



# **Response to Comments**

## **Draft Remedial Investigation and Feasibility Study for the Grain Handling Facility at Freeman**

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**Public comment period held January 4 – February 2, 2021**  
**Facility Site ID: 77319379, Cleanup Site ID: 12540**

**Toxics Cleanup Program**

Washington State Department of Ecology  
Spokane, Washington

February 2021

# Document Information

This document is available in the Washington Department of Ecology's [Grain Handling Facility at Freeman document repository](#)<sup>1</sup>.

## Related Information

- Facility site ID: 77319379
- Cleanup site ID: 12540

# Contact Information

## Toxics Cleanup Program

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**Website**<sup>2</sup>: [Washington State Department of Ecology](#)

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<sup>1</sup> <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=12540>

<sup>2</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites>

<sup>3</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

# 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 are cleaned up under the [Model Toxics Control Act](#)<sup>4</sup> (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 January 4 through February 2, 2021, for the draft [Remedial Investigation and Feasibility Study](#)<sup>5</sup> (RI/FS) for the Grain Handling Facility at Freeman site. More information is available in the [public notice](#)<sup>6</sup> that was mailed to the surrounding community.

Ecology appreciates the comments we received from four people, which included one meeting request. We address them in the Response to Comments section that begins on page 4. After considering the comments, we have finalized the draft documents without further changes.

## 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.

Cenex Harvest States, now CHS, purchased the facility in 1993 and is the owner/operator. Union Pacific Railroad 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. These companies are responsible for cleanup.

The grain handling facility has leached carbon tetrachloride into soil and groundwater. Carbon tetrachloride is a manufactured 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.

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<sup>4</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

<sup>5</sup> <https://apps.ecology.wa.gov/gsp/DocViewer.aspx?did=96890> (**Note:** This link is to the main body of the report. The tables, figures, and appendices are available in the site document repository: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=12540>.)

<sup>6</sup> <https://apps.ecology.wa.gov/gsp/DocViewer.aspx?did=96855>

# Response to Comments

The comment letters are printed verbatim in alphabetic order based on the commenter's last name. Each letter is followed by Ecology's response.

## Index of comments received

Everyone who submitted comments is listed below in alphabetical order by their last name, followed by the date we received their comments and the page on which their comments are printed as received. Contact information (postal and email addresses and phone numbers) has been omitted.

Table 1. Index of comments received

Name	Date received	Page
Dian Allison	January 9	4
Jean Berg	January 30	5
Robin Cole	January 16	6
Janet Gillespie	January 24	7

## Dian Allison, received via email January 9

Subject: Freeman, WA Cleanup Involve Students!!!

Dear Ms. Treccani,

Thanks for your recent, very professionally done Newsletter requesting comments from the Public about the mess in Freeman! What a great idea, to invite the general public to submit ideas. You must realize that even people who lack multiple Doctorates can offer germane "comments".

As a retired RN who also studied Geology, my idea is to develop an antidote for the poison---in this case, Carbon Tetrachloride. (Yecchhh! A truly AWFUL chemical! My Mom kept a tiny bottle of it wrapped in a cloth, inside of a coffee can, and she'd take it out to the middle of the back yard before opening it to clean spots off our clothing!) Then inject this antidote into the site of the spill. Break the Carbon Tet up into smaller, non-poisonous, molecues. I'm not a chemist, nor am I a geologist, so I'll leave the pesky details up to you folks.

INVOLVE THE STUDENTS at Freeman High School! Today's young people are smarter and savvier than my generation, and who knows what they would come up with, if turned loose on this disaster? After all, it is THEIR water supply! (There was a tragic School Shooting there, a couple years ago; this would be just the thing to galvanize the students and the community in a positive way!). Contact the Principal, and the Chemistry Department!

I'm quite serious about this. Our generation has become OBSESSED with "credentialism", and we believe you need three multisyllabic degrees after your name before you can tackle any problem. But history is replete with examples of inventors and thinkers who, though formally uneducated, nevertheless came up with discoveries and inventions that changed the world. Get Freeman High on board!! It will give your Department of Ecology some positive visibility in the community.

Hoping you will see, and read, my "comments",

Yours truly,

Dian Allison

## **Ecology's response**

Thank you for your creative ideas and interest in the cleanup. We are glad you found the public notice informative and professional and appreciate that feedback. We agree that everyone's input is valuable, and we welcome it. Although MTCA requires public comment periods, it doesn't require us to respond to comments we receive. However, we believe it's important to acknowledge and respond to them in a meaningful way.

An "antidote" for breaking down carbon tetrachloride really doesn't exist. Researchers have studied the problem for over 30 years, and although many scientific advancements in groundwater remediation have been made, no silver bullet exists. Substances can be added to groundwater to help microbes break down carbon tetrachloride. However, they can generate toxic breakdown products and may not work well with site geology. We wouldn't want these substances to worsen the water quality. The FS evaluated using a zero-valent iron barrier to capture and degrade carbon tetrachloride, but the timeframe to clean up the plume would be longer and it would be more expensive. That's why the pump-and-treat option was proposed by the liable parties.

We have worked closely with the Freeman School District throughout the cleanup process, making presentations to the school board and updating the superintendent regularly. We also request their review of our public notices before sending them to the community. We would welcome student input and agree that studying this cleanup site could be an interesting project for a science class. We are always willing to make classroom presentations and work with teachers and students on service-learning projects.

## **Jean Berg, received via email January 30**

Subject: Freeman Grain situation

Hi Sandra,

I read an article in the Journal of Business about the pollution from grain storage near the Freeman school. It brought to mind a conversation I had with a co worker a few years ago. Her husband earned money by going to the grain elevators in town with a large truck and he would load up all the grain dust from the elevators he would then take the dust to his parent's

property which she described to me as across from the Freeman school. He would then dump that dust in what I imaged from her description to be in a gully or something like that on the back of their property.

