

Tip Johnson

Please, while we are working on this, will it be possible to actually clean up some of the mercury? How many pounds of mercury has or will be actually re-contained? How much is left? Where is it?

Public safety should compel us to account for the total quantity of mercury used in the chlor-alkali process. The public should know where it went, how it got there or how it remains.

At <https://bit.ly/2HtYN38>, the WSDNR reports that "tsunami waves will reach the Anacortes/Bellingham areas about 1.5 hours after the Cascadia earthquake, with inundation depths as high as 18 feet and current velocities in excess of 20 knots. Tsunami inundation is expected to continue for more than 8 hours."

Can the parties to this agreement assure the public that in-situ remedies will withstand a liquefaction event followed by 8 hours of turbulent inundation?

At the risk of redundancy, I resubmit the following from last April:

I advocate full removal and aggressive pursuit of natural resource damage claims to fund an expanded project. Some concerns I am sure others will also address:

- 1) The plan's baseline assumption for sea level rise is significantly less than current modeling now suggests. Please indicate what contingencies are in place for sea level rises greater than the plan anticipates. How will erosion caused by normal wind wave action and storm surges affect in situ treatment of contaminants?
- 2) There is a discrepancy in exhibits for tsunami inundation of the site. Some federal and state models show inundation extending over the site and into Maritime Heritage Park, while exhibits used by the city and port show the park as a safe zone and the site unaffected. How can we reconcile these differences and how will tsunami inundation affect in situ treatment of contaminants?
- 3) The site is a known liquefaction zone. What potential releases of contaminants might occur in the event of the anticipated 9 - 9.2 magnitude earthquake and soil liquefaction at the site? How will containment measures fare?
- 4) Severe mercury contamination is commonly found on and downwind of chlor-alkali plants. Redevelopment has already begun immediately downwind of the site. How will these sites be monitored and occupants protected? How will workers on and off site be protected?
- 5) Modeling predictions show residual contamination levels gradually subsiding over time. Where will it go?
- 6) Will there be continuing mercury vapor monitoring on site and over potentially contaminated downwind soils and structures that could contribute mercury flux to ambient air in the downtown core?

Slightly off-topic in terms of the remedial alternatives, but the No Action Alternative of the original environmental review substantially lacked substance. I wonder if leaving the site a minimally developed, open public space could provide more benefit for more of Whatcom County than planning for maximum redevelopment and privatization. This was never examined. How would planning for shorter term exposures affect the design of remedial alternatives?

Finally,

6) On behalf of the Mercury Victims of Whatcom County, I incorporate by reference their comments which I compiled from a number of confidential interviews over the past several weeks, currently published at:

<https://nwcitizen.com/entry/mercury-victims-of-whatcom-county>

I appreciate the technical effort that has gone into this analysis, but am more than ever convinced that the scope and clean-up needs to be expanded and elevated to a level sufficient to guarantee protection of the health of our community and environment.