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

October 28, 2025

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

Re: Albert-Jensen Site – Ecology Comments on Uplands RI Report

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

Dear Todd Nicholson:

On August 1, 2025, Ecology received via email the Draft Uplands Remedial Investigation (RI) Report dated August 1, 2025. Ecology provided comments on that report in a letter dated August 12, 2025, and a Revised RI Report was received on September 30, 2025.

Ecology has the following comments and clarification requests on the Revised RI Report. Please revise this document based on the below comments and provide separate comment responses.

With the exception of Comments #5 and #6, the below comments are based on revisions made per Ecology's comments or other changes that were made to the revised report, and do not constitute new comments. Comments #6 and #7 are newly identified concerns. For Comment #6, only some limited additional research is requested at this time. For Comment #7, a deficiency was identified following review of the boring logs that were provided within the revised RI report.

We recognize that the PoFH team would like to close out the RI phase of the project as soon as practicable; however, we must ensure that the RI uplands characterization is sufficiently complete prior to closing of this phase of the project.

We anticipate that the revised document, if sufficiently addressing the below comments, will constitute the Uplands Public Review Draft RI Report. We also anticipate that this RI/FS will go to public review concurrently with both the draft Marine and Uplands RI reports and the Feasibility Study (FS) Report, after all these reports have sufficiently addressed Ecology's comments.

Ecology Comments on Revised Draft Uplands RI Report

Comment #1 – Table 3-2, Monitoring Well Gauging Data and Figure 3-2

The revised RI report included a new Table 3-2 at Ecology's request. Ecology has concerns with this table as follows:

- The depths and elevations are reported to the nearest tenth of a foot. Standard practice is to report depth to water and elevation measurements to the nearest one hundredth of a foot. Please clarify. Resurvey of monitoring well measuring points may be needed if they were not surveyed to 0.01 feet accuracy.
- No date of measurements was provided on Figure 3-2, Net Groundwater Flow. In addition, no measurement data was provided for monitoring wells MW-1, MW-4, and MW-6 on this figure. The groundwater elevations on this figure do not appear to correspond to any measurements on Table 3-2. In addition, Figure 3-2 was revised to only include one contour and elevation measurements were different from the original Figure 3-2 in the RI report. Please clarify what changed between these two versions of Figure 2-3. The Site potentiometric surface map (Figure 3-2) should be include water level data from all monitoring wells. Based on the data presented in Table 3-2, it appears that the December 2023 monitoring round was the most recent round that included data from all monitoring wells.
- Ecology also notes that the data in Table 3-2 has a groundwater elevation at MW-6 in December 2023 (6.2 ft amsl) similar to monitoring wells close to the shoreline. This is quite different from the potentiometric surface indicated by the original Figure 3-2. Please clarify.

Ecology suggest that a Teams call may be warranted to discuss this comment and to provide clarifications.

Comment #2 – Table 3-8

It appears that previous Table 3-7 was changed to Table 3-8; however, the second page of the table is still titled Table 3-7. Please correct this.

Comment #3- Pond Sediment

The response to previous comment #25 stated: "The stormwater pond and solids were previously removed and disposed." The revised report stated on page3-1: "The pond was removed from service in 2021 and the area was re-graded." The footnote to Table 2-3 stated "Material is collected and disposed offsite annually and is not subject to the same transport pathways as upland soil."

Pond sediment sampling results were presented in Table 3-9. Please add the sample date to this table and check that all sampling result tables include a sample date.

The pond sediment included cleanup level exceedances for copper, zinc, arsenic, and cadmium (detections of 12,000 mg/kg, 2,400 mg/kg, 10 mg/kg, and 10 mg/kg, respectively). Therefore, it is important to understand whether or not any of this sediment remains. Additional discussion is needed in the RI Report on these pond sediments. If the sediments were removed and disposed of offsite, then the location that received the soil, disposal receipts, volumes, etc. should be included.

Ecology notes that additional sampling may be needed to document current conditions in this area if documentation of removal of the sediments is insufficient. Such additional characterization can be provided as a standalone submittal independent of the RI report.

