



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 1, 2005

Ms. Loren Carroll  
Senior Hydrologist  
Farralon Consulting  
320 3<sup>rd</sup>. Avenue NE Suite 200  
Issaquah, WA 98027

Dear Ms. Carroll,

RE: Duwamish Marine, Gilmur/Hale Trust Site

The Department cannot issue a No Further Action (NFA) letter for Duwamish Marine. From your first submission it has been clear that Duwamish Marine is a very difficult site. That is partially because it is on the Duwamish River and within the boundary of the Lower Duwamish River Superfund Site. Another and probably more important reason is that, except for the lead, there is no clear source of the contaminants found on Duwamish Marine's property. A site is defined in the Model Toxics Control Act (WAC 173-340-200) as where a hazardous substance has come to be located. Without a good idea of how the contaminants were released, it is impossible to determine the extent of the site, except perhaps by a truly exhaustive sampling regime. Also, the definition cited above prevents the Department from dividing a site and issuing a NFA for a portion of a site. In any case, it seems likely that contamination is present in adjacent Duwamish River sediments, and the Department cannot give NFA Letters for Sediments. River bank soils have not, for the most part, been characterized. Cleanup criteria for river bank soils depend on the carbon content of adjacent sediments which is unknown.

It has been suggested that the contamination could have arrived on the site as part of a river dredging and straightening project. The date of early dredging is given as 1927. PCBs were not in wide use at that time. If the contaminants arrived in later dredge materials, then the size of the site could be truly huge.

Sincerely,

John Keeling  
Toxics Cleanup Program

JK:cu