



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 31, 2007

Karen Keeley
US EPA Region 10
1200 Sixth Avenue
ECL-113
Seattle, WA 98101

RE: Slip 4 Source Control

Dear Ms. Keeley:

This is to inform you that sources are not adequately controlled to protect a sediment cleanup of the Slip 4 Early Action Removal area this coming summer (2007).

As discussed at our meetings on January 9 and 22, 2007, Ecology and the Source Control Work Group for Slip 4 believe more work is needed to control sources in the north part of the King County International Airport (KCIA). The source control work group continues to find polychlorinated biphenyls (PCBs) in storm drain solids at concentrations significantly higher than those typical of urban runoff. We do not have enough information to assess how quickly or to what degree these levels of PCBs might recontaminate the Early Action Removal area in Slip 4.

Ecology plans to manage future source control investigations at north KCIA through an administrative order under the Model Toxics Control Act.

We believe that contaminated soil infiltrating into the storm drain lines is the primary source of the PCBs. There are other potential sources of PCBs there which need further investigation as well. The suspected source area covers about 18 acres. Stormwater treatment is not feasible because of the volumes of stormwater generated by this area.

The city of Seattle and The Boeing Company have collected storm drain solids four times since August 2005 using in-line sediment traps. The City, Boeing and King County also collected samples from and cleaned catch basins, some major drain lines and ten oil/water separators. Despite these efforts, the sediments collected in the storm drain lines within the area Boeing leases from King County continue to have high concentrations of PCBs. Boeing is continuing to video inspect and collect samples from the storm drain lines using other, faster methods to locate the sources.



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Elsewhere in the Slip 4 drainage basin, Ecology and our contractor SAIC evaluated two properties adjacent to Slip 4 and eight properties within the upland drainage as potential sources of recontamination.

Of the properties adjacent to Slip 4, the Crowley property does not appear to be source of contamination to the Early Action Removal area at the head of the Slip although it may be a source of contamination to the river's main channel. We are planning further investigation of this property.

We have determined that First South/Emerald Services, the other adjacent property, is not an ongoing source of contamination to the Early Action Removal area.

Based on available information we have also determined that the other eight upland properties are not sources of contamination to Slip 4.

On January 22, 2007, we provided you with a draft technical memorandum which updates the July 2006 Source Control Action Plan. Documentation for the recommendation and the findings summarized above is in the draft technical memorandum. We are working with our contractor to address your comments on the property summaries and the technical memorandum. I will send the final reports to you as soon as they are available.

If you have any questions please call me at 425-649-7023.

Sincerely,



Daniel R. Cargill
Toxics Cleanup Program

DRC:dc

cc: Lori Cohen, Environmental Protection Agency
Allison Hiltner, Environmental Protection Agency
Kristine Flint, Environmental Protection Agency
Jennie Goldberg, Seattle City Light
BJ Cummings, Duwamish River Cleanup Coalition
Jim Pendowski, Department of Ecology
Steve Alexander, Department of Ecology