Koch, Ken

0296

PRELIM. CORRESP.

From: Peggy Halferty [mhalferty@epi-wa.com]
Sent: Tuesday, December 07, 2004 1:18 PM
To: 303d
Subject: 0296-FW: Port Gamble Bay 303d listing

-----Original Message-----
From: Peggy Halferty [mailto:mhalferty@epi-wa.com]
Sent: Tuesday, December 07, 2004 12:13 PM
To: '303d@ecy.gov'
Cc: 'Ubaldi, David'
Subject: Port Gamble Bay 303d listing

Ken:
I am working with David Ubaldi of Davis Wright Tremaine regarding the Port Gamble Bay 303d listing for Dissolved Oxygen and pH.

The following listing ID numbers have resulted in a 303d category 5 designation for this water body:

Listing ID # : 10279
Parameter: pH
Comment: Ecology Ambient Monitoring Station PGA 001 recorded 5 excursions beyond criterions out of 9 samples collected between 1993-2000.

Listing ID #: 10278
Parameter: Dissolved Oxygen
Comment: Ecology Ambient Monitoring Station PGA 001 recorded 7 excursions beyond criterions out of 18 samples collected between 1993-2000.

We have searched the information available on the Ecology web site and have been unable to locate the data referred to in the comments.

Could you please direct us to the database containing the supporting data?

Thank you so much for assistance with this request.

Sincerely,
Peggy Halferty

0296
COVER

Koch, Ken

From: Peggy Halferty [mhalferty@epi-wa.com]
Sent: Monday, December 20, 2004 12:12 PM
To: 303d
Subject: Comments Regarding Monitoring Station PGA001 303d Listings
Follow Up Flag: Follow up
Flag Status: Flagged

Ken,

Thank you for taking the time to talk with me regarding the 303d listing and review process. The information you provided was very useful.

We have reviewed the available data for PGA001 and monitoring stations in its vicinity. I have summarized the results of our review as comments for the PGA001 Listing #s 10278 and 10279. These comments are contained in the letter attached as a PDF to this email.

Please feel free to write or call if you have any questions.

Sincerely,
Peggy Halferty
425-395-0032

ENVIRONMENTAL PARTNERS INC 295 NE Gilman Boulevard, Suite 201 Issaquah, Washington 98027 ph 425.395.0010 fax 425.395.0011

0296

December 17, 2004, 2004

Ken Koch
Water Quality Program
WA Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Port Gamble Bay
303d listing for Dissolved Oxygen and pH

Dear Mr Koch:

These comments on the proposed 303(d) listings in Port Gamble Bay, discussed below, are submitted by Environmental Partners, Inc. on behalf of Pope Resources, the current owner of the Town of Port Gamble. Pope Resources' predecessor was Pope & Talbot, Inc., the former owner of the town and the former sawmill site. These comments set forth reasons why Port Gamble Bay should not be listed as Category 5 for either dissolved oxygen or pH.

Listing ID # 10278
Dissolved Oxygen
Category 5

We reviewed the dissolved oxygen (DO) data collected at the Ecology ambient monitoring station PGA001 and observed that three of the DO excursions occurred in late 1997 and early 1998. Ocean water during this time period was regionally affected by the 1997-98 El Nino; incoming ocean water was less dense causing suppressed upwelling and reduced flushing in the Puget Sound region. The reduction in flushing resulted in increased stratification and low dissolved oxygen in the hypolimnion. It is likely that this natural condition resulted in the 1997-98 dissolved oxygen at the PGA001 monitoring station.

In the late summer and autumn it is documented that the Pacific Ocean waters entering the Puget Sound through the Strait of Juan de Fuca are predominantly upwelled deep ocean waters with naturally low DO concentrations. Five of the twelve Puget Sound monitoring stations with moderate stratification are close to the Strait of Juan de Fuca where upwelled oceanic waters are seasonally common. These stations include PGA001, ADM002, PTH005, DIS001 and DUN001. Those excursions not accounted for by the 1997-98 El Nino event occurred in the late summer of 1998 and the late summer and autumn of 2001. A strong correlation was found between these DO excursions and data recorded at ADM002 and PTH001 (no data was available from DIS001 and DUN001 in this time period). The correlation of data from these stations and the occurrence during the seasonally documented time period for naturally low DO at these locations indicates the likelihood of the PGA001 excursions being the result of a natural condition.

