

From: [Paulina Lopez](#)
To: [Johnson, Beau \(ECY\)](#); [Waldref, Meredith \(ECY\)](#)
Subject: Industrial Container Services Public Comment DRCC
Date: Friday, January 31, 2025 11:40:29 AM
Attachments: [Memo_ Industrial Container Services Remedial Investigation and Feasibility Study.docx.pdf](#)

External Email

Dear Beau Johnson and Meredith Waldref,

Thank you for the opportunity to comment on the Industrial Container Services WA LLC cleanup site RI/FS located 7152 1st Ave. S. in Seattle near Seattle's South Park Neighborhood and First Ave.

It is vitally important that community voices are heard on the issues that directly impact them. *The Duwamish River Community Coalition (DRCC)* has long been a community steward for environmental justice in the Duwamish Valley, which is one of the most polluted areas in the entire Pacific Northwest following over a century of industrial dumping and release of toxic waste. We seek to amplify the will and voices of community members harmed by the combined impacts of environmental, economic, and health inequities present in the Duwamish Valley.

Please find our comments attached to this email.

Thank you so much!

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Our Vision: An empowered Duwamish Valley community thriving in a healthy and just environment

Read our [2024 State of the Duwamish River Valley!](#) ([español](#)) ([vietnamese](#)) ([khmer](#))

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Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

January 31, 2025

Beau Johnson
beau.johnson@ecy.wa.gov
Site Manager
Washington Department of Ecology

Re: Industrial Container Services (ICS) Remedial Investigation (RI) and Feasibility Study (FS)

Dear Beau Johnson and Meredith Waldref,

Thank you for the opportunity to comment on the Industrial Container Services WA LLC cleanup site RI/FS located 7152 1st Ave. S. in Seattle near Seattle's South Park Neighborhood and First Ave.

It is vitally important that community voices are heard on the issues that directly impact them. *The Duwamish River Community Coalition (DRCC)* has long been a community steward for environmental justice in the Duwamish Valley, which is one of the most polluted areas in the entire Pacific Northwest following over a century of industrial dumping and release of toxic waste. We seek to amplify the will and voices of community members harmed by the combined impacts of environmental, economic, and health inequities present in the Duwamish Valley.

1. Douglas Property coordination

The adjacent Douglas property is going through a separate RI/FS process, but ICS contamination migrated under the property and is being considered here. The ICS RI/FS should explicitly state how coordination will occur on the cleanup for the two sites to ensure that sources to the Duwamish are adequately controlled.



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Treating these adjacent sites as independent does not address the potential cumulative, short-term, long-term, direct and indirect impacts that may occur both from the cleanup process itself, and from the final design at each site. Reducing and/or mitigating impacts from these two sites collectively is important to reduce cumulative impacts to aquatic and terrestrial habitat. We would like to see Ecology evaluate the short and long term cumulative environmental impacts of the cleanup process at both sites concurrently.

In the RI/FS, Ecology should consider a more comprehensive approach to habitat mitigation and restoration along the shoreline of the two sites, as further described in comments below.

2. Preferred alternative impacts and evaluation

While the preferred alternative will result in removal of hot spots for contamination and support riparian vegetation, we have a number of concerns with the alternative and would like Ecology to re-evaluate the alternative with these concerns in mind. We include the concerns below.

We would like more information on whether Ecology believes the impacts from the cleanup will require any habitat mitigation. Potential permanent and temporary habitat impacts include 1) paving over the unpaved portion in the eastern site, 2) installing a new sheetpile wall, and 3) installation of a temporary dam across the embayment. Additional impacts may emerge during the design phase.

3. The Feasibility Study does not adequately account for the regional ecological and recreational impacts and benefits

The embayment provides connectivity between the Duwamish River and inland habitat at Moore Marsh and to the W Duwamish Greenbelt Trail for wildlife and potentially fish, while also supporting flood reduction and carbon storage. In this industrially zoned area, this type of habitat connectivity is rare and should be restored and maintained to support aquatic and terrestrial species.



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Given that the ROD for the Lower Duwamish Waterway Superfund site provides for a beach at the head of the embayment, the preferred alternative should encourage connectivity between the river and the Greenbelt trail. This connection is already informally in place at Highland Park, but could be enhanced as part of this RI/FS.

The Industrial Container Services site is the most viable location to connect with the Greenbelt trail along the river between Salmon Cove and h ?apus Village Park & Shoreline Habitat.

