STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

November 26, 2024

Todd Nicholson, Executive Director
Port of Friday Harbor
204 Front Street
Friday Harbor, WA 98250

Re: Sediments Data Gap at the Albert-Jensen site:

Site Name: Albert Jensen & Sons
Site Address: 1293 Turn Point Road, Friday Harbor, 98250, San Juan County
Cleanup Site ID: 14759
Facility Site ID: 42226979
Agreed Order No. DE 18071

Dear Todd Nicholson:

Based on review of the 2023 in-water and uplands sampling data, as well as other site information, Ecology has identified an apparent data gap in the sediment sampling area from the ship-rail work area (SRWA) to the eastern property boundary along the shoreline and intertidal zone of the Albert-Jensen & Sons property.

The purpose of this letter is to give you a heads up on this data gap concern. As discussed later in this letter, we believe this data gap can be investigated later, and should not affect completion of the remedial investigation (RI) reports for this project.

Basis for the Data Gap Concern

For the SRWA, a few lines of evidence call for the need to better characterize potential sediment contamination. First, the period that boat building and maintenance operations at that portion of the property are quite long, which as noted on page 3-1 of the Remedial Investigation Work Plan (RIWP) dated 7/2022 have been ongoing since at least 1910. Photographic evidence from 1932 (Figure 1, attached) shows a dock and boat-works at the same location. An aerial photograph dated 1977 (Figure 2) shows a much more extensive building footprint taking up all the SRWA area. Historical photos also show a third lift rail was utilized at the site.

Furthermore, as stated on page 5-4 of the RIWP:

> ***"The SRWA includes rail lines east of the pier and the old boat building structure." – "This rail lines were used to transport boats during ship building and maintenance, and contamination in the SRWA is likely a result these activities. As outlined by Shannon & Wilson (2019), SRWA contamination may include metals from paint stripping operations, possibly impacted fill used to develop the SRWA, and TPH-DRO and cPAH from boat maintenance and drained boat bilge water. The SRWA may have also collected stormwater runoff, soils and debris eroded from adjacent upland areas. There are currently no operations that occur within the SWRA."***

The long operational time-period of the boat works, with activities known to generate and release hazardous substances, has resulted in environmental contamination as confirmed by a few sampling locations around the SRWA. On the uplands portion of the SRWA, several sampling locations have indicated elevated levels of Mercury, Copper, Zinc, Arsenic, semi-volatile organic compounds (SVOCs), Tributyltin, Dioxin/Furans, Dichloro-diphenyl-trichloroethane (DDT) and Polychlorinated Biphenyls (PCBs). Despite this level of contamination, only one nearshore- high intertidal sample was taken (SED-13) on the western portion of the SRWA intertidal area. SED-13 showed elevated levels of Copper, Zinc, Mercury, TBT, Pesticides, PCBs, PAHs, and Dioxin/Furans. Furthermore, page 5-3 of the RIWP lends further evidence that better characterization of the SRWA intertidal needs better characterization:

> ***"There is evidence that clams may be present at lower intertidal elevations, but similar to the entire western half of the Project site, the benthic community in this area appears relatively barren."***

For the undeveloped land to the east of the SRWA, including the former dump site, there are similar lines of evidence supporting the need for better sediment contamination characterization.

First, the historical utilization of the eastern undeveloped portion of the property as a dumping site is not well documented. We know that a boat works has been on the site, but the dumping of waste is not mentioned with a time period within the RIWP.

The full extent, composition and depth of the dumped materials has not been characterized with any document submitted to Ecology, but there are indications that disposed of materials are close to the surface and impacting both the uplands and the intertidal area. On page 3-2 of the RIWP:

> ***"The upper shoreline area appears to be composed of upland fill material and garbage (metal, plastic, concrete, wood waste, etc.), which is consistent with historical descriptions of the area being used as a dump. The garbage and fill material from the upper shoreline are emerging from the bank as it descends to upper intertidal elevations. There appears to be a remnant shoreline timber (some treated) structure,***

> ***possibly an old pier or ramp, which has left a debris pile extending from the upper shoreline down to intertidal elevations."***

After the RIWP, test pitting was conducted in this area. Ecology has received soil sampling data from this test pitting work, but have not received any test pit logs providing descriptions of the materials encountered in the test pits.

Initial visual evidence presented in the RIWP (page 5-4) indicates the presence of old batteries, timber, metal, plastic, engine blocks and tires. Uplands sampling near the former dumping area indicate the presence of contaminants including Zinc, Copper, Arsenic, SVOCs, and potentially Nickel, Mercury and Dioxin/Furans. There have been no sediment samples collected downstream of this area.

Based on these lines of evidence, Ecology believes that there is a high potential for contaminants of concern to be present in these near shore sediments in the area shown in Figure 3. Please note that Ecology's conclusions regarding the sufficiency of characterization is based on the information provided to date and our conclusions be affected by new information as it becomes available.

Schedule for Addressing the Data Gap

Ecology recommends that this data gap be investigated concurrently with feasibility study activities at the Site. Ecology has concluded that existing data appear to be sufficient to determine potential remedial options for both upland and marine areas, and this data gap would appear to affect the scale of implementation of appropriate remedial action(s) more than their selection.

Therefore, Ecology considers this data gap to be a design acquisition data need. Ecology does not believe that filling this data gap should await completion of the Cleanup Action Plan (CAP) for the site, but rather would urge filling this data gap after submitting the draft RI reports for the site.

As confirmed in an email from the PoFH dated November 20, 2024, Ecology anticipates that separate RI reports will be submitted for upland and marine areas, and a later feasibility study (FS) report will follow for the site as a whole.

A map showing proposed sampling locations and a table listing proposed locations, depths and analytes to address this data gap can be submitted to Ecology following submittal of the RI reports. We will plan on following up with you on this subject following receipt of the draft RI reports. This letter is being provided at this time to give you a heads up on this data gap concern.

Ecology appreciates the efforts by the PoFH team in cleaning up this site. If you have any questions or concerns please contact Frank Winslow at frank.winslow@ecy.wa.gov.

Sincerely,

Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Cleanup Section

Attachment

cc: Grant Hainsworth, Crete Consulting
Peter Leon, Leon Environmental
Lydia Lindwall, Ecology
Kevin Kalefern, Ecology
Chase Williams, Ecology
Andrea Flaherty, Ecology

Figures

Figure 1. 1932 Aerial photo of the Albert-Jensen site

Figure 2.


SRWA circa 1977. Area contains a much larger building footprint and 3 work rails into the water.

Figure 3.

Potential data gap area indicated by blue dash line and shaded in blue on eastern intertidal.