



PACIFIC CREST ENVIRONMENTAL

1531 BENDIGO BOULEVARD NORTH PO BOX 952 NORTH BEND, WA 98045
T 425.888.4990 F 425.888.4994

May 9, 2012

VIA ELECTRONIC MAIL

Ms. Jing Liu
Site Manager
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, Washington, 98008

**RE: PUBLIC COMMENT - DRAFT AGREED ORDER DE 9000
BLAINE MARINA, INC. CLEANUP SITE (AKA BLAINE MARINA TANK FARM)
BLAINE HARBOR
BLAINE, WASHINGTON
FACILITY SITE ID: #2888**

Dear Ms. Liu:

This letter transmits comments in response to the *Draft Agreed Order No. DE 9000* between the Washington State Department of Ecology (Ecology) and the Port of Bellingham (Port) for the Blaine Marina, Inc. Site (BMTF Site). The comments are being submitted pursuant to the public comment period for the Draft Agreed Order that extends from April 9, 2012 through May 9, 2012.

Comment 1:

The Ecology database shows that the Port and others have identified contamination at various locations within Blaine Harbor, in media that includes upland soil (fill), groundwater, sediment and surface water. The contaminated media appear to be the result of historical industrial, and commercial operations, and recreational activities. Additionally, Ecology's Environmental Response Tracking System (ERTS) database includes more than 80 reports of spills that have occurred in Blaine Harbor. Accordingly, it is unclear how Ecology defined the nature and extent of contamination associated with the BMTF Site under the Model Toxics Control Act (MTCA), WAC 173-340, to support its decision to proceed with the cleanup of this area as a separate "Site" and not in conjunction with other neighboring properties. Based on the known presence of contaminated media throughout Blaine Harbor, Ecology does not appear to have a technical basis for its decision to investigate and cleanup each parcel individually within Blaine Harbor. It appears that Ecology has not critically evaluated the cost implications associated with investigating and cleaning up each parcel in Blaine Harbor in a piecemeal fashion, as opposed to addressing the cleanup of Blaine Harbor as a single Site as required under MTCA.

Comment 2:

Part VI, Section E of the Draft Agreed Order, states:

[E]cology has determined that a portion of the bulkhead that bounds the Site uplands adjacent to marine aquatic lands is at risk of failure and such failure may result in the release of contaminated soil and groundwater to marine surface water and sediment. Ecology has determined that an interim action is required because the failure of the bulkhead may cause the extent of contamination to the environment to become substantially worse and cost substantially more to address if contaminated soils are released to the marine environment.

However, the above statement is inconsistent with information contained in the *Blaine Marina Tank Farm Site Overview* prepared by Landau Associates (November 17, 2011). This document indicates the extent of contamination (i.e., the "Site" as defined in MTCA) is located at a minimum distance of 30 feet from that portion of the bulkhead which is to be repaired under the interim action. It appears that even if a maximum slope failure were to occur, there would still be a distance of at least 20 feet maintained between the contaminant extent and surface water. Thus, a bulkhead failure would not result in a "release of contaminated soil and groundwater to marine surface water and sediment" as envisioned in the Draft Agreed Order. Accordingly, it is unclear why the bulkhead upgrade is even part of this MTCA interim action, except to advance the Port's redevelopment plans.

CLOSING

Pacific Crest appreciates this opportunity to provide public comment in this matter and looks forward to receiving a response from Ecology. Please call the undersigned at (425) 888-4990 if you have questions.

Sincerely,

PACIFIC CREST ENVIRONMENTAL, LLC



Lauren Carroll, LHG
Principal Hydrogeologist

LC/jp

From: [Liu, Jing \(ECY\)](#)
To: [Lauren Carroll](#)
Cc: [Petrovich, Brad \(ECY\)](#); [Fernandez, Sonia \(ECY\)](#)
Subject: RE: Public Comment - AO DE 9000
Date: Tuesday, May 22, 2012 9:31:31 AM

Hi Lauren,

Thanks for submitting comments regarding the draft Agreed Order for Blaine Marina Inc. Site. Attached below are your comments and Ecology's responses. Let me know if you have any questions. Thanks!

