



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 28, 2010

Mr. David Roberts
Aquatics Assistant Division Manager
Aquatics Resources Orca Straits District
919 North Township Street
Sedro Woolley, Washington 98284-9384

RE: BananaBelt Boats Proposal to Lease the State-Owned Aquatic Lands Parcel on the Model Toxics Control Act Site – MJB South Hydro- Fill Area, FSID # 7681, Anacortes, Washington 98221

Dear Mr. Roberts:

The Department of Ecology (Ecology or we) has reviewed BananaBelt Boats (BB) updated proposal dated June 2, 2010, to lease approximately four acres of the Department of Natural Resources (DNR) managed state-owned aquatic land (SOAL) generally located east of T Avenue between 25th and 30th Streets in Anacortes, Washington. This area is part of a site-wide listing found in the state's Integrated Site Information System (ISIS) database under the listing titled "MJB South Hydro Fill" (Site). The Facility Site Identification Number (FSID #) for this listing is 7681. We understand the lease of this parcel would facilitate BBs' expansion of its current operating business located in Anacortes, Washington, by developing the DNR SOAL parcel of the listed Site area into a Boat Dry Storage Facility (BDSF). The property development plans include:

- Grading that may include cut and fill.
- Leveling of the site with hard-packed, crushed aggregate and gravel.
- Storm water management.
- Landscaping and irrigation system.
- Constructing temporary long-term buildings.

We appreciate the concept presented by BB that the BDSF would aid in source removal of copper commonly found in boat bottom paint, zinc, and other metals from the waters of Fidalgo Bay accommodated through the upland storage of marine vessels. However, the available Site information regarding the Site's origins reveal the area is composed of built-up land – backfill from a materials/sediments dredge conducted by the Army Corps of Engineers in the 1970s. Ecology conducted a Fidalgo Bay sediment study in 2007. The results of the study revealed the presence of dioxins/furans (D/F) contamination in sediments near the Site. In addition, the



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results of a Washington State Department of Transportation investigation of the Site conducted in 1991 also showed metals and volatile organic compounds contamination exceeding the Model Toxics Control Act (MTCA) cleanup levels at the interface between backfill and native material.

Due to the above information, we have concern regarding the potential impact of property development and operational activities on contamination present at the Site. Therefore, in order to ensure the protection of human health and environment, appropriate initial investigation should be conducted to better understand the extent of contamination at the Site. Any contamination detected on the Site will need to be addressed prior to property development.

Please submit to Ecology for review and approval, a comprehensive investigation work plan with a sampling and analysis plan for conducting necessary investigations of soil and groundwater at the Site area slated for redevelopment.

If you have any questions or require further assistance in this matter, please contact me at (360) 407-7209.

Sincerely,



Sandra Caldwell
Toxics Cleanup Program

By certified mail: 7006 3450 0001 6754 8068

cc: Matthew Thornton, CPYB, BananaBelt Boats
Panjini Balaraju, Ecology
Don Measmer, City of Anacortes