



12/30/2005

To: Kathy Pierson-Snohomish County Health District  
Fr: Larry W. Baker- Rinker Materials  
Re: Tolt Reservoir Sediment Solids

Please accept the following in response to your letter dated 12/12/05 regarding the sediment solids received by Rinker Materials from the Tolt Reservoir treatment facility.

**Background:**

In July 2004 Western States Environmental contacted Rinker Materials regarding the possible disposal of mechanically dewatered sediment from the Tolt Reservoir treatment facility. Given the source and location of the material there was no reason to suspect any type of contaminants, Rinker Materials primary concern with the material in question was the type of flocculant to be used (please see the attached MSDS) in the dewatering process and the final moisture content of the material after dewatering. Upon examination the sediment appeared to be a fine, silt like material with a moisture content of approximately 6-7%. After review of the MSDS for the flocculant to be used, visual inspection of the dewatering process Rinker deemed the material to be acceptable at our Maltby land reclamation operation. From 10/01/04 through 02/17/05 Rinker Materials received 1987.12 tons of dewatered sediments solids from the Tolt reservoir.

In July 2005 Rinker Materials was contacted by CDM Inc. regarding disposal of Tolt Reservoir sediment solids that would occur in late summer/early fall of 2005. It was explained to Rinker that CDM would not use the mechanical dewatering process used in 2004 but would instead stop the water flow to the detention ponds and allow as much water as possible to evaporate before removing the solids. Due to the fact that the anticipated moisture content would be 10 to 30% Rinker informed CDM that the material would only be accepted at our Everett Landfill. From 10/08/2005 through 11/23/2005 a total of 2357.93 tons of sediment solids was accepted at Rinker Materials Everett landfill.

RECEIVED

JAN 04 2006

Snohomish  
Health District

Rinker Materials. 6300 Glenwood Avenue. Everett, WA 98203  
PO Box 2037. Everett, WA 98203. Telephone Everett (425) 355-2111. Telephone Seattle (206) 624-0301

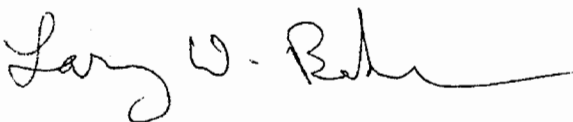
Although the RCRA metals analytical results from samples at the Tolt Reservoir and the Rinker Materials landfill are elevated, and a cause for concern, it is the opinion of Rinker Materials that removal of the material in question is not necessary. This opinion is based upon the SPLP metals and total organic carbon analytical results collected from the same locations in November/December 2005. Copies of the results from samples collected at the Tolt Reservoir and Rinker Materials Everett landfill are attached.

Rinker Materials also believes that TCLP data from February 2004 and the recent sampling results from the Tolt Reservoir and Rinker Materials Everett landfill suggest material disposed into the Rinker Materials Maltby site would pose no threat to the environment.

In closing I would add that, had Rinker Materials received copies of the Total RCRA metals data collected by American Water Works in February of 2004 we would not have accepted the material however given the location of the Tolt Reservoir and the source of the material metals contamination was not thought to be an issue and no data was requested by Rinker Materials. Looking forward we believe that while additional data would be required prior to accepting the Tolt material in the future, it does meet the definition of "Inert Material" and would be accepted again provided SPLP metals and total organic carbon content analysis is provided to Rinker Materials prior to removal of the sediment solids from the Tolt Reservoir

I look forward to your response on this matter. Should you have any questions or require additional information please do not hesitate to contact me.

Thank You,



Larry W. Baker  
Operations Manager  
Soil Remediation

cc: John Bromely- WA. DNR, Greg Lindstat-CDM, Gary Laako-CDM,  
Steve Jowell-American Water Works

RECEIVED

JAN 04 2006

Snohemish  
Health District