

RE Sources

August 4, 2021

RE: GP West Chlor Alkali Draft Cleanup Action Plan and Associated Documents

Dear John Guenther,

Thank you for taking the time to consider our comment on the Georgia Pacific Chlor Alkali Area draft Cleanup Action Plan (dCAP), Agreed Order (AO) Amendment, and SEPA Determination and Checklist.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We appreciate the work that has gone into designing this dCAP for a very complex site. We are very excited to see this area of the waterfront move along in the cleanup process so that one day it can be used by the public as well as commercial and industrial uses. The phased cleanup approach to this complex site makes a lot of sense.

We are pleased to see the neutralization of groundwater in the caustic core being addressed and hope that there is some flexibility if the plan does not neutralize the groundwater pH as intended. If the cleanup plan needs to be substantially changed because the neutralization treatment does not work as intended, please consider another public comment period or otherwise keeping the public informed of any changes. Keeping mercury less mobile is important for human and environmental health and safety.

We also have general concerns about sea level rise and the high seismic hazard of the area. We understand that these factors are taken into account, but with recent events like the extreme heatwave in June 2021 and the 8.2 magnitude earthquake off the coast of Alaska on July 28, 2021, we are reminded of how vulnerable we are to seismic activity and the impacts of climate change that may mean things like sea level rise are higher than the current estimated projections used for this cleanup. We would like to ensure that the most up to date data is being used to ensure a truly lasting protective cleanup despite what environmental hazards may come.

This plan sets the expectation that it will take 34 years for the monitored natural attenuation (MNA) for groundwater to reach safe levels. This is a very long time. We would like to see a plan in place to ensure that the groundwater MNA can continue to occur and receive the necessary resources to see this cleanup action through to the end.

Our other concerns pertain to institutional controls, cleanup activities, and ensuring that this cleanup is well integrated into the plans for the Whatcom Waterway cleanup. These are addressed in the documents for review, but we would like to emphasize the importance of institutional controls ensuring that the cleanup is permanent and will not become an issue again in the future. During cleanup activities, we also feel it is very important to ensure that workers, the surrounding environment and biota, and public are ensured their health and safety from contaminants. We also want to emphasize the importance of ensuring that Whatcom Waterway is protected from potential recontamination from this site and the plans for the cleanup of the Whatcom Waterway is compatible with this cleanup action.

Thank-you for reading our letter and giving our concerns consideration. We value this public comment process and believe that it strengthens community engagement and involvement in the cleanup of Bellingham Bay.

Sincerely,

Eleanor Hines
Northsound Baykeeper, Lead Scientist
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