Comment #4 – Shop Drain

The response to previous comment #15 stated: "Section 4 includes discussion of the shop drain which is believed to drain into the ground via a perforated, buried tank. The uncertainty in its configuration is noted."

Additional characterization of this source is needed to determine whether or not source control measures are needed in this area. A magnetometer survey may be warranted to find the buried tank, exploration with a backhoe and soil sampling also appears to be warranted to characterize this source. Samples should be analyzed for all contaminants with cleanup level exceedances in soil and groundwater in the vicinity of the release (e.g. petroleum and metals). Such additional source characterization can be provided as a standalone submittal independent of the RI report. This does not preclude the FS report defining the appropriate cleanup action for this concern.

Also, Ecology has not found information indicating that this shop drain has been plugged (photographed in 2017). This could present an ongoing risk since machine shop operations are evidently ongoing. This drain should be permanently plugged with concrete, and such plugging documented, including photographs submitted to Ecology. Reporting of the plugging should also include a current inventory of chemicals that are being used within the shop building.

Comment #5 – AST Area

An isolated petroleum release was identified in the AST area with petroleum in soil cleanup level exceedances at locations AST-1-2' and AST-4-1-2'. Ecology previously provided feedback on potentially addressing this area within an Interim Remedial Action. Additional soil characterization is anticipated to be needed to define the lateral and vertical extent of petroleum contamination in this area prior to cleanup. This does not preclude the FS defining the appropriate cleanup action for this concern.

Comment #6 – OPALCO Fire

The RI report stated on page 3-1: "The pad is the building foundation of an OPALCO building that burnt down." The year of the fire and contents in the building that were burned down should be mentioned. This area could be a potentially significant environmental concern if there were any PCB-containing transformers, or chlorinated materials in the building that could generate dioxins/furans (DFs) in a fire.

Ecology notes that soils in this area were not analyzed for either PCBs nor DFs. Only seven soil samples collected at the Site were analyzed for PCBs, and only five soil samples were analyzed for DFs. Ecology notes that PCBs were found at nearby location BLWA-11 0-2.5' at 0.46 mg/kg, and DFs were detected in MW-4.

Additional information on this fire should be available in a historical newspaper or fire station report. Ecology found one on-line reference to an OPALCO Standby Power Station destroyed by fire in 1976. Ecology requests additional information on this fire, including when it occurred, what was inside the building, and whether any transformers were present. This additional information can be provided as a standalone submittal independent of the RI report.

Comment #7 – Photoionization Detector (PID) Data

Ecology reviewed the boring logs that were provided in Appendix A of the revised RI Report. Ecology noted elevated PID readings in the following boring logs:

Table 1 – Soil Intervals with Elevated PID Readings

Sample Location and Depth (feet)	PID Reading (ppm)	Comments
BLWA-6 @ 5'	186	Slight exceedance for NWTPH-Dx
SRWA-5 @ 2-3.5'	36.7	Woody debris in soil
MW-1 @ 12'	407	In saturated zone
AST-2 @10-15'	41.2	NWTPH-Dx not-detected, faint petroleum odors, in saturated zone
BLWA-11 @ 0.5'	12.4	Nothing noted
IOSA TP-2 @ 5'	22	Nothing noted

Ecology considers standard practice in environmental investigations to include analysis of soil samples for volatile organic compounds (VOCs) when PID readings are elevated above background. For most current and well-calibrated PIDs, background is typically less than about 2 ppm. Some older units can have false positive readings due to humidity. Since PID readings less than 10 were fairly common within the Site boring logs, Ecology has flagged PID readings greater than 10 ppm in the above table as potentially indicating the presence of VOCs. Based on the tables presented within the revised RI report, VOCs were apparently only analyzed for the floor drain sediment samples.

