

**Comments Received
Former Reynolds Metals Site
Draft Remedial Investigation/Feasibility Study
Sediment Interim Action
Comment Period Held June 2 – August 1, 2014**

The Department of Ecology (Ecology) received a large number of comments on the draft Remedial Investigation/Feasibility Study and proposed Sediment Interim Action for the former Reynolds Metals Site in Longview, Washington. The comment period was held from June 2 through August 1, 2014. Ecology received comments in a variety of ways:

- Email
- Mail
- Oral testimony during the public hearing held July 16, 2014
- Written comments received in the comment box at the public hearing
- Petition received at the public hearing

Attached are the comments Ecology received during the comment period. Many of the comments received were identical postcards or email comments. In the interest of space, identical comments have not been included multiple times. Therefore the comments that follow are the “unique” comments received. Anyone wishing to review the full comment record (including the identical comments received multiple times) may contact Ann Lowe at (360) 407-6916 or ann.lowe@ecy.wa.gov to schedule an appointment to review the file or to make a public records request.

Reynolds Metals Oral Testimony
Kelso Red Lion Inn
July 16, 2014

I'm Erika Holmes, hearings officer for tonight. This evening we are conducting a hearing on the Draft Remedial Investigation/Feasibility Study and Interim Action for the former Reynolds Metals smelter in Longview.

Let the records show that it is 7:38 on July 16, 2014, and this hearing is being held at the Kelso Red Lion Inn, 510 Kelso Drive in Kelso WA. Legal notice of this notice was published in the Daily News on June 1, 2014. In addition notice if this hearing were mailed to about 77 interested people, email notices were sent to 117 interested people and a news release was issued on June 2, 2014.

I will call people up to provide oral testimony based on the order that your name appears on the sign in cards. Once everyone who has indicated that they would like to testify has had the opportunity, I will open up the microphone for others.

Ok, so, our first person will be Harvey Williamson, Harvey Something.

Harvey: Yes that's me

Erika: Harvey, it'll be Harvey

OK, so when you do. yes you can sit here, yes. And please when you come up to the front, state your name and if you provided your address already on the sign in card you do not need to say that again. But if you did not, please do state your name and address for the record.

Harvey: what is my address anyway, I forgot

Erika: well its right here.

Harvey: oh, okay.

Erika: OK, So, go ahead and speak directly into the microphone so we get a good recording.

Harvey: ok, first of all I would like to thank the citizens' advisory committee and the people... (Erika- whispers, "Say your name.")... My name is Harvey Williamson and I would like to thank them and everyone that was involved in that process, I enjoyed it.

These are my comments. The site where Alcoa, Alcoa's former Longview Plant, now sits was not polluted prior to construction. Now Alcoa, under its subsidiary of Northwest Alloys, is asking to partially clean up the site by capping and building permeable barriers to mitigate the cleanup, the polluted areas. If we the people of Cowlitz County do not insist upon the removal of the contaminants, future business will be restricted in their ability to use the site or else they will have to be responsible for part of cleaning up the rest of Alcoa's mess.

This is unacceptable to the Cowlitz County community and its present and future industrial partners. The removal of site contaminates is positively the best solution for the industrial community that will remain in Cowlitz County for the Longview of future development as a prime industrial value added export site and uh, that will be available for development and be 100% available for development by industry.

The roots of Longview's industrial, uh development, uh will be free then to grow and, Alcoa, uh can then move to other horizons as well and Longview's industrial horizons will be preserved for the future. We cannot bring back the pristine conditions of the pre-industrialization of the Alcoa site, even at level 6. Yet, it is incumbent upon the citizens of Cowlitz county, in accordance with Washington State laws, regulations and values shared by all the people of the State to ensure that the Alcoa site be cleaned up to the highest standard possible so that new industries will have the freedom to make the most of our deep water port and access to 100% of the Alcoa site land.

This cleanup is not a burden to the tax payer. It only becomes a burden if, uh Northwest Alloys, uh is, will be permitted to cleanup to a level 4. It is up to the citizens of Cowlitz County to hold government and industry to the standards set by the Washington State laws and the citizens of Longview and Cowlitz County. Cleanup at level 4 is not up to the industrial standards of the people of Cowlitz County. Alcoa can and must do better.

Erika: ok, thank you. Our next person up is Gayle Kiser who will be followed by Thomas Stecker. And perhaps if the next person can kind of be waiting that will help us expedite things.

Gayle: I'm Gayle Kiser, president of Land Owners and Citizens for a Safe Community. And before I start my formal comment I would like to present (audience member, we can't hear) I would like to present the Department of Ecology with 430 signatures of Cowlitz County citizens that we have collected during our Earth Day and our July 4th tabling event. These are all people who have signed their names and asking for the highest level of cleanup.

Thank you for the opportunity to express my thoughts on the cleanup of the old Reynolds Aluminum plant site. As a citizen of Cowlitz County for the past 20 years, I've been present during times of prosperity when the Reynolds employed many of our local residents and paid them a fine family wage. I've witnessed the despair that followed the sale of the plant that lead to the bankruptcy and the loss of employment for those same residents. I've been aware of the devastation that followed the mismanagement of a supposed cleanup by Chinook Ventures.

The only constant has been the value of that piece of property as one of the last deep water ports on the Columbia, the proximity of the railway for shipping, and the ready workforce of people just waiting for a chance to get back into light industrial manufacturing. To do anything less than a complete cleanup as expressed in alternative 6 of the RI/FS would be a disservice to the entire population of Cowlitz County.

Alcoa knew what they were buying when they acquired that piece of property. The money invested by Alcoa, one of the top 10 corporations in the world, in a complete cleanup can be recouped through the sale of the property to industries that recognizes its value. Alternatives 4

and 5 allow for the consolidation of contaminated soils leaving them onsite. What guarantees do we have that Northwest Alloys, a.k.a. Alcoa, will not be able to import more toxic waste from other sites and deposit it here?

Studying the maps developed by Anchor QEA showing the groundwater flowing from the river inland at the site, may be comforting to some who observed that the fluoride is trapped and attenuated before reaching the ditches surrounding the property. With climate change being a when rather than an if, what happens when the site is inundated by river water in the not so distant future? Thank you.

Erika: Thank you Gayle. Ok, please Thomas Stecker, Is Thomas here? Ok, let's move to Diane Dick please. Who will be followed by John Green.

Diane: Good evening, I'm Diane Dick, a 30 year resident of Cowlitz County and vice president of Landowners and Citizens for Safe Community. I request first that all contaminated sediments from outfall 2.A be removed to an offsite disposal facility. I ask you to choose alternative 6 for the Reynolds cleanup plan. I urge you to reevaluate the removal of the closed black mud pond. The most stringent level of cleanup is justified because it will remove most of the toxic waste materials off the site.

This is extremely important because the site is environmentally unstable and subject to natural events of unknown proportion. By that I mean volcanic eruptions, subduction zone earthquakes, floods, and now large rises in sea level within the century.

The in-place mitigations are planned for the current water and soil conditions of the site. If our overdue Cascadia subduction zone earthquake occurs, the hydrogeology could change in a blink of an eye. According to Washington Department of Natural Resources maps, the Reynolds site sits in a well known liquefaction zone. I have been told according to geotech reports, this means near shore areas could suddenly sink and shift into the Columbia River.

That would be bad enough, but this area was diked less than a hundred years ago. Do we know if the levies protecting this area from floods will remain structurally sound in the event of a large earthquake? If this is not enough to justify offsite removal, consider your own agency, Department of Ecology, has conservatively predicted at least two feet of sea level rise by the end of the century. This will impact the function of the levies, the CDID drainage ditches, and groundwater levels. The groundwater is already so high, some of the toxic laden landfills on the site are sitting in groundwater. You have yet even to find the bottom of field deposit B.1.

There is no certainty about environmental conditions for this site, either 5 years from now or 100 years from now on which to base permanent toxic hazard mitigation, other than to remove all toxic wastes and contaminated sediment off site.

Please select alternative 6 to make this site environmentally safe for the future health and wellbeing of our community and for those who live downstream. Thank you.

Erika: Thank you, Diane. Can we have John Green please? And the next person after John will be Linda Horst.

John: Hi, good evening. Can you hear me now? (Audience – No) no, how is that, (audience – better) better? (Erika - Please state your name too) My name is John Green. I have lived in Longview for the past twelve years. Longview and Cowlitz County have long been leaders in Washington State in unemployment and unhealthy living. We have higher than national and state averages in cancer rates. We would like to turn around these alarming statistics. A good start would be to cleanup Reynolds Alcoa Millennium site.

Besides community health, I am also concerned about our community's economic health, which would greatly improve our quality of life. The RI/FS cost benefit analysis does not weigh how the environmental impacts economic health, and it should. These are very important. Since these economic benefits can only weigh through citizens concern, that's why I am here. If this prime waterfront property were cleaned up to a level 6, we could move forward to a more vibrant economy. Two former Alcoa sites, one in Vancouver, one in Troutdale, were cleaned up and now employ 800-1000 people each. A level 6 cleanup, moving toxic soils offsite, instead of moving it around at the property, would put us on the road to a cleaner and healthier environment and ending Longview's toxic legacy.

Less deed restricted acreage means more property, support more jobs, as well as generating more tax dollars for Cowlitz County. According to its website, Alcoa won awards for its cleanup at Troutdale. Alcoa has accepted responsibility for cleaning up the site, and has said that money would not be a deterrent. In fact, Alcoa's balance sheet shows that it has reserved billions of dollars for contingencies such as this.

Does Longview deserve to be treated any different than Vancouver or Troutdale? Wouldn't it be wonderful if Alcoa won an award for cleaning up Longview? I support level 6, the highest level of cleanup,

Erika: Thank you, John.

John: Thank you

Erika: Linda Horst, please, and following her will be Margaret Green.

Linda: My name is Linda Horst and I am a 25 year resident of Kelso. The Department of Ecology has outlined 6 levels of cleanup at the former Reynolds Metal Facility. Alcoa and Millennium are advocating for a less comprehensive cleanup option of level 4. This option would address only about 2/3 of the problems at Reynolds site, thus leaving a third partially unresolved. My questions is to the Department of Ecology, why would you require any option less than 100% resolution to the myriads of toxic issues at this site?

Anything less than the most thorough level 6 option is a disservice to the people of Cowlitz County. Let's remove 100% of the contamination and move toward a healthy and clean community that we can all be proud of. Thank you.

Erika: Thank you. Margaret Green, please. And following her will be Tom Hutchinson.

Margaret: Okay, am I good? (audience – talking) My name is Margaret Green, I was born and grew up in Longview and returned for retirement twelve years ago. I am here tonight because I care greatly for my community. Thank you for this opportunity to comment.

I am advocating for the most aggressive removal of toxins from the site. With the exception of alternative 6, the majority of toxic soils are left on the property. The other alternatives expect workers and our entire community to be protected from pollution by deed restrictions, physical and chemical barriers, and natural processes.

The Feasibility Study shows the fluoride contamination onsite will take over two thousand years to dissipate through natural reduction. We must not ignore the potential geologic and environmental events that will occur over the next two to two thousand years. They will greatly impact the mobility of the toxins in the soils and groundwater, potentially entering our water supply, the river, and inundating our community.

Waiting two thousand years for natural reduction of toxins that were merely consolidated on site is unacceptable to me. One natural disaster can negate all but the highest cleanup alternative. It is the only choice which provides predictable permanence and protection for our community. These benefits should hold the very highest value.

There has been little business activity and very few employees working at the site compared to historic levels. While some might like to see the site cleaned up quickly, there is negligible industrial activity to be impacted during a thorough cleanup. Considering the property has sat virtually empty and in need of mitigation for over 10 years, I am willing to wait incrementally longer for the highest levels of cleanup of the soils on site, to ensure groundwater pure of toxins and to clean up this property for good. Thank you.

Erika: Thank you. Tom Hutchinson, please. And Tom will be followed by Sandra Davis.

Tom: Good evening. Thank you for the opportunity to speak this evening. Can you hear me? (audience – yeah) My name is Tom Hutchinson. I have lived and worked in Longview for over 25 years now. I reared my children in this community and my wife and I are now retired, but plan to call Longview our home into the future.

As someone currently fighting cancer and successfully so, I am very pleased to say, I am very aware of the significance of carcinogens in the environment. This cleanup is of particular importance to me on many levels. As a Longview city council member, I am also concerned for any condition that affects the Longview citizenry in an adverse way.

In August 2011, the Longview city council issued a letter to the Department of Ecology requesting that the Reynolds site cleanup be prioritized. It stated that continual delay and failure

to move forward with the cleanup acts as a hindrance to the development of this prime industrial property and the much needed jobs it could provide.

I am happy to say Ecology has responded and we are now in the public process which is moving us closer to the cleanup of this badly contaminated site. I want to express my thanks for this action. Developing and executing a final cleanup plan will enable our community to move forward and can provide long term economic potential for the site and surrounding city properties in the Mint Farm.

As a council member I am also concerned for the health, welfare, and quality of life of all of our citizens. So I desire to see a plan that provides guaranteed future permanence as well as the highest level of protection for our citizens, the environment, and the city's investment in our new groundwater supply system nearby.

I am appreciative that Alcoa and Millennium are participating in this process and encourage Department of Ecology to consider the citizens of Longview the most important partners since they will be the recipients of the cleanups plans, benefits, or its failures. Thank you.

Erika: Thank you. Can we get Sandra Davis, please? Followed by Becky Myhre, something like that, I apologize.

Sandra: My name is Sandra Davis, I was born and raised in Kelso, WA, I now live in Longview. I would like to express my sincere thanks to the Department of Ecology for giving us so much of your time and attention with this important cleanup. As you know any property located near water is susceptible to flooding and ground saturation. Our climate is changing; we are seeing extreme weather events around the world.

My husband and his family have lived at our Abernathy Creek property since the early 60's. In January 2009 we experienced a severe rainstorm that resulted in flooding. Water did not reach the 100 year flood plain; it reached the 500 year flood plain. This shocked everyone since it had never happened before. We were unprepared then, but we have made changed and are better prepared now.

In making a decision on the cleanup of the Reynolds property, these extraordinary weather occurrences have to be considered. If hazardous materials are left on site, the likelihood of a severe weather event is very strong and flooding and ground saturation would cause pollutants to move. Fluoride, cyanide, and carcinogens have, can cause irreparable harm if they migrate into the Columbia River, internal waterways, or our groundwater. What happens on that property will impact us all.

Leaving pollutants on site would not be a permanent solution. Capping contaminated areas would not be a permanent solution. The only way to ensure the safety of citizens in this area, and people using the river to fish or recreate, is to eliminate contaminates from this property.

No one can foresee the future but we can prevent the worst from happening. I am asking Ecology tonight to require that contaminated materials be moved to a certified offsite landfill. Thank you.

Sandra: Do I give this to you?

Erika: Sure. Is Becky, here? Yes, I will let you say your last name, and following here is Den Mark Wichar.

Becky: Can you hear me? How about now? I am Becky Myhre, it's ok, everybody else has a question about how to say it too. (Erika- It's spelled differently) Oh well. I have lived in Longview for 38 years. I have been a teacher and raised my child here and I love the area. Just concerned that it seems to be getting environmentally worst and I remember when we could do a great deal more fishing on the river, when there, because the river was loaded. You know, environmental things happen, but I think we need to do a better job with the level 6 cleanup.

Another issue I have is that I live out very close to that site. And I am very concerned about what the contamination, how it could come and um, have a negative effect on me. I say that we do the level 6 cleanup and look forward to a pleasant future and surprises. Thank you.

Erika: Thank you. Do we have Den Mark, yes we do, and then Mary Lyons will follow.

Den Mark: I am Den Mark Wichar, science teacher, Vancouver WA. I live about a 20 minute walk from the Columbia or what in Chinookin is called wemaul. In college I rowed in crew in a shell which silently and smoothly sliced through water, leaving no trail behind. After college I continued rowing and paddling mostly on rivers. When I took out, whether raft, or kayak, or canoe, I looked back on the water I had joyfully played upon and saw no sign that I had been there. That was cool.

