



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Quiet Cove Site | Anacortes, WA

September 11 – October 11, 2019

*Summary of a public comment period and
responses to comments*

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Toxics Cleanup Program
Washington State Department of Ecology
Lacey, Washington

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Puget Sound Initiative

Protecting and Restoring Puget Sound

The Puget Sound Initiative, established by the Washington State Legislature, is a collaborative effort between local, tribal, state and federal governments, business, agricultural and environmental interests, and the public to restore and protect the Puget Sound.

Contaminated sites around the shorelines are a leading source of pollution to the Puget Sound. Ecology has accelerated its efforts to clean and restore these contaminated sites within identified priority bays. Within these bays, Ecology is cleaning up 50-60 sites within one-half mile of the Sound. Cleanup actions will help to reduce pollution and restore habitat and shorelines in Puget Sound, resulting in larger areas of usable shoreline habitat for fish, wildlife and people.



Anacortes Baywide Cleanup – Fidalgo & Padilla Bays

Ecology is taking a baywide rather than site-specific approach to cleaning up numerous sites within a geographic area. In Anacortes, local, state and federal agencies, local Native American tribes, businesses, and property owners are working to restore the waterfront – cleaning up several old industrial sites and restoring waterfront areas for fish, animals and people. This unique, baywide collaboration means more cleanups and restoration are happening faster. Important waterfront uses – shipbuilding, marinas, parks, recreation, housing, fishing, cultural uses, and others – can thrive in a revitalized and healthy waterfront environment.

Sites in the Anacortes area include (see map on page 14):

- **Cap Sante Marine**
- **Custom Plywood Mill**
- **Dakota Creek**
- **Former Shell Oil Tank Farm**
- **March Point Landfill**
- **MJB Properties**
- **Anacortes Port Log Yard**
- **Scott Paper Mill**
- **MJB South Hydro Fill**
- **Quiet Cove**

For more information on these sites visit:

<https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites/Toxic-cleanup-sites/Puget-Sound/Fidalgo-Padilla-baywide>

Quiet Cove Site

Site Background and Cleanup Status

Background

The Quiet Cove cleanup site is located along the southeast shoreline of Guemes Channel just northwest of Fidalgo/Padilla Bays at 202 O Avenue in Anacortes, Skagit County, Washington. The site began operating as a bulk fuel terminal and storage facility as early as 1909. Former oil tanks and associated structures were removed in the 1970's. Now the site's remaining buildings and pavement are used for general storage.



Initial environmental sampling identified contaminants exceeding accepted cleanup levels under the Model Toxics Control Act (MTCA). Soil samples showed hydrocarbon and heavy metal contamination including benzene, toluene, ethylbenzene, xylenes, total petroleum hydrocarbons (TPHs), carcinogenic polycyclic aromatic hydrocarbons, naphthalene, and cadmium.

Cleanup Status

In 2015, Ecology and the Potentially Liable Persons (PLPs) – the Port of Anacortes – entered an Agreed Order (AO). The Agreed Order required the PLP to provide remedial action at the site where there has been a release or threatened release of hazardous substances. The Port of Anacortes completed extensive upland and some in-water investigations. These investigations allowed the Port to propose a Draft Interim Action Cleanup in the upland area to remove the source and clean the area within their property boundary to support redevelopment efforts. The Interim Action Work Plan (Interim Action) is an option under the Order for implementing a partial cleanup preceding the final cleanup action at the Quiet Cove Site and describes details for the scope of work and schedule for the proposed cleanup action.

Proposed Cleanup

The following document has been issued for the Quiet Cove Site and describes the anticipated interim cleanup actions for the site.

Overview of the Draft Interim Action Work Plan

The interim action workplan describes the historical property use, environmental and ecological setting, and current conditions. The workplan will summarize existing data on the environment to understand the extent of contamination. A summary of the interim action objective will be included in the work plan to define cleanup requirements, remedial alternatives considered, permitting requirements, a schedule, and final cleanup actions required.

