RESPONSE TO COMMENTS

Weldcraft Steel and Marine Site
Bellingham, Washington

Draft Remedial Investigation/Feasibility Study

February 2015

ISSUED BY:

WASHINGTON STATE DEPARTMENT OF ECOLOGY

TOXICS CLEANUP PROGRAM

1. Introduction

On July 20, 2014, the Draft Remedial Investigation/Feasibility Study (Draft RI/FS) report for the Weldcraft Steel and Marine site (Site) in Bellingham was issued for a 30-day public comment period. Public involvement activities related to this public comment period included:

- Distribution of a fact sheet describing the Site and the Site cleanup documents through a mailing to 2300 people, including neighboring businesses and other interested parties;
- Publication of a paid display advertisement in The Bellingham Herald on July 28, 2014;
- Publication of notice in the Washington State Department of Ecology's Site Register on July 24, 2014;
- Electronic announcement of the public comment period and posting of the documents on Ecology's web site; and
- Providing copies of the documents through information repositories at Ecology's Bellingham Field Office, Northwest Regional Office, and at the Bellingham Public Library- downtown branch.

A total of four comments were received, all four by e-mail, regarding the Draft RI/FS report.

Section 2 of this document provides background information on the Site and Site cleanup activities, and Section 3 presents anticipated next steps. Section 4 includes the comments received on the Draft RI/FS and Ecology's responses to comments.

2. Background

The Weldcraft Steel and Marine Site is located at 2652 Harbor Loop Drive, within Squalicum Harbor on the Bellingham Waterfront. The Site consists of approximately 2.5 acres of property owned by the Port of Bellingham (Port), including 1.9 acres of in-water aquatic land and 0.6 acres of upland. That portion of Squalicum Harbor was sometimes referred to as the Gate 2 Boatyard in the past, but is now commonly referred to as Seaview Boatyard North, the Port's current tenant in that location. Seaview Boatyard North operates within compliance with their NPDES boatyard permit and is not associated with the historic contamination problems being address under MTCA.
The Site began as Weldcraft Steel Works in 1946, and was subsequently used primarily

for boat repair, maintenance and fabrication work. Contamination at the site is associated with the historic boatyard operations of this prior tenant.

In 2003, Ecology and the Port signed a legal agreement requiring the Port to complete an environmental study of the Site (called a remedial investigation) and evaluate cleanup options (called a feasibility study). The agreement also required an interim cleanup action to remove contaminated sediment from the Site.

Concurrent with Port redevelopment activities in 2004, about 6,800 cubic yards of contaminated sediment were removed and disposed of at the Roosevelt Regional Landfill.

During the remedial investigation, site-wide investigation activities found contaminants exceeding state standards in the soil, groundwater and sediment. Contaminants include:

- In groundwater: petroleum related chemicals and metals (copper nickel, zinc);
- In soil: petroleum related chemicals and metals (copper, lead, nickel, zinc); and
- In pre-interim cleanup action sediment: tributyltin, metals (mercury, zinc, copper), and semi-volatile organic compounds.

Based on the results of the remedial investigation, the feasibility study defined specific units within the site: Cleanup options addressing contamination in these three units were evaluated and a preferred cleanup alternative was identified for each one.

Underground Storage Tank (UST) Unit consisting of the former UST area (soil, soil vapor and groundwater):

- Capping of contaminated soil with existing buildings, foundations, and pavement. Soil vapor control if needed;
- Removal of petroleum product from the groundwater, if possible;
- Reduction of vapor migration potential through petroleum product removal and a vapor control system;
- Soil, groundwater and soil vapor compliance monitoring;
- Property use restrictions to maintain the soil cap, restrict groundwater use and manage any contamination disturbed during future intrusive activities.

Work Yard Unit consisting of the North, South and Northeast work yards (soil and groundwater):

- Capping of contaminated soil with existing and new pavement;
- Soil, groundwater and soil vapor compliance monitoring;
- Property use restrictions to maintain the soil cap, restrict groundwater use and manage any contamination disturbed during future intrusive activities.

The Marine Unit consisting of the aquatic area (marine sediment):

- Interim action and compliance monitoring completed.
- Need for more sediment quality monitoring to be considered during future cleanup action plan development

The Site is one of 12 cleanup sites being addressed as part of the Bellingham Bay Demonstration Pilot Project, a multi-agency initiative integrating sediment cleanup, control of pollution sources, habitat restoration and land use on a bay- wide scale.

3. Next Steps

Comments received during the 30-day public review period on the Draft RI/FS report for the Weldcraft Site did not result in any changes to the document. Therefore the document is now considered final.

