

## TECHNICAL MEMORANDUM

TO: Liu, Jing, Washington State Department of Ecology

FROM: Jeremy Davis, P.E., C.H.M.M., and Larry Beard, P.E., L.G.

DATE: June 3, 2014

RE: **BOUNDARY FISH INTERIM ACTION – COMPLETION REPORT  
WESTMAN MARINE SITE  
BLAINE, WASHINGTON**

This technical memorandum summarizes the completion of the interim action conducted by the Port of Bellingham (Port) to remediate contaminated soil encountered during construction of a new building located partially within the preliminary boundary of the Westman Marine site (Site) in Blaine, Washington (Figure 1). A remedial investigation/feasibility study (RI/FS) is currently underway for the Site under Agreed Order No. DE-9001 (AO) between the Port and the Washington State Department of Ecology (Ecology). The interim action was conducted in accordance with the Washington State Model Toxics Control Act (MTCA) regulations that address interim actions [Washington Administrative Code (WAC) 173-340-430], and in accordance with the approved Interim Action Plan (IAP; Landau Associates 2013).

The Port investigated environmental conditions in the Boundary Fish construction area (Figure 2) and determined that heavy metals, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and diesel-range petroleum hydrocarbons were present in soil at concentrations greater than Site soil screening levels (SLs). The results of the investigation are presented in the IAP along with a discussion of the regulatory basis for conducting the interim action. The MTCA distinguishes an interim action from a cleanup action in that an interim action only partially addresses the cleanup of a site and satisfies one of the following conditions [WAC 173-340-430(1)]:

- Is technically necessary to reduce the threat to human health and the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance [WAC 173-340-430(1)(a)]
- Corrects a problem that may become substantially worse or cost substantially more to address if the remedial action is delayed [WAC 173-340-430(1)(b)]
- Is needed to complete a site hazard assessment, remedial investigation/feasibility study, or design a cleanup action [WAC 173-340-430(1)(c)].

An interim action must also meet one of the following general requirements [WAC 173-340-430(2)]:

- Achieve cleanup standards for a portion of the Site
- Provide a partial cleanup (clean up hazardous substances from all or part of the Site, but not achieve cleanup standards)

- Provide a partial cleanup and not achieve cleanup standards, but provide information on how to achieve cleanup standards.

The interim action was deemed necessary to effectively address the contamination prior to the Port's tenant constructing the building. The Port presented an evaluation of several alternative actions and selection of the proposed action in the IAP. Ecology determined that the action would meet the requirements of MTCA described above by reducing the threat to human health and the environment through eliminating or substantially reducing one or more pathways for exposure to a hazardous substance, as well as correcting a problem that may become substantially worse or more difficult to remediate if action was delayed. Ecology published the IAP and, after holding a public comment period, authorized the Port to proceed with the interim action by removing the contaminated soil, and disposing of the material off site at an appropriate solid waste facility.

The Port excavated the contaminated soil from the construction area based on the analytical results of compliance monitoring soil samples collected both before and after the excavation activities. The iterative process of reviewing compliance monitoring data and conducting additional excavations based on those data resulted in three separate excavation events occurring in October 2013. The excavated soil was temporarily stockpiled on Port property in the vicinity of the Site. The soil was stockpiled on top of plastic sheeting and was completely covered with plastic sheeting secured with sandbags to prevent stormwater contact with the potentially contaminated soil.

The process of developing an approved IAP and allowing for public comments resulted in a temporary stockpile storage time of greater than 90 days. As a result, Whatcom County Health Department personnel visited the Site to confirm the stockpile storage met the performance standards of WAC 173-350-040 and, in February 2014, provided an extension of the 90-day temporary storage period allowing the Port additional time to remove and dispose of the waste.

After receiving an approved waste disposal profile from Republic Services to dispose of the soil as solid waste, the Port contracted with Strider Construction to load the soil stockpile into transport containers and haul the soil to the Ferndale Intermodal Facility for transport to the Roosevelt Regional Landfill in Roosevelt, Washington. The contaminated soil was loaded and transported to the Ferndale Intermodal Facility on March 27 and 28, 2014. Weight tickets for each container are provided in Appendix A and show that in total, about 420 tons of soil was disposed of at the landfill.