Rivers taught me that I can interact with and benefit from nature without hurting it. How good it would be if certain corporations understand that lesson. To come, accept nature's gift and then go, with nothing left behind. Reynolds Metals did not understand that lesson. As far back as the 40's, people and environment suffered from corporate recklessness. 70 years later the mess remains with us, 70 years too long. Ecology can address this by requiring highest standard of cleanup, of both land and water. Including what has polluted the Columbia. Highest standard, fastest schedule, there is no good reason to direct anything less.

A song goes, "River take me along, in your sunshine sing me your song, ever moving and wild and free, you changing old river, you rolling old river, let's you and me river, run down to the sea."

What kind of people abuse the planet? What kind of people let them? What are we doing to air, and land, and river, and sea, and to ourselves? Every time we take out from wherever we joyfully played or worked we should look out over where we had been and see that we have left nothing behind.

Erika: Thank you. So Mary Lyons is next and Gary Wallace will follow.

Mary: Tonight is an important anniversary for me. (Erika – can you say your name) My name is Mary Lyons, I live here in Longview. 27 years ago this evening, I was in intensive care at Swedish Medical Center in Seattle, after surviving a sudden cardiac arrest while playing softball with friends. I was on life support, and comatose, and based upon statistics, the neurologist told me friends and family that I would probably be a vegetable if I ever regained consciousness.

But my family and friends kept telling her, “You don’t know Mary.” What she didn’t know about was my innate and instinctive skills at surviving and thriving. As you can see, her prognosis and dismissal of my personal power in that prognosis, was a crucial element she missed in her calculations. And tonight I have one phrase to leave you with as you consider what weight to assign the elements in your decision making process, and that is, “You don’t know Longview.”

The level of cleanup that the DOE chooses to enforce could have the ability to not only clean up this site but also this region and this country as we lead in holding polluting industries responsible for all the damage that they do. Level 6 is the only level that returns this site to the level playing field it occupied when Reynolds moved in.

And if you think this is a community that’s satisfied with subpar accountability for damages done, you don’t know Longview. The commercial value of this deep water port, so close to the mouth of the Columbia and Portland, could lead the west coast in its efforts to turn this country into an economically powerful and cleaner nation. Lowering the bar to level 4, models the defeatism of a dying vision.

This town will survive no matter what level you choose for the cleanup, but supporting us in rising from the ashes of the past 50 years is a choice which will pay off in spades. And if you don’t believe me, you don’t know Longview. Thanks.

Erika: Thank you. Ok, our next person is Gary Wallace who will be followed by Laura Stevens.

Gary: Hi. I am not going to use the microphone, I think my voice carries. I am a native from here, born here, bred here, raised here. (Erika: Can you state your name? Gary: My name is Gary Wallace, you just said it three times. Erika: I know but we have to get you to say it so we know your name.) Ok, my name is Gary Wallace, born, bred, raised, educated here. I have seen Reynolds from the 60s and the 50s, it’d eat paint off your car. So what’s in the soil? Eat the paint off everything.

So I think Longview/Kelso we are tired of being the armpit of Washington State. We have the history of being the, it’s called “Stink Hole.” So we don’t want to be that anymore. I think we deserve the best. I think the Department of Ecology is weighing monetary over what we demand or what we expect.

Quality of life doesn't have a dollar amount on it. The dollars, who cares, it's going to cost more later. So what we got to do is figure out what we want for jobs. We are looking at cleaning this up to make it back to as close as we can to what is acceptable for everybody throughout the world.

We are on the Pacific Rim, we've got an educated blue color work force. We got heavy industry as a history; we know how to handle it. We have environmental laws now and we are going to get better. I think we changed it or lose it; right now we are losing it. I think the world has got to look at the United States as someplace as a vision and the light of the world. I think Longview/Kelso should be the light of the world. I think we got job opportunities here with the workforce totally educated, totally capable of heavy industry. We can make the, as I talk to the county commissioner, we can make the windmills to supply the power for alternative energy. We can make the solar power panels. We can change the world right here. We ought to start it someplace, it ain't going to be anywhere else.

Lead the way. Longview/Kelso is an intelligent community. We're tired of being on the bottom end of the rest of Olympia, trying to act like we don't exist. It's either the Puget Sound, Spokane, Tri Cities anywhere but the southwest Washington pacific coast. We have the light of everything. We can do this. We don't want to accept just based on dollar amount. Dollar amount is who cares, that's make believe. What we are dealing with is real science, real hard stuff. We got fish that we brought back, we got eagles we brought back, we got osprey we brought back, use to be here when I was a kid. Not any more, they are just now coming back.

We want to clean this up so they still survive. We don't want an industry invited back here to eat the paint off your car at 2 o'clock in the morning, we don't want any more cancers. We don't want any more weird little things. You got Longview city water supply is based right outside of where this site is. And you don't think that they dump stuff outside of their boundaries? I know for a fact, people that I grew up with work there. They know all kinds of stuff. Where they are testing is what they were told to test in because it is at site level. There is all kinds of other stuff out there, the swamp is not going to be any healthier just because the tide goes up and down and they got bone meal calcium walls.

We got to look at the fact that we got to get rid of this stuff, send it up stream, it comes back to where it is. We got to figure out how to get rid of this permanently, handle it. There is another technology we can develop. We've got the brains here, I don't see why we're going to accept anything less than the best. And best is level 6. If it's level 6 we accept it. Anything beneath that, I don't care what the cost is. It's just money, it's make believe. Hard science, life, water and air, it's not a political issue. I don't care how conservative you are, I don't care how liberal you are. ...Erika: Mr. Wallace, can you please summarize, your 2 minutes are up.

Thank you. So in summary, at the request of the monitor, my two minutes are up. I think we can do better than what they proposed. I think we got to go for the best. I think we got to lead the world. I think that we are the beginning of a change. Change it or lose it, I don't want to lose it. Thank you.

Erika: Thank you. So Laura Stevens is next and following her will be Don Steinke.

Laura: Good evening, my name is Laura Stevens and I am an organizer for the Sierra Club and I want to thank the Department of Ecology for holding this hearing tonight. I urge Ecology to require that Reynolds cleanup this site to the highest level possible. That's level 6.

This is exceptionally important to me because well I love eating fish and I am starting a family, so let me explain. Okay...no I am not...not just yet..ok...I am getting married later this summer, to the love of my life and our favorite past time is fishing. To be totally honest, my fiance does the fishing while I sit and keep him company, do the very important work of keeping him company and untying the knots and of course eating the fish, that's very important. So, soon after that, maybe you know in years, years, we will decide to start a family and it will become increasingly important that we watch what we eat for the sake of our children.

PBC's, which are highly carcinogenic, are stored, in fact, particularly in breast fat and when it is passed onto babies through breast feeding, it is, of course, devastating and, um as you well know, PCB's are among the many toxic compounds at this site that need to be cleaned up. So, I urge you, Ecology, to clean up this carcinogenetic, toxic mess, to clear out the waste and get it far away from the water, far from the river, and far from the risk that is poses to fish and to our families.

Because once this site is cleaned up, it will be cleaned up forever, for us, for our children, for our grandchildren, for our great grandchildren, and on and on. So that we can be confident that what we are eating isn't going to give us cancer or make us sick. And that is the great glorious benefit of choosing the highest level of cleanup for this site. If you go an alternate route, that decision will also be felt forever. Future generations will have no guarantee of the safety of their fish, of their river, of their drinking water which is adjacent to this site and who knows, with an earthquake, changes in the hydrogeology, that could be affected.

I have seen Ecology make many sensible decisions and I hope that you will do the right thing again this time and clean up this toxic legacy for good. Thank you.

Erika: Thank you. Don Steinke, please and I apologize for mispronouncing that was well and you will be followed by Alona with the same last name.

Don: Hello, I am Don Steinke from Vancouver Washington. In the year 1700, there was an earthquake off the coast of, off the mouth of the Columbia River. It was so big it made the history books in Japan. Ok, a bit of advice how to hold the microphone. So that earthquake was very large, seduction zone earthquake. They're forecasting that this would happen about every 300 years, so there is one due anytime now. If the earthquake doesn't get the soils that this property, where these things are capped, then the tsunami that comes in will help finish it off.

The tsunami was so big, that is what made the history books in Japan. Because it started here went all the way over there, and went all the way up to Cascade Locks. And so, when they had

the graph of benefits and costs of level 1, 2, 3, 4, 5, 6, level 4 was what they liked but did they think about what the benefits would be if there was an earthquake? Would that be protective and so I don't think, I am assuming that their benefits didn't analyze the possibility of an earthquake.

So if you chose level 4, you can't change your mind after an earthquake. If everything messes up, patterns in the soil change, you can't change your mind and have somebody come back and clean it up. If you choose level 4 the pollution stays on the property. I urge you to clean up the Longview property to the highest standard. Doing so will create clean jobs and make the property appealing to clean enterprises. The property in question is a liquefaction zone near a major subduction zone, next to a river, and our water supply. Simply capping the pollution is not very far sighted. I urge the highest level of cleanup. Thank you.

Erika: Thank you. Alona Steinke, please and then following her will be Richard Green.

Alona: Hello My name is Alona Steinke, I live in Vancouver Washington. As a retired RN, I am really concerned about the potential health effect from the contaminants at this site. Some of which include cyanide, fluoride, polycyclic aromatic hydrocarbons, arsenic, cadmium, lead, and copper. The effects of exposure to these include cancer, birth defects, bone, kidney, heart, and liver disease, as well as interference of the body's natural ability to fight disease. These poisons must not be allowed to enter the nearby aquifer or into the food chain.

For the health of this community and for all of us who share this river, I urge Ecology to require the highest level of cleanup.

Erika: Thank you. We have Richard Green, please and following Richard will be Kathleen Pattan. Please state your name for the record.

Richard: I'm father Richard Green and I'm a 14 year resident of Longview. I am in support of the highest level of cleanup. I'd say I would settle for level 6 because, even at level 6, the ground water is still polluted. And I come to this decision from two sources, one is that the spiritual tradition that I am apart of is referred to as being incarnational. And incarnational means that we experience the divine in the world. And so, out of respect for that divine presence, and in honor of that divine presence, I believe that, as was stated earlier, we need to do what we do and leave no trace.

The second source of that, I learned from my mother, when she told me, "When you make a mess, you clean it up." You don't clean it up a little bit, you clean it all up. And so it seems to me that based on those two things I am willing to settle, for the moment, for level 6 but for all the good scientific reason that I have heard, even that seems a little bit settling for acceptable levels of poison in God's world.

Erika: Thank you. Kathleen and then following Kathleen will be Jasmine Zimmer-Stucky.

Kathleen Pattan: I'm Kathleen Pattan and I have been a priest and a citizen of this community for 14 years. And I also would like to thank Ecology for their careful listening process, this has

been a wonderful evening and I am really grateful for your patience and willingness to communicate and listen to us.

And we have heard tonight, I think we are all concerned about the long term health of our water and our community. These truly are sacred values to all of us. And as we've stated before, you probably know that these ditches run right through neighborhoods where children play. Not too long ago the highlands neighborhood so happily announced this new walking path that runs right by a drainage ditch, one of these ditches that connects with this property. My son has friends who live right next to that area, right there. And I think about their kids and I think about their pets. And of course our precious Columbia flows right past the site.

So my great concern is the inevitability of earthquake and flood and the consequences of these safety measures deteriorating over time. I'm not comforted by the idea that we could possibly hold Alcoa accountable later for anything that might happen later, after a toxic crisis has occurred. I want that pollution out of here now. The health of our community is too valuable to gamble with.

So as stewards of our health, I would like to ask Ecology to fully protect us from contamination of our water, both now and in the future by requiring removal of all the toxic material. This is a mess made by Reynolds Alcoa. I believe they should be held responsible to a complete cleanup now, not after the harm has been done. This is our chance to have this threat to our health remedied for good. Thank you again for your time.

Erika: So can we get Jasmine Zimmer-Stucky and she will be followed by Norm Dick.

Jasmine: My name is Jasmine Zimmer-Stucky and I would like to start by thanking Ecology for hosting this hearing and for having a 60 day comment period for everyone to provide input. I also want to thank the countless community members from Cowlitz County and throughout the region who phone banked, gave up their evening to make turnout for this hearing, for other comment writing events, citizens who wrote comments to the editors, and who spent their weekends collecting petition signatures asking for a full level 6 cleanup for this community.

Because, as it turns out, cleaning up toxic pollution, and doing it right the first time, is a common sense value that Cowlitz County residents and the residents throughout the Columbia river all share.

There are 6 levels of cleanup tonight outlined by Ecology to address the toxic waste at the old Reynolds Metals facility. There's PCB's, there's PAH's, there's fluoride that I wouldn't brush my teeth with from this site. And it should be common sense that we do everything in our power to remove this toxic waste to a certified landfill. Longview sites along the Columbia River are not certified landfills. If we wish to ensure that the salmon are safe to eat, that the water is clean enough to drink and that the Columbia River in Cowlitz County maintains a place where people want to raise their families and live and work, then it is common sense that we clean up to a level 6.

Vulnerable population like pregnant woman and children eat salmon from the river, in which leads to ingesting toxins that come from places like Reynolds facility. The entire town of Rainier gets their water supply from the Columbia River. They deserve a level 6 cleanup, it's common sense. So on behalf of Columbia RiverKeeper, I insist that Ecology take the common sense approach and require a full level 6 cleanup because after all this process is not a partial cleanup process, this is the only cleanup process that we get. Thank you.

Erika: Thank you. Norm Dick who will be followed by Dave Goldberg.

Norm: My name is Norm Dick, I am a 47 year resident of the local area. Ecology in this instance is not following its own rules. The code, the RCW, requires that Ecology shall give preference to a permanent solution to the maximum extent practicable. The Washington Administrative Code sets out standards for determining whether a cleanup action results in a permanent solution to the maximum extent possible practicable.

The department has failed to follow its own standards. Alternative number 4 is not a permanent solution. Alternative number 4 obviously leaves the contamination in place right next to the Columbia River, subject to flooding and in an area that gets a great deal of rainfall.

Moreover, part of the containment plan relies on the mechanical pumping of the drain ditches, drainage ditches, in the area. Pumps will obviously fail over time. Ultimately between rain or flooding from the river and or failure of the mechanical pumping in the ditches in the area, the proposed alternative number 4 will fail in time.

The lowest cost of cleaning up the site now, permanently, is when the material is all in one spot as now, now once it is been subject to movement through flooding or other means. The department has failed to allow any weighting of its cost analysis in favor of a permanent solution, now, with the cleanup of the waste, when the waste is all in one place, versus later after flooding, pump failure, or other event has allowed the waste to spread far beyond its current confined area.

If Ecology properly looked at all aspects of the economics of the various 6 alternatives, it would be apparent that, not only is alternative 6 the only true permanent solution offered, but out of the 6, is not only permanent, but also more economical in the long run.

Erika: Can we get Dave Goldberg followed by Les Anderson

Dave: Thank you.

Erika: Hold it if you like. Please state your name.

Dave: My name is Dave Goldberg, and I am from Vancouver and I am grateful to live in a state that has its own version of the Superfund site program and that this issues is being addressed but it might be time to go even further. Previous speakers have mentioned how seismic activity and global warming make anything but the highest quality cleanup short sighted. I would like the responsiveness survey to directly respond to this assertion of short sightedness.

I believe the corporate structure that we permit, that allows corporate entities to do as they please until caught by a third party, leads to the short sighted thinking. Facing the environmental challenges we do as humanity, it is going to take an internalization of a sense of responsibility to face our problems. A sense of responsibility to the citizens, children, and recovering cancer patients must come from the inside; it must not be enforced by a third party. Also I would urge the responsiveness survey to respond to Ms. Stucky's point that this place is not a certified landfill and therefore should be totally cleaned up. Thank you.

Erika: Thank you. So can we get Les Anderson, please, followed by Jeff Cameron. Audience: I am going to pass. Erika: you are going to pass, Ok.

Les: Les Anderson, I am a board member with LCSC, not being able to hear me, that's a first. I am Les Anderson, a board member with LCSC. When I planned for the building of my home, which is just downstream sharing the river banks with NWA, it was important to me to get the options of two different geotechs; both shared the same professional opinion. That on January 26, 18:30 hours 1700 we experienced our most recent Cascadia subduction zone major event. It was catastrophic, and we were subject to these events approximately every 300 years. There is now been over 15 feet of vertical rise in the Cascades, building tremendous pressure that will be released in the next major event.

