

October 13, 2008

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Via Electronic Mail

RE: Public Comments on the Draft Cleanup Action Plan and Consent Decree for the Alcoa Vancouver Site Cleanup, released September 2008

Dear Mr. Skyllingstad:

Dvija Michael Bertish, Columbia Riverkeeper (CRK), and the Rosemere Neighborhood Association (RNA) (collectively "Commenters") submit the following comments on the Washington Department of Ecology's (Ecology) draft Remedial Investigation/Feasibility Study (RI/FS), Proposed Consent Decree, and related documents including the draft Cleanup Action Plan (CAP), State Environmental Policy Act (SEPA) checklist, and Determination of Non-significance (DNS) for continued cleanup work at the Alcoa Vancouver site. Threats facing the Columbia River are severe by any measure. State and federal law empower and obligate Ecology to protect water quality and the species that depend on our state's waterways. Commenters urge Ecology to reconsider aspects of the Alcoa Site Cleanup to ensure that it complies with state and federal law.

Please note that these comments, submitted for the public record, do not represent the entirety of concerns regarding the draft documents, and are offered as an overview of concerns.

I. Comments on the Consent Decree and SEPA Checklist.

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Issue #1-Transfer of East Landfill

Page 4, section D states: “This Consent Decree does not cover releases of TCE or other contaminants above MTCA cleanup levels from the East Landfill.”

Public Comment: The Model Toxics Control Act and its implementing regulations direct Ecology to “accomplish effective and expeditious cleanups in a manner that protects human health and the environment.” WAC 173-340-100 (Purpose). WAC 173-340-120 provides an overview of the cleanup process. Notably, the site investigation and cleanup process described in WAC 173-340-120 (4)(a)-(c) requires a holistic approach to site cleanup. *See also* WAC 173-340-300 (defining “site”); WAC 173-340-200 (defining “permanent solution” and “permanent cleanup action”); *See generally* WAC 173-340-360 (describing procedures for selection of cleanup actions). Specifically, WAC 173-340-120 (4)(a)-(c) directs Ecology to investigate and develop cleanup actions on a site-wide basis. Notably, the MTCA implementing regulations provide for a bifurcated approach to cleanup in the form of “Interim Actions.” *See* WAC 173-340-430 (describing the basis for and process of implementing interim actions). However, Ecology’s decision to exclude the East Landfill from the current Consent Decree and Cleanup Act Plan is neither consistent with an Interim Action nor does Ecology identify it as such.

While Commenters agree that expeditious cleanup of the mainstem Columbia is imperative, Commenters disagree with Ecology’s decision to delay cleanup of TCE and PAH-laden groundwater from the East Landfill. Despite the MTCA regulation requirements, the proposed Consent Decree and Cleanup Action Plan fail to include the entire Alcoa Vancouver Site and the threats the site—as a whole—poses to the Columbia River and groundwater. The transfer of the Alcoa property to the Port of Vancouver is proposed to take place by the end of the 2008 or early 2009. The Consent Decree needs to identify when the Cleanup Action Plan specific to the East Landfill will be offered for public review. The property should not be transferable to the Port of Vancouver until a thorough Cleanup Action Plan has been implemented and completed. Additionally, until the East Landfill is accounted for, the SEPA requirements are not met.

Issue #2-Liability

Page 4, section G states: “This Decree shall not be construed as proof of liability or responsibility for any releases of hazardous substances or cost for remedial action nor an admission of any facts; provided, however, that Defendant shall not challenge the authority of the Attorney General and Ecology to enforce this Decree.”

Public Comment: Commenters object to the premise that this Consent Decree allows Alcoa to escape liability for contamination it has caused to the environment.

Issue #3-Failure to Address Troutdale Aquifer System

Page 8, section G states: “The Site is situated on the flood plain of the nearby Columbia River. The Site hydrogeology has been characterized by numerous borings, including detailed characterization of the East, North and North 2 Landfills and the National Priorities List (aka NPL) Site. The groundwater system in the area can be divided into four general hydrogeologic

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units: the shallow zone, the intermediate zone, the deep zone, and the aquifer zone. The predominant groundwater flow direction beneath the Site is toward the Columbia River in the deeper hydrogeologic units. The shallow zone consists of dredged sand placed on the Site during the late 1940s and early 1950s. A discontinuous, perched water table is located in the shallow zone during the wetter months of the year. The direction of the movement of water in the saturated portions of the shallow zone beneath the Site varies with the time of year and the amount of precipitation. The intermediate zone consists of sandy silt with clay lenses. The deep zone consists of fine to medium sand while the aquifer zone consists of sandy gravel.”

