



Community Coalition for  
Environmental Justice

The Duwamish Tribe

Environmental Coalition  
Of South Seattle

Georgetown Community  
Council

IM-A-PAL Foundation

People for Puget Sound

Puget Soundkeeper  
Alliance

South Park Neighborhood  
Association

Washington Toxics  
Coalition

Waste Action Project

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*Working to ensure a  
Duwamish River cleanup  
that is accepted by and  
benefits the community  
and protects fish, wildlife  
and human health.*

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Seattle, WA 98105  
206.954.0218  
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[contact@duwamishcleanup.org](mailto:contact@duwamishcleanup.org)

September 26, 2008

Mark Edens  
Molly Morris  
NW Regional Office  
Washington Department of Ecology

Dear Mark and Molly:

Duwamish River Cleanup Coalition (DRCC) appreciates the opportunity to review the Agreed Order, Scope of Work and Public Participation Plan for the investigation and cleanup of North Boeing Field and the Georgetown Steam Plant. This letter addresses our comments on both the Order and the Public Participation Plan.

1. DRCC understands that the Agreed Order has already been signed by the agency and the receiving parties. At the Public Meeting on September 18, 2008, Ecology stated that it would not re-open the Order to make changes based on public comment unless the change were substantial. DRCC would hope that Ecology would not routinely issue such Agreed Orders prior to public comment, as its own responses at the Public Meeting indicate that the agency is less responsive to public comments when such Orders have already been signed. The public is not well served in such a process. As a result of Ecology's statements, DRCC is limiting its own comments on the Order, since we do not expect the agency to revise the Order in response to public comments and are scaling back our effort accordingly.
2. The Public Participation (P2) Plan for the site cleanup does not provide for an equitable level of involvement for the community as compared to the Lower Duwamish River (LDW) early action areas and riverwide cleanup, to which this cleanup action is related, despite a high level of public interest and concern with this site and how it affects the local community and the LDW Slip 4 cleanup.

The P2 Plan should include a detailed description of how the community and other stakeholders will be involved in reviewing the "building blocks" of the investigation and cleanup plan, including sampling plans, source control evaluations, risk assessments if applicable, and early drafts of the RI/FS. The "enhanced" public participation plans for the Slip 4 and T-117 sites can provide a template for the North Boeing Field/Georgetown Steam Plant site. DRCC understands that given that the Order has already been signed, this portion of the P2 Plan will likely have to be in the form of a separate written agreement.

3. The P2 Plan provides a detailed description of the South Park community, across the river from the North Boeing Field/Georgetown Steam Plant site, but very little information about the Georgetown community bordering the site. The Georgetown community description should be at least equivalent to the South Park description, including the industrial and residential history of the community; key community amenities; and neighborhood demographics.

4. Please provide data on the concentrations of PCBs in caulk that has been removed from the site.
5. Please clarify that the location of the wheel wash will be inside the gates of the Boeing facility, rather than in the public streets/rights of way.

Thank you for the opportunity to review the Agreed Order and Public Participation Plan. Please let us know if you have any questions about the comments provided above.

Sincerely,

*BJ Cummings*

BJ Cummings  
Coordinator  
Duwamish River Cleanup Coalition

# North Boeing Field/Georgetown Steam Plant



Note: Submitted at public meeting on 1/18/08. mHE

## Comment Form

This is an invitation for comments on the Agreed Order, Scope of Work, and Public Participation Plan for the North Boeing Field/Georgetown Steam Plant site in Seattle, Washington. If you wish to comment, please fold, affix postage, and mail this form to Ecology by September 26, 2008 (address on reverse). You may also bring it to the public meeting on September 18, 2008 at 6 p.m. at the South Seattle Community College Georgetown Campus (6737 Corson Ave S, Seattle, WA).

Name and address optional

Name: *Gary Lichtenstein*.....  
Address.....  
City..... Zip Code.....  
E-mail Address: *glichtenstern@comcast.net*.....

*I advocate for "Enhanced" public Participation to the point of engaging a professional facilitation for public Meeting & process.*





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000*

December 18, 2008

Ms. BJ Cummings  
Coordinator  
Duwamish River Cleanup Coalition  
5410 First Avenue NE  
Seattle, WA 98105

**Re: Response to Duwamish River Cleanup Coalition (DRCC) Comments on the Agreed Order for the North Boeing Field/Georgetown Steam Plant Remedial Investigation/Feasibility Study**

Dear Ms. Cummings:

Thank you for your letter of September 26, 2008, that provided comments on the Agreed Order for the North Boeing Field/Georgetown Steam Plant Remedial Investigation/Feasibility Study (RI/FS). We have reviewed your comments and have prepared the following responses which we hope address the issues you raised.

**1. Signing of Agreed Order prior to public comment.**

Ecology signed the Agreed Order prior to public comment for two reasons that we believe are in the public's interest: 1) This site is a high priority for Ecology and it is important to us that the work is conducted as quickly as is feasible. Signing the Order prior to public comment saved about six weeks of schedule time. Ecology needed to obtain new environmental data and other information for the supplemental data gaps task as soon as possible. Once the potentially liable persons (PLPs) signed the Agreed Order, they had 60 days to submit these documents to Ecology. 2) Under the Agreed Order, Ecology's contractor will be conducting the Remedial Investigation/Feasibility Study. Since Ecology will be directing the contractor instead of the PLPs, it will be easier to make changes to the scope of the work in response to public comments. Ecology encourages DRCC and others to review and comment on the draft Supplemental Data Gaps Report and draft RI/FS Work Plan when they become available. These two documents will be used to prepare a scope of work for Ecology's contractor to conduct the RI/FS.