Comment 1 – The Ecology database shows that the Port and others have identified contamination at various locations within Blaine Harbor, in media that includes upland soil (fill), groundwater, sediment and surface water. The contaminated media appear to be the result of historical industrial, and commercial operations, and recreational activities. Additionally, Ecology's Environmental Response Tracking System (ERTS) database includes more than 80 reports of spills that have occurred in Blaine Harbor. Accordingly, it is unclear how Ecology defined the nature and extent of contamination associated with the BMTF Site under the Model Toxics Control Act (MTCA), WAC 173-340, to support its decision to proceed with the cleanup of this area as a separate "Site" and not in conjunction with other neighboring properties. Based on the known presence of contaminated media throughout Blaine Harbor, Ecology does not appear to have a technical basis for its decision to investigate and cleanup each parcel individually within Blaine Harbor. It appears that Ecology has not critically evaluated the cost implications associated with investigating and cleaning up each parcel in Blaine Harbor in a piecemeal fashion, as opposed to addressing the cleanup of Blaine Harbor as a single Site as required under MTCA.

Ecology's response: The intent of this proposed action under MTCA is to address soil and groundwater contamination associated with past and present operations at the Blaine Marina, Inc. fueling facility. Previous investigations, including the 2002 Sediment Quality Investigation by Landau Associates for the Port, indicate that the contamination problems associated with fueling operations are localized and do not extend significantly beyond the upland footprint of the facility. The Westman Marine site has also been identified as a discrete cleanup site in the Blaine industrial area that will be addressed by the Port under MTCA with Ecology oversight. Other more broad scale pollution problems are being addressed through other more programmatic efforts, including the Drayton Harbor Shellfish Protection Program, the Puget Sound/Georgia Basin partnership, and other state, federal and Canadian programs.

Comment 2 – Part VI, Section E of the Draft Agreed Order, states:

[E]cology has determined that a portion of the bulkhead that bounds the Site uplands adjacent to marine aquatic lands is at risk of failure and such failure may result in the release of contaminated soil and groundwater to marine surface water and sediment. Ecology has determined that an interim action is required because the failure of the bulkhead may cause the extent of contamination to the environment to become substantially worse and cost substantially more to address if contaminated soils are released to the marine environment.

However, the above statement is inconsistent with information contained in the Blaine

Marina Tank Farm Site Overview prepared by Landau Associates (November 17, 2011). This document indicates the extent of contamination (i.e ., the "Site" as defined in MTCA) is located at a minimum distance of 30 feet from that portion of the bulkhead which is to be repaired under the interim action. It appears that even if a maximum slope failure were to occur, there would still be a distance of at least 20 feet maintained between the contaminant extent and surface water. Thus, a bulkhead failure would not result in a "release of contaminated soil and groundwater to marine surface water and sediment" as envisioned in the Draft Agreed Order. Accordingly, it is unclear why the bulkhead upgrade is even part of this MTCA interim action, except to advance the Port's redevelopment plans.

Ecology's response: The data referred in the 2011 Landau report were collected from 1996 to 2008. The findings in the 2011 Landau report were based on limited sampling, and no samples were collected in the immediate vicinity of the bulkhead. Landau Associates conducted a geotechnical investigation in January 2012. Observations from this investigation indicated that it is likely that petroleum contamination has migrated toward the failing bulkhead. Failure of the bulkhead would likely result in rapid erosion of the shoreline in that area, particularly during winter storms, thus increasing the potential for migration of contaminated soil and groundwater into marine water and sediment. Failure of the bulkhead would also likely result in collapse of the fueling building and almost certain rupture of the bulk fuel lines directly over the water. The fuel lines run directly underneath the fueling building. Therefore, Ecology has determined that the proposed interim action to repair the bulkhead is necessary to reduce or eliminate these potential sources of contamination and that the work should be done as soon as possible.