Public Comment: Both the SEPA checklist and the Consent Decree fail to acknowledge EPA's designation of the Troutdale Aquifer System, which encompasses the vast majority of Clark County, as a Federally Registered Sole Source Aquifer. The Federal Sole Source Aquifer Designation for the Troutdale Aquifer System specifies that " 1) the aquifer system is the principal source of drinking water (approximately 99.4%) for the people in the Troutdale aquifer system area, and there are no alternate sources which can physically, legally, and economically supply all those who depend upon the aquifer for drinking water, should it become contaminated. Potential alternate sources considered include surface water, alternative aquifers, and an intertie with the Portland Water Bureau. None of these sources are considered by EPA to be feasible replacements for the entire aquifer system due to economic barriers or because these sources are not consumed or utilized for domestic purposes in significant quantities; and 2) Contamination of the aquifer system would create a significant hazard to public health. The aquifer system is vulnerable to contamination because recharge occurs essentially over the entire area, the aquifer is highly permeable, and there are many human activities that have released, or have the potential to release, contaminants to the aquifers." (*Martha Lentz, Hydrogeologist, Office of Environmental Assessment, OEA-095, Environmental Protection Agency, Region 10, 1200 Sixth Avenue, Seattle, Washington, 98101, 206-553-1593*).

The aforementioned statements, for the purpose of adequate NEPA and SEPA review, need to be added to the SEPA checklist to describe the groundwater resources. The SEPA checklist and the Consent Decree fail to note that the various zones are contiguous as an aquifer system. Furthermore, there are municipal wellheads in proximity to the site with critical recharge zones that can be impacted by groundwater contamination from the site, and this is a matter of public health. All of Clark County's lowlands are considered aquifer recharge zones. A detailed map indicating wellhead protection zones within proximity of the Alcoa site is included at the end of these comments.

Issue #4-East Landfill and PCB Contamination

Page 10, section L states: “Also in 1997, PCBs were discovered in three Columbia River sediment samples collected by the Clark County Public Utility (CPU) as part of the NPDES permitting requirements for a non-contact cooling water discharge installed approximately 300 feet west of the East Landfill. Alcoa initiated a soil and groundwater investigation of the entire bank/shore of the East Landfill. This work indicates that the East Landfill is not the primary source of the PCBs in the Columbia River sediments.”

Public Comment: Ecology opines that the East Landfill is not the primary source of PCBs in the Columbia River hotspot. However, Ecology fails to indicate the East Landfill's potential to be or qualify the East Landfill as a secondary source. Ecology should explain how a PCB problem discovered in River Sediments in 1997 is only being addressed in 2008, and explain how a submerged hotspot in the river flow would remain solely within Alcoa property lines.

Issue #5-East Landfill Groundwater Discharge

Page 11, section N states: "The East Landfill area is a well-defined area that contains approximately 150,000 yd³ of waste materials. An estimated 53,000 yd³ of this material has concentrations of TCE, PAHs, and PCBs that exceed the MTCA Method A industrial cleanup levels. A portion of the PAH waste that exceeds MTCA Method A industrial cleanup levels would be considered dangerous waste under Washington State dangerous waste regulations if it were moved out of the landfill complex."

Public comment: Ecology maintains that the East Landfill is adequately containing contaminants that exceed industrial cleanup levels and that contaminants from the East Landfill are not impacting groundwater. However, this seems unlikely since the East Landfill does not have a bottom liner, and hydrological impacts from the river can and do influence groundwater levels within the boundaries of the landfill. In particular, the Remedial Investigation states that: (1) groundwater is known to discharge to the river from beneath the East Landfill; (2) tidal fluctuations from the river strongly impact groundwater in that area; (3) there is strong conductivity between the river and the groundwater in that area, and (4) TCE is known to be discharging to the river. Therefore, Commenters believe more study is required to determine effective methods of treatment for this complex problem.

As a heavy substance, TCE has descended into various aquifer zones. The Remedial Investigation Study indicates that the TCE could naturally dissipate within 30 years. Yet, the public should not be expected to wait that long for passive cleanup to be achieved. Again, Commenters maintain that no property transfer should occur before these issues are thoroughly addressed.