Providing habitat connectivity would also support wetland restoration previously completed west of the site, and other regional efforts to support habitat restoration and enhancement along the Duwamish River and floodplain.¹

Similar sites, Salmon Cove and North Wind’s Weir support migrating juvenile salmon from five salmon species, including the critical Chinook salmon. Based on the Washington Department of Fish and Wildlife’s Priority Habitat and Species Maps,² the embayment could provide connectivity between the Duwamish River and WDOT restored wetland to the west for Coho Salmon. The FS should further evaluate impacts and benefits to species that currently or potentially utilize this space.

4. Evaluate replacement of ecology block wall with natural shoreline

There is a hard “precipitate cap” along the north shoreline and an ecology block wall on the north embayment shoreline. An ecology block wall supports a portion of the north embayment shoreline, and the partially pile supported floor of a demolished building is present on the west side of the wall.

The ecology block wall is composed of at least five levels of blocks rising eight to ten feet above bottom sediment with concrete debris, bulkheads and pilings along the

¹https://cdn.kingcounty.gov/-/media/king-county/depts/dnrp/waste-services/wastewater-treatment/program/lower-duwamish/docs/1208_restoration_map_handout_v8_final.pdf

² <https://geodataservices.wdfw.wa.gov/hp/phs/>



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shoreline. A shallow shelf extends 50 to 70 feet out from the steeper northern bank walls. The north sheetpile wall is on the Douglas property and it is believed the current owner has responsibility to prevent collapse of the ecology block wall and north shoreline during remediation.

The preferred alternative for the embayment includes a structural sheet pile wall that would be installed along the north embayment shoreline. The RI/FS states the structural wall is needed to support the existing ecology block wall and embayment slopes while excavation and capping proceed. The RI/FS should clarify if this is a temporary sheetpile wall or if it will be removed as part of the future Douglas Property cleanup.

Either way, because the final cleanup for the embayment through the ROD includes a recreational beach and clamming area, shoreline habitat is necessary to support healthy waters. Removal of the sheetpile wall and ecology block, along with adequate sediment cleanup, provides an opportunity for habitat restoration. Supporting shoreline marsh habitat would help clean and filter water and provide additional habitat to support clam populations. By both enhancing shoreline habitat and supporting connectivity through the embayment, flooding risks from extreme storms and sea level rise could be supported.

The preferred alternative includes riparian restoration but does not outline the locations for riparian plantings. We would like to see more details on the vegetation plan and biological assessment that will inform this.

5. The depth for exposure for clamming and beach play is insufficient

Exposure to sediment and surface water during clamming, beach play, kayaking in the embayment could occur. We recognize that the RI/FS uses the thresholds in the ROD such as clean materials in the upper 45 cm of sediment and increasing the cap thickness to 4 feet in clamming areas.

However, this depth is insufficient for the range of clams that may be found in the Duwamish, and especially in depositional and protected areas like the embayment. For



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instance, in the 2004 Slip 4 Early Action Report and Intertidal Clam Survey Report, the following clam species were found: Baltic macoma, Bent-nose macoma, Fat gaper (horse clam), and Eastern softshell clams. While it is true the other clam species reside in the upper foot of sediment, the fat gaper clam is found at depths of up to 2 feet or 60 cm³ and in California these clams are accessed with shovels and are as deep as four feet in the sediment.⁴ These clams also live in protected bays, and may be more common in the embayment. The embayment sediment is exposed during low tides, which creates a scenario popular for clambers, and since gaper clams live in aggregations, clambers may disturb a greater area than expected when these aggregations are encountered. For this reason, we believe the most protective measure would include a 60 cm deep clamming layer.

The RI/FS also does not clearly show the locations where clamming is proposed, and thus where a deeper cap is proposed to be placed. For reference, the ROD proposes the entirety of the embayment as clamming habitat. To fully evaluate the RI/FS, a map of the proposed clamming and beach areas is needed.

6. Additional evaluation of the possible impact of stormwater solids discharge from the 2nd Ave and potential infiltration

As the RI notes, “Additional evaluation of the possible impact of stormwater solids discharge from the 2nd Ave. Outfall is warranted but is beyond the scope of this RI, as these solids are derived from properties upstream of the ICS/NWC property.”

