Kirsten McDade

Please see the attached document

RE SOURCES

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Transmitted Via Public Comment Form: https://tcp.ecology.commentinput.com/?id=ZUsi5Hrek

2 July 2024

RE: Holly Street Landfill Periodic Review

Dear Mr. Nale,

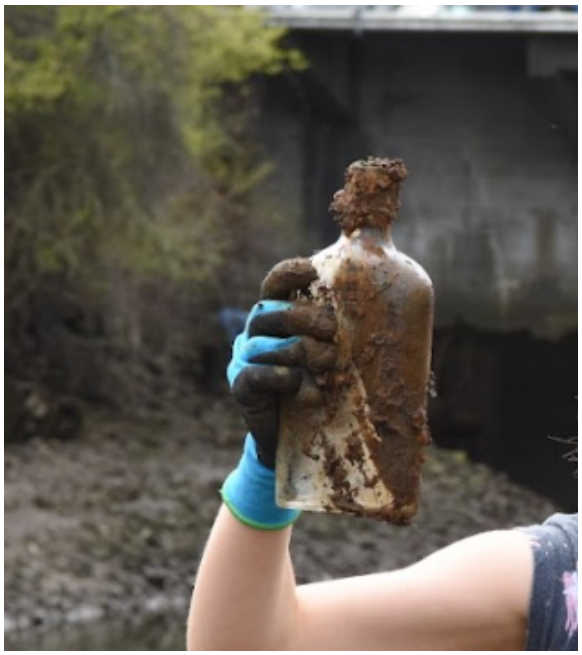
Thank you for taking the time to consider our comments on the First Periodic Review for Holly Street Landfill in Bellingham, WA. We have concerns that this historic landfill may be contributing pollution to Bellingham Bay and would like to see a plan in place to investigate and remediate any pollution problems in a timely manner.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We mobilize people in Northwest Washington to build just and thriving communities and to protect the land, water and climate on which we all depend. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution–all critical issues affecting our region. Our North Sound Waterkeeper 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.

According to the Remedial Investigation, the interaction of water with the historic refuse is one of the main sources of pollution at this site. After removing over 12,000 tons of waste a cap was placed over the remaining refuse to prevent this water-refuse interaction. We are concerned, however, that this cap is not intact. For the past 5 years, from 2020 to 2024, RE Sources has conducted annual trash cleanups at Maritime Heritage Park. We consistently remove over 200 pounds of trash from this site which is, on average, more than our other cleanup sites. While some of this trash is modern day litter, there is a considerable amount of trash that appears to be historic trash. In 2023, in particular, the cleanup occurred in February during a very low tide. Volunteers collected over 1,000 pounds of garbage in 2 hours. People were finding old, large chunks of industrial metal, tubing and piping, vintage metal dishware, and lots and lots of old glass in the sediment on either side of the creek (both intact bottles and shards). It seemed that people were finding more of this material

on the northern bank than the southern bank. While bathymetric surveys performed in years 1, 5, and 9 post cleanup claim the integrity of the shoreline cap is intact, the routine presence of historic garbage on the surface of the sediment challenges this claim. ***We would like to understand the source of this historic garbage being found at our annual trash cleanups and know if it is posing a threat to the water quality of the creek.***

An example of an antique glass bottle excavated from the northern bank of Whatcom Creek during a beach cleanup.



We also have concerns about the stormwater that originates from this area and that is discharged into Whatcom Waterway via the C st outfall. In the 2010 to 2014 Post-Construction Monitoring Report it was noted that a year after the cleanup there were elevated metal concentrations "in a localized erosional area immediately adjacent to a stormwater outfall on the northwest shoreline. To ensure the long-term integrity of the cap, the City subsequently redirected a portion of the storm water flow away from the Site into the larger C street stormwater system." The Bellingham City IQ Online Map Stormwater layer confirms that the stormwater from the NW region of the Holly Street Landfill Cleanup Site (the approximately 9 acres) flows into the C st outfall. Over the last 3.5 years RE Sources has collected monthly stormwater samples from C st outfall and we have concerns about the water quality being discharged here.

The water coming from the C st outfall has a chronic yellow hue, frequently smells like sulfur and petroleum, and a sheen is often noted at the pool below the outfall. *E. coli* bacteria exceedances are common; 57% of the samples in 2022 and 36% of the samples in 2023 exceeded the Washington State Freshwater standards set at 320 cfu/100 ml. There has also been a white microbial mat documented for most of the 3.5 years growing in the

outfall discharge area. In 2022, a DNA analysis was conducted and the mat consists mostly of the 5 following species: *Methylomonas,Pseudomonas, Hydrogenophaga, Sulfitobacter, and Flavobacterium*. Research suggests that these bacteria species are likely growing in response to polluted water. *Pseudomonas* is a known human pathogen.

The C st outfall is hard to access and not many people recreate at the outfall but water quality indicators and standards are also meant to protect the waters in which they discharge into, in this case Whatcom Waterway and the greater Bellingham Bay. ***We would like to see additional testing performed to determine if the Holly St Landfill is the source of this frequently poor water quality that discharges out of C st outfall.*** If not, there could be another pollution source that is currently not understood that needs to be addressed.

Thank you for including additional testing for the source of the dioxin/furan compounds within Whatcom Creek and the Whatcom Waterway. Dioxins and furans are highly toxic at very small quantities (picograms/g dry weight). They can cause reproductive and developmental problems, damage the immune system, interfere with hormones and can cause cancer (World Health Organization). Because they are so toxic at such small amounts, it is not unrealistic that the Dungeness Crab in Whatcom Waterway could be unsafe to eat because of dioxins and furans, this is in addition to the unsafe levels of mercury already measured in crab (Year 5 Compliance Monitoring Report for Whatcom Waterway Cleanup). Currently there is no warning signage at the waterway, or anywhere on Bellingham Bay, and RE Sources staff have witnessed people trapping and harvesting crab from the waterway, presumably to eat. ***We recommend that crab be analyzed for their dioxin and furan content and that the public is made aware of the potential dangers of eating seafood harvested from Whatcom Waterway***.

We agree that a climate vulnerability assessment needs to be conducted for this site and the results of the study implemented into the management strategy. The Federal Emergency Management Agency (FEMA) classifies Whatcom Creek as having a HIGH flood risk. In 1982, the 100-yr flood in Whatcom Creek was estimated to be at 1,429 cfs, however, with more extreme weather events and sea level rise these events will occur more frequently than every 100 years, especially if they coincide with King Tide events. The integrity of the cap and the restoration work could be compromised by the more frequent extreme weather events. Applying and using the Coastal Storm Modeling System (CoSMoS) for this area would be a good starting point.

We also agree with the other recommendations set forth by this review that there is a need for additional sampling of dissolved copper, cPAHs, bis(2-ethylhexyl)phthalate and TPH.

We are grateful that the Holly Street Landfill has been mostly cleaned up and that certain areas have been restored and made into public access areas. This periodic review shows that the work is not done, however, and that further testing and maintenance needs to be done to ensure that the cleanup is protective of human health and the environment.

This park and surrounding area is very important to the Bellingham Community - it is culturally significant to the Coast Salish People where there used to be a longhouse and for the first time in many years they can harvest Spring Chinook again, a very important cultural ceremony. It is a very popular recreation area for the community and a place where large gatherings and festivals often occur. It houses the Bellingham Technical College fish hatchery and is a refuge for wildlife in the midst of an urban jungle. We hope that the necessary work is carried out to ensure that this area continues to be restored and can thrive both culturally and ecologically.

Sincerely,
Kirsten McDade
North Sound Waterkeeper