

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Little Squalicum Creek Area of the Oeser Company - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region X

Subject: POLREP #1
Initial POLREP
Little Squalicum Creek Area of the Oeser Company
WAD008957243
Bellingham, WA
Latitude: 48.7815325 Longitude: -122.5607300

To:
From: Diane Dettling, OSC
Date: 9/2/2010
Reporting Period: 8/18/10-9/2/2010

1. Introduction

1.1 Background

Site Number:	WAD008957243	Contract Number:	
D.O. Number:		Action Memo Date:	7/2/2010
Response Authority:	CERCLA	Response Type:	Non-Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	8/18/2010	Start Date:	8/23/2010
Demob Date:		Completion Date:	
CERCLIS ID:	WAD008957243	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Oeser is a active production facility. Little Squalicum Creek Area is adjacent to it.

1.1.2 Site Description

1.1.2.1 Location

The Little Squalicum Creek Area (LSCA) is located south of the Oeser Company property on the northeast shore of Bellingham Bay in Whatcom County. Parts of the LSCA are in the City of Bellingham. The City of Bellingham owns part of the LSCA and the County owns other parts of the LSCA. The City leases the County's portion of the LSCA for improvement and management as a park. The area being developed by the City is called Little Squalicum Park and comprises 21 acres. Little Squalicum Creek is approximately a mile long and runs through the park down to Bellingham Bay.

1.1.2.2 Description of Threat

Soil, sediment, surface water, and groundwater at the Little Squalicum Creek Area (LSCA) have been found to contain chemicals that are associated with wood-treating operations. The Oeser Company (Oeser), an active wood-treating facility that has operated since the 1940s, has been identified as a source of some of these contaminants within the LSCA. Oeser-related contaminants have historically been discharged to the LSC Site via Oeser's stormwater drainage system. The primary contaminants of concern include PCP, total and carcinogenic PAHs (e.g. benzo(a)pyrene). Dioxins and furans were also found onsite.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Oeser Site was listed on the National Priorities List (NPL), pursuant to Section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. Section 9605, on October 27, 1997. At that time, EPA determined that the Oeser-related contaminants within the LSCA did not pose an unacceptable risk to human or ecological receptors, and that cleanup of Oeser-related contaminants within the LSCA was not warranted under CERCLA. However, over the last several years and based on additional data, the EPA has determined that Oeser-related contamination within the LSCA is subject to cleanup action under CERCLA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In general, the contaminated soil and sediment with the highest concentrations of PCP, PAHs and dioxins/furans

will be removed, and remaining soil and sediments, which have lower concentrations, will be consolidated and capped.

Additionally, based on the City of Bellingham's plans for the park, the creek will be rerouted, the Bellingham technical college outfall will be rerouted, and wetlands will be restored.

2.1.2 Response Actions to Date

Site preparation and utility activities occurred during this time period and will continue to occur. Sampling for delineation of the extent of contamination has also been performed. Landfill waste was encountered during site preparation. The City of Bellingham is working along with Oeser to sample and excavate this.

Site Preparation-temporary sedimentation and erosion controls;improvement of temporary access to the site; signage and fencing;clearing and grubbing;preparing staging areas, stockpiles and borrow areas; revising the trail.

Utilities-abandoning and removing existing monitoring wells;removing the abandoned gas line; rerouting storm drains; installation of a new culvert.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

PRPs have been identified and letters notifying them of potential liability under Section 107(a) of CERCLA are being prepared by the Removal Enforcement Section.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

- Removal and Consolidation With Capping and/or Containmentment

Prior to excavation of contaminated material, the removal action areas would be cleared and grubbed using a bulldozer or other suitable equipment. Contaminated soil/sediment above cleanup levels will be removed in lifts until confirmation sampling shows cleanup goals have been achieved or a depth of six feet is reached. Contaminated soil deeper than 6 feet is not expected to be removed because it does not currently pose an unacceptable risk to ecological receptors or humans. However, if contamination is visually apparent and accessible below 6 feet, additional material may be removed.

It is anticipated that all or most of the excavated material will be consolidated and placed within the middle reach of the existing creek channel (repository area) prior to capping. Soil/sediment which cannot be placed within the middle reach of the existing channel and capped will be consolidated and contained on the Oeser repository. None of the material known or suspected to be found in the LSCA area exceeds levels that would require treatment before or rather than capping or containment.

- Creek Rerouting

The existing creek will be rerouted from the upper portion of the existing creek to the lower historical creek channel. Approximately 700 linear feet of the existing upper creek will be permanently impacted while implementing the removal action. However, approximately 1,300 linear feet of new and historical channel will be constructed, which will have greater functions and values than the existing channel. The creek will not be rerouted through the City's proposed estuary area in the southern portion of the LSCA.

- Bellingham Technical College (BTC) Outfall Rerouting

The BTC Outfall pipe will be shortened so that it no longer enters the creek near the Birchwood/Oeser Outfall, but instead would enter the creek just south of the existing BTC trail.

- Restoration of the Removal Action Areas

The excavated areas will be backfilled with clean material. It is anticipated that the backfill material may come from clean soil excavated as part of the construction project to create a new parking lot at the adjacent Bellingham Technical College, or from material used to create the new upper creek channel. Impacted wetlands will be restored or mitigated. A wetland delineation will be performed prior to construction, and the details of wetland restoration/mitigation will be determined during the engineering design process.

- Capping

The middle and upper reaches of the existing creek channel will be capped using clean material excavated to create the new creek channel and/or from the estuary area.

- Sampling

To better delineate the extent of contamination in the excavation areas, pre-removal soil sampling will be performed. Post-removal confirmatory sampling for COCs will also be performed.

2.2.1.1 Planned Response Activities

- Removal and Consolidation With Capping and/or Containment
- Creek Rerouting
- Bellingham Technical College (BTC) Outfall Rerouting
- Restoration of the Removal Action Areas
- Capping
- Sampling

2.2.1.2 Next Steps

Receive sampling results and begin excavating.

2.2.2 Issues

N/A

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

EPA
OESER
City of Bellingham
WA Ecology

3.2 Cooperating Agencies

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.