In the RI, on page 50 it notes that if the maximum exceedance factor (EF) was greater than ten (EF>10) the constituent was identified as a proposed sediment contaminant of potential concern. For stormwater solids, which eventually become sediment, contaminants with an EF greater than 10 in the RI included 1,4-Dichlorobenzene, Benzyl Alcohol, 1,2-Dichlorobenzene, 1,2,4-Trichlorobenzene, and Hexachlorobenzene.

³Lower Duwamish Waterway Slip 4 Early Action Area: Summary of Existing Information and Identification of Data Gaps. 2004. <https://your.kingcounty.gov/dnrp/library/2004/kcr2051.pdf>

⁴ <https://cdfwmarine.wordpress.com/2015/06/05/creature-feature-gaper-clams/>



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PCBs did not exceed the 2015 stormwater guidance SLs of 130 to 1,000 ug/kg-dw, but are above the LDW-ROD CUL of 2 ug/kg.

The RI/FS should further evaluate potential contributions of stormwater to the Industrial Container Services, embayment, and the Duwamish River areas. This will be necessary to demonstrate source control sufficiency and prevent recontamination of these areas.

There is also potential infiltration of water from the site into the stormwater pipes. The RI did not provide sufficient evidence that this is not occurring. Ecology should include further evaluation of any potential leaks in the stormwater conveyance system.

7. Address seeps present along the shoreline

There are at least 4 seeps along the shoreline, primarily along the embayment. Baseline data did not appear to be available for all contaminants in the RI/FS at the seeps, but some data in the RI/FS suggest elevated contaminants near the seeps. For example, Figures 4-17b and 4-17c show the PCB levels in the upper and lower zones from samples taken adjacent to the seeps with levels that exceed screening levels. Additionally, the aquitard overlaps some of the seeps and could facilitate movement of contaminants into the seeps, but does not appear to be included in the RI/FS.

The preferred alternative, Embayment #3 doesn't mention seeps like the other alternatives do. The FS also does not mention how seeps will be addressed during remediation or whether monitoring of seeps will occur after the cleanup.

According to the RI/FS at least 7% of groundwater enters the embayment, which could include through seeps. Ecology should include a more explicit evaluation of the current contribution of seeps to contaminant movement and evaluate and describe the benefits of the preferred alternative to control of contaminant movement through seeps. The RI/FS should further describe additional data that will be collected on seeps prior to and after construction.



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8. Further address the changes in aerobic and anaerobic conditions on contaminants

Table 4.1 of the FS notes the degradation potential of contaminants in anaerobic and aerobic conditions. The degradation of groundwater contaminants could be influenced by the level of restoration that occurs at the site and the influence of tides on groundwater-surface water interactions.

The potential shift between aerobic and anaerobic conditions is especially important for PCE/TCE since it degrades to vinyl chloride under anaerobic conditions. This potential to degrade into a more volatile contaminant is also important as most of the bottom of the embayment is exposed during periods of relatively low tide, which could create fluctuating aerobic and anaerobic conditions. Metals are also prone to higher mobility in anaerobic conditions. A further evaluation of the potential impacts of shifting anaerobic and aerobic conditions in the RI/FS should be considered.

