



## **RESPONSIVENESS SUMMARY**

**Former Irondale Iron and Steel Cleanup Site  
December 14, 2009 – January 22, 2010 Public Comment Period**

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***Draft Cleanup Action Plan and  
State Environmental Policy Act Determination and Checklist***

Prepared by  
Washington State Department of Ecology  
Southwest Regional Office  
Toxics Cleanup Program  
Lacey, Washington

June 2010

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## Site Information

**Address:** 526 Moore Street, Irondale

**Site Manager:** Steve Teel

**Public Involvement Coordinator:** Meg Bommarito

The Washington Department of Ecology (Ecology) has been working on investigating and cleaning up contamination at the Former Irondale Iron and Steel site. Ecology conducted a site investigation and feasibility study to determine extent of contamination and examine possible cleanup alternatives. Ecology drafted a Cleanup Action Plan based on the results of this work and held a public comment period.

Ecology did a State Environmental Policy Act (SEPA) review of the cleanup actions to make sure they would not have a significant adverse impact on the environment. A Determination of Non-Significance and the checklist were also available for comment

**The comment period for the draft Cleanup Action Plan and SEPA Determination ran from December 14, 2009 – January 22, 2010. Comments received during the comment period and Ecology's responses are included in this document.**

## Site Background

The Former Irondale Iron and Steel site is located at 526 Moore Street in Irondale. From 1881 to 1919, iron and steel were produced at the site by various owners. Steel plant operation during this time resulted in contamination of soil, sediment and groundwater.

In 1919, the plant closed and the equipment was removed from the site. The site was not cleaned up after closing, and slag and other debris are still present. Some building foundations and the concrete walls of an above-ground fuel tank remain on site.

From 1919 until 2001, the site changed ownership several times but no additional waste was produced. Most recently, the site was used as a log storage yard by a nearby chipping facility (1977-1999).

Jefferson County purchased the site in 2001 to use as a recreation area. An initial investigation revealed evidence of hazardous materials such as petroleum and metals. Ecology then conducted a site investigation. Analysis of samples taken during this study showed that contamination was below Model Toxics Control Act (MTCA) cleanup levels for total petroleum hydrocarbons and metals. Ecology concluded that the site did not pose a significant threat to human health or the environment.

In November 2005, a park visitor notified Ecology about an oily residue on the beach at this site. Ecology determined that there was evidence of contamination along the beach and Jefferson county closed the beach to begin an investigation.

In 2007, Jefferson County sampled along the beach area and near the above-ground fuel tank and found levels of petroleum contamination and metals in soil that exceeded MTCA cleanup.

Investigations from 2007-09 revealed evidence of soil, sediment and groundwater contamination. Contamination was found at locations of former buildings and industrial activities and in an area surrounding a former ground fuel storage tank. A Feasibility Study examined possible cleanup options. Based on this study, Ecology drafted a plan to clean up and manage contamination.

# Site Location



## **Comment #1: Molly and Jim Pearson**

We are 35 year residents of Irondale, living right up the street from the Irondale beach and the ruins of the old Irondale steel plant. We are also members of the recently formed “Friends of Chimacum Creek”, a volunteer adopt-a-park organization formed to assist Jefferson County by monitoring the use of the county day-use park, cleaning up trash and educating visitors to the park about the proper handling of pet wastes.

We are writing to express our support for Ecology’s remediation plans for the site. We understand the clean-up may entail removal of the ruins of the old steel manufacturing facilities, and while we certainly appreciate the necessity of removing the contaminated soil from the area, we hope that some of the old structures can be saved, because of their historical significance.

This beach and adjoining area, together with the WDFW’s recent Chimacum Creek salmon-enhancement project, are becoming a favorite destination for residents of Jefferson County.

We will continue to work with Jefferson County, NOSC (North Olympic Salmon Coalition), WDFW and any other groups interested in preserving the natural beauty of the park, beach, and foundry ruins. We formed our group in order to assist Jefferson County because of its budget restraints, but as time passed, we developed a real sense of neighborhood by coming together regularly to monitor and clean-up the area. We are now working on creating an informational kiosk to address several issues: the need to pick up after one’s pet, the partnership of Jefferson County and Friends of Chimacum Creek, and the industrial history of the site.

Thank you for the opportunity to comment on this important remediation project.

Molly and Jim Pearson

## **Ecology Response**

Thank you for your comment. We appreciate your support of the cleanup effort and the information about other activities that are occurring near the cleanup site. We will work with the Department of Archaeology and Historic Preservation to identify and protect any structures of historical significance.

## **Comment #2: Geoffrey L. Glass, Olympia Region Clean Air Agency**

Mr. Teel:

In general, ORCAA considers any forced aeration to remove volatile compounds from soil or groundwater to be a stationary source of air pollution and requires review and possibly a permit from ORCAA. Stationary internal combustion engines may also require review. I can’t tell from the checklist if either of these is likely to be established on site.

Passive aeration of soils and nonroad engines that are mobile by both design and application are exempt from permitting by ORCAA.