Introduction to Summary Response

A significant milestone was reached recently with the issuance of the following draft documents at the Quiet Cove Site:

- Draft Interim Action Work Plan

This draft document was issued for a public comment period from September 11, 2019 through October 11, 2019. During the public comment period, Ecology provided the following public involvement materials and opportunities:

1. Distributed a fact sheet describing the site and the documents through a mailing to addresses in the area and other interested parties.
2. Published a paid display ad in *The Clamdigger*, *Anacortes American* and the *Skagit Valley Herald*.
3. Published a notice in the Toxics Cleanup Program Site Register.
4. Posted draft documents on the Ecology website.
5. Provided copies of the documents through information repositories at:
 - Ecology's Headquarters Office
 - Anacortes Public Library
 - Padilla Bay National Estuarine Research Reserve

This summary response to public comment provides information about the Quiet Cove Site and responds to comments received during the public comment period. Ecology has reviewed and carefully considered all comments received on the draft documents and determined that no significant changes to the documents issued for public review were needed.

Comments and Responses

The comments received were reviewed and evaluated by Washington State Department of Ecology.

A total of seven persons provided comments regarding the draft documents. In the comment table, each commenter is referenced by an assigned commenter number.

List of Commenters:

- Gary Grubb , Commenter: I-1
- Brent Morrison , Commenter: I-2
- Kathy Dickinson, Commenter: I-3
- John Stewart, Commenter: I-4
- Marlene Finley , Commenter: I-5
- Carolyn Moulton , Commenter: I-6
- Kathryn Alexandra , Commenter: I-7

Comment	Ecology's Response
<p>Commenter I-1-1 I just read the article concerning the plans for Anacortes to clean up the Quiet Cove property. If this location has no plans to be turned into commercial use, could we consider a park here? Possibly connecting trails from the TT to the Guemes Channel trsurail? Thank you, Gary Grubb</p>	<p>Thank you for your comment and your thoughtful ideas for redevelopment. Although Ecology does not dictate land use, Ecology requested a response from the potentially liable party, the Port of Anacortes (the Port) regarding your comment and received the following response:</p> <p>The Port's mission is to support economic development. While no plan currently exists, once the Interim Action is complete the Port will seek to draw new business to the site that will support marine related business at Curtis Wharf.</p>

Comment	Ecology's Response
<p>Commenter I-2-1 Thank you for the work you're doing to diagnose and to remediate the Quiet Cove site, and for the action work plan. I have several questions regarding that plan. 1. I note in figures 6 and 12 that there are contaminated areas that extend beyond this property and will not be cleaned up in this round of work. What is the plan to remediate these areas, or at least to notify the owner (viz. the city) and other interested parties about the condition of the site? Whose responsibility is cleanup of these areas, given that the contamination most likely came from the site that you are remediating, for which you have identified a liable party? 2. What is the plan to prevent contaminants that may exist on the extant tank farm to the southwest from leaching into the remediated soil? Also, given that the soil around the remediation site will remain contaminated, what is the plan to prevent contaminants from leaching back from there as well? 3. The beach seems uncharacteristically "dead" to me, and I suspect this could be the result of contaminants from the uplands. As I understand it, most of the sediment samples taken from the beach were only about a meter deep, and many were not analyzed at all. Based on the slope of the top of the contaminated layer through section A-A, it appears to me that one would have to bore down within zero to one meter of MLLW on the beach before contaminants would be found. Are there any plans to test deeper sediment samples, or to analyze more of the sediment samples that have already been taken? Or, could you please explain why you are certain that deeper sediment samples need not be taken and more analysis need not be done? 4. Is there any plan to remove the old product lines identified figure 3? 5. On page 17, the report says that the cultural significance of buildings will be identified with the DAHP prior to demolition, if demolition were required. What</p>	<p>Thank you for your comment. Responses below are separated by the numbering provided in the comment itself.</p> <ol style="list-style-type: none"> 1. The proposed Interim Action is not a final cleanup action. The Agreed Order and subsequent Remedial Investigation (RI)/Feasibility Study (FS) Work Plan requires the Port to complete a RI/FS Report and Draft Cleanup Action Plan that will identify a final cleanup action for the Site. Work on the RI/FS is ongoing and will be completed following the interim action. Contamination related to the Site that is left-in-place after the Interim Action, if any, will be addressed through the RI/FS report and identification of the cleanup action to be documented in the Draft Cleanup Action, which are subject to public comment. As part of the remedial investigation process, all owners are notified and provide permission to access their property prior to any investigation. Generally, any additional parties affected or found to be potentially liable are notified when the remedial investigation provides enough information to accurately identify them. 2. At this time, groundwater and soil data does not indicate contamination is moving onto the site from an upstream source. Recontamination of the Interim Action will be minimized by leaving oxygen releasing material adjacent to contaminated sidewalls along 2nd Street as detailed in Section 5.10 of the Draft Interim Action Work Plan. A geotextile fabric will be placed at the limits of excavation to

