

MAR 13 2018

WA State Department
of Ecology (SWRO)OAKLAND BAY AND SHELTON HARBOR SEDIMENT SITE
AGREED ORDER NO.DE. 14091
COMMENTS AND QUESTIONS

How can a partial cleanup plan be acceptable when the history of this site has been one of the worst polluted areas with extremely toxic chemicals and contaminants for decades?

This so called 'cleanup' is more like a cover-up than a cleanup.

On page 6 of (Agreed Order NO DE 14091) it states; K.” In 2008, Ecology characterized sediments in Oakland Bay and Shelton Harbor. The study concluded that dioxins are present at levels that may present a threat to human The health and the environment..” Then in the conclusion comments were made that “The Washington Department of Health tested shellfish collected from Oakland Bay and found low levels of dioxin.” ... and stated”that eating shellfish that contains dioxin is not expected to harm health the general population.” This does not make any sense. All this contamination has not just gone away. Rather it suggests that some of the testing has been 'adjusted' to make it more in line to be acceptable. The 2,3,7,8TCDD dioxin in particular is of special concern. The amounts of ash containing some of the highest amounts of this the most toxic form of dioxin needs the best and most comprehensive type of cleanup.

The 2003 Herrera Report that samples of the ash from the Simpson Plant boiler showed readings of 2,400 ppt. The MCL for this dioxin (2,3,7,8TCDD) the most toxic form of dioxin, 3-11 ppt is the MCL for soil.

The June 1986 CH2M Hill Study states, Chlorinated dioxins and furans were found in samples of residue in the low pressure boiler. Concentrations of 2,3,7,8 TCDD averaged one part per billion (equals 1,000 ppt). From 1926 to March 1976 the STC boilers were operated without emission controls. The two banks of bag houses produced about 3,000 pounds per day of residue.'

It was known that bag house residues had been sent to two municipal wastewater treatment plants. Effluent from the two wastewater treatment plants had been discharged to Oakland Bay. Page 23. “Potential points of exposure are as follows.:

“Sediment in Oakland Bay near the two municipal sewage treatment plants. Potential exposure be via consumption of fish and shellfish .”

Page 38. Sampling May 1986 ;”Residue from the bag-house for low pressure boiler contained 4.2 parts per billion (4,200 parts per trillion) of 2.3.7.8TCDD were found”.

“Burning salt -laden hog fuel(wood waste from logs rafted on saltwater) has been implicated in the production of dioxins (Ecology 1998) Because PCP is typically contaminated with concentrations of dioxins, PCP wood treatment wood facilities are a concern;Ecology 1998).

In the May 13, 2013 Ecology Study, “Dioxin in Surface Water Sources to Oakland Bay” Page

17, " Shelton Creek sediments had the highest dioxin TEQs of the studied streams Dioxin TEQs increased from 2.46 to 5.77 ng/Kg TEQ."

On page 19 Ash Mound, "The ash mound is about 25 meters wide by 125 meters long." Two terrestrial soil samples were collected from the ash mound and had the highest dioxin concentrations reported for the study (21.3 and 41.1 ng/kg, TEQ Dioxin results from the ash mound show TEQs more aligned with mean TEQs From Shelton Harbor and Oakland Bay surface sediments than TEQs from Shelton Goldsborough, or John's Creek. Results exceeded Washington State background levels for dioxin TEQs in forested and open land-use soil (5.21ng/Kg, TEQ) by about 4 and 8 eight times respectively. These results also exceed a benchmark value proposed for Puget Sound-wide background levels of 4.ng/Kg, TEQ (USACE, 2009)." what happened to this ASH PILE? Wouldn't it have to go through a regulated process under Ecology's supervision? Was something done to it when Sierra Pacific bought the property? Where could it have been moved?

The area marked for remedial cleanup, is much smaller than what is marked as the contaminated area. Why is that?

Simpson owned a facility in the Tacoma harbor. In that cleanup, what method was used to clean it up? How much did Simpson pay for the cleanup?

Why is the information for that clean up site not available from a computer site?

In "The Initial Investigation field Report", Date Submitted 2/18/16, investigator Joyce Mercuri, Lists Site Owners, Rayonier is not listed but is listed "Alternate site Names" Rayonier Shelton Pulp Mill. Comments: Rayonier previously operated a pulp mill that discharged to this bay." Why isn't Rayonier not included in as owner operator that is responsible for clean up costs? If Rayonier was included, what would be the contaminants they would be responsible for in the clean up?

It seems that when the evaluation is made concerning the seriousness of health issues, in connection with these very toxic chemicals, it is always down played as 'not to worry'. But I would argue that because of the very, very toxicity of those chemicals and the extremely high amounts that have been dumped everywhere, in the Bay, Harbor, through the City Water Treatment Plant, dumped all over Shelton Hills (and never covered), does pose a serious condition in Mason County and that the public should be aware of it.

Why is Simpson collecting data TO REFINE the engineering design for the "Interim action"? They are being investigated and should not have any control as to what information is used.

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