



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Draft Interim Action Work Plan and State Environmental Policy Act Documents for the Grain Handling Facility at Freeman Site

Facility Site ID: 77319379

Cleanup Site ID: 12540

Public comment period held:

February 12 – March 13, 2020

Summary of a public comment period and responses to comments

March 2020

Publication and Contact Information

This document is available on the Washington State Department of Ecology's website at <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=1618>.

Contacts

Toxics Cleanup Program, Eastern Region
4601 North Monroe Street
Spokane, WA 99205

Sandra Treccani, Site Manager
509-329-3412, sandra.treccani@ecy.wa.gov

Erika Beresovoy, Public Involvement Coordinator
509-329-3546, erika.beresovoy@ecy.wa.gov

Washington State Department of Ecology - www.ecology.wa.gov

1. Eastern Regional Office, Spokane 509-329-3400
2. Headquarters, Lacey 360-407-6000
3. Northwest Regional Office, Bellevue 425-649-7000
4. Southwest Regional Office, Lacey 360-407-6300
5. Central Regional Office, Yakima 509-575-2490

Accommodation Requests

To request Americans with Disabilities Act accommodation, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, 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.

Toxics Cleanup in Washington State

Accidental spills of dangerous materials and past business practices have contaminated land and water throughout the state. The Washington State Department of Ecology (Ecology) Toxics Cleanup Program (TCP) works to remedy these situations through cleanup actions. TCP cleanup actions range from simple projects requiring removal of a few cubic yards of contaminated soil to large, complex projects requiring engineered solutions.

Contaminated sites in Washington State are cleaned up under the Model Toxics Control Act (MTCA, Chapter 173-340 Washington Administrative Code), a citizen-mandated law passed in 1989. This law sets standards to ensure toxics cleanup protects human health and the environment and includes opportunities for public input.

Public Comment Period Summary

Ecology held a comment period from February 12 through March 13, 2020, for the following draft documents for the Grain Handling Facility at Freeman site:

- [Interim action work plan](#)¹ – Union Pacific Railroad Company (UP) and Cenex Harvest States (CHS), the parties responsible for cleanup, propose to pump-and-treat groundwater contaminated with carbon tetrachloride to reduce the contaminant mass, slow groundwater plume movement, and start progress toward achieving cleanup goals
- State Environmental Policy Act (SEPA) documents – Ecology has reviewed the proposed interim cleanup actions using the [SEPA checklist](#)², and decided they won't adversely affect people or the environment in our [Determination of Non-significance](#)³

More information is available in the [public notice](#)⁴ that was mailed to the surrounding community.

Ecology appreciates the comments we received from one person, which we address in the Response to Comments section that begins on page 2. After considering the comments, we have finalized the draft documents without further changes.

¹ <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=89962>

² <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=89963>

³ <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=89965>

⁴ <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=91060>

Site Background

The site is located at South 14603 Highway 27 in Freeman (Rockford). The grain handling facility is seasonally active and includes 11 steel grain silos/bins, one steel grain elevator, and an underground receiving pit. The facility was constructed by Rockford Grain Growers around 1955. CHS purchased the facility in 1993, and is the current owner/operator. UP is the current and historic owner of the underlying property, and the railroad owns and operates a railway line that traverses the property and roughly parallels State Highway 27.

The grain handling facility has leached carbon tetrachloride into soil and groundwater. Carbon tetrachloride is a man-made chemical that does not break down quickly in the environment. It was widely used as an agricultural pesticide and fumigant to kill insects and rodents in grain storage facilities.

Response to Comments

The comment letter is printed verbatim followed by Ecology's responses.

Cliff Hansen, delivered in person at the March 4 public meeting

COMMENTS:

I want to know that there is some plan in effect for Union Pacific or other responsible parties pay for checking the health effects of students, residents and others who have had access to the water. There, might be health effects a long time down the road, and we need to make sure that there is a long-term plan to ensure their health and fund any treatments if there is a problem that could be a consequence of drinking the water or breathing contaminated air. This needs to be a life-long system, not just a one-time checkup.

