

### Cleanup Action Plan, Remedial Investigation/Feasibility Study & related documents available for review

The Washington Department of Ecology (Ecology) is seeking public comment on a *draft remedial investigation/feasibility study, draft consent decree* and related draft documents including a *cleanup action plan, state environmental policy act checklist and determination of non-significance* for the Holly Street Landfill. Comments on the documents are welcome through September 20, 2002. A public meeting will be held on August 20<sup>th</sup> to discuss the documents.

#### Background

The Holly Street Landfill site is a 13-acre historic solid waste landfill located in the Old Town district of Bellingham (see map below). In the late 1800s, the Holly Street Landfill site was part of the original Whatcom Creek estuary and mudflat. Around 1905, private property owners began filling portions of the site with dredge spoils and other materials to increase useable upland areas. From 1937 to 1953, municipal waste was used by owners to fill private tidelands within the former Whatcom Creek estuary. Wastes disposed at the site included debris and scrap materials consistent with landfill disposal practices of the time.

The solid waste is located on both sides of Whatcom Creek. Approximately 9.1 acres of refuse lie on the northwest side of Whatcom Creek (including the former Sash & Door property, recently purchased by the City of Bellingham) and 3.8 acres lie on the southeast side (Maritime Heritage Park). The City currently owns 8.3 acres of the 13-acre landfill site, including all landfill properties located along the Whatcom Creek shoreline. Various private property owners own land around the perimeter of the landfill.



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#### **Remedial Investigation/Feasibility Study**

An environmental study, called a *remedial investigation and feasibility study* (RI/FS), was done at the site in order to:

- Solution: Gather the data necessary to determine the type and extent of contamination;
- Establish criteria for cleaning up the site; and
- > Identify and screen cleanup alternatives for remedial action.

## August 2002

**Comment Period:** August 12 – September 20, 2002

#### **Public Meeting**

August 20, 2002 Bellingham Public Library 210 Central Avenue, Bellingham Public Meeting: 7:00 pm

If your organization would like to learn more about the cleanup, call (360) 738-6280 to schedule a presentation on the project.

#### Documents are available for review at:

Department of Ecology Bellingham Field Office 1204 Railroad Avenue, Ste. 200 (360) 738-6250

Bellingham Public Library 210 Central Avenue

Department of Ecology Northwest Regional Office 3190 160<sup>th</sup> Avenue SE Bellevue, WA 98008

Department of Ecology website: http://www.ecy.wa.gov/progra ms/tcp/sites/sites.html

#### Send comments to:

Nnamdi Madakor, Site Manager Department of Ecology 300 Desmond Drive Lacey, WA 98504-7600 (360) 407-7244 E-mail: nmad461@ccy.wa.gov

#### **Questions? Contact:**

Jessica Paige, Public Involvement Phone: (360) 738-6280 E-mail: jpai461@ecy.wa.gov

For special accommodations, needs or language translation assistance, call (360) 738-6280 or (425) 649-4259 (TDD).

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Based on the findings in the remedial investigation, controls are needed at the site to continue to prevent human and environmental exposure to buried refuse and associated soil contaminants (e.g., metals, hydrocarbon compounds and methane soil gas).

Although contaminants found in groundwater at the interior of the landfill are below levels of concern, metals such as copper and zinc in landfill refuse along the shoreline are being mobilized by tidal processes and released into the Whatcom Creek estuary at levels that pose a potential risk to sensitive aquatic species in the area.

#### **Cleanup Action Plan**

The *cleanup action plan* is based on information and technical analysis generated during the RI/FS and explains the proposed cleanup action.

As part of the planned cleanup of the site, contaminated soils within the landfill area will be covered with a minimum two-foot cap of clean soil or equivalent structural materials (e.g., concrete, asphalt) to prevent direct contact. Release of metals to the Whatcom Creek estuary will be controlled by constructing a semipermeable cap along the shoreline. Any future development in Maritime Heritage Park will need to include additional soil gas sampling and analyses and/or construction of a passive methane gas venting system below the structure followed by air compliance monitoring.

If funding is available, habitat restoration and public access will be integrated into the cleanup action. Under this alternative, approximately 8,000 tons of shoreline refuse materials would be excavated. Backfilling with a clean cap graded to relatively flat slopes would restore aquatic habitat in the Whatcom Creek estuary. The design would provide trail access along the creek bank to the Maritime Heritage Center and linkages to the Whatcom Creek Trail.

#### **Consent Decree**

The cleanup actions selected for the Holly Street Landfill site are to occur under the legal framework of an agreement, called a *consent decree*, between the City of Bellingham and Ecology. The *consent decree* is a legal document that formalizes the agreement and is approved by a court. The *consent decree* also includes a

# *compliance monitoring and contingency response plan,* a *restrictive covenant* and *public participation plan.*

The *compliance monitoring and contingency response plan* contains detailed discussions on the kinds of monitoring that will need to be performed to 1) confirm that human health and the environment are adequately protected during construction and the operation and maintenance period of the cleanup action; 2) confirm that the cleanup action has attained cleanup standards and other performance standards; and 3) confirm the long-term effectiveness of the cleanup action. The *compliance monitoring and contingency response plan* will also contain backup action plans that can be implemented if the selected cleanup actions fail to meet their objectives.

The *restrictive covenant* details what measures will be taken to limit or prohibit activities that may interfere with the cleanup or result in exposure to hazardous substances contained at the site. For example, temporary fencing will be installed around the area during construction to restrict access. Elements of the restrictive covenant for the site also regulate activities that would damage the soil cover or equivalent structural cap placed over the waste material.

A *public participation plan* prepared to encourage coordinated and effective public involvement will also be available for review and comment.

Additional documents that will be made available include a draft *state environmental policy act checklist and determination of non-significance*. These documents review the potential environmental impacts of the cleanup project.

#### What Happens Next

After the public comment period ends Ecology will review comments received and prepare a summary of the comments and suggested changes. A written response to these comments, called a *responsiveness summary*, will be made available for public review. If significant changes are made to any of the documents, a revised draft will be issued for public comment. If no significant changes are made, the documents will be considered final. Cleanup is targeted to begin during the fall of 2004.

# Holly Street Landfill Comment Form

This is an invitation for comments on the following **draft** documents: *remedial investigation/feasibility study, consent decree (including exhibits A-G), state environmental policy act checklist and determination of non-significance* for the Holly Street Landfill. Please send your comments by September 20, 2002 to:

Nnamdi Madakor Department of Ecology 300 Desmond Drive Lacey, WA 98504-7600

## Name and address optional

Name.... Address... City.....Zip Code .... E-mail Address.

1. Do you have any comments about the investigation results and proposed cleanup activities described in the documents listed above? If so, please describe.



# HOLLY STREET LANDFILL CLEANUP SITE

Ecology seeks public comment on cleanup action plan and related documents

Public comment period Aug 12 – Sept 20, 2002 Public meeting Aug 20th

DEPARTMENT OF ECOLOGY BELLINGHAM FIELD OFFICE 1204 RAILROAD AVE., SUITE 200 BELLINGHAM, WA 98225

ADDRESS SERVICE REQUESTED