As discussed in the IAP, compliance monitoring indicated that a small amount of cPAH-contaminated soil, and possibly metals-contaminated soil, was left in place in the southeast corner of the Boundary Fish building footprint. However, the SLs for metals were developed for the protection of groundwater and preliminary data in the vicinity indicates groundwater is not impacted. As a result, the SLs for metals may be revised upward during the RI/FS process and the residual concentrations may not

exceed final cleanup levels selected by Ecology for the Site. Additionally, the SL for cPAHs is based on protecting human health from direct contact and the new building likely provides an effective barrier to prevent this exposure pathway. These residual concentrations are discussed in the IAP and the Remedial Investigation Upland Data Summary technical memorandum (Landau Associates 2014). Residual soil contamination in the Boundary Fish building area will be further evaluated in the RI and FS reports.

## REFERENCES

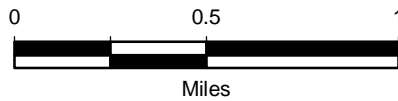
Landau Associates. 2013. Technical Memorandum: *Boundary Fish Interim Action Plan, Westman Marine Site, Blaine, Washington*. From Larry Beard, P.E., to Jing Liu, Washington State Department of Ecology. December 19.

Landau Associates. 2014. Technical Memorandum: *Remedial Investigation Upland Data Summary, Westman Marine Site, Blaine, Washington*. From Larry Beard, P.E., to Jing Liu, Washington State Department of Ecology. February 4.

## ATTACHMENTS

Figure 1: Vicinity Map  
Figure 2: Westman Marine Site Map – Interim Action Area  
Attachment 1: Disposal Documentation

G:\Projects\001\035\010\015\Phase I\Phase I\F01-VicinityMap.mxd 3/28/2014 NAD 1983 StatePlane Washington North FIPS 4601 Feet

