

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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February 8, 1993

Terry Kakida
Seattle City Light
Environment, Health, and Safety Division
1015 3rd Avenue
Seattle, WA 98104-1198

Subject: Future Sediment Remediation Requirements

Dear Mr. Kakida:

I am writing to make sure that you and any potential buyer of the City Light Steam Plant property are aware of potential future sediment cleanup needs at and adjacent to the subject property. The Department of Ecology is currently in the process of developing a contaminated sediment site list for Washington State. Although the list is not complete and the Lake Union area has not yet been addressed, my review of existing sediment and bioassay data for sediments adjacent to the plant indicates that the plant property and adjacent sediments exceed site listing criteria and thus will likely be placed on the sediment site list when the Lake Union area is addressed.

The Sediment Management Standards, WAC 173-204, state that if three stations in an area exceed the Cleanup Screening Levels, the area would be listed as a contaminated sediment site. In the recent report submitted to Ecology, sediments under the building are reported as having high concentrations of PCBs, lead, and mercury. There is also a concern over the potential for PAH contamination due to possible releases of Bunker C fuel oil. Although the sediments under the building that could be reached were remediated, sediments that could not be reached may continue to pose a hazard to the environment. In addition, an earlier report (South Lake Union Pilot Project Report) prepared by the City of Seattle includes discussion of sediment samples collected adjacent to the facility.

In this earlier report, high concentrations of mercury, PAHs, and PCBs were found in sediment samples taken along a transect running from the Steam Plant out to

Lake Union (contaminants also found in sediments under the Steam Plant). In addition, bioassay samples (Microtox pore water test) were collected. These bioassay samples exceeded the "minor adverse effects" level (50% reduction in photoluminescence) used as a Cleanup Screening Level by Ecology for freshwater sediments. These chemical and bioassay results together indicate a potential for biological effects exceeding the narrative Cleanup Screening Levels used for freshwater sediments and will likely result in eventual site listing and ranking.

Both Seattle City Light and the eventual buyer of the property will retain liability for sediment cleanup that is required as a result of sediment site listing and ranking, regardless of agreements between the parties (which are not recognized by MTCA, the cleanup authority that would govern sediment cleanup at this site).

If you have any questions on the above information, please call me at 649-7257.

Sincerely,

Teresa Michelsen

Sediment Technical Specialist

Northwest Region