Both geotechs notes my home on my similar property would sink do to the liquidation 6 to 8 feet and travel towards the river 2 to 3 times that distance. Now think about what will happen to the reactive media trenches or any of the layering techniques used to contain or cap containments. They will be useless. The only safe solution is to remove all the known contaminates to a proper landfill designed for such use.

We don't want NWA's contamination in our rivers, wetlands or our estuary's. Taxpayers have invested many millions to protect them and our fisheries. The DES has no references to Geo Tech reports and I am concerned of why not. We want our port to operate at the highest and best use, to create a solid tax base not the one that loses taxes revenues because it's polluted as this site has.

The 12 million dollar property devaluation highlights our real time losses, what is the real value of a clean fully utilized port property on the Pac Rim. Every square foot of the site means more value for the port, the city, the county, the state, and the landowner, plus the jobs that we all need and want. The only cost analysis should be it cost our citizens and landowners, cost to our property values, our health, our port, and the community's long term success.

The cost analysis should be: you polluted it, now clean it up, completely. Send a message to all polluters that in the State of Washington, in order to do business, you must be responsible. There is only one clear, clean choice and that is the level 6 cleanup. Thank you.

Erika: Our next person is Charlette Persons followed by Jan Hanson.

Charlette: Can you hear me? Yeah, No... Can you hear me now? Ok. I'm Charlette Persons, a 22 year resident of this community; I am making my comments on behalf of Willapa Hills Audubon Society, a 300 member chapter of the National Audubon society. For 39 years, we have worked in southwest Washington for our mission to support ecologically responsible ways of life. We ask that Department of Ecology clean up the Former Reynolds Metals site permanently at the highest level of the proposed alternatives. There are reasons that alternative 6 is rated 9 for protection and permanence. Removing all the contaminated soils offsite is the only way to guarantee that, in the future, severe events do not cause these pollutants to be washed into the Columbia River.

Possible severe events include earthquakes, sea level rise, floods, and storms. We hope we never have these severe events, but we must plan for them. The cost of alternative 6 appear high, but they will seem low if we tax payers must cleanup future problems. With these problems, we will lose the benefit of the billions of dollars spent to restore endanger salmon runs and to raise salmon in fish hatcheries. Fishing creates millions of dollars in tourism, commercial catch, and food for our communities.

If all these benefits are included in the cost benefit analysis, alternative 6 is competitive with the other alternatives. In addition, fishing is part of our community, a tradition that started with the first people to live in on the Columbia River and its tributaries. That tradition includes teaching our children how to fish, both on shore and in boats. All inhabitants of the lower Columbia estuary, both wildlife and humans, deserve a healthy river. By choosing the highest level of protection, Department of Ecology can ensure that we leave this legacy to future generations. Let's clean up this site for good.

Erika: Our next person is Jan Hanson followed by Roy Staples.

Jan: My name is Jan Hanson. I have only lived in Cowlitz County for 12 years. Prior to that I lived in Grays Harbor County in another mill town, and I have also grew up in the Puget Sound area. And I mention that because one thing I learned when I moved away from where I had grown up, is how Seattle-centric the world often seems to be and I had the same experience when I moved to New York, that the world there is often, people don't realize what it's like to live in a place that's a little more remote and outside of their own backyard. People don't fully appreciate that this is a community with children, children who are more venerable to pollution.

I have brought with me, one of my favorite sources of wisdom, Winnie the Pooh. And I am a children's librarian, and every day I work with children who are in a community that is not always putting children first, although I am sure every parent does. Let me just read this very short passage.

This is the part where Pooh is stuck in Rabbit's door. (Audience: Speak up Jan.. Jan: Ok) "I was just beginning to think," said Bear, "Rabbit might never be able to use his front door again and I should hate that." "So should I," said Rabbit. "Use his front door again?," said Christopher Robin. "Of course he'll use his front door again." "Good," said Rabbit. "If we can't pull you out, Pooh, we might push you back." Rabbit scratched his whiskers thoughtfully and pointed out

when once Pooh was pushed back he was back, and of course nobody was more glad to see Pooh than he was, still there was some lived in trees and some lived underground and “You mean I’d never get out?” said Pooh. “I mean,” said Rabbit, “that having got so far it seems a pity to waste it.”

This is a metaphor that I hope you can appreciate. Having got so far it seems a pity to waste the progress we have made. And I understand that the science here is directed at an industrial site level. In other words, that an industrial healthy worker might be able to work there 8 hours a day and maybe not get cancer. But what is happening on that site happens to cells and animals and every part of the web of life and children are part of that and I don’t understand why we don’t want our whole world to be clean enough that children can live and flourish.

Erika: Can we have Roy Staples, please and then Patricia Bellamy.

Angie: We will not have a mic for the rest of the night, they are experiencing technical difficulties. (Muffled talking from the Audience...) Oh, ok well that settles that.

Roy: Hi my name is Roy Staples, let me know you can’t hear me. I’ve been here in town for nine years, I am a teacher and I teach high school students. Before I go on, I want to thank Department of Ecology for going through the democratic process and considering citizen participation before you make a decision.

Anyway, I think a lot about my students and the future. I look into their eyes every day. And I feel this process is our only chance to get Alcoa, the third largest producer of aluminum in the world, to commit to the full cleanup of its property in our town. I’m asking you, the Department of Ecology to hold Alcoa to a level 6 cleanup so that all toxic chemicals are relocated in a safe landfill, away from the old site, away from the Columbia River and away from possible contamination to our groundwater.

I’ve looked over the different cleanup alternatives in your document, and a big consideration that it is missing is what we leave our next generation, our children and grandchildren. Are we going to leave them with a clean business site, one that can attract clean jobs, one that can protect the river and the water quality, or are we going to take the chance on things? Let Alcoa off with just moving waste from here to there on their own property and putting a cover on it, and hoping the toxic waste doesn’t come in contact with rising water levels or flood or whatever.

Are we going to leave our children a toxic time bomb that they will have to take care of, they will have to pay for their cleanup? Only the level 6 cleanup, described on page 29 of your executive summary, comes close to the fully responsible cleanup. Offering future businesses with a clean site to build on without worrying about toxic waste to expose its workers to, and offering our children the safe relocation of toxic waste to an appropriate landfill.

The cost is high, 344.4 million dollars, but for Alcoa, a company with 23 billion dollars of revenue just last year, this is very doable. This is also the time to push for a complete cleanup. According to investors, Alcoa is “set to gain big profits” in the coming years. Let us hold Alcoa

to a complete cleanup now while we have the chance and the political power to do so. Let's have a clean site and a clean river for our children and grandchildren.

Erika: Thank you. Patricia Bellamy, please and Sharon Miller will follow. And I want to encourage people because of the failure of the microphone, if you want to move up so you can hear better, please feel free.

Patricia: It's not working?

Erika: It doesn't seem to be, is it anything, no.. no.. okay, so we can just rule that out.

Patricia: Ok, I will give it my best. My name is Patricia Bellamy and 60 years ago I went to Monticello, it use to be called Junior High, it's now called Monticello Middle School, and I spent many hours playing along Lake Sacajawea. So this is a very special place to me, and but I am speaking tonight as a health professional and as a great-grandmother.

I watched the presentation tonight, and I learned a lot. And the startling thing that I saw was there is 317 million dollars difference between level 4 and level 6. And that seems like a lot of money, but think about how much health care cost today. And think about the kind of risk and the kind of dangers that exist in this toxic sludge and waste that's going to be there after level 4 is cleaned up.

So, we live in a vulnerable area, earthquakes, rising water levels, let's use good sense here. This seems like the height of their responsibility and short sightedness, not to do the highest level of cleaning here. We want our children ,our grandchildren, and great grandchildren to have the opportunity to live a good life and not have risks of cancers and I in my personal experience, both in my family and in my professional life, I have cared for people with cancers and the kind of diseases that would be the result of the kind of opportunities that exist with this stuff getting lose into our environment.

So I urge the Department of Ecology to use the highest level of cleanup. Level 4 isn't going to do it. Putting a patch on this is not going to do it. In health, in public health, prevention is the number 1 principal. We have to prevent, it's not just putting a band aid on the situation, and that's what level 4 is. Would be like putting a band aid on a broken leg. Thank you.

Erika: Could we have Sharron Miller please?

Sharon: My name is Sharron Miller and I also graduated from school in Longview many, many long years ago. And I subsequently moved away and today I was able to travel along the Columbia to Puget Island and back and just appreciate the beauty of this area, and the responsibility that we have to our children to keep this such a magnificent environment for them.

After leaving Longview, I became a juvenile probation counselor and part of my job was to teach young people that they needed to be responsible to victims, we taught restorative justice, we set restitution schedules for these young children who really had very little money that they would pay back their victims. That they really needed to be responsible to their community.

Now I hear, fortunately, that corporations are people. So if corporation are people, we have a duty to teach them how to be responsible for their community. And that they must be pay restitution and if they damage the environment that they must, for the common good, restore it. So I appreciate the effort that the Department of Ecology has to teach our corporations how to become good people.

Erika: Ok, is there anyone else who would like to provide oral comments? Ok (talking from someone in the audience) If you would like to provide another comment for the record you do need to...

David Goldberg: Ok, so if that, I am sorry I forgot her name, the health professional that just spoke recently. And if she's, what she's saying is true about the health, health not being adjusted and that healthcare is so much more expensive, maybe the community should reexamine the healthcare cost and that might raise the green bar and then uh, and then it becomes, number 6 becomes the most beneficial and cost efficient so I would as the responsiveness survey to be reexamine that, thank you.

Erika: That was David Goldberg providing second testimony. Ok, is there anyone else? Alright. Well I want to thank everyone who came tonight whether you provided testimony or not. It's important that you're here, and again you can provide written comments through august 1st, and the way to do that is to send them to Guy Barrett, Department of Ecology, Industrial Section, PO Box 47600, Olympia WA, 98504, or by Email to Reynoldscleanup.comments@ecy.wa.gov, or by fax to (360) 407-6102.

So to close this hearing, I would like to tell you that all testimony received here, along with all writing comments received by August 1st, will be part of the official hearing record for this action. The next step is to review and consider all comments received, other appropriate documentation, and staff recommendations. Then we will make our final decision.

Ecology will send notice about the availability to the final decision, including the responsiveness summary, to everyone who provided written comments or oral testimony on the draft permit, everyone that signed in for today's hearing and provided their contact information, and other interested parties on the agency's mailing list for this action.

The responsiveness summary will contain the agency's response to questions and issues of concern raised during the public comment period. If you would like to receive notice of its availability, but did not fill out a card or sign in, please see me after the hearing or another one of the Ecology representatives. If we can be of further help to you, please do not hesitate to ask or to contact Guy Barrett if you have further questions.

On the behalf of the Department of Ecology, Thank you for coming, I appreciate your cooperation and courtesy. And let the record show that this hearing is adjourned at 8:50PM.

Oral testimony from the Alder Room

I'm Ian Wesley, hearing officer at the Alder Room listening station for the hearing on the Longview Reynolds Millennium Aluminum Smelter cleanup draft Remedial Investigation/Feasibility Study and proposed Interim Action.

Let the record show it's 3:34 on July 16, 2014 and this hearing is being held at the Kelso Red Lion Inn, 510 Kelso Drive in Kelso Washington. Legal notice of this hearing was published in The Daily News on June 1, 2014. In addition, notices of this hearing were mailed to about 77 interested people, email notices were sent to 117 interested people, and a news release was issued on June 2, 2014.

Oral testimony is also being taken in the main ballroom of the Red Lion Inn. Recording of testimony at this listening station will take place when a commenter wishes to provide comment in a smaller area without a microphone and audience. I will pause the recording when no one wishes to provide comment, and resume recording when a commenter is present.

The general time limit for comments made at this station is 5 minutes. If no one is waiting to provide comments at the 5 minute mark, the commenter may continue. If someone is waiting to provide comment, I will ask the commenter to summarize their comments so the next person can testify.

So now we have Harvey...Harvey, you are going to have to..

Harvey: Williamson

Ian: Williamson, who would like to provide comments. And if you could state your name and address.

Harvey: Yes, my name is Harvey Williamson . I live at 8535 Ocean Beach HW, Longview Washington and I have been a resident of Cowlitz County Since uh, 2008. I was born in Cowlitz County. So, anyway here we go.

The site where Alcoa's former Longview plant now sits was not polluted prior to its construction. Now Alcoa, under its subsidiary Northwest Alloys, is asking to partially clean up the site by the use of capping areas and building permeable barriers to mitigate, rather than cleanup, the polluted areas. If we, the people of Cowlitz County, do not insist on the removal of the contaminants, future businesses will be restricted in their ability to use the site or else they will have to be responsible for cleaning up the rest of Alcoa's mess. This is unacceptable to the Cowlitz County community and for its present and future industrial partners.

The removal of site contaminants is positively the best solution for the industrial community that will remain in Cowlitz County. For in the long view of future development, as a prime industrial value-added export site, and all of the present site should be made available to development, not just a mitigated site with portions available for development. The industrial roots of Longview

will then be free to grow where they will, with a more complete cleanup of the Alcoa site. Alcoa can then move on to other horizons, while Longview's industrial horizons will be preserved for the future.

We cannot bring back the pristine conditions of the pre-industrialization of the Alcoa site even at level 6 site restoration. The site cannot even be used by the public as a park, at level 6 clean up. Yet, it is incumbent on the citizens of Cowlitz County, in accordance with Washington State laws, regulations, and values shared by all the people of the state, to ensure that the Alcoa site be cleaned up to the highest standard possible so that new industries will have the freedom to make the most of our deep water port and access 100% of the Alcoa site land.

This cleanup is not a burden on the taxpayer. It only becomes a burden if Northwest Alloys is permitted to get away with a level 4 cleanup. It is up to the citizens of Cowlitz County to hold government and industry to the standards set by Washington State laws, the citizens of Longview, and Cowlitz County. To cleanup at level 4 is not up to the industrial standards of the people of Cowlitz County. Alcoa can and must do better.

Ian: the time is now 4:26 um, please state your name and address for the record.

Joel: My name is Joel Rupley, I live at 2602 Cascade Way in Longview.

Ian: Ok, and then you can go ahead and give your testimony here.

Joel: I will read a letter from my wife and I. A bit of background, I am a former County commissioner here in this county. And I also worked in the environmental policy work for Clark County, so I am familiar with many of the issues that are involved here. And with that being said, here are our comments on the proposed cleanup actions at the Reynolds Metals site.

In reviewing the proposed alternatives for cleanup of the former Reynolds Aluminum plant in Longview, we believe alternative 5 to be the best solution, provided the sediments around the outfall 002A are managed by off-site disposal. Should alternative 5 not include off-site disposal of this sediment, then alternative 6 which is the most expensive, would also be the best solution.

Our suggestion is based on the following considerations: The site is and will continue to be an industrial port site far into the future. Clean up activates should provide for the greatest flexibility for future uses with the greatest amount of land available for those uses. Access to shipping lanes is a very limited commodity. The economic future of our community depends on safe industrial sites with healthy working conditions.

The Columbia River is a dynamic system rather than static. Its interaction with its hyporheic component can and will change, which could impact onsite storage and treatment of contamination facilities. For example, in 1996 the river was above flood stage for over three months, causing significant impacts to the shorelines. In addition, the river at this point provides habitat for all of the ESA listed fish species within its basin. It is absolutely imperative to prevent any contamination from reaching the water. And as an aside, an earthquake could have

major impacts on that with onsite storage, that's why we suggested the offsite storage is a better way to go.

The adjacent lands, the third point is, the adjacent lands to the west are a closed industrial waste site, which has had clean up and monitoring problems in the past and those are ongoing. Leaving contaminated materials at the Reynolds site could compound those problems. Thank you for your consideration and it's signed by me, Joel Rupley and my wife Janice Stixrud.

Ian: Thanks for your comments. The time is now 5:14 if you could please state your name and address for the record.

Ellen: Ok, my name is Ellen Leigh McKeirnan and the reason why I am doing this on the confidential tape is because my husband has Alcoa insurance and we rely on from uh, him working at Reynolds. And um, he told me that uh, none of the men that he worked with would ever drink the water in the 25 years he was there, because the water was so bad. And when working class guys don't drink the water, that alone is just a sign of how tragic that area is and just the total, all the years of dumping and the chemicals. Um, none of the working class people that work there could even comprehend them using that area for the Longview water system or um, all my health friends say it's going to lead to cancers and all kinds of things you know.