The lack of VOC data where soil samples had elevated PID readings is a RI data gap for the Site. Ecology notes that remedial options for VOCs in soil are commonly different than for other contaminants. Hence, sampling at these locations and depths for VOC analysis is needed. It appears that VOC contamination at these locations, if present, are likely reasonably localized;

however, if significant VOC concentrations are present, additional characterization to delineate the lateral and vertical extent of contamination may be needed. Note that locations MW-1 and AST-2 had elevated PID readings within the saturated zone, therefore groundwater would be the appropriate media to sample for VOCs at these two locations.

Ecology also notes that VOCs were not included in Table 3-10 of the revised RI report; however, VOCs were listed in Table 5-2 of the RI Work Plan. That table indicated that all VOC results from MW-1 through MW-6 were below detection limits in February of 2020. In addition, the Revised RI text indicates on page 3-2 that these wells were sampled for BTEX in 2018, though results for this analysis were not included in either Revised RI Table 3-10 nor in the RI Work Plan Table 5-2.

As the PID reading of 407 ppm within the boring log at MW-1 was the highest PID reading detected anywhere at the Site, further investigation on this reading appears to be warranted.

We recommend that an investigation be conducted to address the concern of elevated PID readings at these six locations. The results of this investigation can be provided within a standalone submittal independent of the RI report. The potential ramifications of this data gap on the FS report are not entirely clear at this time. It appears likely that, if needed, separate interim remedial actions could potentially address VOC contamination in soil and groundwater, if found at these locations.

Comment #8 – Former Gasoline UST

Table 3-3 included soil samples from two test pits located north and south of a former gasoline underground storage tank. However, Table 3-3 did not include analyses for NWTPH-Gx or BTEX, which were reported in Table 3-3 of the 2018 RI Report. Since none of these gasoline-related constituents were detected and since PID readings were zero in these two test pits, it appears reasonable to conclude that no gasoline release occurred from this former UST. However, it would be appropriate to show this former UST location on RI Figure 2-1a as well as elaborating on the last sentence in Section 4.3.3 to indicate what data suggest that no contamination is present. This UST was referred to as a former gasoline UST that was reportedly removed in the 1980s. It would be appropriate to mention the source of the information that the tank was removed in the 1980s.

Comment #9 – Use of Groundwater

Ecology concurs with the discussion in Section 5.2 regarding the unlikely use of groundwater for drinking water purposes at the Site. Cleanup levels for groundwater that are anticipated to be applied at the Site are for protection of surface water as opposed cleanup levels based on the direct contact (drinking water) pathway. However, to formalize this conclusion, Ecology anticipates the required recording of an environmental covenant (EC) that prohibits use of groundwater from the property for drinking water purposes.

Comment #10 – Indicator Hazardous Substance and RI Report Conclusions

Section 7 of the report concludes:

> *Based on the investigation activities described in this report, the proposed IHSs for the Site are metals (i.e., arsenic, copper, mercury, nickel, zinc), TPH-Dx (soil only), and TBT. The IHSs will be used to develop and evaluate the effectiveness of remedial alternatives in the FS, however, the FS will also consider the extent of all COIs at the Site.*

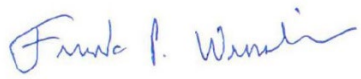
Ecology has concluded that total CPAHs in soil are also an IHS, since this contaminant had a high frequency of cleanup level exceedance, and since different cleanup approaches could apply for this contaminant.

Ecology also notes that very limited soil sampling was conducted at the Site for PCBs (seven samples), DFs (five samples), and TBT (six samples). In addition, there was a high frequency of detection and preliminary cleanup level exceedances for each of these contaminants. Rather than concluding that the lack of significant characterization of these contaminants presents an RI data gap, Ecology concludes that the FS can proceed with the expectation that these contaminants could be present at concentrations above cleanup levels where other Site contaminants are present. Additional soil characterization for these contaminants, such as via confirmation soil sampling to demonstrate complete removal of contamination, is anticipated in the future.

Closing

If you have any questions regarding this letter or would like to schedule a Teams call to discuss any of these comments, please contact me at (509) 424-0543 or frank.winslow@ecy.wa.gov.

Sincerely,



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