

Go East Corp Landfill Site



Comments accepted:

May 8 – June 7, 2020

Submit comments:

Online at:

<http://swm.ecology.commentinput.com/?id=Vfcb5>

Or by mail to:

Alan Noell, Site Manager
 WA Department of Ecology
 3190 160th Avenue SE
 Bellevue, WA 98008-5452
 Phone: (425) 649-7015
 Email: alan.noell@ecy.wa.gov

Site info:

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

Facility Site ID: 2708
 Site Cleanup ID: 4294

Document review locations:

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

Ecology-Bellevue Office
 3190 160th Avenue SE
 Bellevue, WA 98008-5452
 By appointment, call 425-649-7190
nwro_public_request@ecy.wa.gov

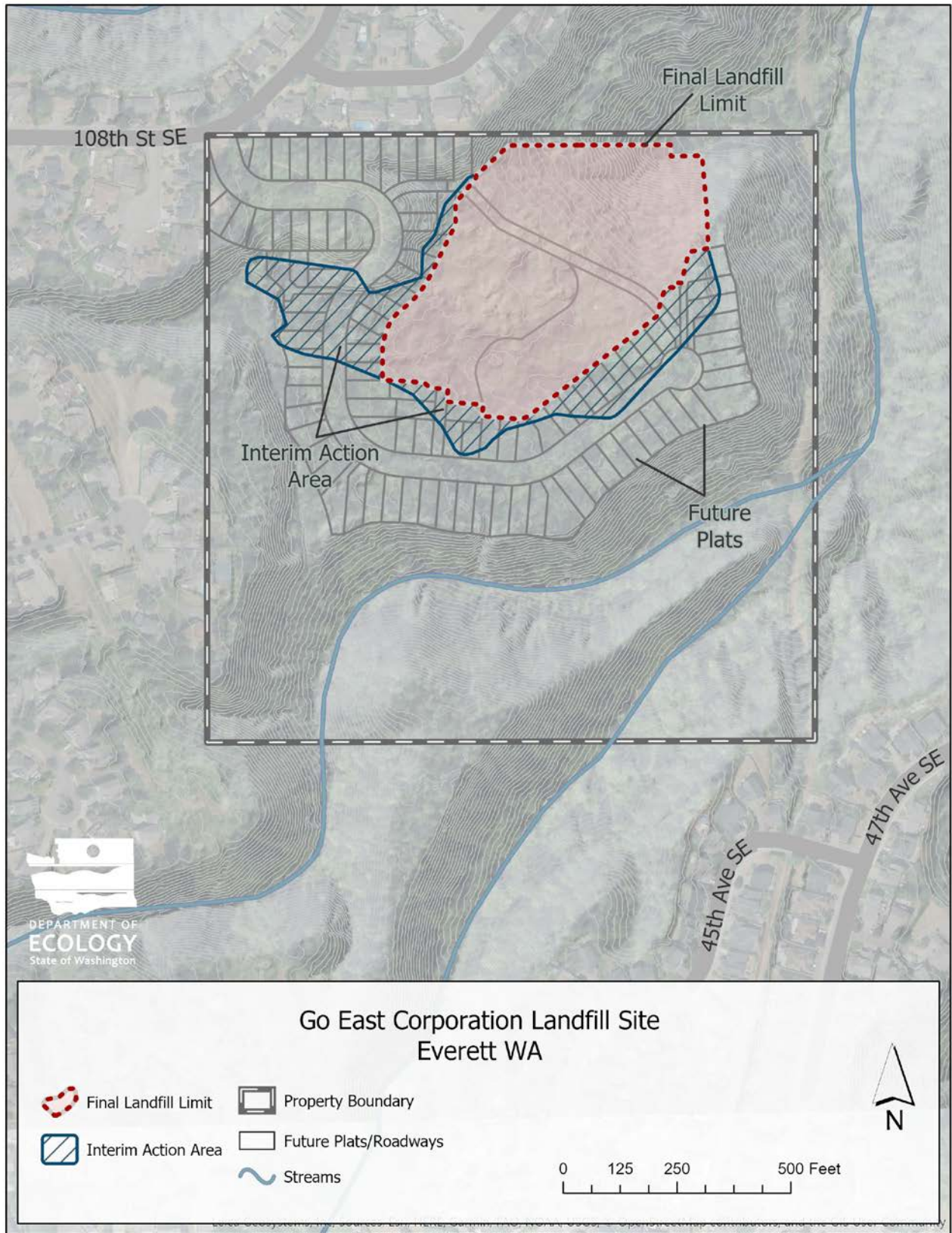
Comment Period: May 8 – June 7, 2020

We invite you to comment on a proposed legal agreement and **Interim Action Work Plan** that requires P&GE, LLC (P&GE) to comply with applicable requirements under Washington state cleanup regulations during landfill closure and development activities at the Go East Corp Landfill Site (Site).

The legal agreement, known as an **Agreed Order**, is between the Department of Ecology and P&GE. The Site is located at 4330 108th Street, Everett, WA 98208 (Property).