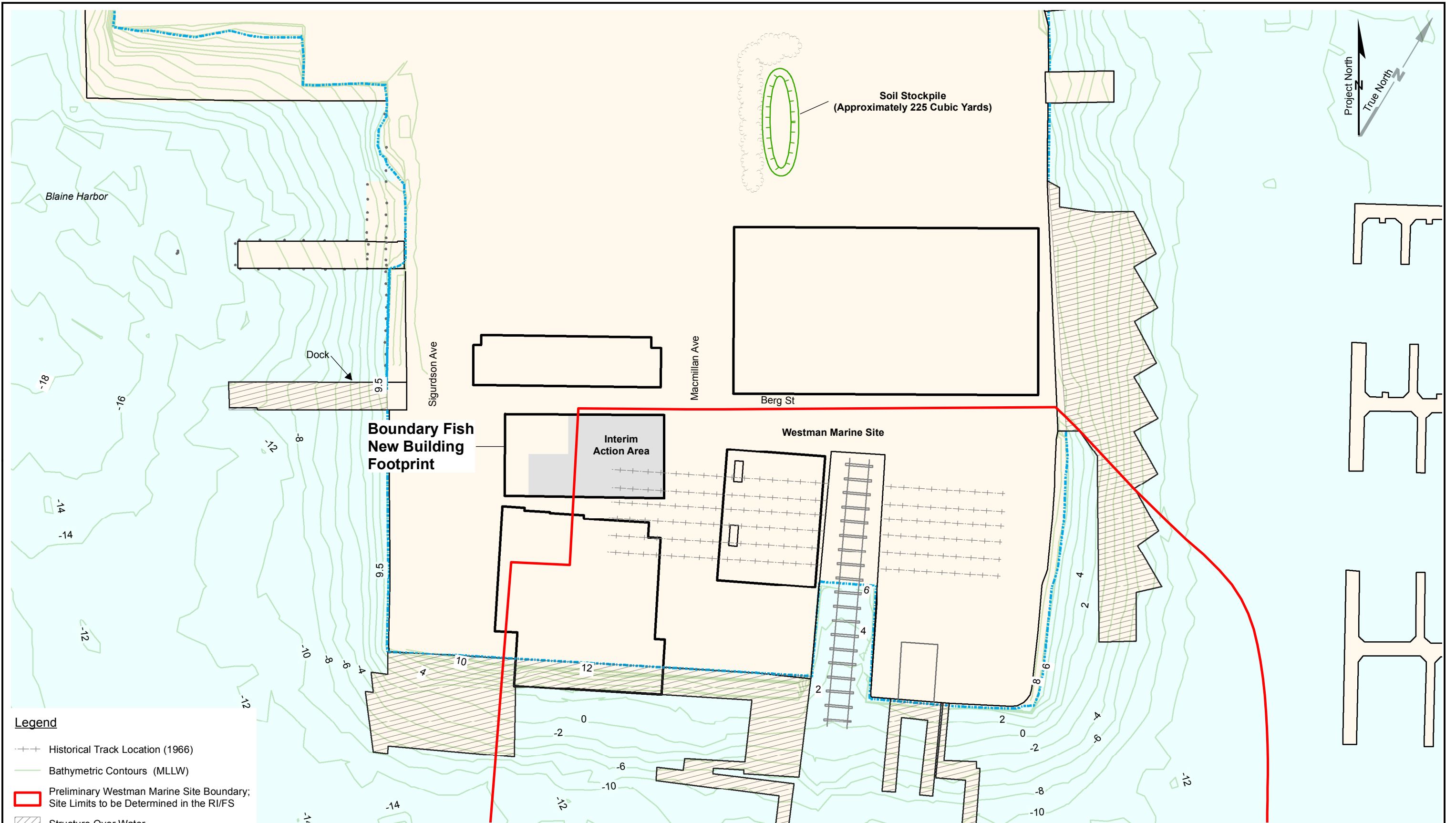


Data Source: Esri 2012

<p>Westman Marine Blaine Harbor Blaine, Washington</p>	<p>Vicinity Map</p>	<p>Figure 1</p>
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G:\Projects\0010350101017\Boundary Fish Interim Action\F02-WestmanMarineSiteMap.mxd 5/20/2014 NAD 1983 StatePlane Washington North FIPS 4601 Feet

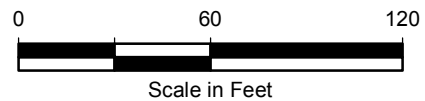


**Legend**

- Historical Track Location (1966)
- Bathymetric Contours (MLLW)
- ▭ Preliminary Westman Marine Site Boundary; Site Limits to be Determined in the R/FS
- ▨ Structure Over Water
- ▭ Interim Action Area
- ▭ Soil Stockpile

**Notes**

1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.



Source: Wilson Engineering 2011, Port of Blaine 2011, Walker and Associates, Inc.



Westman Marine  
Blaine Harbor  
Blaine, Washington

**Westman Marine Site Map**  
**Interim Action Area**

Figure  
**2**

# Disposal Documentation

Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

CUSTOMER  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55825	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 7:10 am	DATE/TIME OUT 04-1-2014 7:28 am	
VEHICLE 6181	CONTAINER TOLU459391	
REFERENCE	INVOICE	
DATE/TIME IN 04-01-2014	DATE/TIME OUT 03/28/2014	

SCALE IN	GROSS WEIGHT	87,220	NET TONS	21.22	
SCALE OUT	TARE WEIGHT	44,780	NET WEIGHT	42,440	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
21.22	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



NET AMOUNT
TENDERED
CHANGE
CHECK#

The undersigned individual signing this document on behalf of Customer acknowledges that he or she has read and understands the terms and conditions on the reverse side and that he or she has the authority to sign this document on behalf of the customer.

SIGNATURE \_\_\_\_\_

Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

<b>SITE</b> 21	<b>TICKET #</b> 55827	<b>CELL</b>
<b>WEIGHMASTER</b> Gail H.		
<b>DATE/TIME IN</b> 04-01-2014 7:14 am	<b>DATE/TIME OUT</b> 04-1-2014 7:31 am	
<b>VEHICLE</b> 7328	<b>CONTAINER</b> GCEU431745	
<b>REFERENCE</b>		INVOICE
<b>DATE OF LABELING</b> 01X430122	03/28/2014	

SCALE IN	GROSS WEIGHT	74,160	NET TONS	13.10
SCALE OUT	TARE WEIGHT	47,960	NET WEIGHT	26,200

INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
13.10	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



<b>NET AMOUNT</b>
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**site** Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

<b>SITE</b> 21	<b>TICKET #</b> 55837	<b>CELL</b>
<b>WEIGHMASTER</b> Gail H.		
<b>DATE/TIME IN</b> 04-01-2014 8:00 am		<b>DATE/TIME OUT</b> 04-1-2014 8:22 am
<b>VEHICLE</b> 1454		<b>CONTAINER</b> TOLU476783
<b>REFERENCE</b>		INVOICE
<b>DATE OF LADING</b> DITX430122		03/28/2014

