER MANUFACTURER'S RECOMMENDATIONS (SEE DETAIL ON THIS SHIT)  
 CONTRACTOR TO PROVIDE A PORT FOR SAMPLE ASSEMBLY LINE

EXTG. STRM MH 3-B  
 RIM: 44.15  
 EXTG. 10" IE 37.25 IN (E)  
 EXTG. 10" IE 37.00 IN (S)  
 EXTG. 10" IE 36.92 OUT (NW)

EXTG MH 3A  
 RIM= 43.46  
 EXTG 10" IE PVC 38.43 IN (NE)  
 EXTG 38.36" IN (SE)  
 EXTG 38.61 IN (SW)  
 EXTG 10" IE PVC 38.28" OUT (NW)  
 SUMP= 37.95

EXTG. STRM CB 21

EXTG. STRM CB 9

EXTG. STRM CB 24

EXTG. STRM CB 28

EXTG. STRM CB 11

EXTG. SS MH 14

EXTG. SS MH 16  
 STA 6+37.92

EXTG. SS MH 17

EXTG. SS MH 18

EXTG. SS MH 19

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EXTG. SS MH 100









