



September 15, 2009

Mark Edens, Site Manager  
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Toxics Cleanup Program  
3190 160th Ave SE  
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Via email: mede461@ecy.wa.gov, nlui461@ecy.wa.gov

**RE: Comments on Agreed Order for Duwamish Shipyard (Facility Site ID #: 2071)**

Dear Mark and Nancy,

Thank you for the opportunity to review the proposed draft Agreed Order between Ecology and Duwamish Shipyard, Inc. for the site located at 5658 W Marginal Wy SW, in Seattle. These comments are being submitted on behalf of People For Puget Sound and Duwamish River Cleanup Coalition.

Duwamish Shipyard, Inc. operated at this site from 1941 to 2007, and is currently leased by Alaska Marine Lines for storage of shipping containers. Known contaminants at the site include: total petroleum hydrocarbons (TPHs), polycyclic aromatic hydrocarbons (PAHs), organic compounds (VOCs), metals (arsenic, cadmium, chromium, copper, lead, mercury, tributyltin, and zinc), and dioxins and furans. The sediment in the Duwamish at this location is contaminated with many pollutants at levels above sediment management standards.

The potential pathways of contaminants from this site to the Duwamish include bank erosion, groundwater flow, stormdrains (which had NPDES violations for metals), surface sheet flow and direct washout from the drydocks when the drydocks were “flooded in order to float vessels back into the river. Materials that may have accumulated on the floor of the drydock, such as spent abrasive grit, oil, paints, and solvents, are potential pollution sources to the receiving water.” (from NPDES Fact Sheet)

Our comments are:

1. **Complete characterization.** The work to date at this site has been piecemeal. Our experience is that Ecology has not required complete characterization in early phases of investigation – that is sampling to depth and horizontally to

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“clean.” This lack of completeness has led to expensive and inefficient follow-up sampling. Enough preliminary work has been conducted at this site so that a thorough sampling plan should be easily accomplished.

2. **Groundwater influence.** We are concerned that the extensive contamination of groundwater in the adjacent Glacier property might be a means for transport of contamination at this site (that is solvents, if present, might cause other contaminants to be mobilized). The workplan text indicates that groundwater flow has not yet been well characterized for this site. Adequate groundwater wells should be installed adjacent to the property boundary to determine the potential cross flow from Glacier. In addition, the workplan includes information about petroleum product and solvent contamination at the site (which have been only partially sampled). The potential for this material to move contamination should also be investigated in a more thorough manner.
3. **Site Conceptual Model is inadequate.** It appears that the writer of the report threw everything but the kitchen sink into the “site conceptual model” description. This section of the workplan should be rewritten to be more coherent or should be eliminated at this point.
4. **Data gaps are under-reported.** We disagree with the statement that “Upland data gaps associated with delineation of the nature and extent of contamination are very limited.” It appears that much more work is needed to fully and properly characterize the site as well as the potential movement of contaminants.
5. **Geoprobings may not be adequate.** It is unclear if proposed geoprobing sampling will be adequate in that the geoprobing may not be deep enough to fully characterize the site. In addition, the number of proposed borings and samples may not be adequate.

People For Puget Sound and Duwamish River Cleanup Coalition request to the opportunity to review the sampling and analysis plan, the draft Feasibility Study (FS) and draft Cleanup Action Plan for this site, at a minimum.

Thank you for your consideration. If you have any questions, please contact me at (206) 382-7007/htrim@pugetsound.org.

Sincerely,



Heather Trim  
Urban Bays and Toxics Program Manager