Based on the information in the RI/FS report, Ecology will select a cleanup action for the Site. A Cleanup Action Plan will then be issued for public review, likely in early 2015.

4. Comments Received and Ecology Responses

Terry Mantonye (e-mail)

From: Terry Mantonye [terrymontonye@msn.com]
Sent: Wednesday, July 30, 2014 7:59 PM
To: Petrovich, Brad (ECY)
Subject: Weldcraft Cleanup Comment

Brad,

Top of my head comment: empty hopper cars back to the Roosevelt Toxic Waste Site close to BNSF on the east side of the state, i.e., why not do everything to dig out all that waste and get it out of here?

Crabbing is good because bottom feeders are virtually wiped. Capping there and on Cornwall Beach won't do it.
Only way to get the bottom feeders back is digging and dredging out all the bad stuff with state and or county cops thereafter sleuthing polluters during dead periods on routine patrols!

Opinion short of financing, obviously. But, something to think about if you folks haven't done so already.

Terry Montonye
Coast Guard and Society for Optical Engineering (ret)

P.S. Thanks for including me!

Ecology Response:

Pertaining to removal of contaminated material, between September 2003 and March 2004, about 6,800 cubic yards of contaminated sediment was dredged and disposed of at the permitted Roosevelt Regional Landfill as part of an interim cleanup action.

With regard to contaminated soil, removal was evaluated in the Weldcraft Steel and Marine draft Remedial Investigation/Feasibility Study report (draft RI/FS) issued for public review. Remedial Alternative 4 called for site-wide removal and permitted landfill disposal of contaminated soil. Alternative 4 and three other alternatives were evaluated through a disproportionate cost analysis as required under the Model Toxics Control Act (MTCA Chapters 70.105D RCW & 173-340 WAC). *See* WAC 173-340-360(3)(e) . Based on this work, the increased cost of Alternative 4 over Alternative 1 (which calls for upland capping) is not proportionate to the increased benefit. As a result, Alternative 1 was found to be the preferred cleanup alternative.

Note that all alternatives evaluated in the draft RI/FS prevent people, plants, and animals from being exposed to harmful levels of contamination as required by WAC 173-340-360(2). The disproportionate cost analysis also identifies the alternative that is permanent to the maximum extent practicable.

Monte Hohanson (e-mail)

From: Monte Hokanson [monte.hokanson@hotmail.com]
Date: August 1, 2014 at 7:32:16 PM PDT
To: "Petrovich, Brad (ECY)" <bpet461@ecy.wa.gov>
Subject: RE: Dept. of Ecology public comment period - Weldcraft Steel & Marine site in Bellingham

Hello Brad,

The Marina project began in 2004 with removal of contaminated soils.

The Cornwall project should reach that same level of clean-up before the Marina is funded for vapor control.

Lessons learned from both projects should accelerate the permitting/study of the remaining waterfront clean-up.

Removal of dumped concrete/bricks from waterfront fishing waters is important. We should do this next without a long study.

My thoughts from outside the battle...thanks for all your hard work.

Monte

Ecology Response:

Sufficient grant funds are projected to be available to complete the cleanup of both of these sites. Through the state's Remedial Action Grant (RAG) program, Ecology plans to reimburse the Port of Bellingham up to half the cost of cleanup. This grant program helps to pay for the cleanup of publicly owned sites. See WAC 173-322A for additional information about the RAG Program.

Regarding lessons learned, Ecology staff working on 12 cleanup sites in and around Bellingham Bay routinely meet to share information and coordinate work.

Pertaining to concrete and bricks on the waterfront, these materials are not hazardous substances and are not regulated under state cleanup law. However, if these materials are co-located with hazardous substances that require remediation they will be addressed.

Jim Hansen (e-mail)

From: JIM HANSEN [jh_mk1234@msn.com]
Sent: Sunday, August 03, 2014 8:54 AM
To: O'Herron, Mary (ECY)
Subject: Weldcraft Site Cleanup

Dear Ms O'Herron

My comment on the proposed cleanup process for the Weldcraft site is that the work should be done in accordance with BBCP Alternative 2B and include significant upland disposal and not just capping in place.

Furthermore, if the cleanup process can only be conducted in accordance with the "Preferred Alternative", why bother seeking public comment. I had to dig through the website quite a bit to find the EIS and review the other Alternatives. The money wasted on the recent public mailing would have been better spent on a real cleanup process.

There are costs more grievous than fiscal ones.

