

RE Sources (Kirsten McDade)

Please see attached comment letter.

To: John Rapp
john.rapp@ecy.wa.gov
Site Manger

Kristen Forkeutis
kristen.forkeutis@ecy.wa.gov
Public Involvement Coordinator

Transmitted Via Public Comment Form: <https://ecology.commentinput.com/?id=uFVkJHsMtE>

30 June 2026

RE: Georgia Pacific West Cleanup Site - Chlor-Alkali RAU Consent Decree

Dear John Rapp and Kristen Forkeutis,

Thank you for taking the time to consider our comment on the Consent Decree for the Georgia Pacific (GP) West Chlor-Alkali Remedial Action Unit (RAU). We appreciate all the work that has been done to clean up this site and the work that will be done in the future to finalize the cleanup. We would like an additional cleanup effort to be added to this Consent Decree — the dirt piles taken from the Georgia Pacific West Pulp and Tissue Mill RAU that are currently piled on the GP West Chlor-Alkali RAU.

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.

As a part of the condominiums currently being built by Harcourt on the northwestern edge of the GP West Pulp and Tissue Mill RAU, adjacent to Waypoint Park, large amounts of dirt and sediment were removed and placed on nearby land which is a part of the GP West Chlor-Alkali RAU (see screenshot below). The piles have been sitting there for over five years with no clear plan to address them (see photos below). Because the dirt originated from a MTCA cleanup site, it is probable that they are contaminated with metals, petroleum, dioxins and furans, and other contaminants both regulated and not. Sediment, contaminated or not, are hazardous to lungs and gills.

Community members have regularly witnessed the wind suspending dirt from these piles onto the surrounding land and water. This is concerning because this is basically

recontaminating areas that have already gone through an extensive and expensive cleanup effort, not to mention the hazards it poses to people and wildlife. Just down wind of these piles, are very popular public spaces: Waypoint Park, a pump track, an event space, and the Port Container Village. Recent events such as the No Kings Rally, the Shoestring circus, and the FIFA World Cup watch parties have attracted 100s and 1000s of people to this space. Additionally, habitat improvements on the shoreline and in the water have likely attracted more wildlife to the area. People and wildlife are exposed to the contaminants in these dirt piles.

We are requesting that a cleanup plan for the dirt piles be added to this Consent Decree. Included in this plan should be: characterization of the dirt piles for contaminants, responsible party for the cleanup determined, method of cleanup explained, and ultimate fate of the dirt piles. It made sense, at the time, to temporarily place the contaminated dirt on the GP Chlor-Alkali site because it had not been cleaned up yet. But now, after more than five years, with no evident action on their maintenance, the dirt piles should now be formally considered a part of the GP Chlor-Alkali RAU cleanup.

The Consent Decree claims that "This Third Amendment contains a program designed to protect human health and the environment from the known release, or threatened release, of hazardous substances or contaminants at, on, or from the Site. All remedial action(s) conducted by Defendant at the Site shall be done in accordance with WAC 173-340." To fulfill this amendment, these dirt piles should be added to the cleanup, because they may be releasing hazardous substances or contaminants on the Site.

If putting the cleanup of these dirt piles into this Consent Decree is not possible, we still ask that the requests above be carried out in a timely manner (months not years): characterization of the dirt piles for contaminants, responsible party for the cleanup determined, method of cleanup explained, and ultimate fate of the dirt piles. We also request that this information be made public. There is a lot of concern from the public about the hazards of these piles and people want to know.

Thank you for considering our request and all the hard work that goes into cleaning up these complicated sites.

Sincerely,

Kirsten McDade
North Sound Waterkeeper

Screenshot: Approximate location of dredge spoil piles



Photos 1 and 2: Dredge spoil piles on 02/18/2021, over 5 years ago:



