

Industrial Container Services WA LLC Cleanup Site



7152 1st Ave. S., Seattle, King County.

Comments accepted:

Nov. 18, 2024 (12:00 a.m.) –
Jan. 16, 2025 (11:59 p.m.)

Submit comments:

Online:

https://go.ecology.wa.gov/ics_comment



By mail:

Beau Johnson, Site Manager
PO Box 330316
Shoreline, WA 98133-9716
(206) 638-0816
beau.johnson@ecy.wa.gov

Document review:

<https://go.ecology.wa.gov/ICS>

Seattle Public Library
South Park Branch
8604 8th Ave S., Seattle, WA

Site info:

Facility Site ID: 2154
Site Cleanup ID: 62

Public Outreach Contact:

Meredith Waldref
Outreach Planner
meredith.waldref@ecy.wa.gov
(425) 229-3683

Documents ready for public review and comment

Ecology invites you to comment on several documents for the Industrial Container Services WA LLC cleanup site (Site) located 7152 1st Ave. S. in Seattle near Seattle's South Park Neighborhood and the First Ave. South bridge over the Lower Duwamish Waterway.

The following documents are available:

- **Remedial Investigation:** A document detailing the nature (types) and extent (locations) of the contamination at the Site.
- **Feasibility Study:** A document showing different cleanup methods, called alternatives. This document includes Ecology's preferred alternative.

Questions? Join us at our community office hours!

Join us this month in South Park to learn more about this cleanup site and others along the Lower Duwamish Waterway. Phone interpretation available in Spanish, Chinese, Vietnamese, and Khmer. All ages welcome!

Wednesday, November 20, 2024
(4:00 p.m. - 6:00 p.m.)

Location: Seattle Public Library
South Park Branch
8604 8th Ave S., Seattle, WA
(206) 615-1688



Scan for [the Latest Information on the Lower Duwamish Waterway](#)

For more language information, see page 5 →

Toxics Cleanup Program

Site background

The Site is in an industrial area of Seattle on the west bank of the Lower Duwamish Waterway (LDW). In 2010, Ecology negotiated a legal agreement, called an Agreed Order, with the property owner Herman Trotsky and the site operator, Industrial Container Services-WA, LLC, the Potentially Liable Persons (PLPs) for the Site.

It is bordered on the north by the [Douglas Management Dock cleanup site](#)¹. The site contains an inlet to the Duwamish River (Trotsky inlet) on the north side.

Industrial activities at the Site occurred at the following times:

- **1930s:** The earliest drum reconditioning and manufacturing operations occurred at the Site.
- **1940s:** Mitzel & Co. reportedly refurbished 1,500 drums per month for the U.S. government during World War II.
- **1953:** The Trotsky family purchased the property and operated the site as Northwest Cooperage.
- **1973-1990:** The property was bermed and paved, and a wastewater pretreatment system was installed. The pretreatment system included a “closed” drainage system that channels all drainage, including stormwater, spills, and process water into a wastewater pretreatment system flowing into the sanitary sewer.
- **Today:** Industrial Container Services-WA, LLC currently leases the property and continues to operate a drum reconditioning facility. Operations at the site include storage, cleaning, and repainting of used drums, some of which may have previously contained food products, petroleum products, solvents, resins, paints, adhesives or other materials.



Investigating contamination (Remedial Investigation)

The investigation found the following contamination above WA State cleanup levels:

- **Soil:** Metals, petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), pentachlorophenol (PCP), DDT, dieldrin, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs).
- **Groundwater:** VOCs, semivolatile organic compounds (SVOCs), PCBs, petroleum hydrocarbons, and pesticides
- **Sediment:** PCBs, metals, and SVOCs

Consider options (Feasibility Study)

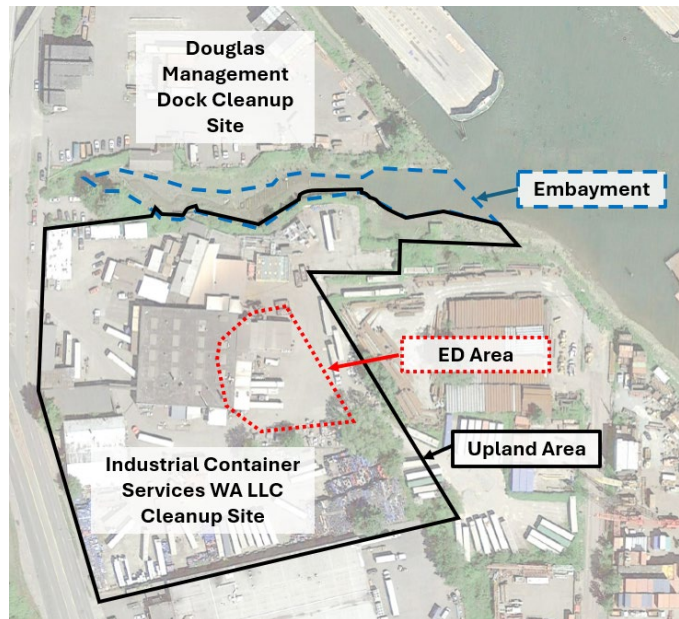
The PLPs prepared a feasibility study to address the contamination found at the Site. The feasibility study evaluated seven different cleanup alternatives. The costs and environmental benefits of the alternatives were then compared, leading to a preferred cleanup alternative.

¹ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=6967>

Toxics Cleanup Program

Upland Cleanup alternatives:

- **Upland Alternative 1:** Containment, Light Non-Aqueous Phase Liquid (LNAPL) Recovery, and Monitoring
- **Upland Alternative 2:** Containment, LNAPL Excavation, and Surface Soil Excavation (with shoring)
- **Upland Alternative 3:** Containment, LNAPL Excavation, and Surface Soil Excavation (without shoring)
- **Upland Alternative 4:** Containment, LNAPL Excavation, Surface Soil Excavation (without shoring), and Former Lagoon Sediment Excavation



Approximate locations of the three cleanup areas called out in the feasibility study.

East of the Drum Reconditioning Plant (ED Area) alternatives:

- **ED Alternative 1:** Monitoring
- **ED Alternative 2:** Air-Sparging/Soil Vapor Extraction and Monitoring
- **ED Alternative 3:** In-Situ Treatment and Monitoring

In-Water (Embayment) Cleanup:

The Lower Duwamish Waterway Group (LDWG) will conduct the cleanup of the embayment (area of the shoreline where an inlet is formed) during the superfund cleanup work supervised by the Environmental Protection Agency (EPA). The preferred alternative was selected by the EPA based on data summarized in the [Lower Duwamish Waterway Feasibility Study \(AECOM 2021\)](#)² and [Lower Duwamish Waterway Record of Decision \(USEPA 2014\)](#)³

Preferred Cleanup Alternative:

A combination of Upland Alternatives 3 and 4, ED Area Alternative 1, and the EPA-selected In-Water Alternative consists of the following activities explained in more detail:

Upland Alternatives 3 and 4:

- **Excavation:** Contaminated soil will be removed in multiple places at the Site. All material will be disposed of a regulated facilities according to the PCB concentrations and EPA approval.
 - *South shoreline of the embayment:* Mobile NAPL (liquid contamination) from Monitoring Well 1 along with two to eight feet of contaminated soil along the south shoreline of the embayment will be removed. This will create a stable sloped shoreline that will connect with the embayment cleanup conducted by EPA. Riparian (river-side) vegetation will be planted along the new south shoreline.

² https://ldwg.org/wp-content/uploads/2019/01/LDW-Final-FS-Executive-Summary_October-31-2012_ADA.pdf

³ <https://semsub.epa.gov/work/10/715975.pdf>

Toxics Cleanup Program

- *Eastern property line:* Buried settling lagoon contaminated material will be removed and backfilled with imported sand and gravel. The backfilled material below the water table will be mixed with 0.5% organic carbon.
- **Cap Installation:** Pavement at the Site will be maintained or repaired to provide a barrier, called a cap, to prevent human contact with contaminated soil and groundwater. The cap will also limit precipitation from seeping into the ground and mixing with contamination.
- **Long-term groundwater monitoring:** The groundwater will be monitored to make sure the site pavement and cleanup actions continue to protect the LDW.
- **Institutional controls:** Legal or administrative measures will be put in place to restrict or prohibit activities that could result in exposure to contaminants that are above acceptable health risk levels or interfere with the integrity of the cleanup action.
- Stormwater runoff will continue to be collected and treated (as necessary) as a part of Industrial Container Services operations.

ED Area Alternative 1

- A monitoring program will be developed to ensure the good condition of the pavement cap in this area. Long-term groundwater monitoring will occur.

EPA-selected In-Water Alternative

- **Excavation:** All material will be disposed of a regulated facilities according to the PCB concentrations and EPA approval.
 - *North shoreline of the embayment:* A structural sheet pile wall would be installed.
 - *Sediment cleanup under the water of the embayment:* A temporary dam would be constructed at the embayment neck to allow sediment removal to be done in the dry. Some dredging may be required on the waterway side of the dam. Shoreline structures, debris, and sediment will be removed to depths of between two and five feet.
- **Cap Installation:** An engineered cap, filled to similar pre-cleanup elevations, will be placed in the embayment. The bottom foot of the cap will be mixed with 0.5% organic carbon.
- **Long term monitoring, institutional controls, and signage** will be installed to prevent significant disturbance of the cap by excavation/dredging.

Why this site matters

This Site is along the [Lower Duwamish Waterway](#)⁴ Superfund Site, which consists of a 5-mile stretch of the Duwamish River. The U.S. Environmental Protection Agency (EPA) added the [LDW Superfund Site](#)⁵ to the Superfund National Priorities List in 2001. Ecology is working to stop or reduce sources of contamination to the LDW Superfund Site, an effort known as “[source control](#)”⁶, so that the EPA can proceed with the cleanup of the river sediment. This site is located in the middle reach at [river mile 2.1-2.2 West: Trotsky Inlet](#)⁷.

⁴ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Lower-Duwamish-Waterway>

⁵ <https://cumulis.epa.gov/supercpad/cursites/csinfo.cfm?id=1002020>

⁶ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Lower-Duwamish-Waterway/Source-control>

⁷ <https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites/lower-duwamish-waterway/source-control/source-control-areas>

Toxics Cleanup Program

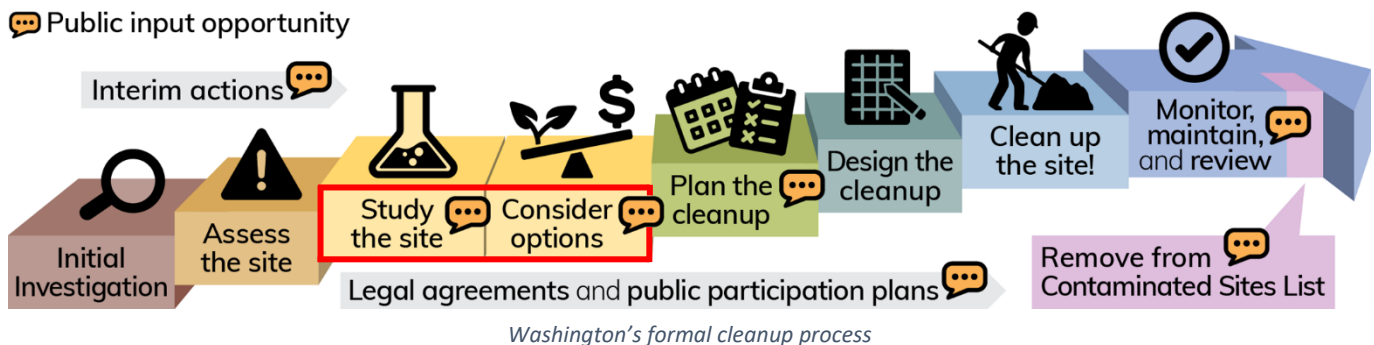
What happens next?

Ecology will consider all comments received during this public comment period and may make changes to the documents. If the documents require significant changes, we will hold another public comment period. If no significant changes are made, Ecology, and then the PLPs, will finalize the documents. The cleanup action plan and a future legal agreement will be available for review during a future public comment period.

Ecology's cleanup process

The Model Toxics Control Act ([MTCA](#)⁸) is Washington's environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect human health and the environment. Ecology is responsible for administering MTCA, including oversight of cleanups. The [MTCA cleanup process](#)⁹ is completed in steps (see graphic below) over a variable timeline.

This Site's review documents are each outlined below in red.



Language information

Español: Si desea obtener una copia de esta información en español, visite nuestra página web (<https://go.ecology.wa.gov/ICS>) o comuníquese con el Seattle Public Library's South Park Branch (8604 8th Ave S. Seattle) por teléfono al (360) 742-1554 o por correo electrónico a preguntas@ecy.wa.gov.

中文: 您可以访问我们的网站查看这条信息的中文版本(<https://go.ecology.wa.gov/ICS>), 或前往位于 8604 8th Ave S. Seattle 的西雅图公共图书馆南公园分馆(Seattle Public Library South Park Branch), 也可致电 (425) 229-3683, 或发送电子邮件至 sunny.becker@ecy.wa.gov.

Tiếng Việt: Quý vị có thể xem bản sao thông tin này bằng Tiếng Việt bằng cách truy cập trang web của chúng tôi (<https://go.ecology.wa.gov/ICS>) hoặc ghé thăm Chi Nhánh South Park của Thư Viện Công Cộng Seattle (Seattle Public Library) (8604 8th Ave S. Seattle), gọi số (360) 790-4730 hoặc gửi email đến địa chỉ lngu461@ecy.wa.gov.

ភាសាខ្មែរ: អ្នកអាចមើលច្បាប់ចម្លងនៃព័ត៌មាននេះជាភាសាខ្មែរដោយចូលមើលគេហទំព័ររបស់យើង (<https://go.ecology.wa.gov/ICS>) ឬមកកាន់សមាគម South Park Branch របស់ Seattle Public Library (8604 8th Ave S. Seattle) ទូរស័ព្ទមកលេខ (425) 229-3683 ឬផ្ញើមេលទៅកាន់ meredith.waldref@ecy.wa.gov។

⁸ <https://ecology.wa.gov/mtca>

⁹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

⁶ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Toxics Cleanup Program
PO Box 330316
Shoreline, WA 98133-9716

Industrial Container Services WA LLC Cleanup Site Documents ready for public review and comment

Información en Español incluida (página 5)

有關的信息, 已被翻譯成中文 (第5頁)

Có thông tin bằng tiếng Việt (Trang 5)

ព័ត៌មានជាភាសាខ្មែររួមបញ្ចូល (ទំព័រ 5)

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Seattle Public Library – South Park Branch

All ages welcome!

ADA accessibility

To request an ADA accommodation, contact Ecology by phone at 425-229-3683 or email LDW@ecy.wa.gov, or visit ecology.wa.gov/Accessibility. For Relay Service or TTY call 711 or 877-833-6341.



Aerial map of the Industrial Container Services WA LLC cleanup site.