

Neil Gilham

Neil Gilham - Comments on Unocal Edmonds Bulk Fuel Terminal 0178 (second comment)

With the understanding that the comment period has expired, I wanted to add one more comment (my second) for consideration. I want to echo the comment submitted by Alan Mearns on November 24, 2024. Alan's comment was regarding a cleanup action alternative that was not considered or performed in any of the previous cleanup actions conducted at the Unocal site and was not presented as an alternative in the recent Public Review Draft Final Feasibility Study Addendum (FS) prepared by Arcadis.

I recommend that Chevron and their consultant Arcadis consider as a cleanup action alternative the use of onsite biotreatment of the petroleum-contaminated soils. The site has adequate space for constructing treatment cells and there is sufficient time when considered with the approximate 5-year timeframe presented in Alternative 6. There are no if this-then that contingencies as in Alternative 6. I know that Arcadis and Ecology are familiar with this approach, so I don't need to go into detail about how to do it. It has been done and I know of at least one site where it was done successfully (<https://apps.ecology.wa.gov/cleanupsearch/site/10915#site-documents>). I was involved with this project, coming in several years after the onsite biotreatment was completed.

I've been an environmental consultant for over 35 years (retired, mostly). I understand the mindset among consultants (me included) that "dig and dump" is a simple and effective approach in most cases where time and space are not available. Or the ease of putting in place an environmental covenant (and walking away?). It would be great to break out of that mold and look at the feasibility of biotreatment onsite. Whether some or all the contaminated soil is removed from the 22 identified PCS areas, the excavations could be left open, some or all could be connected to the inflow/outflow of an estuary system. The treated soil could be left in place on or near the treatment area or distributed in other places onsite as needed.

The use of onsite bioremediation at the Lower Yard could be a showcase of what can be done in an environmentally conscious way.

Thank you for the opportunity to comment (again) on the Unocal Site FS.

Sincerely,

Neil R. Gilham, LG