



ecology and environment, inc.

Global Environmental Specialists

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August 2, 2018

Jeffrey Fowlow, On-Scene Coordinator
United States Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Re: May Creek Landfill Site Walk
Contract Number EP-S7-13-07, Task Order 68HE0718F0470

Dear Mr. Fowlow:

Enclosed please find a site observation report of the July 26, 2018 Site Walk at the May Creek Landfill site, which is located in Renton, Washington. If you have any questions regarding this submittal, please call me at (206) 624-9537.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

Steven G. Hall
START-IV Removal Team Leader

cc: Brad Martin, E & E, START-IV Emergency Response Team Leader, Seattle, WA

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Observation Report

May Creek Landfill
Renton, Washington
Task Order 68HE0718F0470



Prepared for

U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Prepared by

Ecology and Environment, Inc.
720 Third Avenue, Suite 1700
Seattle, WA 98104

August 2018

1. PLACE VISITED

Site Name:	May Creek Landfill		
Responsible Party Name:	Charles Pillon		
Location:	15753 Renton Issaquah Road Southeast, Renton, Washington		
Latitude:	47.501782	Longitude:	-122.131476
Date(s) of Trip:	July 26, 2018		

2. PURPOSE

The United States Environmental Protection Agency (EPA) tasked Ecology and Environment, Inc. (E & E), under Superfund Technical Assessment and Response Team (START)-IV contract number EP-S7-13-07, to participate in a site walk at the May Creek Landfill site in Renton, Washington (Figure 1). START personnel were tasked with:

- Documenting site access
- Identifying safety concerns
- Collecting information to conduct a potential time-critical removal action (TCRA)
- Identifying logistical concerns
- Identifying relevant technologies
- Creating maps and sketches
- Collecting photo documentation

In February 2016, EPA assisted Washington State Department of Ecology, Washington State Attorney General’s Office, and King County in investigating the site. During that investigation, START collected a total of nine product/waste samples and 13 surface soil samples. Product/waste samples were subjected to hazard categorization testing and select samples were submitted for additional off-site fixed laboratory analysis. A total of six samples were submitted for Hydrocarbon Carbon Identification (HCID) analysis, of which four contained petroleum product(s). Laboratory analytical results indicated that two of the seven samples submitted for flashpoint analysis were ignitable. These samples did not contain petroleum hydrocarbons based on the HCID analysis. One liquid sample from a container exhibited a high pH (12.3) but just below the Resource Conservation and Recovery Act (RCRA) characteristic of corrosivity (12.5); however, Toxicity Characteristic Leaching Procedure metals results were elevated for lead, indicating that the product was toxic. These results indicated that RCRA characteristic waste was present on the site.

The soil samples were submitted for off-site fixed laboratory analysis and compared to Model Toxics Control Act Method A unrestricted land use criteria. Sample results indicated two Target Analyte List metals (cadmium and chromium), two Semi-Volatile Organic Compounds

(benzo[a]pyrene and total polycyclic aromatic hydrocarbon total toxicity equivalent concentration [TTEC]) and motor oil range organics were detected at concentrations above the site criteria. Chromium was also detected above the MTCA Method A cleanup level in the background sample and therefore may not be directly attributable to site activities. However, the presence of cadmium, benzo(a)pyrene, TTEC, and motor oil range organics in soil samples at concentrations exceeding MTCA Method A criteria indicated that site activities resulted in the release of these hazardous substances to the environment. Based on the volume and type of waste on the property and the wide distribution of soil contamination (discovered through a very limited sampling regime), it was reasonable to conclude that much of the original surface soil, which was inaccessible during the February 2016 site visit because it was buried to an unknown depth with waste, was similarly contaminated at concentrations in excess of MTCA Method A standards (E & E 2016).

3. PERSONS INVOLVED

Agency/Company	Contact Persons
United States Environmental Protection Agency	Jeffrey Fowlow – Federal On-Scene Coordinator
Washington State Department of Ecology	Robert Warren, Rick Thomas, Katie Gibbs
King County	Mark Stockdale, Lucy Auster
START – E&E, Inc.	Brad Martin
ERRS – EQM, Inc.	Pat Heyneman

4. SITE OBSERVATIONS

On July 26, 2018, START-IV met at the May Creek Landfill site with representatives from EPA, the Washington Department of Ecology, King County, and the EPA Region 10 Emergency and Rapid Response Services (ERRS) contractor to conduct a site walk. After securing verbal site access, the attendees met with Mr. Pillon. Mr. Pillon, the potentially responsible party (PRP), explained some of the history at the site and some recent actions he had taken to lessen hazardous substance concerns at the site. The following describes observations made at the site during the subsequent site walk in the Bus/RV Area, Landfill Area, and Workshop Area (Figure 2). The Residential Area was not assessed during this site walk. During the site walk, START discussed safety concerns, logistical issues, and technology options for conducting a potential Removal Site Evaluation and/or TCRA with EPA and ERRS.

