

To: Mark Adams
Site Manager, RG Haley Intl Corp Site
Washington State Department of Ecology
Transmitted Via Email to: mark.adams@ecy.wa.gov

March 21, 2018

RE: RG Haley Intl Corp Site Cleanup Action Plan and Related Documents Comment

Dear Mark Adams,

Thank you for taking the time to consider our comment on the RG Haley Site Cleanup Action Plan managed by the Washington Department of Ecology.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We appreciate the time and effort taken to put the Cleanup Action Plan, Agreed Order, Public Participation Plan, and the State Environmental Policy Act Determination of Nonsignificance and Checklist out to public comment. Overall these documents address our concerns for human and ecological health; however, we have a few concerns that we would like considered, outlined below.

Agreed Order: We had just a few grammatical comments relating to document, including:

- In section VI. C., there is a comma missing after 2009 in the list of dates.
- In section VIII.F. A. 4. c., the Bellingham Field Office Address provided is the old address (new one is 913 Squalicum Way, Unit 101, Bellingham, WA 98225).

Public Participation Plan: We appreciate the thought put into how to better interact with the public throughout the cleanup process. Below are a few suggestions:



- Having the power point presentations given at public meetings available online would be very helpful. Some presentations do not always translate well to PDFs, such as when there are multiple layers, but spreading out such slides into many slides could alleviate this problem. Being able to look back at slides can be really helpful for us and the public when we formulate comments.
- It is always helpful to indicate where in the process the cleanup is on the factsheets, so thank you when you do. Additionally, keeping the project timeline on the website updated as much as possible is also helpful.
- There are other languages than English spoken in households in Bellingham, so perhaps providing info in other languages could be helpful, or at least assistance with translation.
- We would like to ask you to consider a WebEx option and/or recording of public meetings available online for those who cannot attend the public meetings.

Cleanup Action Plan: In general, we are pleased to see that the site boundaries have been expanded due to additional contaminant information. We also reiterate the importance to make sure plans for RG Haley are consistent with Whatcom Waterway and Cornwall Ave Landfill cleanup plans so that the redevelopment and future land uses can transition smoothly while not compromising cleanup efforts. We also appreciate incorporations to accommodate future sea level rise and what that might mean for the longevity of this cleanup and future site uses. Additionally, where possible, we would like habitat enhancement to be considered, particularly along the shoreline and in the marine nearshore, where possible. Below are some additional highlights of comments specific to certain cleanup actions.

Upland Soil Solidification and Upland Low-Permeability Capping:

- The upland low-permeability cap will need to be vented to prevent build up of soil gases. In the future plans, we suggest that future land use and events like extreme high tides be considered. With rising sea levels and higher king tides, if the off-gas vents are not high enough, they could become clogged with debris brought by the tides.
- We are concerned about the prevention of upland storm/groundwater contamination re-contaminating the site. Consideration into stormwater and groundwater drainage is important
- We would like to be sure that the upland soil solidification be able to withstand future events, such as earthquakes, and land uses, such as a parking lot with heavy vehicles and an adjacent railway so as to prevent such events as fractures in the solidified soil that could facilitate leaching of LNAPL through groundwater.

Intertidal Sediment Removal:

- The LNAPL-impacted sediment in the intertidal zone that will be moved to be consolidated under the upland cap should be tested before being mixed in under

the upland cap to make sure new contaminant issues are not introduced and that proper soil solidification and capping methods are used.

- The plan states that large debris or other materials unsuitable for placement under the upland cap will be disposed of off-site. Will these materials be tested for contaminants and how will they be disposed of?

Sediment Capping and Natural Recovery:

- Where natural recovery methods are used, we stress the importance of continued monitoring and contingency plans to test after an event such if a ship were to strike ground, for example when the Horizon Line ship came unsecured in a strong storm and ran into the sediment of Whatcom Waterway. Also plans to ensure that dredging activities won't accidentally breach these caps.
- Offshore recreational mooring is also a concern in the marine unit here as it is for Cornwall Avenue. We are concerned that offshore anchoring could compromise capping. Proper measure to ensure this does not become an issue should be put in place, possibly including education and outreach to recreational boaters and/or signage on where to not anchor and where it is ok to anchor.

Institutional Controls:

- We are pleased to see institutional controls accounted for in this cleanup action plan. As full removal of contaminated materials is not the plan, institutional controls are a key to permanence at this site.

Thank you for your time and consideration. We appreciate this opportunity for public comment and efforts to protect both human and environmental health.

Sincerely,

Eleanor Hines
Lead Scientist
RE Sources for Sustainable Communities