**2. Enhanced public participation.**

Ecology will continue to provide enhanced public involvement consistent with what the EPA does for the Lower Duwamish Waterway Superfund site. We have reviewed the emails from EPA to the stakeholders on January 19, 2006 and January 30, 2003 regarding



public involvement on EPA's Slip 4 and Terminal 117 cleanup sites. Ecology's level of public involvement outlined in our Public Participation Plan is comparable but set up in a more general format. Ecology's goal is to accommodate the community's interest in investigations and cleanups in the Lower Duwamish. Ecology is committed to working with DRCC as a liaison to the public and other stakeholder groups and to providing for document reviews and access to site managers.

Ecology has not listed which documents DRCC and other stakeholders will review since they are identified in the Scope of Work for the Agreed Order. DRCC will know the schedule of the site cleanup and when documents are due because it is outlined in the Work Plan. Draft documents are posted electronically on Ecology's ftp website and are available to DRCC and any stakeholders. Under Chapter 42.56 RCW Public Records Act, documents Ecology receives are public record, so DRCC may access them as requested. Ecology will work with DRCC throughout the cleanup process on sharing information and soliciting public input regarding the cleanup. Ecology's intention is to be transparent in a manner which enables Ecology to manage an efficient, thorough, and appropriate cleanup at the site.

### **3. Additional information for the Georgetown Community.**

Ecology acknowledges that the community description for Georgetown is less detailed than the community description for South Park in the Public Participation Plan. Ecology is now working with the Georgetown Community Council to enhance the Georgetown community description. This information will be added into the next draft of the Public Participation Plan and to other public participation plans for Ecology's MTCA LDW sites.

### **4. Information on concentrations of PCBs in caulk.**

Copies of the following documents with information on PCBs in caulk at the site were mailed to the Duwamish River Cleanup Coalition and People for Puget Sound on November 6, 2008:

*Concrete Expansion Joint Material Field Mapping, North Boeing Field, Seattle, Washington.* March 21, 2001. Prepared for the Boeing Company by Landau Associates, Inc.

*Sampling and Analysis Concrete Joint Material, North Boeing Field, Seattle, Washington.* March 22, 2001. Prepared for the Boeing Company by Landau Associates, Inc.

*April 2001 Sampling Investigation Concrete Expansion Joint Material, North Boeing Field, Seattle, Washington.* May 21, 2001. Prepared for the Boeing Company by Landau Associates, Inc.

***Work Plan/Health and Safety Plan Concrete Joint Material Removal, North Boeing Field, Seattle, Washington.*** August 8, 2002. Prepared for the Boeing Company by Landau Associates, Inc.

***Technical Memorandum – 2004 Removal of Concrete Joint Material at North Boeing Field.*** February 24, 2005. Prepared by the Boeing Company.

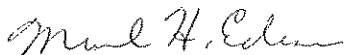
***Technical Memorandum – 2005 Removal of Concrete Joint Material, North Boeing Field, Seattle, Washington.*** March 30, 2006. Prepared by the Boeing Company.

**5. Location of wheel wash for Georgetown Steam Plant flume construction.**

The final plans for the Georgetown Steam Plant flume construction project identify two possible locations for a truck wash facility. One location is on the southeast side of the Georgetown Steam Plant. The other location is south of South Myrtle Street between the North Boeing Field fence and the Georgetown Steam Plant flume. The final location of the truck washing facility will be identified in the Equipment Decontamination Plan prepared by the City of Seattle's contractor. This plan is scheduled to be submitted for review on January 28, 2009, and per the contract specifications comments on the plan will be due within 10 working days after submittal. Ecology will be reviewing this plan with the City of Seattle, and Ecology will make this plan available for your review and comment.

We appreciate your comments on these documents. If you have any questions regarding these responses to your comments, please call me at 425-649-7070.

Sincerely,



Mark H. Edens  
NWRO Toxics Cleanup Program

Response to Gary Lichtenstein's comment at the North Boeing Field/Georgetown Steam Plant RI/FS public meeting.

Mr. Lichtenstein,

Thank you for your comment at the public meeting for the North Boeing Field/Georgetown Steam Plant RI/FS Agreed Order. You stated that you were advocating for enhanced public participation to the point of engaging a professional facilitation for public meetings and process. Ecology will provide enhanced public involvement consistent with what the EPA does for the Lower Duwamish Waterway Superfund site. Ecology's level of public involvement outlined in our Public Participation Plan is comparable to EPA's, but set up in a more general format. Ecology's goal is to accommodate the community's interest in investigations and cleanups in the Lower Duwamish. Ecology is committed to working with community representatives and stakeholder groups and to providing for document reviews and access to site managers.

With the current state budget shortfall, it is unknown if sufficient funds will be available to hire additional staff or private consultants to assist with public meetings and process. Ecology will be providing additional resources for public involvement as funds become available.

We appreciate your comment. If you have any questions regarding this response to your comment, please contact me by email or call me at 425-649-7070.

Mark Edens

NWRO Toxics Cleanup Program