Um, and then on the Coal issue, are you doing that too?

Ian: you can comment on whatever, I am just here listen, to take the comments.

Ellen: Ok, I really, um, well it's just that um, on the financial aspect, I don't want my house devalued from having a million coal trains going through. We already have coal trains that you see going through with no tops on it or anything from preventing the coal from going around. A lot of the rails are right along the river. I have seen people walking along picking the spikes out of the tracks for scrap metal and, and, um, you know the train goes right along the river; it's just so disastrous, we just live in too narrow a community for, um, for coal.

There is just such a thin layer left of the atmosphere, its incredible that we are the ignorant nation that is still promoting coal. Even China is trying to get off coal. They are looking at ways to get off coal now. So why are we putting all this money into coal when they are trying to get off it? They are requiring one third of their cars to be electric in the future, for example.

Um, and then um, on another issue um, I was the one that initiated putting the Trust Land Transfer through in Kelso to the city because it was going to be logged. The Jacob, known as the Jacobson Trust Land Transfer, back in 1999. Unfortunately that was a big mistake putting it through to the city, Doug Robinson the city manager when they put it through, looked at me and smiled and said, we'll log it eventually.

Um, state parks, I think his name Bill Cost told me, oh no one would violate the spirit of a trust land transfer, because I asked that there be a logging restriction in there. And they're all waiting to log it and this is Weyerhaeuser's town and it doesn't matter that um, Scott Burns from

Portland State University said there's um, you know he took geologist from around the world back there and he said it would unleash log land sliding into the river valley there.

The schools, and the elderly, and everybody that are on the other side of the dike. Um, but aside from all that, the DNR originally said that that wetland was too environmentally sensitive to log. And originally uh, I think what was his name Gunther that used to work um, in one of the DNR departments here and then they promoted him out of the area when he said this. He said that whole area would make a perfect um, natural resource park, I forgot the proper name because it has geology, riparian, uh, forest, um, you know uh, I can't remember all the parts but um, you know there are salmon spawning beds behind Aldercrest that have never been rehabilitated. They built a big water tower up on the hill and stopped a waterfall from going back in there. And that was supposed to house a 495 home development in the slide areas which will never happen now, it all been re, uh, required geologic, geotech reports and large tracts of land and some people bought up the land

But there is still the 450 acre Hill Ranch which was on the market recently and then sold and the sale fell through and that whole area could still be a wonderful wildlife area for um, like there is millions of deer and elk there. Although since the logging uh, we've have all kinds of people, well one bow and arrow hunter told me people are just going in there and raping the land and annihilating all the deer. He, that was from a deer hunter stand point, but you know we had, the Trust Land has many eagles nests documented from years ago.

Behind us, I was on the other side of the hill; there were many eagles' nests. But that doesn't stop anything when it comes to the DNR laying down for Weyerhaeuser; I found out, there were buffers that were saved 90 years ago with red Salmon, thousand acre, thousand foot, 8 foot across old growth, and that you have to leave a thousand feet around, or you had to back then. And they just went and shot the eagles before the environmental review, they did find red tail hawks but they never protected those nests even. And there were nests they did find farther up the hill and then those got, disappeared and the DNR never said anything about it. After Aldercrest slid, then the DNR came down, Eric Whisk, who is now head of the region, got awarded for allowing them to log the cliff at the end of my street, two blocks down the ridge from the Aldercrest slide. Over a two thousand foot slide that went across the freeway one time. So, as far as this area goes, the Ecology Department should really get busy.

Because they have allowed what one DNR gentleman behind me said, forester said, he told me to get a biologist in here because it looks like something out of the Olympic rain forest before they annihilated it. And, they just promoted him to the central Cascade Region. And then the biologist said it does look like there were eagle nests all over the place here, but they are gone now, you know. But sounded like a shooting range before they did the permit, well that is Eagle Ridge that did that. They are bankrolled by Weyerhaeuser; I have a letter from Weyerhaeuser saying that.

And, um, Eagle Ridge logged landslide areas all over the County. That was a protected buffer behind men in the city codes, which was ignored completely. Don Mathenson walked the buffer promised it to us then later apologized for the deception. Then they changed the buffers in spite

of the fact that I stood there at the Aldercrest meeting and told them that there were salmon spawning beds over people's heads behind Aldercrest. This is s,o there are thousands of geese and ducks in hearts lake right next to that wetland, on that wetlands. Um, on the a Jacobson Trust Land Transfer, which you guys could get together with Columbia Land Trust and um, you know Justice For Public Land twice was interested for picking it up, but our city turned them down, you know every other city was begging them to do it.

Um, you guys really could get busy in our area and protect that area. Um, Senator Cantwell was going to put it through, and she told us to start with, uh, the US Rep Bairde and he said, at that time, and he said, the city is putting the kybosh on it. You know, his secretary told me that.

Anyhow, um, I feel really like there's not a lot of hope in this area for anybody saving anything. Um, I don't know what they are blasting up there at Mt. St. Helens, that's another problem. All that TNT for science? I don't buy it. I don't buy it, I have a gut feeling it's more the, for the silver mine that they want to approve up there. I think that, and it's suppose to be the end of this month or next month and I think that's some man's ego going overboard, it's just too risky. There is a sediment dam up there for pete's sake that would flood this whole valley. Not to mention I-5.

Um, so I just feel like our officials are basically playing with fire all around, Mt. St Helens should be a national park, it's all set and ready to go for a national park. But there's rednecks with the race car, uh, track up there and a bunch of other people who think that they won't be able to go hunting at their will if they get a national parks.

Um, and uh, what else, um that man that owned the race track was the same guy, Dan Dale, who is on the permit for the Aldercrest landslide. So that just kind of goes to show, Aldercrest did, also Eagle Ridge, did illegal logging all across the country. They have been in numerous bankruptcies. Uh, the last one they were in lasted 13 years but um, with 200 entities and that didn't include any of the slide victims or maybe 1 if none but unbeknownst to me.

And um, I have pictures, wildlife pictures a wildlife photographer gave me. And I have support letters for all kinds of groups, the schools, and all kinds of people from years ago to do something with that land. Um, Bill Digidart, that Columbia land, a grant writer that works with Columbia Land Trust, he has most of my material if you ever need it. um, I just wish the Department of Ecology could, you know, turn this town upside down and you know, why risk taking oil or coal along the rivers and who's going to pay for all the infrastructure, we'll get , we'll all get foot with the bill anyhow but that's our property values that go down, I am not really interested in any of that, I really care about what it'll do to this area.

Um, that's it.

Ian: Ok, great. Thank you for your comments. Did you want to make comments? Did you want to make comments, (someone says yes) that would be great excellent. Ok, thank you so much.

Ellen: I hope I didn't over

Ian: come sit down and have me take your comments and (background talking)

I didn't know if it had to be written or just verbal

Ian: either way is great, so we are recording at the moment and (person – Okay) you can just go ahead and if you can say your name and address for the records, that would be great.

Jeff: My name is Jeff Childres address is 2920 Rose Valley Road, Kelso. Um, I know there is some cleanup that needs to be done on the Reynolds Metals site. Um, I feel that it doesn't need to be excessive. Anything on 1-4 would be adequate. Um, there has already been a lot cleaned up down there now. I don't see any reason to dig up and disturb the stuff that is already sitting there and is not moving. And that's about all I have.

Ian: Alright, thank you so much..

Jeff: Thank you.

Ian: The time is 5:29, if you could state your name and address for the record please.

Lucinda: My name is Lucinda Burchatz. I live at 2401 Birchum Street in Kelso, Washington. I am a third generation here and have two generations following, so it is our home.

I think that we should have the best protection possible., from any type of toxic waste or harmful environmental effects especially in the location that being discussed because it is near, or not near, but it's on, and it's part of the Columbia River, which is uh, a great asset to the Northwest if we care for it. We have had nuclear plants have to clean up.

Ah, I hope the water temperature is somewhere near normal because I know there have been things that have made overheated and warmed it and you see all kinds of things happening with fish populations when water is too warm. I see right now even out at the ocean that the sea stars are losing their legs, they are rotting and falling off. And we may lose all the starfish along the coast, something to do with temperature perhaps or other toxic waste that is coming out into the ocean from our river.

I didn't ever think in my lifetime that I would see a volcano in the neighborhood. I didn't realize that we would have 100 year floods, which we have had in my lifetime. I didn't realize that we would have a neighborhood straight across the Coweman Valley from me, completely, completely disintegrate by sliding down the hill. Um, so I think as one of the largest perhaps residential slides, the most people effected in the United States. But that's because of the soil, our soil slips and slides around here.

I know that the um, the tsunami, the earthquakes the causes the tsunami in Japan, they are telling us it is inevitable, we will have that same type of quake along our coast. We will, if we have the same type of quake be facing the same type of tsunamis and I know they wash inland a long distance, they're talking about very tall water and a very hard shake. And I just forgotten the other thing. Uh, oh it was on my mind a second ago but I am getting older, uh, um, besides the

earthquakes, mmm, the other thing that could happen, anyway, there's, there's so many of possibilities of things that can go wrong, that can displace the earth, that can move the earth, that can flood the earth, or undermine the earth.

And all of those things remain possible if you seal over the top of toxic waste, it's still there. It expects to, if it expects to stay there forever, what, what are we doing to this earth, if we are expecting to be able to create these poisons and plant them for further generations to worry about.

My husband and I were interested in what was going to happen to the nuclear waste years ago. And listen to all the debate and heard great experts and listen to Dixi Ray Lee or Lee Ray, whatever her name was, the governor that said, it's all fine, it's all fine, we'll just have, we'll just put it in a safe place over in Eastern Washington you know, the deserts don't care. Um, I am sorry but they do care and every part of this earth is valuable to us and it's bad enough that we create these things, I realize we have to have some of the products that we expect to have.

But right now they are talking about a place that isn't going to be put to its best and highest use, which would be having a manufacturing of finished products to be exported. That is uh, a wonderful port area, we have a workforce that is used to doing manufacturing work, or mill work or whatever. The docks right now are completely loaded with whole peeled logs waiting to be exported which could be turned into lumber or into finished products here in this town that needs employers and employment, employment for its people.

But instead, we are talking about shipping off a, a, um, natural resource from our country again to a country that is not going to worry about how they use it. Ok, that's another topic, I understand, but I feel like that particular site should be well cared for and cleaned up to the highest standards so that we can have all kinds of, any kind of, including parks, uh, any kind of facility there that we would need to provide employment, to make good use of the river and the highways and the railroads.

But not employment for a few, and not great profit for people far removed from us. We need the income from it to stay in, be in our area, because of the vast amount of people that are employed and because especially for using things like the lumber, not lumber, the timber that's being shipped away turning it into lumber. Using the lumber to build things, exporting those things will create what we deserve.

Um, I know that there is a place that will take the contaminated soil that is uh, within a shipping distance and I think it needs to be done. And I don't know, I had another catastrophe I was going to bring up, but I can't think of it right now. But um, I guess I am through.

Ian: Thanks so much for your comments and, uh, the time is now 5:41 if you could please state your name and dress for the record and well take your comments.

Lorie: Lorie Black is my name; I live at 2040 Cold Creek Road, Longview Washington. And I, I believe there should be a cleanup but not to the real excessive cleanup. You know I think

they should cleanup the site but it's um, it's the lowest the state wise, it's the lowest of the cleanup. 1 being low and 5 being high, its ranked at the lowest level so I think they should do cleanup, just not at, not excessive cleanup that ever, some people want, so that's all.

Ian: Time is now 5:45 if you could please state your name and address.

Trevor: Sure, my name is Trevor Simmons, I live at 1548 River Road in Longview.

Ian: you can go ahead and give your comments

Trevor: So, um, my comment is, having studies all the documentation and all the information that's available, I would a, I could see that it's been a very thorough process, the process that Ecology has followed, is the same process that's been successful in remediating a number of other uh, smelters, aluminum smelters, I have practiced saying that instead of aluminum (says it phonetic).

And uh, yet the process today has been very thorough, h it's been tried and tested and the outcome that's presented, option 4. is one that I would support. However from my reading the documentation, option 1, 2, 3 would also be satisfactory. However, option 4 is the one that is presented and I would support that. Um, I do not see the need to go to 5 or 6, and in fact, when you look at the graph, the benefit, the cost benefit of going with 5 and 6 shows that there's very little environmental benefit for a huge amount of cost that would, that that just is not necessary.

So, um, yeah I would support going ahead with option 4 but if you want to go with option 3 that would be okay too. Thank you.

Ian: the time is now 5:48 if you could please state your name and address for the record.

Dani: My name is Dani Maren-Oliver, 78 Blue Heron Drive, Longview Washington.

Ian: Ok, you can go head

Dani: Ok, My name is Dani Maren-Oliver and I am an RN, I am a resident of Longview Washington. It is imperative that the Department of Ecology holds Alcoa/Millennium responsible for the highest cleanup level, which is level 6, of the horribly dangerous contamination of the Reynolds site in Longview on the Columbia River.

If not. and any lesser level of cleanup is mandated, pollutants, e.g. highly elevated levels of fluoride, cyanide, polycyclic aromatic hydrocarbons, total petroleum, hydrocarbons in the soil and groundwater contaminants that also include fluoride, cyanide, and PAH's may well already be polluting our rivers, soil, and adjacent drinking water supply source. And will certainly gravitate more and more off the site leaching everywhere.

A cursory cleanup will only cap and cover, not eliminate, e these deadly to health toxins. This will not only adversely affect public health, but workers health, property values, and keep cleaner industries which, parenthesis, can provide a lot of jobs, close parenthesis, for moving onto the site. It will also Columbia, excuse me, it will also contaminate the Columbia River, its

fish and fishing, and other recreational activities that are important for social standards necessary for emotional health and attracting people to our area.

Certified contractors should oversee this immense project to make sure that the mandated standards are met, standards are met. We need to protect our public's present and future health and quality of life, not send it down the drain, literally. As well as industrial and it's workers and all of you from the EPA who live in or care about the area, thank you in advance for making the right decision.

Ian: The time is now 6:01, if you could please state your name , address and then begin your testimony that would be great.

Doris: ok, my name is Doris Disbrow at 1639 21st Ave in Longview. I don't understand how the numbers are assigned in each box on plate 11-1. These numbers are important because they are then multiplied by the value percentages for each of the, to reach the benefit score. It appears a 10 point scale was used, but it is not clear what is used to value each increment of change.

For example alternative 1 is given a score of 2 for protectiveness, and in the box for alternative 2 it states, quote, similar protectiveness to alternative 1. However, protectiveness is increased with enhanced soil cover and it's given a score of 5. What does the 3 point increase mean? Why isn't it 2 or a 4? It needs to provide consistent intervals through all alternatives so that it's less subjective, or at least it appears less subjective, when comparing one alternative to another.

Ian: the time is now 6:07 and if you could please state your name and address for the record and then start your comments.

Gilbert: My name is Gilbert Ratcliff and I reside here at Longview. And my comments are very simple, I just feel that industry needs to be responsible for any kind of activity they do in a community plus or minus. And there are many, many negative things that the industry has done to this area and I would like them to have to pay for the repair.

Ian: the time is now 6:10 if you could please state your name and address for the record.

Jeff: My name is Jeff Wilson and my address is 4723 Mount Solo Road, Longview Washington.

Ian: great if you would like to give your comments.

Jeff: Yeah, I'm basically here to support option number 4 which is predominately what I have been informed Ecology is too looking at., the cleanup option. And in doing so, but I want to make sure and go onto public records like I am doing here, Ian, and reminding everybody why I chose option number 4 was based on reasonableness not any prejudices towards one side or the other. This is an agreed cleanup, it is a killer awesome cleanup, it's a rare cleanup, it's not disputed, nobody is suing each other, it's not under enforcement, and not tax dollars are incorporated into this.

And because no tax dollars are incorporated into this, that's what makes the project feasible for option 4. Nobody has ever been requested to spend so much money under option 6 or other options. In fact the scoping of this is starting to get out of hand, this whole project is out of hand. This has been taken now all the way to the EIS impact statements to study impacts that have nothing to do with my backyard, nothing to do with my house, nothing to do with the existing permitting.

