



## **RESPONSIVENESS SUMMARY**

**Solid Wood Incorporated site**

**November 20 – December 24, 2008 Public Comment Period**

**Revised Agreed Order and Interim Action Work Plan**

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

**January 2009**

## TABLE OF CONTENTS

Site Information .....	3
Site Background .....	3
Site Map .....	4
Comment #1: Tim Davis .....	5
Comment #2: Bob Hodges.....	5
Comment #3: Phil Weigand .....	6
Comment #4: Heather Trim.....	6

## Site Information

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**Address:** West Bay Drive (north of Fourth Avenue Bridge)

**Site Manager:** Steve Teel

**Public Involvement Coordinator:** Meg Bommarito

**The Washington State Department of Ecology (Ecology) entered into an Agreed Order with the City of Olympia for a Remedial Investigation, Feasibility Study, Interim Action and draft Cleanup Action Plan in July 2008.** As a result of public comment and preliminary Remedial Investigation work, the work plan and Agreed Order were revised to include additional work and to adjust the schedule. The revised work plan now includes:

- An Interim Action (partial cleanup) to remove 277 pilings and debris from the northern area of the site.
- Sediment sampling after the pilings are removed.
- Groundwater sampling from five seeps (springs).

**The comment period for this agreed order ran from November 20 – December 24, 2008. Public comments and Ecology's responses are summarized in this document.**

## Site Background

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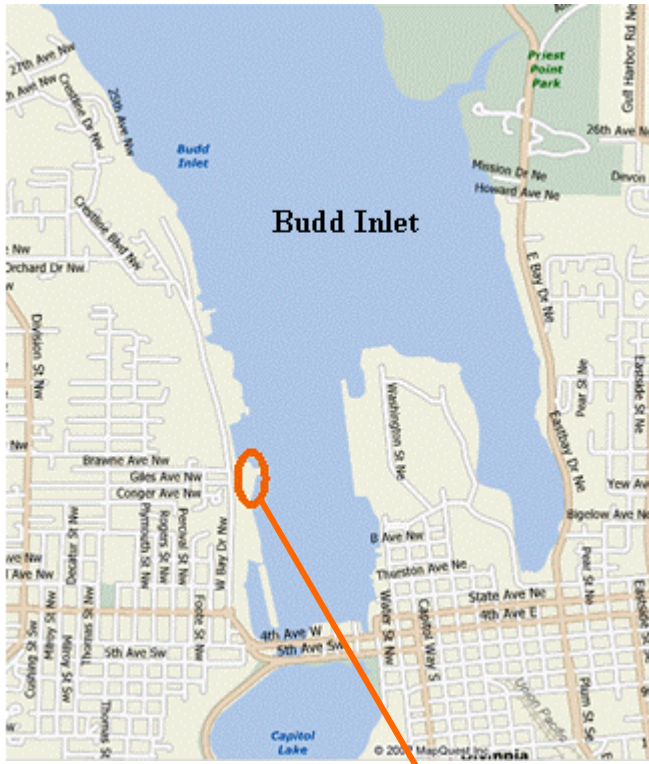
The Solid Wood Inc. site (proposed West Bay Park) is about 16.4 acres in size and historically operated as a lumber mill. The site lies on the West Bay of Budd Inlet, east of West Bay Drive and north of the Fourth Avenue Bridge. The Solid Wood Inc. site includes the former mill area, former railroad right-of-way, and peninsula.

Past operations at the site resulted in the contamination of soil, groundwater, and possibly sediment. Initial investigations discovered total petroleum hydrocarbons (TPH), carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and metals at levels that exceed the Model Toxics Control Act (MTCA) cleanup standards for soil and groundwater.

The site has been purchased by the City of Olympia for development as a park. The City is now responsible for the cleanup of contamination at the site. Cleanup and development of the first phase of the West Bay Park is planned for this summer. For more information about the development of the West Bay Park, please contact Julie McQuary at (360) 709-2700 or [jmcquary@ci.olympia.wa.us](mailto:jmcquary@ci.olympia.wa.us) or visit

<http://www.olympiawa.gov/cityservices/par/parks/westbay.htm>

# Site Map



## Comment #1: Tim Davis

**From:** Tim Davis [mailto:timyodavis@msn.com]  
**Sent:** Thursday, November 20, 2008 5:29 PM  
**To:** Teel, Steve (ECY)  
**Subject:** West Bay Park

I saw the Olympian's article about the plans for West Bay Park. This park will be a great addition to the area and I fully support its development. While I understand that the cleanup process needs to occur and all appropriate regulations met, I encourage you to keep the process moving as swiftly as possible. I've seen these project hurdles take on lives of their own and sometimes lead to the death of some valuable projects.

Tim Davis

### Ecology Response:

Comment noted. Thank you for taking the time to comment! We appreciate your support for the swift cleanup of the site. We will continue to update you on the cleanup progress.

## Comment #2: Bob Hodges

**From:** Robert Hodges [mailto:robertcharleshodges@gmail.com]  
**Sent:** Friday, November 21, 2008 7:43 AM  
**To:** Teel, Steve (ECY)  
**Subject:** Solid Wood cleanup

My comment on the Solid Wood cleanup on West Bay Drive is: this latest proposal is more than enough. Let's get on with it.