Comment	Ecology's Response
<p>range of actions could be taken based on the determination of cultural significance?</p>	<p>delineate contaminated sediment from the clean backfill placed for the Interim Action.</p> <p>Additionally, groundwater flows away from the Interim Action area towards Guemes Channel reducing the potential for recontamination of the Interim Action area from the north and west.</p> <p>3. The current RI samples were collected in accordance with the RI/FS Work Plan. Deeper samples were not collected due to encountering refusal at deeper depths while collecting sediment samples. We agree that more sediment information and data will be needed to complete the RI Report in accordance with Ecology's MTCA requirements. The Interim Action will not disturb sediment or the beach area.</p> <p>4. Figure 3 identifies historical product lines based on a hand-drawn Standard Oil drawing (included in Appendix C of Draft Interim Action Work Plan). The RI included visual inspection to determine if the product lines were abandoned in place or removed, but this visual inspection did not find evidence of existing subsurface product lines. The Interim Action will determine if any product lines from historical operations are still in the subsurface within the excavation footprint. If found, these product lines will be removed and disposed appropriately. If product lines extend off the Interim Action area, the lines will be capped at the excavation limit. If historical product lines remain after the interim action, a determination will be made in the future</p>

Comment	Ecology's Response
	<p>whether those lines should be removed or can remain in place in accordance with Ecology's MTCA requirements.</p> <p>5. Demolition of the existing buildings on the Site will be completed in accordance with requirements of the Washington State Department of Archeological and Historic Preservation (DAHP) guidelines and Washington State Executive Order 05-05. This requires formal consultation with DAHP. DAHP will determine any additional requirements prior to demolition if they find the building to contain items of historic or cultural significance.</p>
<p>Commenter I-3-1 Of course I do not know the legalities associated with this issue, but it only seems fair that whom ever was the responsible party dumping these toxins or not caring enough to protect the environment should be held liable and pay for the cleanup. They benefited from their actions and it should not come from the citizens who trusted them to do the right thing.</p>	<p>Thank you for your comment and concern. Your comment is noted.</p>
<p>Commenter I-4-1 Hi, I am interested in receiving future notices about the clean up plan for this site. Looks pretty straight forward to my layman's eyes. Will there be post clean up water quality monitoring? Apologies if it is in the plan and I missed it. Thank you, JA Stewart</p>	<p>Thank you for your interest and comment. Ecology will include you in future notices for this site.</p> <p>Yes, there will be groundwater quality monitoring completed following the Interim Action construction as part of compliance monitoring of the Interim Action (see Section 6.0 of the Draft Interim Action Work Plan). The post-construction groundwater quality monitoring is detailed in the Compliance Monitoring Plan included as Appendix F of the Draft Interim Action Work Plan.</p>

Comment	Ecology's Response
<p>Commenter I-5-1 Please add me to the list of contacts on this project. I would like to request a public meeting with a presentation followed by public comment to better understand this project and provide input. Cleaning up shoreline contamination is imperative. How cleanup is conducted is important to make sure that there is no recontamination, no additional release of contaminants and that the edges or margins of the contaminated soils are properly sealed.</p>	<p>Thank you for your interest and comment. Your comment is noted. Ecology will include you in future notices for this site.</p> <p>Ecology provides public meetings if we receive 10 or more requests. At this time we have not received a sufficient number of requests to initiate a public meeting; however, the Port of Anacortes and Ecology are considering providing an informal public presentation with Q&A this spring in Anacortes. We will notify you and other commenters interested in a public meeting if this occurs.</p>
<p>Commenter I-6-1 Thank you for providing information about the proposed clean-up of the Quiet Cove site. As a neighbor, I would like to receive future notices regarding this project. Thank you, Carolyn Moulton</p>	<p>Thank you for your interest and comment. Ecology will include you in future notices for this site.</p>
<p>Commenter I-7-1 1. I wish to be added to the list of contacts on this project. 2. I am requesting a public meeting, in Anacortes, with a presentation .</p>	<p>Thank you for your interest and comment. Ecology will include you in future notices for this site.</p> <p>Ecology provides public meetings if we receive 10 or more requests. At this time we have not received a sufficient number of requests to initiate a public meeting; however, the Port of Anacortes and Ecology are considering providing an informal public presentation with Q&A this spring in Anacortes. We will notify you and other commenters interested in a public meeting if this occurs.</p>

