



Mr. Brad Thiele
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Re.: MTCA Cleanup of Former Evergreen Fuel Facility Site

Hi Brad,

In the DOE note dated 9-29-2021, Laura expressed concern for the former Evergreen Fuel facility and the MTCA cleanup effort that was completed under the Port of Shelton's stewardship. We are aware of this situation and express similar concerns for the site. The remnants of the old creosote soldier Pile and creosote lagging wall left by the Port of Shelton and the MTCA cleanup effort has continued to fail. The tides routinely overtop the wall as well as to penetrate through the old lagging and under the wall. The result has been a continued degradation of the wall such that failure of the wall is imminent. Potentially contaminated soils left behind the wall are migrating into Oakland Bay. It should also be noted that this area of work is currently permitted under NWS-2017-366. The proposed solution of encapsulating the existing wall remnants prior to restoring the damaged shoreline was assigned as part of this underlying Corp Permit. Our efforts are intended to continue that effort under this application, NWS-2021-668. Please find attached the most recent testing results from Farallon Consulting as well as pictures showing current conditions. Also attached is a proposed draft section for the work to be completed for review and confirmation.

It appears that during the original cleanup of the former Evergreen Fuel Facility conducted by the Port and others as part of a MTCA cleanup effort they did not remove the entirety of the contaminated soils. The site has a failing bulkhead that surrounded the old Evergreen Fuel facility. This area was converted to a parking lot by the Port and the area was actively being used by pedestrians and vehicles at the time. The Port had investigated several alternatives to remove and replace the bulkhead. This work could have been coordinated with the MTCA cleanup effort to result in a fully restored site. However, our understanding of the circumstances at the time suggests that funding for the wall replacement costs and lack of environmental permitting were not completed, and the work was deferred by the Port. The existing bulkhead was and continues to be structurally unsound. The wall remnants left by the Port have been further degraded by tidal action and are currently in a state of imminent failure.

At the time of the cleanup work the Port negotiated a solution leaving the existing wall in place, allowing the cleanup work to proceed. The existing wall was "unloaded" to about half the original height of the wall by removing the fill behind it and laying the soil back. They removed about half the upper height of the wall by removing the upper creosote lagging. They also left the old creosote soldier piles in place standing above the remaining creosote lagging remnants. The MTCA cleanup work proceeded to remove the contaminated soils in the interior areas. The work was stopped short of the wall, leaving a structurally deficient wall in place and a narrow ribbon of contaminated soils between the newly cleaned site and the wall remnants that remained in place.

We suspect that part of the reason this was done was to protect Oakland Bay from unnecessary contamination caused by cascading soils accidentally released by a wall failure caused by the remediation work. It is also likely that the wall itself may not have been within the scope of the MTCA cleanup work. Where the Port may not have been prepared to address its



replacement, the cleanup work itself could not be completed all the way to the wall without addressing the walls structural integrity before backfilling against the old wall or its remnants.

The Port at the time was aware of the need to replace the wall and completed several designs towards this prior to and after the MTCA cleanup effort. Thinking the wall remnants and the ribbon of contaminated soils left by the cleanup effort would be a temporary condition until eventual replacement by the Port of Shelton may have weighed in the decision to leave this condition. However, the needed repairs and replacement were never completed, and the Port instead sold the site to the Shelton Yacht Club “As-Is” with all of its defects.

Since the MTCA cleanup of the Evergreen Fuel Facility, the wall remnants have continued to deteriorate, and the remnants left are now in a state of imminent failure. This is not surprising because the wall was well beyond its structural life when the Port lowered the wall height to address obvious failures then. However, the remedial work completed only lowered the height and did not address the failing structural components and the remnants left are now failing altogether. The creosote lagging continues to rot and deteriorate as tidal waters routinely penetrate under, through, and over top of the creosote lagging. Soils are being washed from behind the remnants of the existing wall into Oakland Bay. The soldier piles have continued to rotate forward due to mounting hydraulic pressures and increasing soil weights behind the wall. Imminent failure of the wall could result in large sections falling into Oakland Bay releasing contaminated soils behind in a large event. Other sections will continue to allow materials to wash through the wall over time until an eventual failure occurs. The contaminated soils are not currently being contained now and continue to migrate into Oakland Bay. This could be further accelerated by a failure.

Figure 5 from Farallon Consulting shows an outline of the narrow ribbon of contaminated soils left. The exhibit also shows monitoring wells and recent results of site testing. While 4 of the 5 monitoring wells show conditions that have mitigated below MTCA limits, Monitoring Well No 10 remains above MTCA levels. This well is in an area of wall remnants showing signs of failure. Contaminated soils are currently migrating under and through the wall in this vicinity.

The improvements in the marina and the new boat launch being proposed by the project are very much needed to meet user demand within the community and to meet revenue needs for the project. However, despite the immediate need, the project is instead proposing to construct assigned mitigation improvements first. The adjacent habitat restoration work is proceeding towards completion. In coordination with the HR project, this proposal removes the last section of industrially damaged shoreline and completes the HR work by tying repairs completed by our partners into the adjacent natural shorelines of Oakland Bay. The entirety of the HR work is being completed on lands owned by the Shelton Yacht Club by our partners the Squaxin Tribe and the South Puget Sound Salmon Enhancement Group. We feel we have a responsibility to support the HR work and the efforts of our partners by competing the assigned mitigation work first. By repairing the damaged shorelines, the project proposes to contain the remaining contaminated soils by stabilizing the site and encapsulating them permanently until they have remediated over time.

We are also conscious of the risks during construction. The project proposes to cut off the exposed tops of the creosote soldier piles left by the Port. The tops of the existing creosote lagging are proposed to be removed a minimum of 2' below finished grade and disposed of. The areas in front of the wall remnant and behind the wall can then be constructed to desired grades with imported fill materials. Beach nourishment will be added to the top 2' of the shoreline repair to march the existing beach located to the north of the project. The uplands areas will be



constructed to grade leaving the ribbon of contaminated soils and creosote materials encapsulated in place. We suspect that WSDOE monitoring via the existing monitoring wells will continue until the ribbon of soil left behind has been shown to have remediated itself.

The following are attached pictures of the current conditions. Figure 5 from the Farallon Consulting Group is attached along with a cross section of the proposed work for your review. We look forward to reviewing this with you and hope that you will see the need to complete the encapsulation of the material left by the Port of Shelton and the MTCA cleanup effort. We are also hopeful for your approval so that this work can commence quickly to prevent further impact to Oakland Bay and so that it can be best coordinated with the adjacent habitat restoration work.

Respectfully,

Dave Mariano
Shelton Yacht Club



Oakland Bay Marina





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