The East Landfill, formerly a Superfund site, was delisted when the cap was placed over the landfill. The capping action was employed in hopes that it would isolate the contaminants and protect the public and environmental health. These objectives have not been achieved, and the leaking landfill has posed a significant threat for many years.. Groundwater contamination on site poses a threat to future workers, and that future potable water resources could be compromised.

Issue #6-Continued Groundwater Monitoring.

Page 12, section S states: "The current groundwater monitoring program was implemented in 2003. Groundwater has been monitored at the Site since the mid-1980s. Since the consolidation of waste and capping of the East Landfill in 2004, concentrations of TCE, TCE degradation products, fluoride, cyanide, and TPH have been in decline. However, these concentrations remain above MTCA Method A groundwater cleanup levels."

Public Comment: Groundwater monitoring, institutional controls, and landfill maintenance must continue to be performed as long as the landfill exists. Costs associated with these items should be maintained in perpetuity by Alcoa.

Issue #7-Conveyance

Page 20 states: “No voluntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by Defendant without provision for continued operation and maintenance of any containment system, treatment system, and/or monitoring system installed or implemented pursuant to this Decree.”

Public Comment: This item becomes vague relative to the lack of a cleanup and management plan for the East Landfill

Issue #8-SEPA Checklist

Question 7 on the SEPA Checklist asks: ““Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.” Alcoa’s checklist answers this question “No.”

Public Comment: Ecology’s website and supporting documents state that the East Landfill cleanup will occur at a future date. Furthermore, the East Landfill is discussed at length throughout documents related to this Consent Decree, Cleanup Plan, and RI/FS. Commenters disagree with the response to Question 7 in the SEPA checklist. The East Landfill cleanup is a “further activity related to or connected with this proposal.”

II. Comments on the Cleanup Action Plan.

Issue #1-Separate CAP for East Landfill and Transfer

Page 2 states: “The CAP outlines the steps and procedures for conducting an environmental cleanup of the AOCs at the Site consistent with MTCA and SMS requirements, with the exception of the East Landfill AOC. A separate CAP will be issued to address trichloroethylene (TCE)- bearing groundwater within the vicinity of the East Landfill.”

Public Comment: Ecology provides no timeframe for public review of the separate CAP for the East Landfill. Commenters oppose any transfer of the site prior to instituting a CAP for the East Landfill.

Issue #2-Sole Source Aquifer Compliance

Page 6 states: “Alcoa and Evergreen intend to sell their properties to a buyer which will use the property in an industrial capacity. Current plans for the Site include the development of rail lines across the properties and development of a car unloading and storage facility. In the future, a wide variety of industrial use activities may occur on the property.”

Public Comment: The Port of Vancouver has already begun railroad expansion projects on spurs east of the Alcoa site. These projects use federal funds. It is apparent that federal funds will be sought to finance future railroad expansion on Alcoa property as

noted under Future Site Use and Development. Since the Alcoa property is situated within a federally designated Sole Source Aquifer, and since federal resources will be used, Ecology should plan for review of the Cleanup Action Plan and related documents by EPA to ensure Sole Source Aquifer compliance. There are a number of aquifer/groundwater related issues at the Alcoa site that are of importance to the Sole Source Aquifer program.

Issue #3-Sole Source Aquifer Designation

Page 8 states: “The four hydrogeologic units identified by Hart Crowser continue to be used in current Site investigations and are defined below.” – Text continues to identify characteristics of the Shallow Zone, Intermediate Zone, Deep Zone, and Aquifer Zone.

Public Comment: Hydrogeologic references should include federal Sole Source Aquifer designation since the site is within critical aquifer recharge areas for contribution to municipal wellheads.

Issue #4-Dyke System Contamination

Page 11 states: “In 1996, Vandalco filled a low-lying area of the perimeter dike in the SW corner of the facility with bake oven brick and other debris. During facility demolition activities, this area was sampled and confirmed to contain PAHs (TEF adjusted) above the site cleanup level of 18 mg/kg. Approximately 1,476 tons of brick, debris, and sand were removed and residual soils were confirmed to contain less than 18 mg/kg residual PAHs (TEF adjusted). No further action is required in this area.”

Public Comment: Commenters repeat the concern that the extensive dyke system has not been adequately characterized to determine if spent potliner or other caustic materials were buried within the dyke system in areas other than where the noted underground storage tanks are situated. A systematic grid should be established to investigate the depth and breadth of the entirety of the dyke system.

