

Public comments: Central Waterfront cleanup site interim action – agreed order amendment

Following are public comments for the Central Waterfront cleanup site interim action. The public comment period was July 17 through Aug. 15, 2012.

From: [carl.nln](#)
To: [Sabo, Brian \(ECY\)](#)
Subject: Bellingham waterfront cleanup interim action
Date: Wednesday, July 25, 2012 1:23:53 PM

While it appears that there is an immediate problem to be resolved, the proposed interim cleanup may be too limited. Even if there is leak source within the proposed interim action area that does not mean that there are not other leak sources within the larger Chevron sub-area. If so, there will likely be continued leakage flowing around the proposed barrier created for the interim action area. Has this been studied? If not, the proposed action may be a wasted effort.

From: [Tom Olsen](#)
To: [Sabo, Brian \(ECY\)](#)
Subject: Public comment for file
Date: Wednesday, July 25, 2012 2:12:01 PM

Re: Site 2864, interim action amendment

The proposed amendment seems practical and appropriate. Please move ahead with work under this amendment as soon as practical.

Since the specific site contamination under this interim amendment is on a Chevron site, it would seem logical to bill Chevron for the incremental cost. I recommend this even though I'm a Chevron shareholder.

But I do not propose slowing down cleanup work while liability disputes are sorted out. It would make more sense to do the work, accumulate the costs, and deal with Chevron after the fact.

Tom Olsen
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From: [Evaan Dossa](#)
To: [Sabo, Brian \(ECY\)](#)
Subject: Bellingham Central Waterfront Clean-up Facility Site ID #2864
Date: Friday, July 27, 2012 6:31:15 PM

Mr. Sato
Site Manager

Regarding Toxic Cleanup Program for Bellingham Central Waterfront Area.

I recently received the Dept of Ecology Publication Number 12-09-121, Central Waterfront.

I fully support moving forward with the Bellingham Central Waterfront Clean-up - responsible removal and disposal of all toxic materials from not just the "**sub-area**" but the **entire site**.

I can only hope this site clean-up will continue to move forward in a "timely manner" and equally important making it safe for Bellingham Residents and visitors to fully enjoy.

Thank You
Evaan Dossa



for Sustainable Communities

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Brian Sato, site manager
WA Department of Ecology
Toxics Cleanup Program
3190 160th Ave SE
Bellevue, WA 98008-5452
[via e-mail: bsat461@ecy.wa.gov]

RE: Bellingham Central Waterfront Interim Cleanup Action

August 15, 2012

Dear Brian Sato,

RE Sources North Sound Baykeeper exists to protect and preserve habitat and water quality in Whatcom and Skagit County. We have approximately 800 members, most residing and recreating in Bellingham.

We thank you for the opportunity to comment on this cleanup action and appreciate the efforts to clean Bellingham Bay, especially by taking action to control the petroleum source and protect the marine environment. We do, however, have a few concerns and clarifications that we would like to see addressed.

First of all, the groundwater is a point of concern. We are pleased to see that the groundwater will be collected during the cleanup action. Although this is the case, we are concerned with the potential for the groundwater contamination after the interim cleanup. We propose that there be groundwater monitoring and contingency plans. These should be outlined in the compliance monitoring plan.

In addition, the work plan should delineate the source of the petroleum. We would like to see the source of contamination completely removed, to ensure that petroleum seeps do not reoccur in the near future. If this is not possible, contingency plans to contain the contamination are needed.

Thank you for taking our comments into consideration.

Sincerely,

Jackson Barnes, Baykeeper Intern
Wendy Steffensen, Lead Scientist
North Sound Baykeeper, RE Sources



August 15, 2012

Mr. Brian Sato
Site Manager, Bellingham Central Waterfront
WA Department of Ecology
Toxics Cleanup Program
3190 160th Avenue SE
Bellevue, WA 98008-5452
Via E-mail: brian.sato@ecy.wa.gov

**RE: Proposed First Amendment to Agreed Order No. DE 3441 (2006 Order),
Interim Action to Deal with Leaking Bulkhead, Chevron Subarea Beach, Whatcom
Waterway**

Dear Mr. Sato,

Thank you for the opportunity to comment on the proposed first amendment to Agreed Order No. DE 3441 announced last month, for the Chevron Subarea Beach (Facility Site Identification Number 2864), located on the Whatcom Waterway, Bellingham, Washington.