9. Address potential contributions of the former ditch

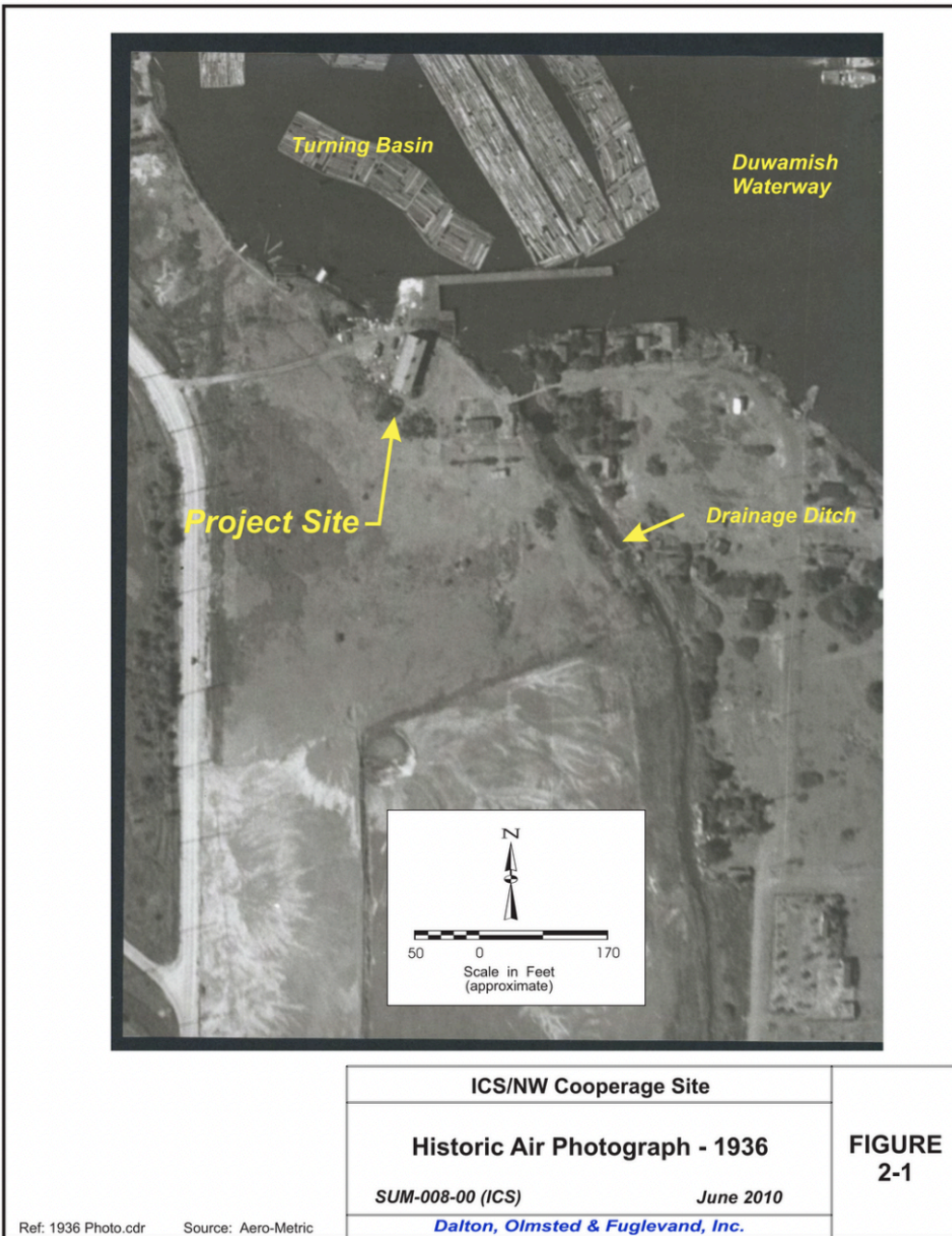
A surficial drainage ditch occupied the property until it was filled in the late 1960s (shown in Figure 2-1). A portion of this ditch was used as a wastewater settling lagoon. The filled-in ditch now flows in a buried storm water drainage pipe to the 2nd Avenue Outfall.

As noted in the RI/FS the samples from wells near the former drainage ditch had estuarine water contributions that ranged between 49% and 87%. This suggests a high degree of exchange between the river and the former drainage ditch soils and groundwater.

The former ditch has high levels of arsenic, total chromium, lead, zinc, sum 4,4'-DDE, -DDD, -DDT, DRO/RROs, and total PCBs near the bottom of the filled-in drainage ditch. While the RI/FS states that "Available groundwater analytical data indicate that PCBs and DRO/RRO are not migrating in groundwater above SLs from the filled-in drainage ditch", the presence of high levels of contaminants and a clear pathway to the

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Duwamish River indicate additional and focused sampling is needed.





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10. Clarify the role of the Seattle reservoir outfall

As noted in the RI/FS, a Seattle reservoir overflow outfall exists at the head of the embayment. Seattle Public Utilities (SPU) operates an overflow pipeline from the West Seattle reservoir that discharges excess potable water to the embayment (Sewer Card No. 5340-79). As noted in the RI, visual observation noted that this outfall contributes to erosion on the shoreline.

Figure 5-5a of the RI shows a hotspot of elevated PCB levels in sediment just below this outfall in 2012. However, no other subsequent samples are shown to further characterize the sediment below the outfall. This is confirmed in the sample location map (Figure 4-1a) in the FS. Because the outfall has the potential to erode sediment and soils at low tides, the area around the outfall should be further characterized.

In addition, since the outfall is located at the head of the embayment, it would likely be a viable location for habitat restoration.

We appreciate this opportunity to provide comments. Please do not hesitate to contact us if you have any questions.

A handwritten signature in blue ink, appearing to read "Paulina Lopez", is written over a light blue background.

Paulina López
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