

To: Brian Sato, Site Manager
WA Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008

April 10, 2018

RE: Comments on GP West Feasibility Study Including Chlor-Alkali Area

Dear Brian,

Thank-you for the opportunity to comment on the feasibility study that evaluates clean up alternatives at the Georgia-Pacific West (GP West) site including the Chlor-Alkali area. We greatly appreciate your efforts in the Bellingham Bay waterfront cleanup including addressing public comments. As the Clean Water Team at RE Sources for Sustainable Communities, we represent almost 20,000 supporters in Whatcom and Skagit Counties. Our comments on the cleanup alternatives are as follows:

1. We encourage the Port of Bellingham and Department of Ecology to continue cleanup plans at the GP West site along compliance with either Alternative 6, 7, or 8; with our preferred Alternative being 8, followed by 7 if Alternative 8 is unfeasible. These alternatives have a MTCA Benefits Ranking of above 7 therefore protecting future human and ecosystem health. Alternative 4, the preferred alternative, is insufficient at protecting water quality, human health, and the health of the ecosystem. Alternative 4 focuses on cleaning up only the “caustic core”, visible mercury, and removal of soil near the Log Pond, therefore leaving behind contaminants that have the potential of continued environmental degradation.¹ Bellingham is a fortunate city because it is able to clean up old industrial sites and redevelop the waterfront to meet the City’s 21st century needs; long-term public health and safety should be at the top of the Port of Bellingham’s and WA State Department of Ecology’s priorities.
2. With the proximity of the GP West site to city parks, new development, and our current vibrant downtown, as well as the waterfront cleanup projects being zoned for mixed-use, we would like to see an alternative that is more aggressive in removing the toxics from the site beyond the MTCA requirements for *industrial zoning*. We would like to see a removal of all soils exceeding cleanup levels such as Alternative 7 or 8. Alternative 7 and 8 cleanup plans would protect children, families, and the environment and not have potential economic impacts of restricted land use in the future.
3. Again, with the proximity of the GP West site to downtown Bellingham, the fact that our weather often comes from the south and west, and the toxics associated with this site are volatile, we are concerned about dust and vapors blowing from the site into heavily populated areas. We would like to see wind restrictions on when cleanup can take place to reduce the amount of potentially toxic wind going into town.
4. With this site being zoned as mixed use, including industrial, the capping method might not accommodate construction of buildings appropriate for industry without demolition of part of the cap. Alternatives 1, 2, 3, 4, 5, and 6 all utilize capping as a form of containment. Larger buildings

- and/or industries that have heavy equipment and equipment that must be stabilized use pilings for stability, these pilings would need to go into the ground therefore through the capping layer.
5. The toxics associated with the GP West site are harmful to human health and the environment. Mercury is a neurotoxin that affects humans of all ages, but while in fetus can have even more harmful effects;² even if the GP West site is zoned for industry, children could be exposed to the heavy metal while their mother is pregnant and have teratogenic effects. Without extreme measures to remove soil contaminated with mercury, the mercury still can leach into the environment and accumulate in nearby shellfish beds, thus impacting those that eat local shellfish. Polycyclic aromatic hydrocarbons and petroleum hydrocarbons are known to exist on the GP West site at potentially harmful levels including Naphthalene. Naphthalene is “reasonably anticipated to be a human carcinogen and may be associated with an increased risk of developing laryngeal and colorectal cancer.”³
 6. Alternatives 1, 2, 3, and 4 (the Preferred Alternative) do not address caustic groundwater. We are concerned with the fate and transport of contaminants from the site by this caustic groundwater leaching into the water of Bellingham Bay with increasing the mobility of contaminants such as mercury.
 7. As the cleanup process for this remedial action unit continues, careful consideration should be taken to coordinate cleanup efforts with the adjacent cleanup sites, such as the Whatcom Waterway and the rest of the GP West site, and ensure the best potential future uses for these sites.

Thank you very much for considering our comments.

Eleanor Hines
Northsound Baykeeper, Lead Scientist
RE Sources for Sustainable Communities

Resources:

1. Feasibility Study Chlor-alkali Remedial Action Unit Vol. 2b of RI/FS, Georgia-Pacific West Site Bellingham, Washington. Aspect Consulting. February 2018. Table 8-1 Disproportionate Cost Analysis.
2. United States Environmental Protection Agency: Health Effects of Exposure to Mercury. April 2, 2018. <https://www.epa.gov/mercury/health-effects-exposures-mercury>
3. US National Library of Medicine: Naphthalene. April 2, 2018. <https://pubchem.ncbi.nlm.nih.gov/compound/naphthalene#section=Top>