Three Documents Available for Review and Comment

- **Draft Agreed Order** - The Agreed Order requires P&GE to perform an interim cleanup action during landfill closure, prepare a remedial investigation/feasibility study for the Site, and prepare a preliminary draft cleanup action plan in accordance with the Model Toxics Control Act (MTCA), our state cleanup law.
- **Draft Interim Action Work Plan (IAWP)** - The IAWP identifies the interim action area (a.k.a. the “wedge area”), which includes peripheral areas of the existing landfill that will be excavated and consolidated under the engineered landfill cap to be installed during landfill closure. The IAWP describes the historical disposal area and provides waste characterization sampling data from the wedge area, as required in the landfill permit. The IAWP provides interim action levels for soil beyond the final landfill boundary, and provides a confirmation soil sampling plan for the wedge area and a borrow source sampling plan for the onsite soil to be used as construction fill. A sampling and analysis plan and a quality assurance project plan are provided in the IAWP appendices.
- The **Public Participation Plan** explains how people can participate in the cleanup process.



Landfill Closure and Development Plans

P&GE plans to implement a landfill closure plan that reduces the area of the landfill. The landfill closure will be performed in order to develop the Bakerview Plat Subdivision on portions of the Property outside the final landfill boundary. The area within the final landfill boundary will be covered with an engineered cap that includes a geomembrane liner, a grass cover, a stormwater control pond, and a naturally vegetated slope. The final landfill area will be accessible to the general public.

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.

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. 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 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.

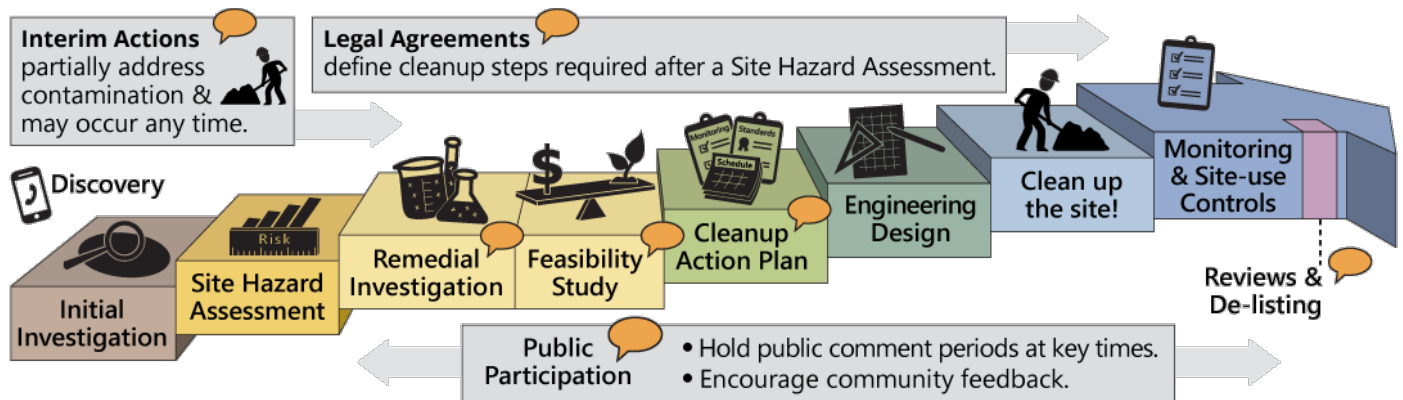
P&GE excavated test pits within and adjacent to the wedge area in June 2019 and collected soil samples in accordance with the Go East Landfill Closure Plan. Although concentrations of oil-range petroleum hydrocarbons and polycyclic aromatic hydrocarbons exceeded MTCA soil cleanup levels in some samples, the concentrations do not preclude disposal of the waste in the wedge area into the final landfill boundary.

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 MTCA 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>

Ecology's Cleanup Process

MTCA ([Chapter 70.105D RCW¹](#)) is Washington's environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect human health and the environment. Ecology enacts MTCA and oversees cleanups.



What Happens Next?

- Ecology will finalize the Agreed Order, Interim Action Work Plan, and Public Participation Plan after the public comment period ends. Ecology will review and consider all comments received and respond accordingly. Ecology will make appropriate revisions (if any) to the draft documents.
- P&GE will implement the Interim Action Work Plan in summer/fall of 2020.
- P&GE will prepare a Remedial Investigation Work Plan for Ecology review and approval and then initiate the remedial investigation activities.
- P&GE will prepare a draft Remedial Investigation/Feasibility Study Report and a preliminary Draft Cleanup Action Plan. Ecology will review the preliminary Draft Cleanup Action Plan and prepare the Draft Cleanup Action Plan for public review following the landfill closure.
- The next opportunity for public comment will be when the draft Remedial Investigation/Feasibility Study Report and Draft Cleanup Action Plan are complete.

¹ <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

Solid Waste Program
3190 160th Avenue SE
Bellevue, WA 98008-5452

Go East Corp Landfill Public Comment



Public Comment Period

May 8 – June 7, 2020

Periodo de comentarios: 8 de mayo – 7 de junio de 2020

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). Lo invitamos a comentar sobre un acuerdo legal propuesto, el Plan de Acción Provisional de Trabajo, y un plan de participación pública que requiera que P&GE, LLC (P&GE) cumpla con los requisitos aplicables según las regulaciones de limpieza del estado de Washington durante el cierre de rellenos sanitarios y actividades de desarrollo en el Sitio. Information en Español incluida

Accommodation Requests: To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 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