Issue #5-Timing of East Landfill Cleanup

Page 12 states: “Based upon the above discussions, there are five remaining AOCs at the Site. As previously stated, one of these AOCs (TCE-bearing groundwater at the East Landfill) will be addressed in a separate CAP.”

Public Comment: There is no date referenced when East Landfill will be addressed. Commenters request that Ecology provide a timeline for East Landfill cleanup to ensure that TCE and PAH-bearing groundwater is addressed promptly.

Issue # 6: PCB Sources

Page 13 states: “The highest concentrations of PCBs were located closest to the CPU outfall pipeline between the shoreline and the river shipping channel. Total PCB concentrations up to 28 mg/kg were detected immediately adjacent to the CPU outfall.”

Public Comment: Ecology states that the East Landfill is not the primary source of contamination near the CPU outfall or within the Columbia River sediment. Ecology has also admitted that the source of the noted PCB hotspots had not been identified (*Interim*

Action Work Plan for the East Landfill Site at the Former Alcoa Vancouver Operations, Vancouver, WA, Washington State Department of Ecology Industrial Section, September 2003, ES-10 2.4.3 South Bank Investigation). There needs to be data presented within the Cleanup Action Plan that clearly identifies the source of PCBs in this instance, and the path of migration in order to determine that the contaminant load will be sufficiently remediated and to ensure that PCB contamination will not arise in once the Cleanup Action Plan has been satisfied. Furthermore, since characteristics of the East Landfill contaminant load are often referenced in both the Cleanup Action Plan and the Consent Decree, Ecology must include detailed analysis of the East Landfill load in order to justify that the East Landfill is not a primary source of river sediment contamination, or beachfront contamination.

Issue #7-Offsite Migration of Contaminants

Page 13 states: “ Phase 2 of the sediment sampling program was implemented to further refine the nature and extent of PCBs in surface and subsurface sediments adjacent to the CPU outfall. Phase 2 sediment sampling was conducted during two separate events. During the first event on August 15, 2000, 30 surface sediment samples were collected from 12 transect lines extending from the shoreline toward the Columbia River shipping channel. The transects were located on either side of the CPU outfall, beginning 700 feet upstream and continuing approximately 800 feet downstream of the outfall. A second sampling event was conducted from November 12 to 18, 2000, to collect additional surface sediment samples and subsurface samples. Surface sediment samples were collected from 26 additional stations downstream of the stations sampled during the first event and along transects located 900 to 2,500 feet downstream of the CPU outfall. Subsurface sediment samples were collected from 24 subtidal and three intertidal stations. One to two cores were collected from each of the 14 transects located 200 to 700 feet downstream of the CPU outfall.”

Public Comment: Ecology did not initiate investigations into offsite migration of contaminants, even though additional hotspots of PCBs are known to exist beyond Alcoa property lines. The question as to whether Alcoa contributed harm to additional natural resources beyond Alcoa property lines has not been addressed. The Cleanup Action Plan must be expanded to include offsite investigations.

Ecology must consider PCB migration from the Alcoa Site. Sediments from the Flushing Channel to Vancouver Lake, fish tissue toxicity studies by Ecology, clam toxicity studies by the Army Corps of Engineers and Columbia Riverkeeper all show dangerous levels Aroclor 1248, the same type of PCB found at the Alcoa hotspot.

Comparisons with other available data indicate that Aroclors specific to the PCB hotspot in the Columbia River in front of the Alcoa Plant are: 1) also found in sediments samples within the Flushing Channel to Vancouver Lake (*Results of Sediment Sampling at Flushing Channel to Vancouver Lake, Hart Crowser November 2003, for the Port of Vancouver*); 2) also found within clams harvested 5000 feet downstream in the US Army Corps of Engineers Clam Toxicity Study (*Sherman, T., Siipola, M., Abney, R., Ebner, D., Clarke, J., Ray, G., and J. Steevens. Corbicula fluminea as a Bioaccumulation Indicator Species: A Case Study at the Columbia and Willamette Rivers. U.S. Army ERDC Report,*

Vicksburg, MS., *In Press.*, 2008);, and 3) also found within fish tissue samples harvested from Vancouver Lake that initiated a 303(d) listing for PCBs in 2004 (*Washington State Toxics Monitoring Program; Toxic Contaminants in Fish Tissue and Surface Water in Freshwater Environments*, Seiders, K. 2003, *Ecology Pub.* 03--03-0112.); 4) in clams harvested at the mouth of the Flushing Channel (*Columbia Riverkeeper, Concentrations of PCBs in Asian Clam Tissue at the mouth of the Vancouver Flushing Channel on the Columbia River, July 2008*). **Note:** The US Army Corps clam toxicity study found Aroclor 1248 downriver from the Alcoa plant, but not upriver of the Alcoa site, suggesting that further studies should include PCB transport downriver from the Alcoa site. Congener concentrations are also elevated downriver near the Alcoa hotspot, but not at near upriver locations.