I believe Ecology needs to completely be reasonable and accommodate best management practices which will clearly show option 4 is what's called fair. There is plenty of hammers, if Ecology doesn't like this they can come in at any later time, change this, Northwest Alloys and Reynolds can't run, they can't hide, it's not going to happen. You have them in a place to work this out agreed. I am also encouraging Ecology to make sure that they tone it down, on being what I would say as a private citizen, excessive control. You can't, you can't enforce something that may have never been enforceable before. I know of no other private remediation project that has jumped to they immediately dig, haul, and remove.

Why I am against the most expensive option, isn't just the money aspect, and I think it is unfair. It's unfair because how dare you at Ecology ask to dig something up out of your backyard because that requires, that means you put it in somebody else's backyard. It moves it from point A to point B in fact you lose control under the most expensive option. And I want Ecology to maintain control, I want the contaminants kept onsite and remediated onsite, not removed off site.

With exception to the Columbia River you have to remove that contaminated soil at the Columbia River, and I believe that will be unanimous and undisputed in the remedial action.

Again, option 4 is the best option as far as I'm concerned. Ecology has to be fair across and set the standard at the existing standard, not increase the bar standard for future other what if's. I think that is it.

Ian: the time is now 6:20, please state your name and address

Elaine: Elaine Sharpe, 1609 22 Ave, Longview Washington. Ok, I do not feel that the summary of MTCA cost analysis for number 6 is the score for the benefit score is not high enough. I think it should be looked at again and I do believe that number 6 is what should take place, but I would settle for number 5 if I had to. But I do not think number 4 is enough to clean up and be responsible for. They made money they should clean up what they do, now someone just told me they don't have to do any of this at all so I don't know if that is true or not. But, I do believe that they should be responsible and do number 5, 6 preferably but number 5.

Also I just went online and when they cleaned at Troutdale they spent over 50 million dollars cleaning it up and they did it quite quickly. So my question is, if Millennium has already started work down there, how will Alcoa go in there and work. So I don't feel Millennium should be doing any more progress on their end until this is settled.

Ian: Record, the time is now 6:24, if you could please state your name and address for the record.

Susie: Ok, Susi Hulbert in Longview Washington and I have lived here about 40 years. And I wasn't aware of all the bad industry problems that we have here until recently, and um, now I am totally for it to be cleaned up to the highest ability it can. Because why just cover over a little bit, I think that our health depends on a healthy environment and if we don't have a healthy environment we're not going to have a healthy living. And I think the whole area is so beautiful.

And, I mean with the rivers and stuff but if the rivers start with toxic things in them, then we don't have the fish in them. Things leach out even though it's been there a long time. Ah, it needs to be cleaned up and now is the opportune time because this time the party that made the toxic waste will be responsible to clean it up and I think that we haven't done that as a country very much. It's always like, well we'll take tax payers money more so I think now they need, I mean I wish it would have been cleaned up when they left. But I wasn't aware and now I have learned so much from employees that have worked there. That know, oh they, they even took um, what do you call it, bids and put money in a pot to see how long that muskrat would last in the canal if there is a new muskrat.

You think a day, do you think half day, I was not aware of any other that, the toxic things. Or a man seeing a bird fly down into the, they called it the black lagoon but it was a pot like a little lake of water, water was black. And he said he saw the duck fly down, get in the water, and it just died. Just before his very eyes, so I mean to just leave it there is stupid. And so I think that we all deserve to have a good life. And that makes us responsible to see that we don't have any more industries because if that is cleaned up properly, we would be able to have a cleaner industry to come in that is healthy for everybody. The people who work there and the people that live in the whole environment, because it's not just Longview, it's the whole area across the river, it's west, it's east and um, you can't build on a toxic field, it's got to be cleaned up. So right now, I mean I wish it would have been 16 years ago but, just because it's been there a long time doesn't mean we should just leave it there.

That's my feeling. So I think it needs to be cleaned up so that then we need to make sure that all other things are cleaned up. And that's the responsibility of the whole community, state, whatever, that we have um, a healthy environment for everybody, animals, people. That's it.

Ian: The time is now 7:32 if you could state your name and address for the record.

Shirley: Shirley White, 3303 Olympia Way Longview Washington. What I happen to see 30 years ago, or so, on television, they were talking about Alzheimer's and showing the hot spot in the United state. There weren't hardly any on the west coast except one little place in Southwest Washington. The reporter said we don't know why there, but that is when the aluminum plant was still running.

Number two, other comment may or may not be pertaining to this, is the fact that when I went to high school I lived down on 27th Ave., and most a lot of my friends were down there, and the

ones that had been there since they were babies, shall we say, have had breast cancer and have since passed away. Now, they say that this happens everywhere, does it have anything pertaining to this or not, pollution is pollution whether it is in the ground or in the air or in the water. So, and that is not healthy. That's it.

Ian: The time is now 8:02 if you could please state your name and address for the record and then go ahead and launch into your comments.

Pat: I'm Pat Freiber, do you want me to spell that

Ian: No, I think um

Pat: and I reside in Vancouver, 40 minutes south of here. My address is 8327 NE 54th Street, Vancouver, 98662. Between 1985 and 1990 I worked in the Longview Kelso area as a vocational rehabilitation counselor. I met with injured workers, employers, and medical personnel. I loved the work, came to know some of the townspeople and businesses and I have a strong affection for some of this area.

Today, I am here to ask you to require a level 6 cleanup at the old Reynolds Aluminum site. Because of its location along the Columbia River, the high water table, the possibility of liquefaction during earth movements, and the nearness to the city water supply, nothing less than a thorough cleanup meets the needs of the Longview community.

There is no level of PHA's, mercury, fluoride, cyanide, arsenic, lead, or petroleum hydrocarbons that is acceptable in the groundwater, in the ground, in the water, or on the waterfront. At any level, the chemical cocktail at the old Reynolds Aluminum site impacts on the livability of the Longview citizens.

At level 4, as presented by DOE, the site would leave most contaminants in the soil in most areas but do a fair amount of capping. Capping contaminated soil is not cleaning it, it's covering it up. As reported in the 2012 Reynolds site feasibility study, the white mud ponds contains caustic sodium hydroxide, fluoride, and cyanide. The black mud ponds hold cyanide, fluoride, and PAH's. And you propose covering over these areas with more dirt to sort of seal it in.

In a worst case scenario, Longview is at or below sea level. The Reynolds site is subject to liquefaction and geologists tell us we're overdue for a massive earthquake in the Cascade subduction zone. The Lower Columbia River will surely be effected, likely causing it to slam back upstream and the pumps that prevent the contaminated Reynolds site groundwater from flowing into the River will likely fail.

All of these contaminants will slosh hither and along over Longview. Truly, level 4 cannot be called a cleanup. In all fairness nothing less than a level 6 cleanup meets the needs of this town. It must be conducted by a party certified to handle the chemicals involved and a party unaffiliated with Millennium Bulk Terminals or Northwest Alloys, Incorporated. Thank you very much.

Reynolds Metals Oral Testimony

July 16, 2014

Page 31 of 31

Ian: all testimony received at this hearing along with all written comments received by August 1, 2014 will be part of the official hearing record for these actions.

Let the record show that the listening station closed at 8:50 PM.

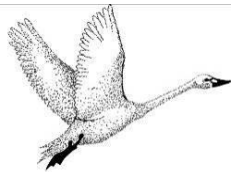
From: [C. Persons](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Comments on Reynolds RI/FS
Date: Friday, August 01, 2014 5:59:23 PM
Attachments: [Reynolds cleanup draft 2 .pdf](#)

Dear Mr. Barrett--

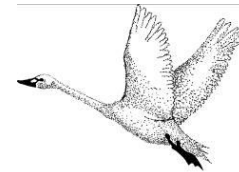
Attached please find comments from Willapa Hills Audubon Society on the draft RI/FS for the Reynolds Metals Cleanup. Thank you for the opportunity to comment on this matter, which is quite serious for our community. These are an extension, with more support, of the two-minute testimony that I gave on behalf our our organization at the public hearing on June 18, 2014.

Charlotte Persons
2409 Bloyd Street
Kelso, WA

(not the address of Willapa Hills Audubon Society)



Willapa Hills Audubon Society



August 1, 2014

Willapa Hills Audubon Society
P.O. Box 399
Longview, WA 98632

Guy Barrett
Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett:

Willapa Hills Audubon Society is a 300-member chapter of the National Audubon Society. For thirty-nine years we have worked in SW Washington for our mission to support ecologically responsible ways of life.

We ask that Department of Ecology clean up the former Reynolds Metals site permanently, at the highest level of the proposed alternatives, Alternative 6. We also ask that the sediments that are removed from the shores of the Columbia River as ordered by the Agreed Order No. 8940 amendment be taken to a safe landfill, not simply transported to an upland part of the Reynolds Metals site.

Ecological and Human Health Reasons to Choose Alternative 6

There are good reasons that Alternative 6 is rated 9 for protection and permanence. Firstly, removing all the contaminated soils off site is the only way to guarantee that future severe events will not cause these pollutants to be washed into the Columbia River. Those severe events include earthquake, sea level rise, floods and storms. While we hope that these severe events never occur in our region, we must plan for a future that includes the high probability that at least one of these events will occur in the next twenty to fifty years and that areas of the Reynolds site that are close to shore will cave into the river or will be washed away into the river.

Secondly, removing toxic soils, not leaving them in place, is the only way in the long term to be sure that groundwater containing toxins will not leach into ditches. This toxic drainage can affect marine life in the ditches, and eventually the human population living nearby. While the leaching of these chemicals into drainage ditches will continue for centuries, and the only way to shorten that time frame and lower concentrations of that drainage is to remove the toxic soils, not simply cap them. The RI/FS clearly states that only Alternative 6 allows groundwater to meet acceptable levels (Reynolds RI/FS section 8.5.3, page 230).

Economic Benefits of Preserving the Fishing Industry in the Lower Columbia River Estuary

The costs of Alternative 6 appear high, but they will seem low if we must clean up large quantities or concentrations of Reynolds site toxins washed into the Columbia River in a severe weather or seismic event. These toxins, as detailed in the RI/FS, include PAHs, arsenic, cadmium, chromium, naphthalene, PCBs, TPHs, dibenzofuran, carbazole, and fluorides. We cannot predict, of course, exactly which part of the Reynolds site might be affected by a severe event, and therefore in what concentrations or quantities such a severe event would transport these toxins into the Columbia River. However, we can be sure that a toxic spill from the Reynolds site would potentially harm or even eliminate fish stocks, including both endangered salmon and commercially and recreationally caught fish such as hatchery-bred salmon and other fish.

We could potentially lose all or most of the benefit of the billions of dollars spent to restore endangered salmon runs. In March 2011, the Washington State Salmon Recovery Office predicted that \$5.5 billion will be spent for salmon recovery in our state alone over the next ten years. These funds are spent for habitat restoration, water quality, in stream flow improvement, removing passage barriers, and so on (Funding). Imagine what the total sum for salmon recovery has been over the last eighty years in the entire Columbia River estuary, including Idaho and Oregon. Preserving these endangered species is a huge public investment.

Of course, a toxic spill from the Reynolds site would also affect hatchery salmon which are caught by recreational fishers. According to the Washington Department of Fish and Wildlife, there are 83 state-run salmon hatcheries, a capital cost investment of \$1 billion, and \$63.8 million is spent for those hatcheries each year (Hatcheries). However, Washington State reaps enormous economic benefits from these efforts to provide salmon that can be legally caught and consumed. Recreational fishers spend \$904.8 million in Washington State. Fifty-two percent of recreational fishing is for salmon and about 30% of fresh-water fishing. Commercial fishing also creates income for our state, \$65.1 million in ex-vessel value in 2008; more than half of the catch is salmon. A large part of these salmon come from the Columbia estuary (TCW).

The bottom line is that fishing creates millions of dollars in tourism, recreational expenditures, and commercial catch for our communities. If all the potentially lost benefits from endangered salmon recovery and fish stock preservation are included in the cost/benefit analysis for the clean-up, Alternative 6 is more than competitive with other alternatives. We ask that you re-consider the cost/benefit analysis to include these benefits to the Washington State economy.

Cultural Value of Fishing in the Lower Columbia Estuary

Beyond the economic value of fish for our state, fishing is also part of a long community tradition in the Lower Columbia River, a tradition that dates back to the first people who lived here. Native Americans and American settlers depended on fish for a large part of their diet. Today many families still eat a good deal of fish, both because of its wide availability and their enjoyment of fish as a traditional food. Just as important as the food value is the high regard that fishing has as a recreational tradition in our local culture. We want to see this tradition continued, not destroyed by a future spill of toxins into the Columbia River from the Reynolds site. The traditional value of fishing and the fish themselves, not just economic value, is why the public supports all the efforts and

cost to preserve fish stocks in the Columbia estuary. We ask that you include this cultural value as a benefit in your analysis of the different alternatives.

All inhabitants of the Lower Columbia estuary, both wildlife and humans, deserve a healthy river. By choosing the highest level of protection, level 6, the Department of Ecology can ensure that that we leave this legacy to future generations.

Sincerely,

Charlotte Persons
Conservation Co-chair
Willapa Hills Audubon Society

References

- Funding for Salmon Recovery in Washington State. Salmon Recovery Funding Board. Washington State, 2011
- “Hatcheries”. Washington Department of Fish and Wildlife. 2012. Web. 30 July 2014.
- Reynolds Metals Aluminum Smelter. Draft Remedial Investigation/Feasibility Study (RI/FS). Washington Department of Ecology. June 2014.
- TCW Economics. Economic analysis of the non-treaty commercial and recreational fisheries in Washington State. December 2008. Sacramento, California.

From: [Roy Staples](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Clean Up
Date: Friday, August 01, 2014 5:12:23 PM

The email address, guy.barrett@ecy.wa.gov was not working, so I am sending this email to this address.

Guy Barrett

Washington State Department of Ecology

Department of Ecology

Dear Mr. Barrett,

I am a member of the Kelso/Longview community and I'm writing to urge you to hold Alcoa to a LEVEL 6 cleanup, so that all toxic chemicals are relocated in a safe landfill away from the old site, away from the Columbia River, and away from our groundwater.

I've looked over the different cleanup alternatives in your document², and a BIG CONSIDERATION that is missing is what we leave our next generation, our children and grandchildren. It seems the six alternatives are unbalanced, with Levels 1 through 4 showing a gradual increase until levels 5 and 6. What we need are more levels between 5 and 6. As a result, offering level 4 seems more than a good deal for the community, when in fact, it is less money than Alcoa spent in its two other cleanups in Vancouver and Troutdale. What makes Longview - by far the worst site of these 3 - less deserving of cleanup money?

Only the LEVEL 6 cleanup described on page 29 of your executive summary comes close to a fully responsible cleanup:

- Offering future businesses with a clean site to build on without worrying about toxic wastes to expose its workers to;
- Offering our children the safe relocation of toxic wastes to an appropriate landfill.

The cost is high - \$344.4 million – but for Alcoa, a company with \$23 billion of revenue last year³ - this is very do-able.

This is the time to push for a complete cleanup. According to investors, Alcoa is “set to gain big profits⁴” in the coming years. Let us hold Alcoa to a complete cleanup now, while we have the chance. Let's leave a clean site, and a clean river for our children and grandchildren.

Sincerely,

Roy P. Staples

From: [Norm Hale](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Request
Date: Friday, August 01, 2014 5:07:40 PM

Please require the highest level of cleanup at this site. Specifically, the toxins should be removed from contact with the soils , ground and surface waters of the area. Past years of toxins stored or improperly disposed of have left a measurable amount of harmful substances on site that could pose ongoing problems for the health of the Columbia River, workers and residents of the area as well as the economic viability of the site as a future environmentally friendlier port site.
Thank you for your efforts in this important community goal.
Dave

August 1, 2014

Guy Barrett
Dept. of Ecology
Industrial Section
Reynoldscleanup.comments@ecy.wa.gov

Thanks to you and your staff for the clearly written study, the effort to provide an objective decision and for the open house and hearing, which were very well organized.

