

Mt. Baker Group, Sierra Club

On behalf of the Mt. Baker Group of the Washington State Chapter of Sierra Club, of which I am the vice-chair, I write to comment with regard to the proposed Central Waterfront Site toxic waste cleanup in Bellingham, and in particular the Final RI/FS Report submitted March, 2018 by Anchor QEA, LLC to the Port of Bellingham ("RI/FS") (including all later documents and plans based on it). Several clean up areas of significant and urgent interest are not adequately addressed in the RI/FS, so that the preferred Alternative A clean up approach is inadequate to assure the health and safety of the citizens of Bellingham.

Specifically, I refer to section 6 of the RI/FS, entitled "Conceptual Site Model," beginning at p. 73 of the RI/FS. Problems become apparent in section 6.3, "Hilton Avenue Properties Subarea," beginning at p. 96. (These same problems appear to apply to the C Street Properties as well – see Figure 6-10, p. 430 of the RI/FS – but for ease of discussion, I refer only to the Hilton Avenue Properties.) Section 6.3.1 describes the Contaminants of Concern ("COC") as "TPH's" (Total Petroleum Hydrocarbons), specifically "TPH-G" (gasoline) and "TPH-D" (diesel), and "PAH's" (Polycyclic Aromatic Hydrocarbons) from fuel tank operations and creosote-treated piles.

Section 6.3.2.1, addressing "Soil Nature and Extent" (starting p. 97), indicates the presence of TPH-G and "TPH-Dx" (diesel extended range) in certain parts of the Subarea, as well as "BTEX" (benzene-toluene-ethylbenzene-xylene) in another part of the Subarea. I think we can all agree that gasoline, diesel, benzene, toluene, ethylbenzene and xylene are extremely toxic and/or carcinogenic whether their fumes are breathed in or they contaminate water (fresh water for humans, land animals and plants, or seawater for sea animals and plants). The presence of PAH's was also indicated on the site (from the former olivine plant, p. 98).

In Section 6.3.3, "Contaminant Fate and Transport," p. 100, it is stated that "[TPH] and PAH impacts at depths to 15 feet bgs [below ground surface] are present and have the potential to enter stormwater drainage, . . ." This same paragraph goes on to indicate that groundwater monitoring indicates that these substances are not a threat to groundwater, but nowhere in this paragraph or section 6.3 is potential floodwater contamination addressed.

Section 6.3.4 addresses "Exposure Pathways and Receptors" (p. 101), and states that the exposure concerns are personal contact with the TPH's and PAH's (and presumably BTEX, though that is inexplicably not discussed in this section), either from the soil or by inhaling, or "[r]unoff from surface soil to sediments from erosion of surface soils to the stormwater drainage system." Section 6.3.5, "Remedial Investigation Conclusions for the Hilton Avenue Properties Subarea" (also p. 101), concludes that

an evaluation of remedial alternatives . . . is developed in the FS, [which] will focus on eliminating the potential for direct contact exposure and contaminated soil to enter the stormwater drainage and runoff to adjacent sediments.

No other exposure concerns are addressed regarding the TPH's, PAH's, and BTEX in the Hilton Avenue Properties Subarea.

The RI/FS goes on to decide that the appropriate manner of dealing with these areas of contamination is to cap them, as illustrated in Figure 6-10, p. 430, and Figure 9-1, p. 431 (Alternative A).

The concerns we have are that the contaminants in both of these subareas, the Hilton Avenue Properties and the C Street Properties, being liquid in nature, could be spread widely in the event of flooding, either from rising sea level, a tsunami or stormwater. Yet the RI/FS indicates that mere capping is a sufficient remedy. Unless "capping" means complete 360 degree impermeable encapsulization of the contaminants, which does not appear to be the case (see Section 8.3, beginning p. 111), then floodwaters could conceivably push these highly toxic and/or carcinogenic substances into other areas where humans, animals, and plants could be exposed to them, with devastating and possibly deadly results. No one wishes to risk that kind of exposure, especially the people of Bellingham Bay.

To the extent that it could be argued that cleanup Alternative A meets all legal requirements, it seems obvious that merely meeting legal requirements is not enough when dealing with contaminants of this level of toxicity and/or carcinogenicity. The people of Bellingham deserve to know they are safe from such dangerous substances. Period.

The better approach to these contaminants would be to completely excavate them, and then remove them to an appropriate toxic waste land fill, where they could be properly contained. Therefore, on the specific behalf of the members of the Mt. Baker Group/Sierra Club, as well as the general behalf of the people of Bellingham and those who live around Bellingham Bay, we urgently and respectfully demand that the cleanup alternative include this cleanup methodology for the Hilton Avenue Properties and C Street subareas (and anywhere else in the Central Waterfront Site where such substances might be found).

Thank you.