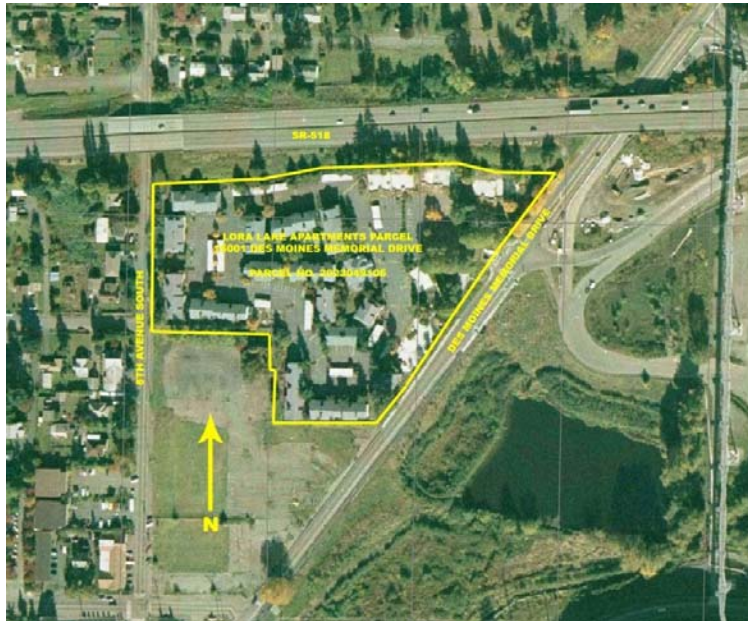




## Responsiveness Summary

### Lora Lake Apartments Public Comment Period July 10 – August 10, 2009



Washington State Department of Ecology  
Northwest Regional Office  
3190-160<sup>th</sup> Avenue SE  
Bellevue, Washington 98008

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## **Introduction**

A public comment period was held July 10 – August 10, 2009 on the Lora Lake Apartments. A public meeting was held on July 23, 2009 at the Highline School District's Educational Resource and Administration Center, 15675 Ambaum Blvd. SW., Burien, WA from 7 to 9 pm.

Details of the site and documents are available at the Washington State Department of Ecology (Ecology) website:

[http://www.ecy.wa.gov/programs/tcp/sites/loraLakesAps/loraLakesAps\\_hp.html](http://www.ecy.wa.gov/programs/tcp/sites/loraLakesAps/loraLakesAps_hp.html)

Ecology received four comments (attached) in response to the public notice for the Lora Lake Apartments.

## **Site Background**

The site is located at 15001 Des Moines Memorial Drive in Burien, Washington (see figure). This site was an orchard and private residence prior to 1940. During the 1940s and 1950s, the site was used by Novak Barrel Cleaning Company. Operations included cleaning barrels that, presumably, previously contained hazardous materials. From approximately 1960 to 1981, Burien Auto Wrecking operated at the site. In the 1980s the site was purchased by a developer, and in 1987 the Lora Lake Apartment complex was built. In 1998 the Port of Seattle bought the site, part of which was required for the third runway protection zone (RPZ). The portion of the site not required for the RPZ was to be redeveloped for future airport support uses. The six buildings within the RPZ were demolished in 2007. Sixteen buildings remain and are being demolished this summer.

The apartment complex is currently vacant, and constitutes a public safety hazard. Vacant properties are attractive to transients and susceptible to arson or accidental fires. The Port is demolishing the above-ground portions of the apartment complex this summer, leaving the foundations and asphalt areas intact. Measures are being taken to ensure the demolition activities do not disturb potentially-contaminated soil. Workers are protected from contaminated soil by existing pavement, by placing rock work surfaces in traffic areas as necessary, and by fencing off unpaved areas. Storm water in demolition areas is being collected on site and disposed of at a permitted facility approved by Ecology.

**Comment #1: From Ms. D. Wagner.** Ms. Wagner indicated concern about air contamination at and in the vicinity of Lora Lake Apartments. It was concerned that the contamination at the site might actually be an airborne problem.

