



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Evergreen
Alcoa Site

October 2, 2008

Mr. Stephen Wilson
Crowley Maritime Corp.
P.O. Box 2287
Seattle, WA 98111-1030

Re: Review of Draft Remedial Action Work Plan for Former Columbia Marine Lines Site

Dear Mr. Wilson:

Ecology has reviewed the July 30, 2008 Draft Remedial Action Work Plan for the former Columbia Marine Lines Site. The Site is located on Alcoa property at the Vancouver Washington aluminum smelter complex. The site consists of three soil covered infiltration basins which were used periodically for the disposal of oily barge slops. The draft work plan describes the remedial action planned for the site.

The feasibility study completed in March of 2008 recommended excavation and on-site treatment of any petroleum affected soils discovered above the 5070 mg/kg TPH soil cleanup level. Crowley plans to begin the remediation in October of 2008 after receiving local environmental permits.

Ecology has comments on the Planned Remedial Action Section 3.0 of the work plan. The descriptions of the planned excavations as described in the document do not clearly specify the sequence of excavations and treatment. SLR needs to break down the different actions that will be completed during the remediation and organize them sequentially. Ecology recommends that the remediation plan be broken up into individual tasks that are numbered in sequence.

Some specific items that add to the confusion in Section 3.0 are: 1) the area GP – 5A is not identified on the accompanying figures, and 2) Appendix B and A are interchanged in the document. The Sampling and Analysis Plan is identified in the text as an incorrect Appendix. The accompanying figures in the document do not clearly describe how the remediation will progress during the cleanup.



Storm water and petroleum contaminated water management at the site could be a problem during the fall and winter seasons in Vancouver. It appears from the description of the excavation plan in Section 3.0 that a soil berm will be constructed around the excavation site. Clean soils will be removed and stock piled within the bermed area. When TPH contaminated soils are reached in the excavation they will be separated from the clean soils and placed on an enclosed pad within the bermed area for bio-remediation. It is not clear how storm water and contaminated water from the excavations and treatment area will be managed during the rainy season. Both storm water, bio-treatment run off and contaminated groundwater will have to be managed and disposed of by the contractor.

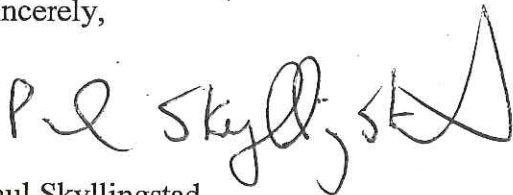
If the project was started at the beginning of the summer season as originally planned water management would not be as great a concern for Ecology at this site, but the project has been delayed by local permits until late this fall. Ecology would like to review any calculations made to estimate the amount of water that will be treated at the site during the excavation. Treated groundwater will be injected back into sediment by using either the existing pump and treatment system or a new approved injection point.

The work plan calls for the excavations to be filled with bioremediated soils after the material has met the remediation level of 5070 mg/kg TPH. No clean soil cover is mentioned in the work plan. Ecology will require that a one foot cover of clean soil be placed on the area to cap and isolate the treated material. This is necessary to protect stormwater runoff from the site once the remediation is completed.

Crowley shall submit Ecology for review and approval, prior to recording, the deed restriction language required by the Model Toxics Control Act (WAC 173-340-440) for this site.

Please resubmit the work plan with revisions addressing my comments. If you have any questions regarding the review of the proposed Remedial Action Work Plan, please contact me in Lacey (360) 407-6949 or psky461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Skyllingstad". The signature is stylized and includes a large, sweeping flourish at the end.

Paul Skyllingstad
Industrial Section

Cc: S. Hammer - SLR
M. Stiffler - Alcoa
L. McLellan - Evergreen