The data, therefore tends to indicate that the DO excursions observed at PGA001 are related to natural conditions either resulting from the 1997-98 El Nino regional effect or from the seasonal ocean water upwelling.

Listing ID # 10279
pH
Category 5

During our review of the data associated with PGA001 we noted that the pH excursions were associated with pH of 8.5 to 9.0 and occurred in a temporally isolated period, from March through August of 2001. The data for PGA001 prior to and after this time period ranges from 7.1 to 8.3. In addition the data show the pH is elevated throughout the entire water column, rather than in a stratified layer. No known source in the Port Gamble Bay area would cause a high pH excursion for this period of time. Data from nearby monitoring stations showed pH excursions of the same magnitude over the same time period (HCB006, ADM002, ADM001 and PTH005). Some of the pH data from these stations is not available for this time period but the consistency was marked.

We suggest that due to the area-wide, temporally isolated nature of the data that the pH excursions could be related to instrument or calibration error or some other anomaly. For these reasons and since no pH excursion have occurred since this time and no activities in Port Gamble Bay can be identified as likely contributors to high pH excursions/ we suggest that it is not consistent with the intent of the TMDL regulation to list Port Gamble Bay as a Category 5 for pH.

Comment Applying to Both Listings:

The parameter excursions recorded in the listing ID #s above occurred in or prior to 200I. Beginning in 2002 the Port Gamble Bay sediment and upland areas have undergone substantial environmental remediation. This provides another reason not to rely on the 1997-2001 data for 303(d) listing purposes.

Pope & Talbot, Inc., the former owner and operator of the Port Gamble sawmill, dredged approximately 12,000 cu. yds of wood waste from Port Gamble Bay sediments adjacent to the former sawmill site. This work was carried out pursuant to a July 2003 Cleanup Action Plan approved by the Department of Ecology. Parametrix, *Sediment Cleanup Action Plan; Former Pope & Talbot, Inc. Mill Site* (July 2003). Pope & Talbot's consultant, Parametrix, Inc., subsequently performed a comprehensive baseline monitoring study in 2004 as part of the monitored natural recovery plan contained in the Cleanup Action Plan. Parametrix, *Baseline Natural Recovery Sediment Monitoring Report; Former Pope & Talbot, Inc. Mill Site* (Oct. 2004) (Baseline Study). The Baseline Study showed substantial recovery of the benthic biological community following removal of the woodwaste in 2003. Thus, current Port Gamble Bay sediment conditions are substantially different than when Ecology collected its listing data.

In addition, recent environmental cleanup of adjacent upland areas has occurred under Ecology's MTCA Voluntary Cleanup Program, in the form of independent remedial actions undertaken by Pope & Talbot and the current owner of the Town of Port Gamble, Pope Resources. The areas cleaned up include the former sawmill site, various areas within the town of Port Gamble, the former industrial landfill area to the south of the Town, the former dredge spoils regulated landfill to the south of the town, and several locations along the

shoreline where landfills were formerly located. Most of these independent cleanups have been completed or are nearing completion, and Ecology has issued several of no-further-action determinations. In recognition of these cleanup efforts, the Department of Ecology has recognized Pope Resources and Pope & Talbot with an Environmental Excellence Award.

Accomplishment of the Bay wood waste removal and upland cleanups has most likely had a beneficial effect on Bay water quality. Thus, Ecology should not rely on the cited data for 303(d) listing purposes, because of these subsequent and significantly changed circumstances.

We hope this information is helpful in determining the appropriate 303d listing category dissolved oxygen and pH in Port Gamble Bay. If you have any questions regarding these comments please do not hesitate to contact us at 425-393-0010.

Sincerely,

MARGARET ANNE HALFER
STATE OF WASHINGTON
35719
REGISTERED
PROFESSIONAL ENGINEER

Peggy Halfer
Senior Chemical Engineer
EXPIRES 1/04/06

JOHN S. BRASINO
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Principal Engineer
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JB

Enc:
cc: Rich Elliott, Davis Wright Tremaine
Jon Rose. ORM

QR TR