Please call or e-mail if you have any questions.

Geoffrey L. Glass, Engineer II

## Ecology Response

Thank you for your comment. Forced aeration has not been included as a cleanup remedy for this site. Please visit our website [http://www.ecy.wa.gov/programs/tcp/sites/irondale/irondale\\_hp.htm](http://www.ecy.wa.gov/programs/tcp/sites/irondale/irondale_hp.htm) to review the Cleanup Action Plan. This plan outlines the steps that will be taken to address contamination. Ecology will use a combination of soil excavation, capping and institutional controls to remove and manage contamination on this site.

## Comment #3: Kevin Long, North Olympic Salmon Coalition

Hi Steve,

I know I just missed the comment period for the Cleanup action plan at the Irondale Steel Plant, but did want to contact you anyway regarding the possibilities for partnerships as you move forward with clean up actions.

I wanted to be sure you are aware of the shoreline restoration that has taken place on the WDFW owned parcel directly North of the cleanup area and also to inform you that further shoreline restoration work is envisioned on the Jefferson County property on which your project will take place. WDFW and NOSC would like to see the fill along the shoreline on the Jefferson County parcel pulled back to a more natural state that mimics the work done to the north. Your project proposes shoreline restoration at the slag pile along the beach. Our restoration vision for the area includes removing this slag, but we'd also propose moving the shoreline restoration elements further North along the properties entire eastern edge.

As your project moves forward I hope you'll consider contacting me with ideas on how we might collaborate to execute both projects at the same time or at least with consideration to one another. We do not have funding for our proposed work but your remediation project makes seeking funding all the more important.

Thank you for your consideration.

Kevin Long, Project Manager

North Olympic Salmon Coalition

## Ecology Response

Thank you for the information about the work that's being done by the North Olympic Salmon Coalition. The cleanup action plan will be implemented some time in 2011. Planning and a detailed design of the cleanup will be completed in 2010. We will be holding a 30-day public comment period on the design details (engineering design report) before work begins on the site. Cleanup work will begin in 2011. We

would be more than happy to contact you prior to implementing the cleanup to make sure we consider your work as we move forward.

## **Comment #4: Deanna Pindell**

My perspective in this public comment is twofold: I walk through this park frequently all year around, and love many aspects of it. I also am a public artist, whose work emphasizes the integration of ecology and environmental concerns into the artwork.

1. I enthusiastically support the Alternative 4 plan as selected in your draft. In particular, the draft plan allows for the possible preservation of a few larger trees in the Steel Production Building area. While they present challenges, saving two or even one of them would add greatly to the character of the site and the sense of “public memory” and passage of time. They have a unique beauty in the way that their growth pattern is integrated into the ruins. No doubt, these largest trees also contribute to the habitat in a variety of ways, and I urge you to make every possible effort to keep them.
2. Also in the Steel Production Building area, there are a few large sections of brick masonry which have fallen off their foundations and lay askew. I assume these would be impediments to the process of laying the geotextile, and would need to be removed for that purpose. However, perhaps it would be possible to set them aside, then once the new soil fill is in place, these sections could be re-integrated into the landscaping (as decorative element, the way that large rocks are often used).
3. Another much-appreciated aspect of this plan clearly shows great concern for the historic nature of the structures, including the AST. I hope that, in conjunction with the Department of Historical Preservation, the tank will also be able to be preserved. The acoustic nature of the structure is fascinating, and suggests possible performance uses in the future park (poetry readings, or solo musicians, for instance).
4. Please consider the importance of the beehive kilns as historical structures also, both regarding their former location on the site, and as the current remnants. There are several larger sections of weathered masonry which have slid to the beach. They tell an important story, referencing several historic labor trades (charcoal burners, woodchoppers, masons, drovers); they provide a great visual and tactile tool for education. These semicircular forms add to the unique character of the site, and multiply the “memory cues” for visitors through the repetition of masonry, as found in the Steel Production Building ruins. These offer great potential to become a key design element for the future park by echoing the circular forms, or the brick color, texture, and pattern.
5. Would it be possible, not only to preserve these kiln remnants, but to return them to (approximately) their original location on the site, after the contaminated soil is removed? At that point (I don’t know if this would be one of the final steps in the action plan, or possibly earlier, during the construction drawing phase) it would be highly desirable to have the input of a public artist or landscape architect to help with the final placement and arrangement ... a professional trained in the design of public spaces.
6. Finally, I would also like to suggest that a public artist be involved in designing and placement of the signage element of Institutional Controls (suggested as part of the capping alternation for the Steel Production Plant). The design of the signage should enhance the character of the park as well as

declaring it's message; any necessary warning signs should still be aesthetically unified with other park signage design.

I myself would be thrilled to be involved in these two design issues, as a public artist and volunteer, and have the training and capacity to do so.

Thank you for your time and attention, and for your efforts to protect and enhance this wonderful site!