The conceptual site model employed by Ecology hypothesizes that the PCB hotspot at the CPU outfall was contained and only caused localized migration. The site model appears to infer that the CPU outfall dredging caused the hotspot within Columbia River. Yet, the site model does not investigate the impacts of the flood of 1996. Specifically, parts of the Alcoa property were submerged within flood waters. Nonetheless, the site model ignores the possibility that Alcoa's PCB contamination may have swept downstream in this flood event or at any other point.

Commenters believe that the site model in this instance is in error. Ecology must consider alternate contaminant sources (such as industrial dumping near the shoreline) and possible offsite migration.

Issue #8-Dredging Activities

Page 22 states: "The anticipated sediment remedial action at the Site involves mass removal to the maximum extent with modern, conventional dredging equipment capable of operating safely and effectively under the potentially difficult conditions at the Site (i.e., relatively steep riverbed slopes, dense sediments, and potentially adverse weather conditions). A mechanical dredge with a closed-bucket will be used to the extent practicable to remove the sediment. This method will reduce the volume of water which potentially could require treatment by removing the sediment close to its in situ water content. This design is permanent to the fullest extent. Although this method may also minimize the potential for resuspension, even with careful control of operations, dredging residuals will persist from sources including sloughing."

Public Comment: Various dredging operations around the state have gone awry, including one a couple of years ago on the Duwamish River. The most critical components of a successful dredging operation are the experience of the company that is performing the dredging and the crew and mechanics that are used. The Duwamish project resulted in the accidental dumping of dredged PCBs both up and downstream of the work site, work that often occurred during high tide when river flow reversed. The Duwamish project caused unstable bucket loads when massive amounts of sediment were being dredged in quick intervals. These big "bites" were brought to the surface where they ended up being dumped right back in the river. Tidal influences on the Columbia River cause daily reverses of flow, and this will complicate dredging activity.

Consequently, Commenters request direct Ecology/EPA oversight of the dredging project at Alcoa in order to avoid spillage.

Another big factor to success in dredging is selection of the technology. Because of public recreation, fishing, and proximity the flushing channel to Vancouver Lake, this project calls for vacuum dredging as opposed to the bucket method in order to prevent increased turbidity and mobilization of contaminants within the water column. The CAP states: “Although [a mechanical dredge with a closed-bucket] method may also minimize the potential for resuspension, even with careful control of operations, dredging residuals will persist from sources including sloughing.” Vacuum dredging will reduce the potential for resuspension of contaminated sediments within the water column.

It is clear that PCB migration could occur during dredging operations. In turn, Commenters have repeatedly requested that the flushing gates be closed at Vancouver Lake to avoid contaminated sediment drift into a more closed Lake system. The flushing gates should only be closed while active dredging is underway, and until sediment resuspension dangers have passed. This request is for a temporary closure of the flushing gates at the most critical juncture to avoid increased contaminant load into Vancouver Lake, which is already 303(d) listed for PCB contaminant in fish tissue.

The CAP needs to specify plans to remove and process contaminated clams from the work area – there is no mention of this in the draft. Furthermore, it has recently been discovered that crawfish in this area also show high levels of PCBs, and therefore the CAP should also seek to remove crawfish along with the clams.

Issue #9-Tables (page 24 and 27)

Public Comment: The groundwater clean and remediation level tables do not mention thresholds for TCE, PCBs or PAHs. Ecology should include threshold information to provide context for known groundwater contamination issues at the site, even if it will be handled in a different Cleanup Action Plan. Additionally, Tables showing Soil Cleanup and Remediation Levels do not include TCE, which would be useful for context.

Issue #10-Site-wide Approach to Groundwater

Page 25 states: “Cleanup levels based on Method C direct contact must also be adjusted as necessary to ensure groundwater resources are protected. However, when empirical data exists that indicates that current groundwater impacts are not occurring and sufficient time has elapsed for migration from source areas to the point of measurement to reinforce that demonstration, then cleanup levels derived for direct contact do not require adjustment.”

