



Duwamish River Cleanup Coalition

Community Coalition for Environmental Justice • Duwamish Tribe • Georgetown Community Council • Green-Duwamish Watershed Alliance
• ECOSS • People for Puget Sound • Puget Soundkeeper Alliance • Washington Toxics Coalition • Waste Action Project

August 6, 2002

Ms. Allison Hiltner
Mr. Ravi Sanga
U.S. Environmental Protection Agency
1200 Sixth Avenue, ECL-111
Seattle, WA 98101

Re: Comments on Port of Seattle's Draft Task 1 – Summary of Existing Information and Data Gaps Analysis

Dear Ms. Hiltner and Mr. Sanga:

Thank you for the opportunity to review the Port of Seattle's Draft Task 1 Summary of Existing Information and Data Gaps Analysis and EPA's Draft Comment Letter. We represent nine environmental, tribal, community and small businesses organizations affected by the contamination and cleanup of the lower Duwamish River, and collectively serve as the Community Advisory Group to EPA on the Superfund site cleanup. We have reviewed the draft documents and have the following comments:

General Comments

- We appreciate EPA's diligence in validating the Port's recent groundwater monitoring data. While this is an important exercise, validation of the data does not necessarily close the question of ongoing seeps or groundwater migration of PCBs. As a dense, non-aqueous phase liquid (DNAPL), PCBs may be difficult to capture with groundwater monitoring data, even when present. It is not clear that the groundwater monitoring wells currently on site are sufficient. Monitoring should be conducted at greater depth, sampling of filtered water is necessary, as well as sampling of the filtrate material.

In addition to groundwater monitoring data from the T-117/Malarkey site, the neighboring Basin Oil site, which has a known history of product spills and mishandling, needs to be characterized for PCBs and petroleum hydrocarbons in particular in both the shallow and deeper soils, as well as groundwater, free product and smear zones. This characterization should focus on likely migration routes through the T-117 property and include ongoing monitoring for seeps along the shoreline.

The difficulty of collecting the data to monitor for PCB migration through groundwater should not prevent the Port from taking all possible measures to perform on ongoing and comprehensive source identification and monitoring program, given the high environmental, health and financial cost of any potential recontamination.

- In addition to on- and off-site PCB groundwater contamination and data collection in unpaved areas of the T-117 property, soil samples should be taken under previously paved areas as well. The post-remediation data presented in the report shows at least one sample far in excess of the proscribed cleanup level. In addition, given previous data showing groundwater contamination, the difficulties of capturing PCB contamination data in groundwater, and PCBs' tendency to be mobilized by contaminants known to be present on-site and immediately off-site (upgradient), previously remediated areas may have been recontaminated and the current soil chemistry should be verified. This will provide another set of confirmation data related to groundwater migration of PCBs, as well as confirmation that paved-over soils are not now a source of PCBs themselves.
- It is not clear that pre-, during, and post-removal sampling will be sufficiently integrated to capture all necessary information regarding cleanup success and confirmation. The pending Sampling Plan should clearly demonstrate the connectedness of these sampling plans to ensure the means to monitor cleanup success.
- Given that data collection at the T-117/Malarkey site will necessarily be an iterative process – future data needs will be determined as each data collection step is completed – EPA, the Port and DRCC need to diligently ensure that the public remains an informed stakeholder in reviewing and determining next steps. In addition, DRCC requests notification and access to observing data collection events associated with the T-117/Malarkey cleanup.
- The Department of Ecology's source control program and schedule for the T-117 basin should be presented and discussed in the document.

Specific Comments

Section 4.2.4. The quantitation limit (PQL) is too high for one set of soil samples for each Aroclor. One set shows a limit of 0.5 ppm, the other of 0.06 ppm. The latter are the more accurate and realistic limits for detection and quantitation. The set of data with the 0.5 ppm limit are only useful for screening and more general purposes, as the lower soil levels will be missed in that sample set.

Section 6.2. Sediment capping is a problem unless the source is known and does not pose a potential for continuous input of chemicals from the side or bottom of the waterway. Capping will not work when the source continues to add contamination to the sediments from the substrate levels. In such cases, the contamination will only come up through the bottom, eventually leading to recontamination of the cap from below. The T-117/Malarkey site has the potential for side seeps to contaminate; these need to be ruled out or eliminated before capping is used as a remedy.

EPA Comment #4/Section 2.3. EPA has requested additional information about recreational use of the T-117 property and adjoining areas. This description should include recreational boating and kayaking in the river fronting the property, recreational boating and fishing at the South Park Marina neighboring the property, and potential future recreational use of the intertidal area by restoration workers and shoreline/birding enthusiasts.

EPA Comment #40/Section 4.2.1.12.Future cleanup standards may be more protective, given recent human health and ecological risk assessments.

EPA Comment #41/Section 4.2.1.15.DRCC is concerned about the indication that high PCB concentrations remain on-site in previously remediated and paved-over areas. These areas should be sampled to determine the extent of contamination remaining on site, as well as possible recontamination from petroleum distillates acting as a PCB driver and enabling enhanced PCB migration through the site.

EPA Comment #46/Section 4.2.4. Bullet 1. DRCC agrees that the absence of monitoring data at Basin Oil and surrounding properties is a data gap. The data gaps related to neighboring properties, as well as the fate of previously observed product in on-site wells, should be addressed in order to prevent future recontamination of the T-117 site and adjacent sediments. Indeed, given site materials and handling practices, it is possible that T-117 and Basin Oil are functionally one continuous contaminated “site” with multiple ownership.

EPA Comment #47/Section 4.2.4. Bullet 2. DRCC supports this comment. All potential exposure pathways must be considered in determining sufficiently protective cleanup levels.

EPA Comment #59/Section 5.2.3.4. 1st paragraph: This comment should be modified to inquire whether the South Park Marina boatyard was in compliance with its NPDES permit conditions *and whether the samples exceeded Washington State Water Quality Standards*, as boatyard NPDES permits only recently began to impose chemical-specific permit limitations.

Thank you again for the opportunity to provide comments on the draft Task 1 report. If you have any questions about our comments, or need further information, please do not hesitate to contact us.

Sincerely,

BJ Cummings
Coordinator