Deanna Pindell

## **Ecology Response**

Thank you for your interest in the site cleanup and the great suggestions. As much as possible, larger trees will be preserved. Also, we will work with the Department of Archaeology and Historic Preservation to identify and protect any structures of historical significance.

In regards to signage, you will need to direct your inquiry to the Jefferson County Parks Department. They are the owners and managers of the property and will be able to discuss the potential for signage at the site.



**Comment #5: Gretchen Kaehler, Department of Archaeology and  
Historic Preservation**



STATE OF WASHINGTON

**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

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January 21, 2010

Mr. Steve Teel  
Site Manager/Hydrogeologist  
Toxics Clean-Up Program  
PO Box 47775  
Lacey, WA 98504-7775

In future correspondence please refer to:

Log: 070109-11-ECY  
Property: Irondale Iron and Steel Remediation and Clean-Up  
Re: **Archaeology – DAHP Excavation Permit Required**

Dear Mr. Teel:

We have reviewed the materials forwarded to our office for the proposed project referenced above. The project area is a National Register of Historic Places (NRHP)-listed historic district. An excavation permit from this office will be required for this project prior to ground disturbance. The permit should include provisions for a Cultural Resource Management Plan (CRMP) and a Treatment Plan. I have attached a list of professional archaeological consultants for your convenience.

If any federal funds or permits are involved Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800, must be followed. This is a separate process from SEPA and requires formal government-to-government consultation with the affected Tribes and this agency. We would appreciate receiving any correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive.

Should you have any questions, please feel free to contact me at (360) 586-3088 or [Gretchen.Kaehler@dahp.wa.gov](mailto:Gretchen.Kaehler@dahp.wa.gov).

Sincerely,

Gretchen Kaehler  
Assistant State Archaeologist  
(360) 586-3088  
[gretchen.kaehler@dahp.wa.gov](mailto:gretchen.kaehler@dahp.wa.gov)

CC: Bill White, Archaeologist, LEKT  
Marie Hebert, Port Gamble S'Klallam Tribe  
Dennis Lewarch, THPO, Suquamish Tribe  
Kathy Duncan, Jamestown Band of S'Klallam

## Ecology Response

Thank you for the information about site requirements. We will contact you before work begins on the site to respond to your concerns.

## Comment #6: Susie Learned

Dear Meg,

Our Irondale property has been in my husband's family for over 100 years. We are on the bluff overlooking the beach at Irondale Beach Park and the ruins of the old Irondale steel plant. We are also members of the recently formed "Friends of Chimacum Creek", a volunteer adopt-a-park organization formed to assist Jefferson County by helping to maintain this County Park by cleaning up trash and educating visitors to the park about the proper handling of pet wastes.

We are writing to express our support for Ecology's remediation plans for the site. We understand the clean-up may entail removal of the ruins of the old steel manufacturing facilities, and while we certainly appreciate the necessity of removing the contaminated soil from the area, we hope that some of the old structures can be saved, because of their historical significance.

This beach and adjoining area, together with the WDFW's recent Chimacum Creek salmon-enhancement project, are becoming a favorite destination for residents of Jefferson County.

We will continue to work with Jefferson County, NOSC (North Olympic Salmon Coalition), WDFW and any other groups interested in preserving the natural beauty of the park, beach, and foundry ruins. We formed our group in order to assist Jefferson County because of its budget restraints, but as time passed, we developed a real sense of neighborhood by coming together regularly to monitor and clean-up the area. We are now working on creating an informational kiosk to address several issues: the need to pick up after one's pet, the partnership of Jefferson County and Friends of Chimacum Creek, and the industrial history of the site.

I appreciate having the opportunity to comment on the remediation project.

Best regards,

Susie and Howard Learned

## Ecology Response

Thank you for the information. It is always helpful to be aware of other projects are occurring at or near cleanup sites before we begin work. As much as possible, larger trees will be preserved. Also, we will work with the Department of Archaeology and Historic Preservation to identify and protect any structures of historical significance. We appreciate your support of this cleanup!

## Comment #7: David Kellum

Steve,

I received a letter regarding the cleanup of the Irondale steel plant site #95275518. I know that the focus is the contaminated soil from past activity, but wondered if there is anyone looking at the runoff from E Moore Street to this same site?

The high water table in this area and numerous older septic systems as well as whatever else may have been let from the operation of the steel facility makes me think that a sample of this runoff might be a good idea at this time. I believe if there are other sources of contamination at this site now would probably be the time to look into it.

I have seen that there is seepage runoff at all times of the year on the side of E Moore Street carrying water from the road and the seepage from all the properties uphill from there. Please let me know of any such information about this matter, I have been curious about it for some time, and it seems the county is aware of this runoff, but seemingly not interested in addressing it.

Thanks for your time,

David b Kellum  
(property owner)  
Irondale

## Ecology Response

Thank you for voicing your concern about runoff from septic systems. The best person to talk to about this would be Allison Petty with Jefferson County Environmental Health at (360) 385-9444. If you have any further questions after you talk to Allison, please don't hesitate to give us a call.