SCALE IN	GROSS WEIGHT	92,280	NET TONS	22.10
SCALE OUT	TARE WEIGHT	48,080	NET WEIGHT	44,200
				INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
22.10	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



<b>NET AMOUNT</b>
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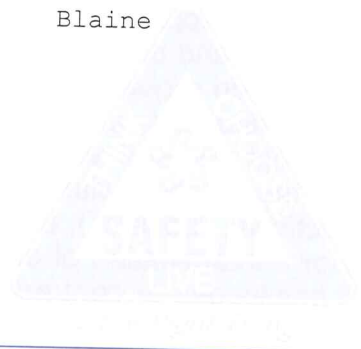
site Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

CUSTOMER  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55838	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:01 am	DATE/TIME OUT 04-1-2014 8:23 am	
VEHICLE 6181	CONTAINER GCEU435353	
REFERENCE INVOICE		
BIN OF DRAINING BNSF250101 03/28/2014		

SCALE IN	GROSS WEIGHT	94,960	NET TONS	24.94	
SCALE OUT	TARE WEIGHT	45,080	NET WEIGHT	49,880	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
24.94	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



NET AMOUNT
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 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55839	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:05 am	DATE/TIME OUT 04-1-2014 8:27 am	
VEHICLE 7328	CONTAINER TPHU252576	
REFERENCE INVOICE		
BIN OF LADING BNSF230101 03/28/2014		

SCALE IN	GROSS WEIGHT	103,280	NET TONS	28.19
SCALE OUT	TARE WEIGHT	46,900	NET WEIGHT	56,380
				INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
28.19	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



NET AMOUNT
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Site Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55840	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:15 am	DATE/TIME OUT 04-1-2014 8:40 am	
VEHICLE 7327	CONTAINER GCEU430961	
REFERENCE	INVOICE	
BIN OF DRAIN BNSF230101	03/28/2014	

SCALE IN	GROSS WEIGHT	101,140	NET TONS	28.31	
SCALE OUT	TARE WEIGHT	44,520	NET WEIGHT	56,620	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
28.31	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



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 Roosevelt Wa, 99356

**CUSTOMER**  
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 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55841	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:17 am	DATE/TIME OUT 04-1-2014 8:40 am	
VEHICLE 6182	CONTAINER GCEU432018	
REFERENCE	INVOICE	
BLN OF LADING BNSF230045	03/27/2014	

SCALE IN	GROSS WEIGHT	105,380	NET TONS	28.42	
SCALE OUT	TARE WEIGHT	48,540	NET WEIGHT	56,840	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
28.42	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



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Roosevelt Wa, 99356

**CUSTOMER**  
014209  
Strider Construction Co. Inc.  
4721 Northwest Road  
Bellingham, WA 98225  
LW-14048

SITE 21	TICKET # 55842	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:16 am	DATE/TIME OUT 04-1-2014 8:46 am	
VEHICLE 5833	CONTAINER EGTU420439	
REFERENCE	INVOICE	
BLN OF LADING BNSF230101	03/28/2014	

SCALE IN	GROSS WEIGHT	103,560	NET TONS	27.97
SCALE OUT	TARE WEIGHT	47,620	NET WEIGHT	55,940

INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
27.97	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL Blaine				



NET AMOUNT
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Roosevelt Wa, 99356

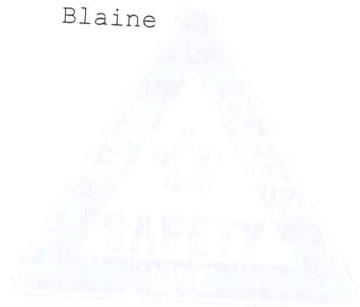
**CUSTOMER**  
014209  
Strider Construction Co. Inc.  
4721 Northwest Road  
Bellingham, WA 98225  
LW-14048

SITE 21	TICKET # 55843	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:56 am	DATE/TIME OUT 04-1-2014 9:15 am	
VEHICLE 1454	CONTAINER TRLU902653	
REFERENCE		
INVOICE		
BILLS OF LADING DNSF230045 03/27/2014		

SCALE IN      GROSS WEIGHT      104,720      NET TONS      29.05  
SCALE OUT      TARE WEIGHT      46,620      NET WEIGHT      58,100

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
29.05	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL Blaine				

INBOUND



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SITE Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