Comments on draft Remedial Investigation Feasibility Study (RIFS)

1. The Columbia River is the most valuable natural resource of Longview and the southwest Washington State. It has always been, and continues to be, a critical component of our agriculture, industrial production, transportation, sports, recreation, human and livestock water consumption, and aesthetic renewal. We are dependent on having the best quality of water from the Columbia River. Protection, restoration, and preservation of the quality of water is a fundamental goal. Money must not be the limiting factor to this goal! Therefore, Alternative 6 is the only appropriate option.
2. The selection of Alternative 4 is inappropriate because contaminants remain on site and the potential for natural disasters in the area is high. Earthquakes and floods are in the history of the area and a given for the future. The protective dikes are ninety years old and bound to decline. Leaving toxic elements on site, even though under “protective cover” of low-permeability caps, is inadequate protection of the River and the surrounding land. On page 286 of RI/FS the statement is made “Excavaed areas wthat contributed to groundwater cleanup level exceedances would be backfilled with reactive materials , POSSIBLY REDUCING THE TIMEFRAME (caps added for emphasis) to achieve groundwater cleanup levels. Furthermore in that same paragraph it states “As demonstrated...reductions in infiltration of 50-100 percent do not appear to appreciably improve groundwater quality; however, added protection MAY BE PROVIDED (caps added for emphasis) against migration of the fluoride plume toward the Columbia River...” These ambiguous statements indicate the inadequacy of this alternative! The River and the land were in no way responsible for the contamination! Toxic elements were put there and left there by the industry, and they should be removed by the industry.
3. Alternative 5. We are told on page 287 that Alternative 5 “provides no incremental benefit”. How can that be true when 164,000 cubic yards more of “impacted soil fill deposit and landfill materials are removed”, rather than being “consolidated and [REMAINING] ON SITE”? (Caps added for emphasis.) There certainly is a benefit to removing these materials; they won't remain there to be dislodged and distributed by future storms, floods and earthquakes! Why would they need to be treated if they are being removed? Treatment is only for undesirable materials that are retained! Current operations at the site are very limited; therefore little integration is needed with current operations. The contaminant removal is certainly “technically possible; the necessary off-site facilities” have been identified; scheduling and complexity excavating and removing off-site would be no more than scheduling for the excavating, moving and consolidating on-site for Alternative 4.

For the reasons above I believe protectiveness should be 9, permanence 10, 8 for long-term effectiveness, 7 for “slightly elevated” short-term risk, and 9 for implementability The

environmental benefit score would, therefore, be 8.125. Obviously the weighting provided in Plate 11-1 is very subjective and needs to be reviewed and explained.

4. Alternative 6. This alternative has the greatest protection for human health and River health. The toxics are GONE! They cannot be disturbed by any natural disaster because they are no longer present! As currently presented in column 1, the reduction for “temporary off-site risk” should not be included here as it belongs in, and currently is duplicated in column 4 (short-term risk management). Permanence cannot be any greater than removal. What could provide more “long-term effectiveness” (column 3) than removal? I agree with reducing the score for short-term risk (column 4), but I think the score should be 6 in comparison to Alternative 5. This is a very good example of the subjectivity in this very important table. Alternative 5 and 6 both remove and transport the toxic materials; the only difference is in the quantity.

Therefore I believe the appropriate scores should be 10 for protectiveness, 10 for permanence, 10 for long-term effectiveness, 6 for short-term risk, and 7 for implementability, giving an environmental benefit score of 8.65.

5. Cost-effectiveness analysis is certainly an appropriate tool for decision making. However, the weighting must be made much more objective! The weighting needs to be able to differentiate the degree of difference between the alternatives. What is the value of a 1 point reduction, or a 2 point increase. The earlier part of the RI/FS presents research and experience with the various methods of clean-up to allow more objectivity. Table 11-1
6. Plate 11-1 is very helpful in understanding the process of evaluating the effectiveness of each alternative by calculating an “Environmental Benefit Score”. But “Technical and Administrative Implementability” have nothing to do with determining environmental benefit. How work is scheduled and organized is a management process and has nothing to do with resulting human health or the environment. I wholeheartedly agree with the choice of the other four categories making up this score and suggest the administrative weight be dropped to zero and the remaining four be recalculated.

Thank you again for helping Longview and Southwest Washington achieve the greatest benefit of clean-up from the mess that was left. Thank goodness, too, for improved environmental laws and regulations!

Sincerely,

Doris Disbrow, DrPH
Very Concerned Resident

From: [vj](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comments
Date: Friday, August 01, 2014 3:44:58 PM

Reynolds Site Cleanup Comments:

1. Until you have contacted those who worked for Reynolds, you are not finished with your "Site Discovery and Investigation" yet. It is the understanding of some that Hazardous Material dumping occurred in areas that you have not indicated. A thorough site grid sampling protocol may be in order on ALL properties and parcels owned and/or operated by Reynolds at the time in that area.
2. Tidal action from the Columbia River directly affects the level of the water under the surface beyond the borders of the Reynolds site. The Army Corps of Engineers can attest to this if you need data. That together with future Earthquake, Temblor, or Rodent activity of various specie could easily cause any "in place" remedy such as capping or barrier material to FAIL.
3. Those of us who live downstream of the site have to live with what is done there. "Aquatic Life" is not the only life using and swimming in the Columbia River.
4. For the above reasons, maximum remedies are required. Because you don't live in the impact zone, don't short those who do. We didn't make the mess. Don't expect us to live with a partial measure remedy, what you feel is sufficient. Expect us to live with the best remedy that can be done bar none. Not for a particular price but regardless of price. Benefit / Cost ratios are irrelevant when it comes to safety or you eventually get toxic overload and cannot escape from it.

Sincerely,
Vance Fraser
POB 1443
Clatskanie OR 97016

From: [Wilund, Josh D.](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Alcoa public comment
Date: Friday, August 01, 2014 2:42:35 PM

Public comment submitted for Alcoa, thanks Guy.

With the draft clean-up study out for public review, the former Reynolds Longview Plant remediation has reached a major milestone. This clean-up is important environmentally and economically, which is why Northwest Alloys, a wholly owned subsidiary of Alcoa, and Millennium Bulk Terminals Longview, voluntarily entered into a formal agreement with Washington Department of Ecology (Ecology).

Under the direct oversight of Ecology, the site has been thoroughly analyzed to characterize impacts from Reynolds' operations, which ceased in 2001. The comprehensive process involved over 18,000 chemical measurements of soil, surface water, groundwater and sediment along with additional testing to support clean-up alternatives. The thorough scientific study ensures that conditions at the site are fully understood.

Results of the years of testing have shown that despite its long history of use, the site has been well managed. The main clean-up issues to be addressed at the former Reynolds Longview Plant are managing residual carbon deposits in soil, and ensuring that the low levels of fluoride present at the site remain contained and decrease over time.

Clean-up alternative #4 has been identified as the preferred alternative. It meets all of the requirements of our State's clean-up regulations (MTCA), and provides additional measures to optimize protectiveness and permanence. Washington's clean-up rules are some of the most stringent in the nation and ensure that the final clean-up will be protective for future generations. Alternative #4 provides a protective clean-up that allows the property to be reused to its full potential as an industrial port site, consistent with the community's land use planning framework.

Alternative #4 uses clean-up methods that have been proven successful at other sites, including those with higher levels of contamination such as the former smelter sites in Vancouver, and Troutdale. Both of those were cleaned-up successfully and have been put back into productive use. We were awarded the US Environmental Protection Agency's 2011 Phoenix Award Grand Prize for our role in the Troutdale site brownfield redevelopment.

Alternative #4 protects the environment, human health and the community. It includes expedited action in the river, extensive excavations and removal, consolidation and capping of the materials in designated containment areas, and water treatment and monitoring systems. The clean-up activities proposed within Alternative #4 work and are compatible with continued productive use of the property, and we understand that's why Ecology supports Alternative #4.

Alternative #4 includes long-term monitoring and Ecology remedy review to ensure that clean-up

levels continue to be met. It also includes deed restrictions to ensure that constructed elements of the clean-up are not removed or damaged by future property owners. The preferred alternative ensures that controls and ongoing monitoring are in place to allow the safe reuse of the property. Institutional controls and monitoring are a regular part of Ecology and EPA clean-up actions, and they are an integral part of all clean-up alternatives for the site. The presence of institutional controls and monitoring have not at all hindered the successful reuse of the Troutdale or Vancouver sites, which are both successfully being reused for port and industrial purposes.

Alternative #4 goes well beyond the level of work necessary to ensure the clean-up is protective and the site owners have committed to implement the clean-up as soon as final approvals are obtained. We recognize the value of protecting the environment and generating jobs. The Company has a track record of implementing high quality clean-ups and returning properties to safe and productive use. Industrial properties like the former Reynolds Longview Plant are critical to the health of our working waterfront, which remains the economic engine for our region. It's time to wrap-up the study and start working on the clean-up of the former Reynolds Longview Plant.

Josh Wilund • Manager, US State Government Affairs

Alcoa • Government Affairs

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www.alcoa.com

From: [Lauren Goldberg](#)
To: [Toteff, Sally \(ECY\)](#); [Barrett, Guy E. \(ECY\)](#); [Schriever, Garin \(ECY\)](#)
Subject: Public Comment on Reynolds Longview RI FS and Agreed Order Amendment
Date: Friday, August 01, 2014 1:16:40 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[2014.8.1 Columbia Riverkeeper et al Reynolds Longview RI FS Comment.pdf](#)

Good afternoon,

On behalf of Columbia Riverkeeper, Sierra Club, and Landowners and Citizens for a Safe Community, I am submitting the attached comment on the draft RI/FS and Agreed Order amendment for the former Reynolds Reduction Plant, Longview.

Riverkeeper appreciates Ecology's efforts to kick-start cleanup at the site after years of delay. Riverkeeper also appreciates Ecology's efforts to collaborate and improve public engagement on this important cleanup action.

I would greatly appreciate if you could confirm receipt of this comment.

Thank you,

Lauren



Lauren Goldberg | Staff Attorney
Columbia Riverkeeper | 111 Third St. Hood River, OR 97031
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August 1, 2014

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Submitted Via Email

RE: Public Comment on Draft Remedial Investigation and Feasibility Study and Agreed Order Amendment No. 8940 for the Former Reynolds Aluminum Plant, Longview, WA.

Dear Ms. Toteff, Mr. Schrieve, and Mr. Barrett,

Columbia Riverkeeper, Sierra Club, and Landowners and Citizens for a Safe Community (collectively "Riverkeeper") submit the following comments on the Washington Department of Ecology's (Ecology) Draft Remedial Investigation and Feasibility Study (draft RI/FS) for the former Reynolds Metals Reduction Plant in Longview, Washington (the Site). Anchor Environmental QEA, LLC submitted the draft RI/FS on behalf of Northwest Alloys, a subsidiary of Alcoa (collectively "Alcoa") and Millennium Bulk Terminals, LLC, a subsidiary of Ambre Energy (collectively "Ambre"). Riverkeeper's comments also address draft Agreed Order Amendment No. 8940, which proposes a rapid response action to address contaminated river sediment near an outfall, Outfall 002A, which discharges to the Columbia River.

The Site is heavily contaminated by decades of aluminum smelting operations and, most recently, years of mismanagement by Chinook Ventures, Inc. (Chinook Ventures). The Site is currently a hazardous waste site under Washington State's Model Toxics Control Act (MTCA), Cleanup Site ID No. 2497. Known pollution at the Site includes soil, water, and above-ground

building contamination. The major chemicals of concern (COCs) identified to date include cyanide, fluoride, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPHs). Draft RI/FS at 45. Fluoride is the principal COC for groundwater. *Id.* at 209.

Groundwater contamination is well-documented at the Site. For most of the Site, groundwater flows from the Columbia River north to the Consolidated Diking Improvement District (CDID) ditches. As the groundwater flows from the river, it passes through soil contamination, moving pollution toward the CDID ditches. The CDID ditches discharge directly to the Columbia River through a pump system. In addition, the CDID ditches are not enclosed, and therefore wildlife and fish have direct contact with this man-made tributary to the Columbia. In the southernmost portions of the Site, groundwater gradients are at times toward the Columbia River. Draft RI/FS at 211.

Commenters Interest in Protective Cleanup

Columbia Riverkeeper, Sierra Club, and Landowners and Citizens for a Safe Community have a significant interest in a protective, timely cleanup of the Site.

Columbia Riverkeeper is a 501(c)(3) non-profit organization incorporated in Washington State. Riverkeeper's mission is to protect and restore the water quality and habitat of the Columbia River, from its headwaters to the Pacific Ocean. Riverkeeper has over 7,000 members and volunteers who reside in Washington and Oregon. Many of Riverkeeper's members live, work, and/or recreate near and downstream of the Site.

Sierra Club is a nonprofit corporation incorporated in California, with more than 600,000 members nationwide, nearly 23,000 of whom reside in Washington. The Sierra Club is dedicated to exploring, enjoying, and protecting the wild places of the Earth; to practicing and promoting the responsible use of the Earth's resources and ecosystems; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives.

Landowners and Citizens for a Safe Community is a Washington State non-profit corporation based in Cowlitz County. The mission of Landowners and Citizens for a Safe Community is to strengthen the environmental, social and economic health of our community. The organization currently has 2,000 members. Columbia Riverkeeper, Sierra Club, and Landowners and Citizens for a Safe Community have a strong interest in Ecology's oversight of the Site based on concerns about pollution at the Site and its potential impacts on public health, fish and wildlife, and the Columbia River.

Commenters join other organizations and citizens in urging Ecology to adopt the most protective cleanup alternative for the Site. Ecology's July 16, 2014, public hearing on the draft RI/FS drew a large crowd of concerned citizens. At the hearing, the public delivered a consistent message: Alternative 4, which leaves behind groundwater and soil pollution, is not adequate to protect the citizens of Longview and people who use the Columbia River. For the reasons

explained below, Riverkeeper requests that Ecology scrutinize the draft RI/FS, reject Alcoa and Ambre's assumptions and conclusions about the costs and benefits of cleanup alternatives, and select Alternative 6, which calls for the most comprehensive cleanup.

Background on Site Ownership & Management

Decades of aluminum smelting left a legacy of heavily contaminated groundwater and soil at the Site. For nearly sixty years, the Reynolds Metals Company operated an aluminum smelter on the 436 acre property. The Site contained two aluminum plants: one constructed during World War II, and a second constructed in the 1960s. Alcoa purchased Reynolds Metals in 2000.¹ In January 2001, Alcoa sold most of the fixed assets and improvements to Longview Aluminum, LLC. Reynolds retained ownership of the real estate.

Since 2003, property ownership and management has been in flux. In March 2003, Longview Aluminum, LLC declared bankruptcy. Shortly thereafter in December 2004, Chinook Ventures purchased Longview Aluminum's assets during bankruptcy proceedings. In September 2005, Alcoa transferred its interest in the property to Northwest Alloys, a subsidiary of Alcoa.

Chinook Ventures operated the site from 2004 to January 2011. During its tenure, Chinook Ventures violated federal and state laws and faced government and citizen enforcement actions, including Clean Water Act citizen suits by Columbia Riverkeeper and Landowners and Citizens for a Safe Community. Chinook Ventures operated a dry storage and bulk import/export terminal, which included unpermitted outdoor storage of petroleum coke. Chinook Ventures also engaged in demolition actions, including demolishing portions of the smelter buildings, removing spent potliner, and shipping spent potliner off-site. Among other actions, Chinook Ventures discovered, but failed to report promptly, a previously undocumented black mud deposit located within a forested wetland.

Overall, the draft RI/FS contains a very limited discussion of Chinook Ventures' tenure at the site and associated record of mismanagement and pollution. This is discussed in greater detail below.

In January 2011, Millennium—an Australian company owned by Ambre Energy—purchased the facility with plans to operate one of the largest coal export terminals in the nation. Ambre's plans were quickly stymied by its untruthful representations to state officials and the public about the size of its highly controversial coal export terminal. Since that time, Ambre launched a public relations campaign to paint itself as the "white knight" of cleanup. In truth, Ambre has **no experience** cleaning up hazardous waste sites, let alone one of the most contaminated sites on the Lower Columbia River.

