



Duwamish River Cleanup Coalition

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

September 24, 2003

Mr. Ravi Sanga
U.S. EPA Region 10
1200 Sixth Ave
Seattle, WA 98101

Re: Port of Seattle Draft Sampling/Analysis Plan and Quality Assurance Project Plan for Terminal 117/Malarkey Asphalt (LDW Early Action Area No. 5)

Dear Mr. Sanga:

The Duwamish River Cleanup Coalition represents nine environmental, community, business and tribal organizations in the Duwamish River Valley and is EPA's Community Advisory Group for the Lower Duwamish River Superfund Site. We have reviewed the above referenced document and the associated Health and Safety Plan and have the following comments:

Sampling and Analysis Plan/QAPP

General Comments

DRCC recommends that the sampling plan be expanded to include:

1. Sampling for contaminants at depth (25–30 feet) beneath the capped upland areas;
2. Sampling for contaminants at all depths around the boundary of the Malarkey site to determine if sources are being transported through the site from neighboring properties, especially Basin Oil. Such sources may not yet have traversed the site since the upland cleanup was completed, and would not therefore be detected in shoreline well or seep monitoring;
3. Characterization of waste materials along the shoreline and/or analysis of sediments associated with these waste materials (the current SAP/QAPP calls for full suite analysis of sediments associated with outfalls and seeps; sediments associated with waste drums and materials should trigger similar sampling and analysis);
4. Improved integration of cleanup and source control data needs;
5. Data necessary to characterize hydrology at and through the site.

In addition, we support EPA's request to add new groundwater monitoring wells and conduct seep sampling at the site. It is critical to collect the necessary data and site information to determine the appropriate placement for any new wells and ensure that all seeps are adequately characterized (there appear to be more than one major and two minor seeps along the shoreline).

The draft report does not differentiate between the data objectives and removal decisions for the previous upland emergency removal and the present action. At a minimum the report should discuss the difference in data objectives between the emergency removal and the proposed early action data collection effort with an identification of resulting data gaps.

Specific Comments

The QAPP has a recurrent typo that refers to Table 2.1 instead of 2.3 when referring to SMS chemicals.

Page 2: Tad Deschler must not be in the position of supervising himself, no matter how competent.

Page 5, section 2.2.2: There is substantial concern that the very shallow depth of removed wastes may have missed buried containers that could act as localized recontamination sources for site sediments. This concern is quite reasonable given the apparent haphazard disposal of drums at this site, which apparently included dumping them on and over the bank of the river. The cleanup depth of 3-5 feet in previous work is evidence that the site has not been fully investigated and needs soil sampling to 25-30 feet or to the point where clean soil is found.

Page 6, section 2.3: Sampling depth is too shallow; should be 25-30 feet.

Page 7, section 2.3.3: The text indicates that the soil boring will determine the depth of contamination in the shore zone; the same needs to be done in the whole site.

Page 18, section 3.1: The text indicates that the high value PCB sample is given as 50 mg/kg PCBs, twice the supposed cleanup level of 25 mg/kg PCB's. This raises substantial doubt about the efficacy of the emergency cleanup and any assumptions about existing site conditions based on the emergency cleanup action.

Page 19, section 3.1: The sampling needs to include deeper samples. While PCBs and VOC's are mentioned, SVOC's are omitted. The report should be revised to include SVOC's. This is consistent with the limited information on this site and what is known of potential sources in the vicinity.

Page 20, Section 3.1.3: As discussed above in general and specific comments above, the lack of borings in the upland area (former emergency cleanup area) is not supported by the data. Indeed the limited data provided show reason for concern in that apparently contamination at twice the cleanup standard was simply left in place even in the very shallow area where PCB's were actually addressed. At this point the available information clearly supports additional investigation of this upland potential source which should be addressed as part of the site boring effort. The other primary elements of the sampling program being used to address recontamination potential, groundwater and seep sampling are not sufficient to predict potential recontamination potential without additional boring data for known potential sources.

Page 24, section 3.1.6: The sampling should include at least 4 from each drainage ditch and for all SMS chemicals.

Page 27, section 3.2.2.2: The QAPP should refer to the ASTM procedures for benthic sampling.

Health and Safety Plan

The HSP has several shortcomings that are based on an approach of this effort being a "routine" sampling effort. Routine sampling at Superfund sites should involve more care and preparation than is displayed here.

There is no mention of what procedures to use on encountering containers and objects that might either be contaminated or contain toxic chemicals. Considering the presence of in the product barrels in the intertidal zone, the field crew must be prepared to handle such objects, as well as smaller hazards. There are specific hazards associated with closed containers, which are not even mentioned in the HSP. This needs to be corrected.

Second, the HSP is remarkably silent on the procedures for handling free product, such as PCB's in the seeps or VOC's that may be encountered. What should the field crew do if they encounter a substantial pocket of hydrogen sulfide that can overcome or worse?

The HSP needs to be explicit about weather conditions that will cause a day's work to be postponed.

The corporate health and safety officer must be available via cell phone at all times while the field crew is out.

The local fire and rescue squads need to have the sampling/field schedule and know what days the crew will be in the field.

Page 1, section A.1.0 fails to mention barrels or free product. What is the crew to do if the sampling equipment cannot puncture through soil or accidentally punctures a barrel?

Page 2: The Corporate Health and safety officer availability has to be explicitly listed.

Page 3, A.4.1.5: What weather conditions will cause postponement and what is the procedure/protocol for the crew?

Page 4, A.4.2: What other chemicals are known or suspected to be present? The HSP must inform the field crew of the full range of potential contaminants that may be encountered.

Thank you for the opportunity to comment on the Port's Draft SAP/QAPP and HSP. We look forward to your final comments and cleanup plan for the site.

Sincerely,

BJ Cummings
Coordinator