SITE 21	TICKET # 55844	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 8:58 am	DATE/TIME OUT 04-1-2014 9:21 am	
VEHICLE 6181	CONTAINER AWIU8130	
REFERENCE BNSF230045	INVOICE	
BLNCP14000	03/27/2014	

CUSTOMER  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SCALE IN	GROSS WEIGHT	109,220	NET TONS	31.35	
SCALE OUT	TARE WEIGHT	46,520	NET WEIGHT	62,700	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
31.35	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL Blaine				



<b>NET AMOUNT</b>
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 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55845	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 9:02 am	DATE/TIME OUT 04-1-2014 9:22 am	
VEHICLE 7328	CONTAINER AWIU200005	
REFERENCE		INVOICE
BILL OF LADING BNSF230045		03/27/2014

SCALE IN	GROSS WEIGHT	113,860	NET TONS	32.48
SCALE OUT	TARE WEIGHT	48,900	NET WEIGHT	64,960

INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
32.48	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL Blaine				

<b>NET AMOUNT</b>
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SR  
 Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

CUSTOMER  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55846	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 9:16 am	DATE/TIME OUT 04-1-2014 9:40 am	
VEHICLE 7327	CONTAINER GCEU431575	
REFERENCE	INVOICE	
BITS OF LABING BNSF230045	03/27/2014	

SCALE IN	GROSS WEIGHT	98,700	NET TONS	27.88	
SCALE OUT	TARE WEIGHT	42,940	NET WEIGHT	55,760	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
27.88	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



<b>NET AMOUNT</b>
TENDERED
CHANGE
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Roosevelt Landfill  
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 Roosevelt Wa, 99356

CUSTOMER  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

SITE 21	TICKET # 55847	CELL
WEIGHMASTER Gail H.		
DATE/TIME IN 04-01-2014 9:16 am	DATE/TIME OUT 04-1-2014 9:41 am	
VEHICLE 6182	CONTAINER GCEU420049	
REFERENCE	INVOICE	
BILL OF LADING BNSF230045	03/27/2014	

SCALE IN	GROSS WEIGHT	101,920	NET TONS	27.36	
SCALE OUT	TARE WEIGHT	47,200	NET WEIGHT	54,720	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
27.36	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



NET AMOUNT
TENDERED
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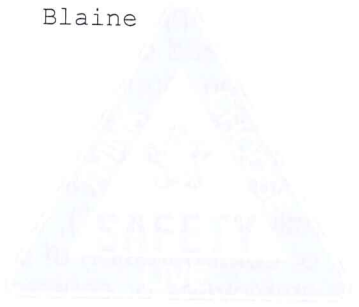
**SR** Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

<b>SITE</b> 21	<b>TICKET #</b> 55848	<b>CELL</b>
<b>WEIGHMASTER</b> Gail H.		
<b>DATE/TIME IN</b> 04-01-2014 9:21 am		<b>DATE/TIME OUT</b> 04-1-2014 9:45 am
<b>VEHICLE</b> 5833		<b>CONTAINER</b> GCEU425116
<b>REFERENCE</b>		INVOICE
<b>BILL OF LADING</b> BNSF231189		03/27/2014

SCALE IN	GROSS WEIGHT	125,400	NET TONS	37.78	
SCALE OUT	TARE WEIGHT	49,840	NET WEIGHT	75,560	INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
37.78	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



<b>NET AMOUNT</b>
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**SITE** Roosevelt Landfill  
 500 Roosevelt Grade Rd  
 Roosevelt Wa, 99356

**CUSTOMER**  
 014209  
 Strider Construction Co. Inc.  
 4721 Northwest Road  
 Bellingham, WA 98225  
 LW-14048

<b>SITE</b> 21	<b>TICKET #</b> 55849	<b>CELL</b>
<b>WEIGHMASTER</b> Gail H.		
<b>DATE/TIME IN</b> 04-01-2014 9:53 am		<b>DATE/TIME OUT</b> 04-1-2014 10:18 am
<b>VEHICLE</b> 1454		<b>CONTAINER</b> GCEU426056
<b>REFERENCE</b>		INVOICE
<b>BLN OF LADING</b> BNSF231189		03/27/2014

SCALE IN	GROSS WEIGHT	129,200	NET TONS	39.37
SCALE OUT	TARE WEIGHT	50,460	NET WEIGHT	78,740
				INBOUND

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
28.00	YD	TRACKING QTY				
39.37	TN	Cont Soil				
1.00		CONTAINER/CHASIS RENTAL				



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