Regards,

Jing

Jing Liu
Toxics Cleanup Program, Northwest Regional Office
Washington State Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008
Phone: (425) 649-4310
Fax: (425) 649-7098
Email: jliu461@ecy.wa.gov

From: Lauren Carroll [<mailto:lc Carroll@pcenv.com>]
Sent: Wednesday, May 09, 2012 2:24 PM
To: Liu, Jing (ECY)
Subject: Public Comment - AO DE 9000

Dear Jing,

Attached for your review are comments pursuant to the public comment period for the Blaine Marina, Inc. Site, in Blaine Harbor.

Please let me know if you have any questions.

Thank You,

Lauren Carroll

Lauren G Carroll | Principal Hydrogeologist
Pacific Crest Environmental, LLC
O: 425-888-4990 / C: 425-985-6088 / F: 425-888-4994
lc Carroll@pcenv.com
PO Box 952 / 1531 Bendigo Blvd N | North Bend, WA | 98045
www.pcenv.com

This correspondence contains confidential and/or privileged information from Pacific Crest Environmental, LLC and may be "Attorney-Client Privileged" and protected as "Work Product". The information contained herein is intended for the use of the individual(s) or party named above. If you are not the intended recipient, note that any copying, distribution, disclosure, or use of the text and/or attached document(s) is strictly prohibited. If you have received this correspondence in error, please notify us immediately. Thank you



May 9, 2012

Ms. Jing Liu
Site Manager, Blaine Marina, Inc.
WA Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452
Via E-mail: jing.liu@ecy.wa.gov

RE: Proposed Agreed Order for Interim Action, Remedial Investigation, Feasibility Study, and Draft Cleanup Action Plan - Blaine Marina, Inc. Site

Dear Ms. Liu,

Thank you for the opportunity to comment on the proposed Agreed Order (no. DE 9000) announced last month, for the Blaine Marina, Inc. site (Facility Site Identification Number 2888), located at 214 Sigurdson Avenue, Blaine, Whatcom County, Washington.

People for Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore the health of Puget Sound and the Northwest Straits.

We view this Blaine Marina Inc. site interim cleanup action and remedial investigation (RI)/feasibility study (FS)/draft cleanup action plan (DCAP) preparation from the perspective of restoring the Sound's long-term characteristics. The potential flow of toxic chemicals from the site to the Sound must be reduced.

Background: This site is located in the Blaine Harbor industrial area near the western end of the industrial fill spit separating Drayton and Blaine Harbors. The site owner, the Port of Bellingham, leased this property to Blaine Marina Inc. in the 1950's. The latter uses it as a tank farm and fueling facility. A section of the timber bulkhead that supports an overwater building and protects fuel lines is failing. This failure could result in the release of fuel into the harbor. Portions of the property and surrounding areas have been contaminated by fuel spills and leaks. Petroleum-associated chemicals have been documented in soil and groundwater. Some of these contaminants exceed the state's cleanup law's acceptable standards. Under the proposed agreed order, the Port will repair the bulkhead in an interim cleanup action, study the site's environmental conditions (RI), analyze cleanup options (FS), and prepare the DCAP.

Our comments on the proposed interim action plan follow:

- We support the work of Ecology and the Port of Bellingham to contribute to recovering the health of Puget Sound (1) by alleviating the immediate environmental danger posed by the failing bulkhead (please address this as

expeditiously as possible!) and (2) by accomplishing the necessary monitoring, analyses of options, and cleanup plan preparation to deal with the long term threat posed by the contaminants found on this site.

- We are concerned that the present RI/FS/DCAP documents address only a small geographical portion of the Drayton/Blaine Harbors. As indicated in the Ecology sediment quality assessment of the southern Strait of Georgia (1997, 2006), sediment conditions tend to be more degraded close to population centers. Blaine is mentioned explicitly. However, none of the 40 sampling stations in this assessment are actually in Blaine and Drayton Harbors. These harbors should be sampled more comprehensively, either as part of the current RI or in a separate, concurrent effort. Ecology must take a more active role in implementing this comprehensive effort since it encompasses far more than the area owned by the Port (i.e., Whatcom County, towns to include other parts of Blaine, Canada).