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

We view this interim action to excavate and remove the Chevron Subarea Beach non-aqueous phase liquid (NAPL) petroleum and petroleum contaminated soil/sediments from the perspective of restoring the Sound's long-term characteristics. The potential flow of toxic chemicals from the site to the Sound must be reduced and, hopefully, eliminated.

Background: This site, a pocket smaller than 5,000 square feet, is located on the northwest bank of Bellingham's Whatcom Waterway, near the southwest end of C Street. It is now owned by the Port of Bellingham. The soil and sediment were reportedly contaminated by petroleum from the former Chevron Fuel Terminal operations during the period 1904 to 1987. In February 2012, Ecology and the Port of Bellingham site managers discovered an intermittent oily sheen on Whatcom Waterway. The resulting investigation revealed a completely deteriorated bulkhead (~70 feet long) that is allowing water at high tide to saturate the shoreline and draw out this historical contamination, particularly when rain increases the groundwater flow to the waterway. The proposed interim action involves removing about 800 cubic yards of petroleum-contaminated soil and sediment from this pocket and rebuilding the excavated area with clean sand and rock. It also involves installing an impermeable plastic sheet (design life: ~5 years) into the soil inland of the excavated area to prevent recontamination of the newly rebuilt shoreline. It is expected to take between four and six working days to

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complete. This interim action will be integrated into the cleanup of the full 55-acre Central Waterfront site, owned by the Port and others. Ecology expects to release the latter's draft remedial investigation (RI) and feasibility study (FS) in 2013 for public review.

Our comments on the proposed interim action plan follow:

- We support the work of Ecology and the Port to contribute to recovering the health of Puget Sound (1) by alleviating the immediate environmental danger posed by the failed bulkhead (please correct as expeditiously as possible!) and (2) by accomplishing the necessary post-cleanup monitoring until it can be effectively integrated into the Central Waterfront cleanup and monitoring operations, to deal with any long term threat posed by contaminants found on this interim cleanup site.
- We are concerned about the considerable elapsed time until the interim action is taken (the time elapsed since last February plus a minimum of 45 days for the Port's actions after this amendment is approved plus the time for Ecology to approve the interim action work plan and then to approve any revised interim action work plans plus the time needed by the Port to prepare for the start of the cleanup). Meanwhile contaminated material from this site continues to enter Whatcom Waterway. (What about additional contamination entering the Waterway that does not emit a recognizable sheen?) We understand Ecology has measures in place to expedite dealing with time-sensitive disasters. Should an expedited procedure also be formulated to deal with time-sensitive emergencies of this nature, i.e., slow, continual leaks of toxic materials that aggregate into significant environmental threats over time?
- We strongly support the potential for Port personnel (and supported by them) to use the information garnered from this project to support Central Waterfront RI/FS planning and other Sound rehabilitation projects, e.g., further detail on the flow of contaminated material through intertidal areas via both tidal movement and ground water, especially after rains; the effect of this material on fish, both those species resident in the waterway (e.g., forage fish) and the migrating Whatcom Creek salmon. We suggest an independent research and development effort be conducted in parallel with this interim action to capture the maximum possible amount of this valuable information. Is it practicable to support nearby university research entities to do this study?
- Although we understand the sampling to date has not revealed contaminated material on either side of the interim cleanup site, we urge continual attention be placed on detecting possible flows of toxic material around/through the interim barrier once it is established.

Thank you for your consideration. You can reach me at (206) 382-7007 X172 or Tom Winter at (206) 723-5311/t2winterjr@yahoo.com if you have any questions or concerns.

Sincerely,



Heather Trim
Director of Policy