



RESPONSIVENESS SUMMARY

West Bay Marina

August 7 – September 8, 2014 Public Comment Period

*Remedial Investigation/Feasibility Study Report,
Draft Cleanup Action Plan, and
State Environmental Policy Act (SEPA) Checklist and Determination*

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

September 2014

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Site Information

Address: 2100 West Bay Drive NW, Olympia

Site Manager: Andrew Smith

Public Involvement Coordinator: Diana Smith

The Department of Ecology (Ecology) held a public comment period on a proposed remedial investigation (RI) report and addendum, feasibility study (FS), draft cleanup action plan (CAP) and State Environmental Policy Act (SEPA) checklist and determination for the West Bay Marina site from August 7 – September 8, 2014. Public comments and Ecology's responses for this comment periods are summarized in this document.

Site Background

From 1919 – 1966, the West Bay Marina site was used as a saw mill, veneer plant, and stud mill. In 1966, the site became a boatyard and marina. The site has been used as West Bay Marina since 1990. Boat maintenance and repair ended in 2002.

In 1999, the marina entered the Voluntary Cleanup Program to clean up a petroleum spill from an underground storage tank system. At that time, the marina removed the underground storage tanks and cleaned up contaminated soil and groundwater.

In 2008, Ecology entered into an agreed order (legal agreement) with Westbay Marina Associates for the company to investigate the site and study cleanup options. Due to inactivity with the investigation, Ecology finished the investigation and studied cleanup options. We also developed the cleanup reports that underwent public review.

Next Steps

Based on discussions with Westbay Marina Associates (see comment letter on page 5 of this responsiveness summary), we will enter into an agreed order with Westbay Marina Associates for the company to do the cleanup. We anticipate holding a public comment period on the proposed legal agreement for cleanup in late 2014.

Responses to Comments

Comment #1: Harry Branch

Sent: Wednesday, August 13, 2014 10:14 AM

To: Smith, Andrew (ECY)

Subject: West Bay Marina Cleanup

I'm having a difficult time understanding this process. Ecology believes the source of dioxin at the site was a former hog fuel burner and is requiring that contamination be removed. Yet dioxin at the site of a former hog burner at East Bay Park was capped in place.

Contaminated soils, other than those removed in the process of burying utilities, were capped in place at the site of the Hands On Children's Museum adjoining East Bay. According to the Budd Inlet Sediment Characterization, surface sediments directly offshore from this site are a dioxin hot spot. The impetus behind this Characterization was to locate hot spots, pursue them to their sources and control the sources. Yet this is not the process in practice.

The other hot spot in Budd Inlet lies offshore from West Bay, well south of the marina. This contamination is attributed to Hardel lying to the south. But to my knowledge this has never been empirically established and the area adjoining the hot spot to the west, an area littered with broken pilings and other signs of historic industrial activity, has not been adequately assessed for dioxin.

I'm not seeing a lot of consistency. I think this lack of consistency is consistent with the State's handling of shoreline issues in general.

Ecology Response

Thank you for your comments.

Selecting Cleanup Actions

During the state cleanup process, a feasibility study is done to evaluate cleanup options that protect human health and the environment. Ecology selects the most appropriate option in the draft cleanup action plan.

We select cleanup options for sites depending on site-specific circumstances, so different sites will have different cleanup. When selecting cleanup actions, we prefer actions that are as permanent, complete, and effective as possible; are feasible; that will complete cleanup in a reasonable timeframe; and that consider community concerns. At some sites, as in the East Bay Redevelopment site, capping contaminated soil effectively protects human health and the environment by removing the pathway for exposure.

In the case of West Bay Marina, the dioxin-contaminated soils are shallow and limited in extent. The best approach for this site is to excavate and dispose of that soil. Capping was not an option for the West Bay Marina site because most of the dioxin-impacted soil is within an area with trees. You can read more about the cleanup actions we considered in the feasibility study.

Regarding your reference to East Bay Park, we assume that you are referring to the Solid Wood Site (also known as West Bay Park). An interim action (partial cleanup) was performed at that site in 2009 during park construction. The interim action included excavating soil contaminated with metals and dioxins from a former hog fuel burner (Cleanup Area D). All of the metals and dioxin contamination associated with the hog fuel burner was removed during the cleanup (see the interim action report at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=4228>).

Sediment Cleanup

Regarding Budd Inlet sediment characterization work, under an agreed order amendment with Ecology, the Port of Olympia is continuing to investigate cleanup options for a study area in southern Budd Inlet. The Port recently submitted the initial draft investigation report, which we are reviewing. We hope to make the investigation report available for public review this fall, along with a study of potential sources of the dioxins.

After that, the Port will finish evaluating cleanup options for the study area. Then they'll develop an interim action cleanup plan for the study area. We'll make each of the Port's cleanup reports available as a public review draft once we've approved each one. However, we don't plan to hold a formal public comment period until we have all three of the reports.

Comment #2: Westbay Marina Associates



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Andrew smith,
Site Manager DOE
Andrew.smith@ecy.wa.gov

September 8, 2014

Delivered electronically, 9/8/2014

RE: Westbay Marina FS ID #92753273

Dear Mr. Smith,

Westbay Marina Associates wishes to comment on the proposed clean-up of the dioxin contaminated soils mentioned in the fact sheet, August 2014, Westbay Marina.

We are aware of our obligation to remove the contaminated soil resting on our property.

We plan to move ahead with removal of the trees and soils as soon as possible. After the soils are removed we will have Anchor Environmental test the area to verify dioxins are not present. When “clean area” is confirmed we will backfill and regrade. Once the grade is restored new trees will be planted.

To assist in the endeavor we would appreciate a copy of the boring logs from previous Hart Crowser.

Thank you for the opportunity to comment.

Neil Falkenburg,
General Manager, Westbay Marina Associates

Ecology Response

We are glad to hear that you are planning on implementing the cleanup action plan. Ecology will work with Westbay Marina Associates to develop an agreed order for accomplishing this cleanup. We look forward to working with you toward the success of this project.