Thank you for your consideration. If you have questions, please contact me at (206) 7007 (X172)/htrim@pugetsound.org or Tom Winter at (206) 723-5311/t2winterjr@yahoo.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Trim", with a stylized flourish at the end.

Heather Trim
Urban Bays and Toxics Program Manager

From: [Liu, Jing \(ECY\)](#)
To: [Heather Trim](#)
Cc: [Tom Winter](#); [Petrovich, Brad \(ECY\)](#); [Fernandez, Sonia \(ECY\)](#)
Subject: RE: People For Puget Sound Comments Blaine Marina
Date: Tuesday, May 22, 2012 9:20:54 AM

Hi Heather,

Thanks for submitting comments regarding the draft Agreed Order for Blaine Marina Inc. Site. Attached below are your comments and Ecology's responses. Let me know if you have any questions. Thanks!

Comment 1 – We support the work of Ecology and the Port of Bellingham to contribute to recovering the health of Puget Sound (1) by alleviating the immediate environmental danger posed by the failing bulkhead (please address this as expeditiously as possible!) and (2) by accomplishing the necessary monitoring, analyses of options, and cleanup plan preparation to deal with the long term threat posed by the contaminants found on this site.

Ecology's response: Ecology appreciates your shared concern and support for the proposed MTCA cleanup for this site.

Comment 2 – We are concerned that the present RI/FS/DCAP documents address only a small geographical portion of the Drayton/Blaine Harbors. As indicated in the Ecology sediment quality assessment of the southern Strait of Georgia (1997, 2006), sediment conditions tend to be more degraded close to population centers. Blaine is mentioned explicitly. However, none of the 40 sampling stations in this assessment are actually in Blaine and Drayton Harbors. These harbors should be sampled more comprehensively, either as part of the current RI or in a separate, concurrent effort. Ecology must take a more active role in implementing this comprehensive effort since it encompasses far more than the area owned by the Port (i.e., Whatcom County, towns to include other parts of Blaine, Canada).

Ecology's response: The intent of this proposed action under MTCA is to address soil and groundwater contamination associated with past and present operations at the Blaine Marina, Inc. fueling facility. Previous investigations, including the 2002 Sediment Quality Investigation by Landau Associates for the Port, indicate that the contamination problems associated with fueling operations are localized and do not extend significantly beyond the upland footprint of the facility. The Westman Marine site has also been identified as a discrete cleanup site in the Blaine industrial area that will be addressed by the Port under MTCA with Ecology oversight. Other more broad scale pollution problems are being addressed through other more programmatic efforts, including the Drayton Harbor Shellfish Protection Program, the Puget Sound/Georgia Basin partnership, and other state, federal and Canadian programs.

Regards,

Jing

Jing Liu
Toxics Cleanup Program, Northwest Regional Office
Washington State Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008
Phone: (425) 649-4310
Fax: (425) 649-7098
Email: jliu461@ecy.wa.gov

From: Heather Trim [<mailto:htrim@pugetsound.org>]
Sent: Wednesday, May 09, 2012 4:51 PM
To: Liu, Jing (ECY)
Cc: Tom Winter
Subject: People For Puget Sound Comments Blaine Marina

Hi Jing,

Attached are our comments on Blaine Marina.

Thank you so much!

Best,
Heather

Heather Trim
Director of Policy | People For Puget Sound
htrim@pugetsound.org | T(office): 206 382-7007 X172 | T(direct): 206 456-3809 | F: 206 382-7006
911 Western Ave, Suite 580
Seattle, WA 98104
www.pugetsound.org
Save Our Sound!

[Sign up for our monthly newsletter and action alerts](#)