Jim Hansen
360 676-8014

Ecology Response:

The EIS and BBCP Alternative 2B referenced appears to pertain to the EIS prepared in 2000 for the Bellingham Bay Comprehensive Strategy planned action, which included Near-Term Remedial Action Alternatives for the cleanup of the Whatcom Waterway site. The Whatcom Waterway site is a contaminated marine sediment site located south of the Weldcraft Steel and Marine site. Information about the Whatcom Waterway site can be found at: https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=219. State Environmental Policy Act review for the cleanup of the Weldcraft site is expected to occur next year, as part of Ecology's development of a cleanup action plan for the site.

Regarding the difficulty in finding the EIS, since this document does not relate to the Weldcraft Steel and Marine site we did not provide a web address for the document in our mailer. However, a web address was provided in the mailer for the Weldcraft Steel and Marine draft Remedial Investigation and Feasibility Study report (draft RI/FS) that was issued for public review. In addition, the document was placed at a number of repositories listed in the mailer. Here's a link to the web page: https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=1785.

With regard to the removal of contaminated soil, this was evaluated in the draft RI/FS. Remedial Alternative 4 called for site-wide removal and permitted landfill disposal of contaminated soil from the upland portion of the site. Alternative 4 and three other alternatives were evaluated through a disproportionate cost analysis. Based on this work, the increased cost of Alternative 4 over Alternative 1, which calls for upland capping, is

not proportionate to the increased benefit. As a result, Alternative 1 was found to be the preferred cleanup alternative.

Note that all alternatives evaluated in the draft RI/FS prevent people, plants and animals from being exposed to harmful levels of contamination as required by WAC 173-340-360(2). The disproportionate cost analysis also identifies the alternative that is permanent to the maximum extent practicable.

Regarding public review of the draft RI/FS, this information is made available for public review so that the public is aware of the remedial actions taking place at the site and has the opportunity to share concerns and provide comments. These comments vary by site and can range from input on the accuracy of the information provided in the document to alerting Ecology that pertinent information may be missing. Public notice and participation requirements and processes under MTCA are explained in detail in WAC 173-340-600.

Pertaining to upland disposal and capping of contaminated sediment, in 2004 about 6,800 cubic yards of contaminated sediment was dredged and disposed of at the Roosevelt Regional Landfill, as part of an interim cleanup action at the Weldcraft site.

RE Sources (e-mail + attached letter)

From: Lee First [leef@re-sources.org]
Sent: Thursday, August 28, 2014 3:32 PM
To: O'Herron, Mary (ECY)
Subject: Weldcraft Comment Letter

Hi Mary, here's our comment letter. Thanks in advance for considering our comments. Let's meet for a walk at Little Squalicum sometime...I've made plans to conduct a tour of Little Squalicum for our PPG grant on October 15. We'll discuss stormwater, cleanup processes, and future plans for estuary development. Then, on October 29, planning to do a tour starting at Holly Street Landfill. City restoration and parks staff are working with me on both tours.

cheers

lee
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Lee First
Pollution Prevention Specialist, North Sound Baykeeper Team
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Mary O'Herron – Site Manager
WA Department of Ecology
1440 10th Street, Suite 102
Bellingham, WA 98225
[via email: mary.oherron@ecy.wa.gov]

RE: Weldcraft Steel & Marine

August 28, 2014

Dear Mary:

Re: Comments on Weldcraft Steel & Marine

The North Sound Baykeeper, a project of RE Sources, has a mission to safeguard marine and freshwater water quality and habitat in Whatcom and Skagit Counties. Our members reside primarily in Whatcom and Skagit Counties, and it is on their behalf that we submit these comments on the proposed GP West cleanup. We hope that these comments help Ecology develop a more robust and protective plan. We do appreciate the sustained efforts of you and the Bellingham Bay Action Team to clean up Bellingham Bay, and we look forward to a restored shoreline and healthier habitat in Bellingham Bay.

1. As part of an interim action, 7,000 cubic yards of contaminated marine sediment was removed from the in-water portion of the site in 2004. This resulted in the loss of about 0.18 acres of intertidal habitat (above elevation -4 feet MLLW) and about 0.23 acre of shallow subtidal habitat (between elevation -4 and -10 feet MLLW), and an increase of about 0.46 acre of deep subtidal habitat (below elevation -10 feet MLLW). In accordance with the project permit requirements, habitat impacts were mitigated by construction of a new marine habitat bench along the seaward side of the Squalicum Outer Harbor federal breakwater. The goal of the marine habitat bench construction was to initially create a minimum of 2 acres of shallow subtidal habitat above elevation -10 feet MLLW including a minimum of 1 acre of habitat between elevation -4 and -6 feet MLLW. The physical success criteria for the marine habitat bench is that after 5 years, a minimum of 1 acre of shallow subtidal habitat above -10 feet MLLW is maintained, including a minimum of 0.5 acres of habitat above elevation -6 feet. Information about the performance of the habitat bench was not included in the RI/FS, and is not available. We request that this information be provided, and that the requirement for successful mitigation, including performance standards, be included in the Consent Decree for this project.