Thanks, Bob Hodges

### Ecology Response:

Comment noted. Thank you for taking the time to comment! We appreciate your support for the cleanup of the site. We will continue to update you on the cleanup progress.

### **Comment #3: Phil Weigand**

**From:** Phil Weigand [mailto:PhilWeigand@comcast.net]  
**Sent:** Sunday, November 23, 2008 4:29 PM  
**To:** Teel, Steve (ECY)  
**Cc:** 'Judy Weigand'  
**Subject:** Solid Wood, Inc Site

Steve –

I live just across the street on West Bay Drive from the former Port property sold recently to the City of Olympia. For more than four years the city has been collecting a 3% utility tax for the purpose of developing West Bay Park and other sites. West Bay Park has been a designated site for a park for at least a decade, yet no substantive progress has been made, with the city often citing cleanup as the hold up.

My only comment is that I wish you would get going and do whatever needs to be done to make the site safe for use as a city park. The wheels of government go very, very slow and I would like to see the park become a reality in the first quarter of this century. Do you have a timeline of what it might take in time to certify the solid Wood site safe and suitable for development as a park?

Phil Weigand

#### **Ecology Response:**

Comment noted. Thank you for taking the time to comment! We appreciate your support for the rapid cleanup of the site. We will continue to update you on the cleanup progress.

### **Comment #4: Heather Trim**

December 24, 2008

Steve Teel, Site Manager  
WA Department of Ecology  
SWRO Toxics Cleanup Program  
P.O. Box 47775  
Olympia, WA 98504-7775  
Via email: stee461@ecy.wa.gov, mbom461@ecy.wa.gov

**RE: Solid Wood Incorporated revised Agreed Order and revised Clean Up Work Plan**

To Mr. Teel,

We are writing to comment on the *Solid Wood Incorporated revised Agreed Order and revised Clean Up Work Plan*, dated November 17, 2008. The site is located at 700-900 West Bay Drive north of the Fourth Avenue Bridge.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits.

Ecology has entered into an agreement with the City of Olympia for cleanup of the Solid Wood site. This comment letter addresses the revised agreed order and workplan which includes: an Interim Action to remove 277 pilings and debris from the northern area of the site, sediment sampling after the pilings are removed, and groundwater sampling from five seeps. The site will be redeveloped with the help of the Rotary Club into a waterfront park to be known as "West Bay Park."

The chemicals of known concern at this site are: petroleum hydrocarbons, poly-aromatic hydrocarbons (PAHs), and metals in soil, groundwater and sediment. Preliminary evidence points to previous spills of Bunker C fuel and lube-oil range organics.

Our comments follow:

1. **Type of work.** It is not clear from the Agreed Order or other documents as to why this is an interim action rather than a final action. Why is a final action not warranted? We are concerned that the health of Puget Sound be restored in an expedient manner and therefore the sediment should be addressed at the same time rather than delayed. We have no true assurance that the sediment will be addressed at this site because an interim action is being required.
2. **Downgradient threat to Puget Sound.** It appears from the Work Plan description that the downgradient extent of groundwater contamination (at elevated levels) has not been defined and may be a threat to Puget Sound at SB-19 and possibly other areas. We request that soil be sampled for these downgradient well locations.
3. **Public Participation Plan.** We are concerned that Ecology has a policy of signing agreed orders and developing "draft" work plans and other documents, sending them out for public comment and basically making no changes. This policy is contrary to true public participation and we ask Ecology to revise this policy for future sediment and upland cleanups in the Puget Sound region.

Thank you for the opportunity to comment. Please contact me with questions at (206) 382-7007 X215.

Sincerely,



Heather Trim  
Urban Bays and Toxics Program Manager

## Ecology Response:

Thank you for taking the time to comment! Our responses to each of your comments are listed below:

**Comment #1, Type of Work:** The purpose of the Interim Action is to reduce the threat to human health or the environment by eliminating or substantially reducing the soil, groundwater, and sediment contamination. Planned interim action activities that will immediately benefit sediments include the removal of 277 creosote pilings and soil excavation and removal from the hog fuel burner area. Performing the interim action as described in the work plan will result in a faster and more cost effective cleanup because the interim action will be performed in conjunction with the Phase I Site development. It is possible that the Interim Action will be sufficient and no further cleanup work will be necessary. The data collected during the remedial investigation should answer the question of whether additional cleanup actions are necessary.

**Comment #2, Downgradient threat to Puget Sound:** The Remedial Investigation/Feasibility Study and Interim Action work plan includes the installation of groundwater monitoring wells downgradient of SB-19. During installation of the wells, geologic logging and field screening of soil conditions are planned. Quarterly groundwater samples will be analyzed from these new wells to help define the extent of groundwater contamination.

We agree with your comment that soil samples should be analyzed if field screening suggests that contamination is present. Therefore, the work plan will be modified to state that soil samples will be collected and analyzed from any intervals that show noticeable staining or odors from apparent contamination.

**Comment #3, Public Participation Plan:** The first comment period for the Agreed Order and work plan was held in June 2008. However, based on public comments and Ecology's review of additional data that became available during the comment period, significant revisions needed to be made to the work plan. The work plan was revised and a second comment period was held from November 20 through December 24, 2008. This is an example of where Ecology revised a document in response to public comment. Therefore, we are not sure of the applicability of your concern in this instance. However, we will note your concern for future comment periods for this and other Sites.