I am not sure if this has significance to what you are trying to clean up, but I thought it might be worth mentioning.

If I can be of any further help, please let me know.

Jean Berg

### **Ecology's response**

Thanks so much for providing this information. Dust collected from silos and placed on the ground shouldn't be a problem. The chemical we are concerned about (carbon tetrachloride) is very volatile. When it is sprayed in grain silos for pest control, it quickly evaporates. This allows it to be used on grain without causing a problem when the grain is eaten later. The same should be true for any grain dust in the silo. The groundwater contamination at Freeman occurred because the chemical was likely spilled directly on or under the ground, so it couldn't evaporate.

### **Robin Cole, received via email January 16**

Subject: Freeman Grounwater Cleanup

Ms. Treccani:

Thanks for your information on the Grain Handling Facility at Freeman Cleanup. Having read the brochure, I agree with the preferred option Two. 17 years vs 32 years makes more sense if the results are to the Department of Ecology standards.

I do have a question. Is there an option that would allow future flexibility if there are scientific advancements regarding the pollution cleanup?

Regards,

Robin L. Cole

### **Ecology's response**

Thank you for your comment indicating support for the proposed option. To answer your question, yes, we will always have the ability to modify or make additions to the remediation.

This RI/FS document, authored by the liable parties, is only proposing a cleanup option. Ecology will write a document called a cleanup action plan that will list what the liable parties will be required to do. Often, it will be in line with the proposed option, but we can modify it if we feel it's necessary. That document will also go out for public comment.

They will then implement the cleanup plan. For Freeman, since we are almost ready to operate the interim action (which is the same technology as Option 2 in the RI/FS), a "pilot"

implementation will likely already have happened. During the interim action, we will be closely monitoring several things to make sure that the system is sized right. If it's not big enough, we may require the system to be expanded when we write the cleanup action plan. At any time as the system is operating, we may make minor modifications to it to make sure it's working the best it can. These might include changing pumping rates or pump depths. However, none of these changes can include a completely new type of cleanup action, which we believe is the focus of your question.

If a new promising technology were developed that we think could work better at the site, then we would thoroughly evaluate it. If everyone agreed it was applicable, then we would amend our legal agreements to allow the liable parties to use it at the site. Any amendments would go through public comment so the community knew what was being proposed. We would likely also do a smaller "pilot" test to ensure it's safe and will work before a lot of money was spent to install a full-size version.

Every five years after we start a cleanup action, we are required to evaluate it. One of the things we evaluate is whether any new technologies could achieve cleanup faster. So, even if a liable party isn't out looking for better technologies, Ecology will evaluate them at least every five years.

## **Janet Gillespie, received via email January 24**

Subject: Request for on-line public meeting for cleanup site ID12540

Dear Ms. Trccani,

I definitely request an online public meeting for cleanup site ID12540. I would never again pretend to believe anything published by the department of ecology and I want to open you up to as much scrutiny as possible, because you, as an agency, need it, especially now.

The Department of Ecology's political "ecology" and lack of willingness to be honest about the state of water in the northwest contributed greatly to the demise of my sister's career at Ecology and to her early death. Kitty had epilepsy and lived atop the westside hill in Olympia, but because she couldn't drive, she either rode her bike the 6 miles, one-way out to Lacey everyday, or took the bus. She was always early. She worked tirelessly for 18 years and she didn't miss work unless she fell off her bike because of a seizure. She singlehandedly gathered people together for the very first collective purchasing agreement in the state and she has a special dedication in the introduction of David Major's world renowned book, "Street Smart Sustainability," because she believed that water is a public trust and that Ecology represented the People of the State of Washington and not themselves. David was her close friend and mentor and I was pleased for my mother that he stayed in touch with Kitty until her death, when of course, he was in touch. With years of taking epilepsy medications, her numerous bike accidents and the political fence built around her truths at work, she finally became socially inappropriate at and was fired. She remained too devastated to work again and four years later tried to kill herself in her house with propane, but it didn't work at first; she turned the gas off and took a shower when the refrigerated restarted and blew her house up. She was airlifted to Harborview Burn Unit in Seattle and died 12 hours later.

I am moving somewhere where there is extremely limit water, in order to be closer to family. I am leaving Washington because Kitty is no longer alive and we don't have each other to take care of. You have no idea how hard it is for me to leave this wonderful place, where my great-grandparents opened the first shoe store around, all my family are buried and I can swim with my eyes open underwater and pick huckleberries an hour away. Backward flips, huckleberry pie, minnows, salmon, good rocks, dogs swimming. Bye bye.

Go look for her file in Personnel.

Please get your leadership to forget their stupid politics and to listen to the little farmer out on the prairie who used to think he had some water, but now he guesses that that guy with seven cars has it.

My sister trusted you Ecology and she can now see everything that you do. But We the People can't.

So again, yes, I request an on-line public meeting for cleanup site ID12540

Sincerely yours,

Janet Gillespie  
Spokane,WA

## **Ecology's response**

Thank you for your comment and your request for a public meeting. We require 10 requests to hold a public meeting to ensure significant interest to justify the costs of the meeting. However, we are happy to discuss the cleanup and answer questions at any time during the process, including outside of public comment periods.

We are sorry for the loss of your sister. The goal of the public notice you received about this cleanup, and Ecology's other publications, is to provide factual information to help people understand and become involved in environmental issues in Washington. We are public servants working to protect human health and the environment, and we welcome public input and feedback.