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Ecology needs to put science first in its decision-making process, and prioritize true risk from there.. From my review of state-wide projects, municipalities and ports receive millions of dollars in taxpayer funded MTCA Remedial Action Grants based on flimsy science. Sites with little to no risk are hyped up so that Ecology will write an Agreed Order that includes an interim action, so that a new park or overpass is funded in the name of a cleanup. OK. but no one got hurt (besides the taxpayer).

Much of the administrative language in the new rule seems to be policy written to make the RAG funding even easier for ports and municipalities to get there hands on.

On the flip side, the lack of thorough scientific oversight at these sites is frightening with regard to what is pushed beneath the radar. Example:

Ecology and Environment conducted a Targeted Brownfield Assessment (TBA) at the Seaport Landing Site in Aberdeen. This site was a former mill donated by Weyerhaeuser for redevelopment as a park. The TBA states that concentrations of thallium in soil samples were "in line with naturally occurring background concentrations". Ecology (WAC 173-340-709) provides detailed procedures for calculating site-specific natural background concentrations. These procedures were not followed; the thallium concentrations are not background. Thallium is known as "the poisoner's poison".

The concentrations of thallium in soil samples collected at the site by E&E ranged from 1.8 milligrams per kilogram (mg/kg) to 6.2 mg/kg, which exceed MTCA's direct contact cleanup level of 0.8 mg/kg. Lethal doses of thallium in humans are within this range.

Thallium was used as a rodenticide and insecticide until it was banned in 1972. It is easily taken up and concentrated in plant tissues. In 1954, Weyerhaeuser participated in a study in which pine forests were treated with thallium sulfate as a rodenticide. It is postulated that thallium in the surface soils is related to the metal being concentrated in wood ash from refuse burners that were spread out on the property.

Seaport Landing is being redeveloped as a park and recreational area with grass and open areas.