I'm also concerned with having Union Pacific be putting forward a proposed solution for this when they have a financial interest in making the solution as inexpensive as possible.

Ecology's response

Thank you for your interest and for sharing your concerns about past, current, and future health impacts from the contamination at the Grain Handling Facility at Freeman site. Our program's directive is to protect human health and the environment from releases of contaminants to the environment. Current and future impacts to drinking water at the

school are being addressed through a drinking water treatment system. Treated water is sampled monthly to ensure the system is working and Freeman School District students and employees are not being exposed.

Because the school is a Group A Public Water System, they are required to regularly sample and report water quality to the Washington State Department of Health (DOH). Sampling has been occurring since the early 1980s, and on a more regular basis since 1999. [Water quality sampling data on the DOH website](#)⁵ shows the sampling history and maximum contaminant level (MCL) exceedances. Find site data by searching for “Freeman” or ID Number 26460H. The MCL, or regulatory compliance concentration, for carbon tetrachloride is 5 micrograms per liter ($\mu\text{g}/\text{L}$), so the “exceedances” tab lists when samples had concentrations higher than 5.

Treatment was installed at the school in fall 2012, so any exceedances after that were not reaching any receptors (people, plants, or animals) because the samples were taken before the water was treated. The data shows three detections of carbon tetrachloride exceeding the MCL before treatment was installed, and the levels were not significantly higher than the MCL.

Evaluating the health risks from exposure to chemicals involves several factors. According to the Agency for Toxic Substances & Disease Registry (ATSDR):

“If you are exposed to carbon tetrachloride, many factors will determine whether you will be harmed. These factors include the dose (how much), the duration (how long), and how you come in contact with it. You must also consider any other chemicals you are exposed to and your age, sex, diet, family traits, lifestyle, and state of health.”

For this site, the short duration of exposure and low dose would yield a low concern for health effects. At a public meeting for this site in April 2015, Dorothy Tibbetts with DOH fielded this question:

“What are the health effects of carbon tetrachloride? Based on what we know should we be concerned if our kids went through school at the time of the concern (elevated levels of carbon tetrachloride)?”

In her response, Dorothy stated that her concern was very low. Carbon tetrachloride has chronic health effects, meaning that long-term exposure may increase health risks. She reiterated the school’s drinking water had carbon tetrachloride levels higher than the Safe Drinking Water MCL of 5 $\mu\text{g}/\text{L}$ for a short time.

ATSDR is preparing a Health Assessment for this site, which it does for most sites across the country that are on the National Priorities List, also known as Superfund sites. Although the report is not yet final due to staffing limitations at the Centers for Disease Control, they have indicated that there are no current health affects from site-related

⁵ <https://fortress.wa.gov/doh/eh/portal/odw/si/Intro.aspx>

contamination. Their reports do not typically evaluate past risks. No evaluation of past health impacts is currently planned by ATSDR or DOH for the reasons above. However, if one occurred, it would be performed by one of these entities, not Ecology.

Your second comment questions UP's ability to propose a solution when they have a financial interest. At a state-led Superfund site like this one, Ecology's job is to ensure that all work is done in compliance with state and federal law. When UP proposes a remedy for the site in the draft Remedial Investigation/Feasibility Study (RI/FS), the public will have an opportunity to comment. Their proposal does not automatically become the final cleanup action. Ecology will take UP's proposal and public comments into consideration, and then decide the final cleanup action. We put that decision into the draft Cleanup Action Plan, which will also go to the public for review and comment. The RI/FS is expected to be available for public comment by mid-2020, and the Cleanup Action Plan should be available for public comment in late 2020 or early 2021. Your information has been added to our mailing list, so you will receive notice of these comment periods when they are open.

We appreciate your comments and participation in this cleanup process.