Explanatory Figures

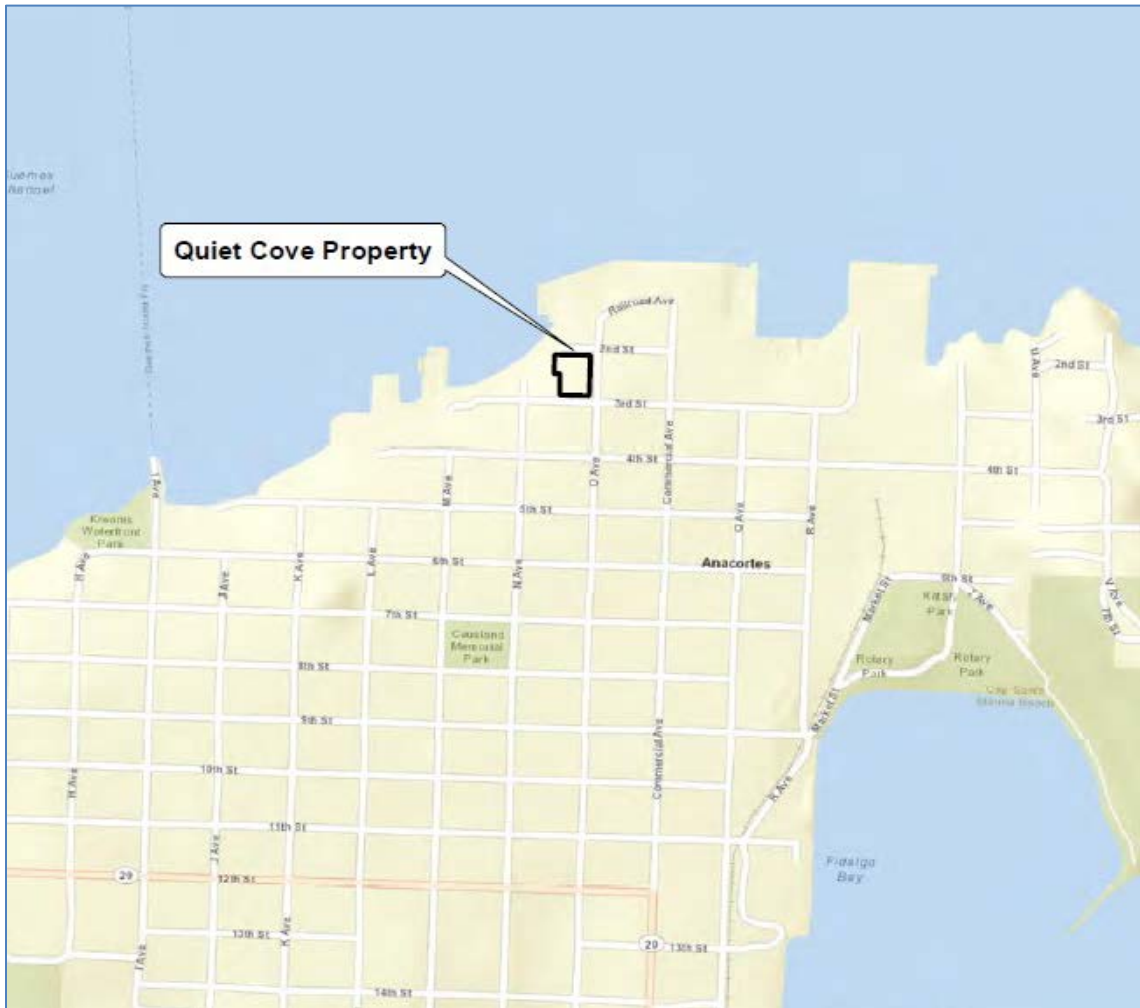


Figure 1. Quiet Cove cleanup site location.

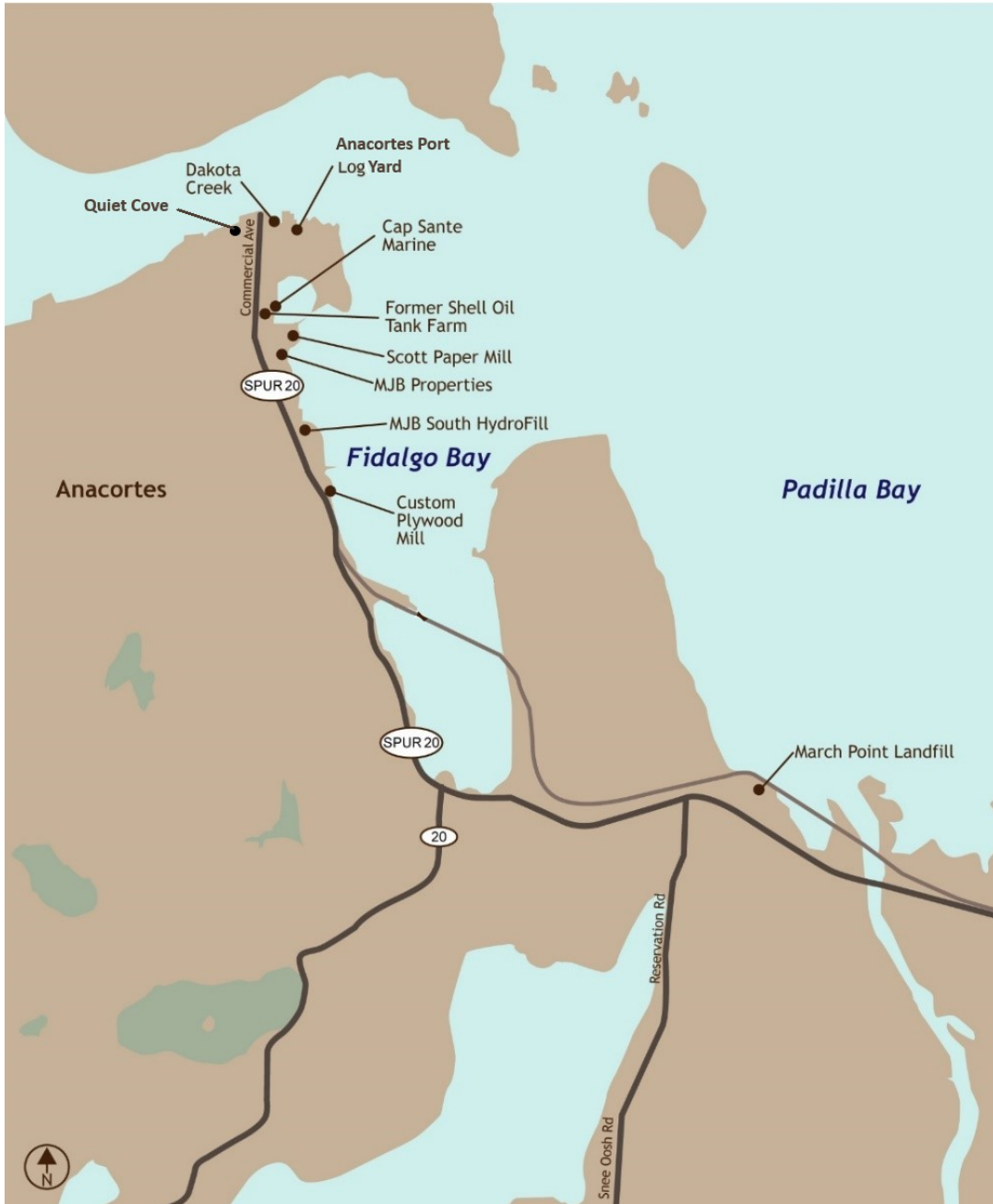


Figure 2. Fidalgo and Padilla baywide area cleanup sites under the Puget Sound Initiative.

Ecology Contact Information

For more information on the Quiet Cove Site, contact:

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Website: <http://epls.org>

Padilla Bay National Estuarine Research Reserve
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Mount Vernon, WA 98273
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