

To: Hun Seak Park, Site Manager
Toxics Cleanup Program
PO Box 47600
Olympia, WA 98504-7600

Sept 27, 2018

RE: Scott Paper Mill Site 5 -Year Review

Dear Hun Seak Park,

Thank-you for the opportunity to comment on the 5-Year Review for the Scott Paper Mill Site. We appreciate your willingness to address public comments, and we appreciate all your efforts in the cleanup processes.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We recognize that there have been huge environmental gains from the cleanup efforts thus far but that there are still areas that are falling below cleanup level standards as outlined in Tables 1-3 of Scott Paper Mill Site 5-Year Review document. We encourage the Department of Ecology to continue to monitor and explore additional and new technologies to bring all areas to cleanup level standards. Specifically, we ask that you:

- Continue to monitor heavy oil-range petroleum hydrocarbons in Remedial Excavation Area 5 sidewall to ensure there is no escapement.
- Explore mechanisms to remove the toxic dioxins and furans that are contaminating the site even though this is not apart of the ecology-required cleanup.
- Continue to assess that the cPAHs in the eastern sidewall of Remedial Excavation Area 12 is contained within the marine area cap.

- Continue to ensure that the lead found in Remedial Excavation Area 12 does not migrate.
- Continue to monitor the levels of mercury, PCBs, TVS, and wood content to ensure they remain under protective caps.

In the Compliance Monitoring section, it is stated that arsenic is exceeding groundwater cleanup levels but that it is decreasing over time. Could you please clarify whether the arsenic is biodegrading, being transported away, or something else?

Thank you for your time and consideration. We appreciate this opportunity for public commenting and efforts to to protect Fidalgo bay, forage fish habitat, and human health.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist
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RE Sources for Sustainable Communities