Public Comment: These statements are misleading in that contaminants from the East Landfill are known by Ecology to be leaching into the Columbia River. It is erroneous to establish cleanup levels for groundwater impacts while excluding known groundwater issues at the East Landfill.

Issue #11-Sediment Disposal

Page 34 states: “The next segments to be removed would target the sediment to be disposed of on site in the North and North 2 Landfills (i.e., sediment less than 10 mg/kg PCBs). This material would be transferred on site and placed within the North and North 2 Landfills footprint where it would be allowed to passively dewater prior to final compaction and covering with a 1-foot sand layer.”

Public Comment: The North and North 2 landfills were previously evacuated, with contaminants sent to offsite locations and also redirected into the East Landfill. Yet, Ecology’s plans will dump contaminated river sediments into these evacuated landfills, allow them to dewater, and then backfill when all groundwater monitoring has ceased at these locations. Commenters urge Ecology to consider an alternative that is more protective of water quality. Specifically, once dewatered, all contaminated sediment should be transferred to an authorized offsite location.

Issue #12-Groundwater Injection

Page 37 states: “Groundwater would be pumped from the excavation pits and treated on-site via an existing oil/water separator, bag filters, and activated carbon. After treatment, groundwater will be stored in a temporary storage tank for laboratory testing of TPH concentrations. If the TPH level is determined to be below the groundwater cleanup level, the water would be injected into the extraction/injection trench previously used for the bioventing system which would be re-registered with Ecology as an injection point. Depending on the season, groundwater is located approximately 14 to 17 feet bgs, and preliminary calculations indicate that up to 250,000 gallons of groundwater could be extracted and require treatment.”

Public Comment: Groundwater injection needs to be reviewed by EPA to ensure Sole Source Aquifer compliance.

III. Comments on the Remedial Investigation.

Issue #1-Groundwater Treatment

Page 128 states: “Also, the effectiveness of a pump and treat system in the most contaminated groundwater zone, the semi-permeable intermediate zone, is very low.”

Public Comment: We disagree with Ecology’s model on this issue and maintain that pump and treat systems could be effective and necessary to address the East Landfill problem. The Commenters request that pump and treat methods be reconsidered to treat groundwater contamination at the East Landfill.

Issue #2-TCE and Groundwater

Page 167 states: “Although TCE levels persist above the groundwater cleanup level, these reductions in the concentrations of TCE and the production of degradation products (e.g., vinyl chloride) demonstrate that:

- Natural attenuation/degradation of TCE is occurring
- The landfill is no longer impacting groundwater as the source of TCE has been effectively isolated”

Public Comment: These statements are misleading. Ecology has determined that contaminants are being discharged to the Columbia River from the East Landfill. It is erroneous to declare that the landfill is not impacting the groundwater. The cap on the landfill has failed to prevent river influences from impacting groundwater contamination. As long as the landfill exists without a bottom liner, leakage will occur. Additional groundwater modeling, and monitoring will be required to design a successful cleanup plan for the East Landfill.

Issue #3-Site Redevelopment

Page 199 states: “Potential pump and treat activities at this Site would be limited to the East Landfill and must be compatible with future redevelopment plans restricting the size of a treatment system. Therefore, this treatment technology has not been retained for further consideration.”

Public Comment: The site will require restrictions for redevelopment. The Port of Vancouver is currently designing an air-stripping tower with Ecology to remediate a TCE plume at the Cadet Manufacturing site. This air stripping station is situated within existing port facilities. Redevelopment should embrace cleanup technologies, and should not prevent them from being used. Pump and treat actions should be retained as possible solutions to the East Landfill contamination. Allowing the Port of Vancouver to build around the Landfill without treatment of the groundwater problems is inconsistent with MTCA and unacceptable.

IV. Conclusion.

Mr. Bertish, Columbia Riverkeeper, and the Rosemere Neighborhood Association respectfully request that Ecology to consider the above comments. In particular, Commenters ask Ecology to examine setting a prompt timeline for the East Landfill cleanup. Ecology has a duty to ensure cleanup of the entire Alcoa Site. Further delay is simply unacceptable. While the scale of toxic threats to the Columbia River is daunting, Ecology has the authority and duty to ensure a historic source of toxic pollution is held accountable. Thank you in advance for considering these comments.

Sincerely,

Dvijja Michael Bertish

/s/

Lauren R. Goldberg
Conservation Director, Columbia Riverkeeper

Rosemere Neighborhood Association