Today, the future of the Site is unclear. Alcoa continues to import alumina through the site, which is then transported to its Wenatchee, Washington, smelter. Ambre also imports coal

¹ See Agreed Order NO. DE 4263.

that is transferred to a neighboring site. In late 2010, Ambre applied for county land use permits to operate a 5 million ton per year coal export terminal. Ambre later withdrew its permit application following revelations that Ambre failed to provide accurate information to state and county officials about the coal terminal's size. Documents disclosed during legal proceedings revealed that Ambre planned to operate a 20 to 60 million ton per year coal export terminal. As Ecology is well aware, Ambre's coal export proposal faces unprecedented opposition from political leaders, Tribes, non-governmental organizations, and citizens across the Pacific Northwest.

Ecology Should Hire an Independent Contractor to Review and/or Develop an Alternative RI/FS

In a letter dated January 31, 2012, Columbia Riverkeeper urged Ecology to hire an independent contractor to develop a draft RI/FS. Columbia Riverkeeper's letter stated:

Under the 2007 Agreed Order, Ecology had the option of hiring a contractor, with Northwest Alloys and Chinook Ventures footing the bill. The department never took advantage of this provision. The 2012 Agreed Order also allows for contractor reimbursements. Moving forward, Ecology should hire a contractor, based at the cleanup site, to ensure that Millennium—a recently formed Limited Liability Company with absolutely no cleanup experience—does not become another Chinook Ventures. By hiring a contractor, Ecology can also ensure the timely review, revision, and approval of future sampling actions, the RI/FS, and cleanup action plan.

Although the Ecology's Agreed Order provides for Alcoa and Ambre to pay for an independent contractor, Ecology did not do so. It is unclear why Ecology made this decision. Reading the draft RI/FS, the consequence of Ecology's decision is crystal clear: the absence of an independent contractor-prepared draft RI/FS undercuts the efficacy of the cleanup process.

Question: How does it benefit the public and long-term cleanup to have the Potentially Liable Parties (PLPs), who stand to benefit financially by recommending less stringent cleanup requirements, develop the RI/FS?

Question: Why did Ecology choose not to hire an independent contractor with expertise in aluminum smelter cleanups to develop the RI/FS and bill Ambre and Alcoa for this expense?

Question: Was the contractor hired by the Ambre and Alcoa, Anchor QEA, also a contractor to Chinook Ventures, which was fined multiple times and sued in federal court for environmental infractions?

Ecology's threshold decision not to hire an independent contractor calls into question many of the findings and recommendations in the draft RI/FS. This is discussed in greater detail below.

By failing to hire an independent contractor to develop or review the RI/FS, Ecology has shifted the cost from the corporate entities responsible for pollution cleanup to the general public. This is bad public policy. The state's environmental regulators should not expect individual citizens in Longview to pay for a third-party contractor to review a draft RI/FS of this scope and complexity. Similarly, non-profit organizations should not bear the cost of hiring independent contractors to review over a thousand pages of analytical reports and technical documents when Ecology had the legal right to require that PLPs pay for an independent contractor answerable to Ecology.

Riverkeeper urges Ecology to reconsider its decision not to hire a third-party contractor to develop a new and/or analyze scrupulously the draft RI/FS.

The RI/FS Fails to Incorporate Lessons Learned from Aluminum Cleanup Sites

The Site is one of the last decommissioned aluminum smelters in the Northwest to undergo a comprehensive cleanup process. The unfortunate delay in developing an RI/FS for the Site, however, can result in an improved final remedy: Ecology can use lessons learned from other aluminum smelters in the region to develop and select the most protective alternative.

Alcoa and Ambre acknowledge the importance of learning from other aluminum smelter cleanups while, at the same time, failing to analyze other cleanup actions in the draft RI/FS. The only discussion of so-called "lessons learned" is contained in the following passage from the draft RI/FS:

Many former aluminum smelter sites have been cleaned up in the United States and worldwide; Alcoa has performed similar cleanups at two former aluminum smelters in Washington and Oregon, as well as a facility still in operation in Ferndale and various cleanup in the United States, some currently in progress. Therefore, there is a wealth of experience from similar facilities that can be applied to determine the best cleanup approach at this site. Because the COCs are similar at aluminum smelter sites and because byproducts from the manufacturing process were typically deposited on site in large volumes, remedial technologies applied to the cleanup of former aluminum smelters are well understood. On-site containment of residual carbon, spent lime, and construction debris is typically a component of cleanup at these sites because the materials are not very toxic, and containment technologies are effective in eliminating exposure to potential receptors and preventing migration of COCs. However, there are site-specific factors that must be considered in the cleanup of any site, including hydrogeology, geochemistry, physical setting, potential exposures, and receptors.

Draft RI/FS at 241. Alcoa and Ambre's passing reference to the value of learning from other aluminum plant cleanup actions—absent any additional discussion or technical analysis—is a significant shortcoming in the draft RI/FS.

At a minimum, Riverkeeper urges Ecology to evaluate other aluminum smelter cleanup actions on the Columbia River, which include the former Evergreen site in Vancouver, Washington, the former Martin Marietta site in The Dalles, Oregon, and the former Reynolds site in Troutdale, Oregon. These aluminum smelter cleanup sites offer invaluable information that can inform the final RI/FS and Cleanup Action Plan for the Site.

Of particular value to Ecology are the EPA Five Year Reviews and other cleanup action reviews assessing the effectiveness of selected remedies at other cleanup sites. For example, in 2012 EPA released the Fourth Five Year Review for the former Martin Marietta site in The Dalles, Oregon. The Review states that “EPA cannot make a determination that the remedy is functioning as intended,” describes EPA’s concerns groundwater conditions, questions the effectiveness of the biological treatment of cyanide, and expresses concern about whether the engineering controls (including constructed soil covers and access-restrictive fencing) are protective. EPA notes that, as described in previous five-year review reports for the site, diminished quantities of leachate and diminished levels of hazardous constituents were not observed as anticipated. *See* Lockheed Martin Fourth Five Year Review at 9 (2012). In 2013 EPA completed the Second Five Year Review for the former Reynolds aluminum smelter in Troutdale, Oregon. Like the aluminum smelter cleanup in The Dalles, the Troutdale smelter cleanup involves many of the same COCs as the former Longview smelter. *See* Second Five Year Review at 11 (2013) (“Contaminants included fluoride, PAHs, cyanide, metals and PCBs.”). Unlike the draft RI/FS, which does not evaluate groundwater pump-and-treat as part of the alternatives analysis, the Troutdale site operates pump-and-treat systems to remove fluoride. The use of pump-and-treat at a former aluminum smelter located along the Columbia River calls into question Alcoa and Ambre’s decision to remove pump-and-treat technologies from the alternatives analysis early in the RI/FS. *See* Draft RI/FS at 257.

Riverkeeper urges Ecology to review other aluminum smelter cleanup actions and incorporate applicable lessons learned into the draft RI/FS.

Riverkeeper Supports Alternative 6

Alternative 6 offers the most comprehensive approach to soil and groundwater contamination at the site. Alternative 6 requires aggressive removal and offsite disposal of contaminated soils, sediment removal, some reliance on natural attenuation, and institutional controls. In particular, Alternative 6 expands the use of removal and off-site disposal to soils and fill materials from SU1 and SU2 (Fill Deposit B-3 and Landfill #2), SU6 (Fill Deposit B-1), and SU7 (Fill Deposit A). This alternative also calls for adding a permeable reactive barrier to the northwest corner of the site to reduce that area’s groundwater restoration timeframe. Under Alternative 6, Alcoa and Ambre must manage the sediments removed from the area around Outfall 002A (SU-12) by off-site disposal. Alternative 6 also calls for the same long-term monitoring and institutional controls called for under less protective alternatives.

Under MTCA, Ecology must consider public concerns as it evaluates cleanup alternatives. Based on the testimony at the July 16th public hearing and comments on the draft

RI/FS, Riverkeeper urges Ecology to select Alternative 6. The public support for Alternative 6 is overwhelming. Moreover, Alcoa and Ambre's draft RI/FS presents a flawed Disproportionate Cost Analysis that stacks the decks against Alternative 6. These flaws are discussed in detail below.

Remedial Alternative Disproportionate Cost Analysis

Ecology has the authority under WAC 173-340-360(3)(e)(ii)(C) to use its best professional judgment in comparing the benefits and costs of cleanup alternatives. Riverkeeper urges Ecology to scrutinize the quantitative values Alcoa and Ambre assign in their Disproportionate Cost Analysis and exercise best professional judgment. Based on this analysis, Riverkeeper urges Ecology to reject Alcoa and Ambre's recommendation of Alternative 4.

Overall, the lack of a third-party author or reviewer calls into question the quantitative scoring and qualitative analysis disclosed in Alcoa and Ambre's Disproportionate Cost Analysis. The draft RI/FS concludes that the disproportionate cost of Alternative 6 does not outweigh its disproportionate benefit. Alcoa and Ambre reach this conclusion based on a series of qualitative conclusions and quantitative assumptions. Riverkeeper urges Ecology to develop an independent Disproportionate Cost Analysis to inform its final decision. Riverkeeper provides comments on the five components of the Disproportionate Cost Analysis below.

Protectiveness. Riverkeeper questions the protectiveness values Alcoa and Ambre assign to Alternatives 2, 3, and 4, for the following reasons: (1) these values—5, 6, and 7.5, respectively—are not supported by the draft RI/FS narrative description of protectiveness, (2) the values are based on Alcoa and Ambre's conclusion that contamination will not migrate which should—at a minimum—be reviewed by a third-party, and (3) the values fail to account for lessons learned from other aluminum smelter cleanup sites. For example, Alcoa and Ambre assign a protectiveness value of 2 to Alternative 1. For Alternative 2, the protectiveness value jumps to 5. This four point increase is not warranted given Alcoa and Ambre's statement that “[w]ith respect to groundwater and surface water, Alternative 2 provides a similar level of protectiveness to Alternative 1.” Draft RI/FS at 285. Because all values are relative to other alternatives, the initial leap from 2 to 5 skews the protectiveness values assigned to later alternatives, including the recommended alternative, Alternative 4.

Permanence. The quantitative rankings Alcoa and Ambre's assign to the permanence of each cleanup alternative, *see* Plate 11-1, are not supported by the narrative description contained in the draft RI/FS at pages 289 – 90. Specifically, Alcoa and Ambre assign a quantitative value of 8 to Alternative 4 and a quantitative value of 9 to Alternative 6. It is entirely unclear how Alcoa and Ambre can claim a one-point difference between the permanence afforded by Alternative 4—keeping waste on-site—in comparison to Alternative 6—moving waste off-site to a Subtitle C landfill. In particular, a permanence value of 8 for Alternative 4 is not supported by the narrative description of Alternative 4, which retains waste onsite in close proximity to the Columbia River and the CDID ditches.

Long-Term Effectiveness. The quantitative rankings Alcoa and Ambre’s assign to the long-term effectiveness of each cleanup alternative, *see* Plate 11-1, is not supported by the narrative description contained in the draft RI/FS at page 290. The draft RI/FS states: “Based on the fate and transport modeling that demonstrates suitable conditions exist to essentially arrest the elevated fluoride concentrations in time and space for hundreds, if not thousands of years, long-term effectiveness of each alternative will not be a concern.” Draft RI/FS at 290. This statement is not supported by earlier statements on the long-term effectiveness of Alternative 6 in comparison to other alternatives. In particular, the draft RI/FS states:

This alternative [Alternative 6] provides a high degree of long-term effectiveness through the removal of all impacted soil and fill deposit and landfill materials from the site and increased residual groundwater treatment in SU2 (Fill Deposit B-3). Low residual risk is expected to remain on site after construction; however, natural attenuation of site groundwater will likely still be required to achieve cleanup levels at the standard POC since fluorite that has precipitated in groundwater beneath sources [sic] areas will buffer dissolved fluoride concentrations for a very long time.

Draft RI/FS at 292. Alcoa and Ambre’s narrative description of the long-term effectiveness of Alternative 6 does not square with the close ranking it assigns to Alternative 4 (a long-term effectiveness ranking of 7.5) in Plate 11-1.

Short-Term Risk Management. Alcoa and Ambre’s Disproportionate Cost Analysis also provides an unsupported quantitative ranking of 4 to the Short Term Risk Management under Alternative 6. Plate 11-1 states:

This alternative has the greatest risks to human health and the environment relative to other alternatives due to the largest volume of material to be excavated and transported off-site. In addition, groundwater treatment (primarily backfill and reactive agent) will be the most wide spread under this alternative. As such, the assigned value is lower than the previous alternative.

At no point in the draft RI/FS is the marked drop in the Short Term Risk Management value explained adequately.

Question: Does Ecology agree with Alcoa and Ambre’s short-term risk management value of 4 for Alternative 6 given the information provided in the RI/FS regarding risks from excavating contaminated soils?

Question: Is a Short Term Risk Management value of 4 consistent with short term risk management values associated with excavating materials from former aluminum plant sites?

Question: Did Ecology verify independently that there is not a hazardous waste disposal landfill capable of accepting waste from the Site that is in closer proximity than the proposed landfill?

Technical and Administrative Implementability. Alcoa and Ambre’s Disproportionate Cost Analysis assigns a numeric value of 5 to the “Technical and Administrative Implementability” of Alternative 6, stating:

This alternative relies on excavating and hauling source material off-site and, as such is a relatively simple alternative. However, the greatest schedule and logistical challenges exist for this alternative to minimize impacts to current operations. This alternative would also require several months to construct.

Draft RI/FS at Plate 11-1. Alcoa and Ambre’s quantitative value is not supported by the facts on the ground: (1) Ambre has not started operating a coal export terminal, (2) if Ambre is able to obtain state and federal authorizations to operate a coal export terminal, those authorizations are likely years away, and (3) in the interim, Ambre’s current operations at the site (aside from its much touted cleanup work) are minimal (*i.e.*, alumina and coal import).

Comments on Agreed Order Amendment No. 8940

Riverkeeper supports Ecology’s proposal to require that Alcoa and Ambre remove contaminated sediments in a small area of the Columbia River near Outfall 002A. Chemical analysis of sediments at the site revealed one location near Outfall 002A where PAHs exceeded screening levels. Near Outfall 002A, a localized area of sediments represented by sample Station SS-09 exceeded bioassay performance standards. Draft Agreed Order Amendment No. 9040 requires dredging of up to 5,000 cubic yards of contaminated sediments. The draft Agreed Order Amendment does not address disposal of the contaminated sediments.

Question: Why did Ecology elect not to specify the disposal location in the proposed Agreed Order Amendment?

The draft RI/FS contains limited explanation for the transport pathway of contaminated sediments near Outfall 002. During the public meeting and in a phone conversations with Riverkeeper’s Staff Attorney, Ecology explained its belief that operations during the Chinook Ventures era caused the contaminated sediment at Outfall 002A.

Question: Is Ecology considering adding Chinook Ventures as a PLP in an amended Agreed Order?

Question: Has Ecology investigated what actions it could have taken to prevent sediment contamination or discover sediment contamination sooner?

Conclusion

Riverkeeper appreciates the opportunity to comment on the draft RI/FS and Agreed Order amendment. Riverkeeper also appreciates Ecology's efforts to respond to public calls to jumpstart the cleanup process after years of delay. Ecology's recent actions, including setting new deadlines for the parties to submit work plans, proposing a new Agreed Order adding the new site operator as a party, the RI/FS timeline, and updating the website with the most current information on cleanup developments, reflects a new commitment by the agency to address historic contamination at the Site. Riverkeeper encourages Ecology to hold Alcoa and Ambre accountable for meeting cleanup milestones and complying with the Agreed Order.

Riverkeeper looks forward to continued opportunities for public understanding and input about this important and complex Lower Columbia River cleanup. Please direct any questions to the undersigned at (541) 965 – 0985 or lauren@columbiariverkeeper.org.

Sincerely,



Lauren Goldberg
Staff Attorney
Columbia Riverkeeper

cc:

Matt Niles, Washington Department of Natural Resources
Shayne Cothorn, Washington Department of Natural Resources

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #15
Date: Friday, August 01, 2014 1:02:05 PM

Dear Mr. Barrett,

Please accept my below comment.

Areas for additional testing

Several Reynolds retirees have stated that in the South Plant (pot rooms) during the reduction process chemicals were released. Because the building was completed in 1941, it was not constructed with enclosed floor/foundations as was built in the more modern North Plant. Contaminants such as fluoride and cryolite leaked under the floors of the South Plant. Since demolition of the South Plant is presently taking place, this would be an opportune time for Ecology to request additional testing of soil and groundwater in this area.

