



September 14, 2009

Victoria Sutton, Site Manager
WA Department of Ecology
Toxics Cleanup Program, NWRO
3190 160th Ave SE
Bellevue, WA 98008
Via email: vsut461@ecy.wa.gov

RE: Comments on Agreed Order for Crowley Site (Facility Site ID #: 1940187)

Dear Victoria,

Thank you for the opportunity to review the proposed draft Agreed Order between Ecology and 8th Avenue Terminals, Inc. for the site Crowley Marine Services 8th Ave. South site, in Seattle. These comments are being submitted on behalf of People For Puget Sound and Duwamish River Cleanup Coalition.

Known contaminants at the site include: arsenic, copper, bis 2-ethylhexyl phthalate (BEHP), carcinogenic polynuclear aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), and total petroleum hydrocarbons (TPH). Elevated arsenic appeared to be localized in the area of a former pole-dipping facility. The potential pathways of contaminants from this site to the Duwamish include bank erosion, groundwater flow, stormdrains, and surface sheet flow.

Our comments are:

1. **Complete characterization.** Our experience is that Ecology has not required complete characterization in early phases of investigation – that is sampling to depth and horizontally to “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. We
2. **PAH plume.** The PAH plume in the Duwamish River deserves special attention in this investigation as it appears to originate from this site.

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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Trim", with a long horizontal flourish extending to the right.

Heather Trim
Urban Bays and Toxics Program Manager