**Ecology's Response:** Ecology is aware that there are a good many hazardous air pollutants present in the environment. These pollutants are generally present in greater concentrations in urban environments than in suburban and rural environments. Investigations at the Lora Lake Apartments site are focused on contaminants that originated from past operations on the site. Impacts from area-wide air pollution must be considered when assessing whether a particular contaminant is related to past operations or whether it is due to area-wide contamination. The investigations will be designed with this in mind.

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**Comment #2: From Mr. Dennis Clark.** Mr. Clark noted the Water Resources Inventory Area (WRIA) number given in the web site for the Lora Lake Apartments was wrong, and provided the correct number. He indicated interest in the potential impacts of the site on water quality in the basin.

**Ecology's Response:** The WRIA number has been corrected on the web site. Mr. Clark has been included in our mailing list for the site and will receive information as it becomes available.

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**Comment #3: From Mr. George Hadley.** Mr. Hadley was concerned with the potential for use of the Lora Lake Apartments as emergency housing should a flood on the Green River displace a significant number of people, and with plans for preventing pollution from stormwater during demolition.

**Ecology's Response:** Ecology contacted the King County Office of Emergency Management and advised them of Mr. Hadley's concern that the apartments might be used for emergency housing. Ecology also advised the Port of Seattle Emergency Manager of Mr. Hadley's concern. Subsequently, Mr. Ron Harmon, Emergency Manager for the Port of Seattle, advised Mr. Robin Friedman, Director of the King County Office of Emergency Management, that the Lora Lake site was determined to be uninhabitable. The condition of the apartments, which have been vacant and unheated for a number of years, makes them unsuitable for use as emergency housing.

The stormwater detention facility used during demolition will hold all runoff from area under active demolition. The detention facility will be sized to capture water from a 10-year, 72-hour rainfall event. This is greater than the typical event used to size stormwater detention facilities, a 10-year, 24-hour event. If an event occurs such that it appears the detention facility capacity will be exceeded, other means of detention will be transported to the site. This would include the use of tanks and/or tanker trucks. Any water captured in the detention facility will be tested regarding its quality and disposed of at an

appropriately permitted facility. The Stormwater Pollution Prevention Plan is available for review on Ecology's Lora Lake Apartments web site.

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**Comment #4: From Mr. Greg Wingard:** Mr. Wingard had three concerns: (1) sampling soil near utilities as the utilities are exposed during demolition; (2) the need for an individual National Pollutant Discharge Elimination System (NPDES) permit for general stormwater discharge; and (3) the quality of general stormwater discharge, that is, stormwater discharge from the apartments not related to demolition activities.

**Ecology's Response:** Utilities will be disconnected during demolition by excavating to specific points and capping the lines. Sampling during this time could interfere with the demolition contractor's schedule. In addition, rather than simply sampling at points chosen by the contractor, Ecology believes a better approach is to integrate this soil sampling in a coordinated sampling program to be performed during the remedial investigation work. The Remedial Investigation/Feasibility Study Work Plan will indicate the soil sampling program to be performed.

Mr. Wingard has indicated he is discussing the need for an individual NPDES permit at the Lora Lake Apartment site with appropriate Ecology management personnel. The management contact for the Lora Lake Apartments site for this issue is Mr. Robert W. Warren, Section Manager, Toxics Cleanup Program, Northwest Regional Office. At this writing, the discussions are ongoing.

The Port of Seattle and Ecology agree that characterizing the quality of current general stormwater discharge from the site is warranted at this time rather than waiting until the Remedial Investigation/Feasibility Study Work Plan is approved and implemented. The Port will perform an Interim Action under the current Agreed Order pursuant to WAC 173-340-430. The interim action will characterize the quality of current general stormwater discharge from the site and assess whether actions are necessary to eliminate or substantially reduce this pathway for contaminants to leave the site. The Port plans to submit a draft work plan to Ecology for approval by October 15<sup>th</sup>. Once approved, the plan will be issued for concurrent public comment and a copy placed on the Lora Lake Apartments web site. A public meeting on the work plan will be held if ten or more people so request. Ecology will have individual discussions with smaller groups. The approved work plan will be issued for public comment, rather than a draft plan, because the sampling is weather dependent. Storms of the appropriate duration and intensity must be sampled, and up to ten storms may be sampled, depending upon results from sampling the first storms. The work plan needs to be in place prior to the beginning of the wet season.