Bus/RV Area

START observed approximately 30 containers in an old bus. The containers were mostly 1 and 5 gallons and appeared to be paint-related wastes. Two 55-gallon drums were observed in the bus. Many of the containers did not have markings and appeared to be in poor condition. No observable management system was apparent to prevent mixing of incompatible chemicals or to prevent release.



During the 2016 site visit, START had observed several hundred containers in this bus. The PRP explained that he had emptied the contents of those containers to the ground and mixed them with woodchips/sawdust. He reported that the containers he emptied contained only latex paint and that the containers with flammable waste were left in the bus. He crushed and stockpiled the empty containers next to the bus. ERRS observed latex and oil-based paint containers and reported a solvent smell near the stockpiles. See photos below of the spilled material and crushed containers.

*Site Observation Report
May Creek Landfill*





START observed approximately ten 55-gallon metal drums on the bed of a truck. These containers were also observed during the 2016 site visit. The drums had few if any labels and appeared to have contents in them. One drum was leaking a black liquid to the soil. Nearby an additional stainless steel drum with no labels was observed.





In addition to the observations noted above, START also observed dozens of containers (1 and 5 gallon) and cylinders (assorted sizes) throughout the Bus/RV Area laying on the ground or mixed in with solid waste. START also observed materials that could be considered suspect asbestos containing materials (ACM) including cement/mortar, insulation, demolition debris, and flooring.

Landfill Area

During the site walk in this area, START observed 20+ containers/cylinders laying on the ground or otherwise mixed with solid waste at various locations. Suspect ACM was also observed throughout this area. Of note in this area was a school bus that contained approximately 100+ 1-gallon containers. This bus was not present at this location during the 2016 site visit.



START also observed several junked/abandoned vehicles capable of carrying several thousand gallons of liquid throughout the site (including two fire trucks, a jet fuel carrier, and a small tanker truck). One such vehicle is pictured below but was not accessible to assess for contents. The PRP indicated it was a water truck and was empty.



Workshop Area

START observed approximately 10 drums in the workshop area. Many of the drums were being used to manage the PRP's used/waste oil and other materials from vehicle maintenance. Since these drums appeared to be actively in use, not all of them are accounted for in this report as being potentially subject to a TCRA. Assorted 1- and 5-gallon containers were also observed in this area.





The container that contained a liquid with elevated pH (12.3) and that was a toxicity characteristic hazardous waste for lead in 2016 was still present on the site in this area, as shown in the photo below:



Summary of Site Observations

- START observed approximately 250 visible containers at the site. The containers were primarily 1- and 5-gallons in size. There were approximately fifteen to twenty 55-gallon drums. Most of the containers did not have labels. There was no recognizable system of storing most containers safely or in a manner suggesting regular use or with care to prevent release.
- The PRP reported that he emptied various containers from the bus/bus area onto wood chips (used for absorption) spread directly onto surface soil. The PRP reported to have

emptied containers with latex paint only, but it is unknown whether any of the emptied containers also included mixed waste.

- There are dozens of junked/abandoned vehicles at the site. At least four vehicles capable of carrying several thousand gallons of liquids were observed (two fire trucks, a jet fuel carrier, and a small tanker truck). The volume of fuel in junked/abandoned vehicles was not assessed with the exception of the jet fuel carrier, which was only assessed visually and by knocking on the tank wall (there was no apparent sight glass and it did not sound as though it was full).
- Evidence of container releases were observed, including actively leaking containers and stained soil.
- Suspect ACM was observed throughout the site.
- Many parts of the site were not safely accessible (e.g. inside overly packed buses and RVs).
- It is possible that containers are buried and intermixed with solid waste based on how containers were managed on the surface.

References

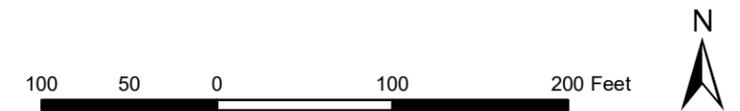
Ecology and Environment, Inc., May 2016, *Final Trip Report: May Creek Landfill*, prepared for United States Environmental Protection Agency, Contract Number EP-S7-13-07, Technical Direction Document Number 16-02-0007.

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Figure 1
Site Vicinity
May Creek Landfill Stie

Renton, King County, Washington



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MAY CREEK LANDFILL
 Renton, Washington

Figure 2
 SITE WORK AREAS



Date:
 7/14/16

Drawn by:
 AES

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