2. A successful habitat restoration project should include information about what species have colonized the habitat area, not merely elevations. Please provide this information.
3. The RI/FS states that stormwater runoff in the North Work Yard only occurs during extreme runoff events, and then ends up in the bioswale. Once this area is paved (a provision of Alternative 1) much more stormwater will be routed to the bioswale. Is the bioswale appropriately sized to handle additional stormwater? Is it currently maintained properly? Please require that the soil and vegetation be changed at least once per year to ensure that contaminated runoff is not escaping the bioswale, and be properly recorded in the stormwater pollution prevention plan.
4. Alternative 1 does not include paving the eastern portion of the dry storage yard, which is used by the current tenant for boat repair activities. Please include paving this area as part of the cleanup. Pavement provides a surface that is easy to clean, and will act as a cap, as in other areas of the site. Stormwater should be collected, managed, and treated from this area in the same way as in other areas of the site
5. The RI/FS states in several places that the current tenant has improved stormwater management and treatment activities since the start of their tenancy in 2004. The document also states the former tenant applied poor housekeeping and limited stormwater treatment and management practices, which resulted in the release of contamination to surface water and marine sediment. We request that the cleanup of the site include a cleanup strategy that is independent from best management practices that may not be consistently employed.
6. Several reports on Ecology's Environmental Report Tracking System documents concerns which may lead to re-contamination:
    - The new berm along Squalicum Way is not properly sealed. During rain events, stormwater leaks under this unsealed berm. Once under the berm, it enters the City's stormwater conveyance system. The entire berm area should be subjected to a leak test.
    - Paint chips and metal flakes have been observed in the roadway along Squalicum Way. Stormwater from this area drain north, into the City's catch basin near the corner of Squalicum Way and Roeder Avenue, and are discharged to marine waters without any treatment.
    - Tarps under vessels in the boatyard have been observed highly contaminated with paint chips and dusts. It appears that these areas are not cleaned regularly.
    - Stormwater has been observed leaking out under the berm on the south side of the South Work Yard unit. Pavement should be replaced, and/or a new, engineered berm should be installed along the south property boundary to ensure that stormwater has no opportunity to escape the site. The berm in this area should be subjected to a leak test.
    - In a photo log (February 11, 2010) provided by Ecology inspectors, important BMPs appear to be lacking. These include, but are not limited to an uncovered dumpster, chemical storage with a containment berm that may be improperly sized, chemical storage with some chemicals stored on the ground instead of on top of containment pallets, presence of water or liquids inside of containment pallets, and turbid water surrounding a catch basin.

Thank you again for responding to our concerns. We look forward to reviewing the final documents.

Sincerely,

Lee First, Pollution Prevention Specialist
Wendy Steffensen, North Sound Baykeeper

Ecology Response:

1. Information related to the habitat bench was not included in the RI/FS report because the purpose of the habitat bench is to address impacts related to the infrastructure improvements constructed in conjunction with the interim action, not for the interim action itself. Ongoing habitat bench compliance activities required under the Port's U.S. Army Corps of Engineers Section 10/404 permit for the 2004 interim action and infrastructure improvements will be discussed in the Consent Decree.

2. See response to #1.

3. The operations of the Port's current tenant at the site, Seaview Boatyard North, are covered by an NPDES boatyard general permit. This NPDES permit addresses issues such as waste and stormwater management and treatment. We are working with Ecology's Water Quality program to ensure that NPDES permit and cleanup issues are effectively coordinated. Also, NPDES permit requirements will be considered during design of the cleanup action to ensure that stormwater affected by the cleanup action is managed consistent with all applicable regulatory requirements, including the tenant's existing NPDES permit.

4. The engineering design phase of the cleanup action will determine if paving the Dry Storage Yard is necessary for cleanup. Paving requirements might also be considered as part of stormwater management under the facility's NPDES permit.

5. Please see response to #3. State water quality and cleanup regulations are overlapping tools for protecting human health and the environment. We are coordinating to effectively achieve this mandate.

6. Your observations have been shared with Ecology's NPDES permit manager for the Seaview Boatyard North facility. Also, please see responses to #3 and #5.