



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Agreed Order Amendment

South State Street Manufactured Gas Plant Site Bellingham, WA

Facility Site ID: 2865

Cleanup Site ID: 4606

May 2019

Publication and Contact Information

This document is available on the Department of Ecology's South State Street Manufactured Gas Plant website at:

<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=4606>

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- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Olympia 360-407-6300
- Central Regional Office, Union Gap 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-255-4400 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

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Washington State Department of Ecology

Northwest Regional Office

Toxics Cleanup Program

Bellevue, Washington

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Public Outreach

From March 18 to April 16, 2019, the Department of Ecology (Ecology) solicited public comments on an amendment to an agreed order (legal agreement) for the South State Street Manufactured Gas Plant cleanup site (Site) on the Bellingham waterfront. The amendment requires development of a cleanup action plan and design documents to address contamination at the Site.

Our public involvement activities related to this 30-day comment period included:

- **Postcard:**
 - US mail distribution of a postcard providing information about the cleanup documents and the public comment period to approximately 2,100 people including neighboring businesses and other interested parties.
 - Email distribution of the postcard to approximately 200 people, including interested individuals, local/county/state/federal agencies, and interested community groups.
- **Legal Notice:**
 - Publication of one paid legal ad in *The Bellingham Herald*, dated Friday, March 15, 2019.
- **Site Register:**
 - Publication of 4 notices in Ecology's Toxics Cleanup Site Register:
 - Comment Period Notice:
 - March 14, 2019
 - March 28, 2019
 - April 11, 2019
 - Response Summary Notice:
 - June 6, 2019
 - Visit [Ecology's Site Register website](#)¹ to download PDFs.
- **Website:**
 - Announcement of the public comment period and posting of the post card and associated documents for review on [Ecology's South State Street Manufactured Gas Plant website](#)²
- **Document Repositories:**
 - Provided copies of the documents for public review through three information repositories:
 - Bellingham Public Library in Bellingham
 - Ecology's Bellingham Field Office in Bellingham
 - Ecology's Northwest Regional Office in Bellevue

¹<https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

² <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=4606>

Comment Summary

Ecology received four comments during the 30-day comment period.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Scott	Moore		Individual
2	Sam	Shipp		Individual
3	Alexandra	Castro		Individual
4	Carole	Slesnick		Individual

Next Steps

Later in 2019 or early 2020, Ecology will make a draft Cleanup Action Plan available for public review and comment. This draft Cleanup Action Plan for the Site is based on the information in the final Remedial Investigation and Feasibility Study report.

Comments and Responses

Ecology has reviewed and considered all comments received on the amendment to the agreed order. Based on Ecology’s evaluation of the comments, no changes were made to the documents, and they are being finalized.

The comments are presented below, along with Ecology’s responses. Appendix A, on page 5, contains the comments in their original format.

Comment from: Scott Moore

Thanks for the opportunity to provide comments. I agree with the clean up effort, but have some comments. While I do agree with the clean-up proposal my preference would be to completely remove the toxins though I realize it may not be practical or fully needed. One dilemma I have is that currently (if I'm my interpretation and understanding of the clean-up effort is correct) is that presently the in-water toxins are not considered a hazard as time has rendered them less harmful or not dangerous to life, thus I'm wondering if or why removing or capping the in-water toxins is actually needed at this point especially as the mere passing of time has and is diluting the harmful chemicals!

Another area of concern is the toxin contamination surrounding the railroad tracks. I realize the difficulty and complexity to address this area as it's an active rail line, but it seems this hazardous area of concern is being ignored and would like to see if some kind of arrangement with the railroad could be found to mitigate this location of toxin issues!

I've been following the past proposals to construct a new northern in-water boardwalk route from Boulevard park to a projected new park along the waterfront area (the location of an old city dump I believe) and I was wondering how this toxic clean-up effort is going to impact that project?

I would like to commend all the entities for addressing these past hazardous occurrences and making our community a better and safer place to live and play. Thank you all for your good efforts as it's much appreciated and applauded.

Response:

Complete removal of the contamination was evaluated but determined unnecessary to eliminate the risk of exposure or to meet the required cleanup standards. This determination was supported by the results of a disproportionate cost analysis (DCA) that was conducted for the complete removal alternative.

Ecology does not consider the “in-water” (i.e., sediment) contamination non-hazardous and the contaminants are not being diluted. Under the MTCA, elimination of exposure pathways may be an acceptable remedy. In this case, the application of a sand cap or capping by enhanced and monitored natural recovery was determined an effective remedy to eliminate the risk of exposure.

We did not collect data from the railroad right-of-way (ROW). The current railroad tracks and ballast are constructed on top of the historic ground surface. Ecology will require that land use or administrative controls be implemented to address the potential for any future exposure to contamination that may be present beneath the railroad ROW.

The cleanup of this site will have no direct impact on the possible future development of an over-water walkway connecting Boulevard Park with the Cornwall landfill site.

Comment from: Sam Shipp

The agreed order was complete in May of 2010. Its almost been 9 years.

Response:

That is correct.

Comment from: Alexandra Castro

I been lucky to call South Hill my home for nearly 4 years as a transplant. Bellingham is so near and dear to me as my new home and I especially love my new neighborhood. If I could propose a mural of jellyfish or cephalopods to beautify a bit I'd be honored to do so. I am more than prepared to show my body of work. And yes I know it's a silly thing but I find jellyfish relaxing and beautiful. Maybe it'll make my little piece of the world a little more of the same. I've included a mural I did for a friend's nursery.

Response:

Thank you for your comment and willingness to enhance the park. However, that type of work would be captured under the City's park operations and unrelated to the MTCA cleanup effort. Ecology has shared your comment with the City of Bellingham's Park Development Division.

Comment from: Carole Slesnick

This plan will be about the third time in just a few years that the boulevard park has been torn apart.

What summer did we last hear regularly scheduled music in that park?

Very sorry to see the historic overpass go. But even sorrier to see the park go.

Sincerely,

Carole Slesnick

Response:

Boulevard Park is an important asset to the City of Bellingham and community. This cleanup project and the City's continued improvements to the park's infrastructure will enhance this asset. The removal of the railroad overpass is not part of, nor will it affect, this cleanup effort.

Appendices

Appendix A. Public Comments in Original Format

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From: **Carole Slesnick** caroleevelyn3@gmail.com
Subject: boulevard park
Date: March 20, 2019 at 12:54 PM
To: bit.ly/Ecology-SouthStateStMGP-Comments2019

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Sincerely,
Carole Slesnick

comment period Mar 18 - April 16

Since these comments did not
"send" I hope you can get
it to the address before Apr 16

Thanks

RECEIVED

MAR 29 2019

DEPT OF ECOLOGY
BELLINGHAM FIELD OFFICE