Thank you for your consideration.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: jgreen2317@aol.com
To: [Barrett, Guy E. \(ECY\); ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment, Draft RI/FS
Date: Friday, August 01, 2014 11:47:08 AM

**Guy Barrett
Washington State Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600**

Dear Mr. Barrett,

Thank you for the opportunity to comment.

Since eight percent of the Alcoa/Millennium site is comprised of the 33 acre closed Black Mud Pond, which contains many hazardous pollutants, it would be extremely beneficial for our community to remove these toxic soils from the site. The agreement to cap this area was done before present laws were in effect (MTCA revised 2007) and should be removed along with the other contaminated soils on the property. This would benefit the citizens of Longview and Cowlitz County both financially and from a health standpoint. So in addition to an Alternative 6 cleanup, I would request that the 33 acre closed Black Mud Pond be removed.

Thank you.

**Regards,
John Green
1318 25th Avenue
Longview, Washington**

From: jgreen2317@aol.com
To: [Barrett, Guy E. \(ECY\); ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup, Comment on Draft RI/FS
Date: Friday, August 01, 2014 11:16:32 AM

Guy Barrett
Washington State Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett,

Thank you for the opportunity to comment.

Regards,
Margaret Green
1318 25th Avenue
Longview, Washington

Disproportionate Cost Benefit Analysis

1) Weighting of Criteria

Since the percentage weight of importance for each criteria seems to be subjective, I am unsure how public concern will be considered and integrated into the final benefit score. Please explain.

2. Comparative Benefit Scoring of the Alternatives

Since the scoring is subjective, I went through an exercise giving my lay opinion on the scores for each criterion in an effort to see how this would impact the outcome. I provide this exercise and the reasoning below.

Protectiveness:

RI/FS Scoring	Alt. 4 – 7.5	Alt. 5 – 8	Alt. 6 – 9
My Scoring	Alt. 4 – 7.5	Alt. 5 – 8.5	Alt. 6 – 9.5

For Alt. 5, the installing of Permeable Reactive Barriers (PRBs) at the NE fill sites, offers a much greater level of protection than Alt. 4, due to source control and destruction of fluoride. (This PRB interrupts the ditch-water pathway, further reducing potential off-site risk) Additionally, the removal of 13 more acres of contaminated soil addresses other contaminants. Alternative 6 addresses all other contaminants as well, by removal of an additional 30.6-acre volume(above that of Alt. 5) of contaminated soil to offsite landfills.

Permanence:

RI/FS Scoring	Alt. 4 – 8	Alt. 5 – 8	Alt. 6 – 9
My Scoring	Alt. 4 – 6	Alt 5 – 7	Alt. 6 – 9.5

In the RI/FS, I could not find research on future conditions including potential risks from seismic activity and instability at the site. Only Alt 6 achieves adequate and predictable permanence. Because most contaminated soils are left on site for Alt 4, I dropped its score by 2 points. The RI/FS scoring shows no incremental benefit, between 4 and 5. However I rated Alt. 5 higher because more soil, 13 acres, is moved to an off site landfill and the fluoride is destroyed as it moves through the PRB placed at the NE fill sites. Alt. 6 receives my highest score because the removal of all contaminated soil and the backfills in most of the fill sites make this remediation nearly irreversible, quite different from the other two alternatives. MTCA advises a higher degree of permanence for reducing toxicity, mobility and volume over containment. Containment is the major method of remediation for Alternative 4 and for 2/3 of the soil in Alternative 5.

Long-term Effectiveness:

RI/FS Scoring	Alt. 4 – 7.5	Alt. 5 – 8	Alt. 6 – 9
My scoring	Alt. 4 - 6	Alt. 5 - 7	Alt. 6 – 9.5

Again, the future site conditions are not being considered. This has a great impact on the certainty for success for these alternatives. With the inevitability of a large seismic event and potential for soil liquefaction, there is no certainty, except for the total removal of contaminated soils in Alt. 6. The magnitude of residual risk with the Alt 4 or Alt. 5 plans is very great both on and off site. The reduction of the concentration of fluoride is expected to take 2000 years when it still remains 10 times greater than acceptable levels. The extensive use of permeable soil caps for these two alternatives is not an effective control for managing remaining substances.

Short-term Risk:

RI/FS Scoring	Alt. 4 – 7.5	Alt. 5 – 6	Alt. 6 – 4
My scoring	Alt. 4 – 7.5	Alt. 5 - 6	Alt. 6 – 4

The RI/FS says that the technologies for all Alternatives are known and commonly used and that experienced contractors are available. I would assume that containment of these materials for travel to a landfill and handling at the landfill site would be predictable. The RI/FS (table 11.1) Alt 4 narrative states: “It assumed that the risks could be easily mitigated with standard construction soil tracking and erosion control best management practices.” Narrative for Alt 5 states “This alternative has slightly elevated risks . . . but overall potential risks. . . are still not substantial.” . Alt 5 is 1.5 points below Alt 4 and the same amount of material is being moved. It makes no sense to me that the scores for Alternatives 5 and 6 are dropped so dramatically. It appears that the scoring does not reflect the narratives provided. That said, I will still use the recommended scoring for my test model, though I believe it unfairly skews the scoring for the better alternatives, downward.

Implementability:

RI/FS Scoring	Alt. 4 – 8	Alt. 5 – 7	Alt. 6 – 5
My Scoring	Alt. 4 - 8	Alt. 5 - 7	Alt. 6 – 9

RI/FS page 293 states best management practices for all Alternatives are easy to

implement and have been used before. Even the narrative for Alt. 6 states this “is a relatively simple alternative.” The main concern for Alt. 5 and Alt. 6 is the construction time frame “(several months)” and the impact on current operations. Since the proposed project for this site is most likely years away and current operations are minimal, “several months” should not create a problem. This narrative does not support such a low score for Implementability. Also, MTCA says a longer time frame is acceptable to achieve a greater degree of long-term effectiveness.

The composite benefit scores can be compared:

Alternative 4: RI/FS 7.7	My Score 6.9
Alternative 5: RI/FS 7.7	My Score 7.35
Alternative 6: RI/FS 7.9	My Score 8.875

Summary:

This exercise was done to show how a subjective determination with a ½ - 1 point difference here or there can significantly skew the outcome. This observation makes this concerned citizen feel powerless to impact that final outcome. So, though, I am extremely appreciative for the opportunity to participate in the public process and have done so to my best ability, I am frustrated a bit by it all. I would ask that the entire Disproportionate Cost/Benefit analysis be reevaluated, preferably by an independent consultant.

From: jgreen2317@aol.com
To: [Barrett, Guy E. \(ECY\)](mailto:Barrett.Guy.E.(ECY))
Subject: Fwd: Comments
Date: Friday, August 01, 2014 10:26:08 AM

Resend, due to confusion on email address:

Guy Barrett
Washington State Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett,
Thank you for the opportunity to comment.

From: jgreen2317@aol.com
To: reynoldscleanup.comments@ecy.wa.gov
Sent: 7/30/2014 5:09:59 P.M. Pacific Daylight Time
Subj: Comments

Comment from:
Margaret Green
1318 25th Avenue
Longview, WA

[1986 Incident of potential toxic leakage as reported in The Longview Daily News \(now known as The Daily News\) on July 18, 1986.](#) (attached)

Cows and assorted fish and wildlife, were found dead near the CDID ditch along Memorial Park Drive. This is one of the ditches that abuts the northern property line. Minimal testing was done on the property north of SR432 and in the ditch sediments on these perimeters. Although this incident was nearly 30 years ago, and autopsies and water testing were not conducted due to delay in reporting, it was anecdotally connected to toxic migration from the site. I believe this news release exhibits enough uncertainty of site conditions to warrant additional testing of ditches and soils. Retired Reynolds' employees talk of dumping on this side of SR432. This news report also may offer evidence of the potential migration of ground water, carrying contaminants, into CDID ditches further from the actual production facility, which could become a serious concern for the community.

Dead cows spur concerns about ditches

The demise of several cows left to graze near a West Longview drainage ditch has raised concern about the quality of water controlled by the county's diking districts, officials said Thursday at a Cowlitz-Wahkiakum Board of Health meeting.

The cattle, as well as assorted fish and wildlife, died a few weeks ago at the ditch that runs along Memorial Park Drive, said Bill Harper, environmental health director for the Cowlitz-Wahkiakum Health District.

Because no autopsies were done on the animals, he said, it isn't known whether they drank polluted ditch water. The state Department of Ecology, which is responsible for policing water quality, did not do a toxic analysis of the ditch water, Harper said.

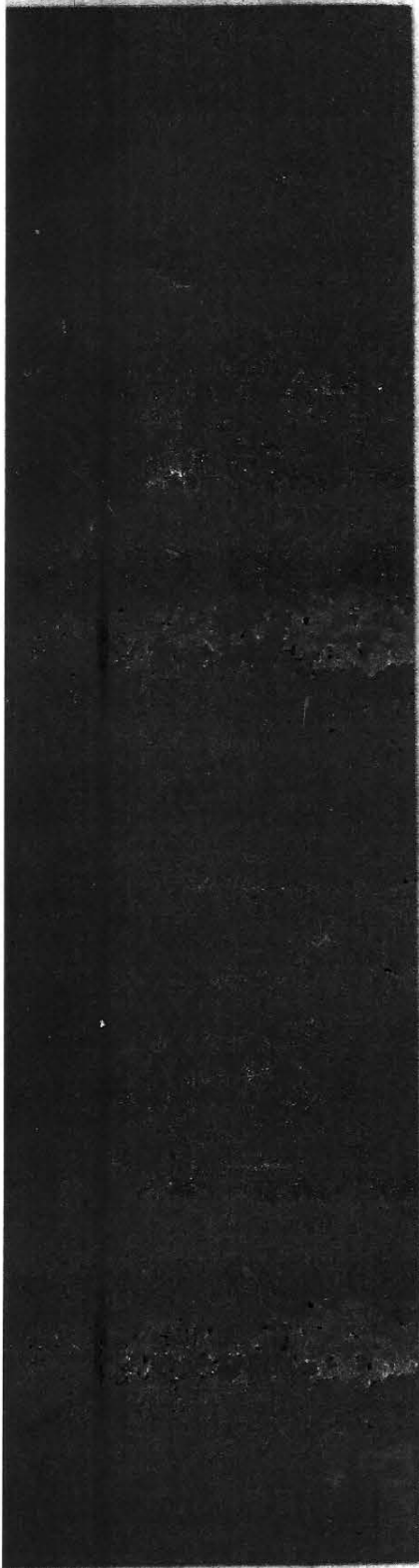
Board of Health members were dismayed by the report and the potential threat to public health.

"One thing that disturbs me is the number of small youngsters who play in and around those ditches," said Cowlitz County Commissioner Van Youngquist.

At Thursday's meeting, Stephen L. Wozny, attorney for Consolidated Diking Improvement District No. 1, called for technical assistance and intergovernmental cooperation in identifying and alleviating any pollution problems in the district's ditches. CDID No. 1 controls 35 miles of open ditches that drain Longview and West Kelso storm sewers and discharge into the Cowlitz and Columbia rivers.

Brett Betts, a DOE inspector, said no autopsies were done on the dead cows because the owner had already disposed of them when the DOE was notified of the incident. Betts said the water wasn't analyzed for toxicity because the farmer had not collected an adequate sample and because too much time had elapsed before his agency received the report.

CDID No. 1 supervisors will discuss the issue at their next meeting at 1:30 p.m. July 29 at Longview City Hall.



Daily News photo by Gail Hinds

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July 31, 2014

Guy Barrett
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
guy.barrett@ecy.wa.gov

Dear Mr. Barrett:

Thank you for the opportunity to comment on the draft Remedial Investigation/Feasibility Study, and draft sediment remediation interim action, for the Reynolds Metals site near Longview. Although the Washington Public Ports Association has no direct interest in this MTCA cleanup, we are commenting in order to support the choice of a remedy option that aligns with key cleanup policies that our state's port districts were instrumental in developing when they were added to MTCA in 1994. Those requirements relate to the use of industrial cleanup standards at industrial sites, along with other changes to the law designed to facilitate and expedite the cleanup and return of contaminated industrial lands to productive use.

WPPA worked to craft policies that move "brownfields" cleanups and projects forward before that term even came into the lexicon. The 1994 amendments to MTCA, which were enacted through ESSB 6123, were prompted by concerns that requirements related to the recently enacted MTCA statute would push commercial and industrial development onto undeveloped property. I have attached the House Bill Report, which gives some additional background.

Among the changes to MTCA brought about by ESSB 6123 was a requirement that Ecology allow the use of industrial cleanup standards at industrial properties, provided those properties would remain industrial and the cleanup would not create problems on adjoining non-industrial properties. This sensible approach ensured that Ecology would allow liable parties to address cleanup in a fashion that would be protective but not needlessly costly. It also gave those crafting cleanup plans a much greater opportunity to design the cleanup in a fashion that dovetails with future industrial site uses. This is critical for Washington's ports, as waterfront properties were where the first industrial development occurred and almost always need remediation of some kind before they can be re-developed for port purposes.

In reviewing the proposed cleanup plan for the former Reynolds Metals site in Longview, we were pleased to note that ESSB 6123 appears to still be working, 20 years later. The proposed cleanup alternative uses industrial cleanup standards for this industrial site, and strikes a good balance between the on-site consolidation and off-site removal of waste materials. In particular, the beneficial re-use at the site of sediments to be dredged from the Columbia River as part of the sediment cleanup interim action provides a win/win/win solution that cleans up the aquatic portion of the site, aids in the capping of consolidated upland waste materials, and helps prepare the site for future re-use. Because sediment cleanup standards are much more stringent than

upland soil cleanup standards, sediments that must be removed from the aquatic environment can often be safely and effectively used as a component of an upland industrial facility cleanup. The alternative of hauling away the dredged sandy sediments to a commercial landfill and bringing back in freshly-quarried sand for the first layer of the cleanup cap is exactly the kind of approach we need to avoid if we want shoreline industrial property owners such as public ports to continue their efforts to clean up and redevelop industrial properties.

We understand that Ecology has received a great many public comments on this site's RI/FS asking for a "full" cleanup involving the removal of all contaminated materials from the property at a cost of over \$300 million. One of the rationales given for why such an extraordinary cleanup should be required is, ironically enough, that a full cleanup is needed to support future property re-use. We are confident that you will not take this approach to an otherwise-unremarkable shoreline industrial property cleanup. In the most trade-dependent state in the country, the ability of ports and other industrial shoreline property owners to quickly and efficiently address contamination issues, and move under-utilized properties forward towards economically beneficial uses, is absolutely critical. This fact, along with the requirements added to MTCA by ESSB 6123, appears to be lost on those asking Ecology to require a cleanup with an unprecedented and unwarranted scope. Rather than supporting property re-use, moving away from a sensible approach to shoreline industrial property remediation would result in precisely the ills ESSB 6123 was enacted to prevent -- more pressure on undeveloped land while existing industrial properties languish as underutilized eyesores.

Instead of bowing to public pressure to require a cleanup that can only be described as punitive, we encourage Ecology to stay true to MTCA and its underlying policies. The preferred cleanup alternative will provide a comprehensive, protective remedy that will support further industrial activity. A thorough cleanup is needed, of course, and that is exactly what Ecology has proposed in the draft RI/FS and the sediment interim action. It is now time to move ahead with the cleanup as proposed.

Thank you for the opportunity to provide comments on the Reynolds Metals site RI/FS.

Very truly yours,

From: [Orionhp](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Comment on the planned Alcoa/Reynolds draft clean up plan
Date: Friday, August 01, 2014 6:54:45 AM

I support option 4 of the clean up plan. I believe the option balances the environment while being cost effective. The small amounts of contaminants to be left on the site will be isolated and controlled to prevent the material from entering the environment. I have been a member of the community advisory board for the Alcoa/Reynolds clean up and have been very happy with the involvement by Ecology at the meetings. I understand based on answers to my questions that the materials to be left on the site are not highly toxic and are of minimal risk for causing damage to human health or the environment.

Thank you for this opportunity to make a comment

Regards

Tom Meek
6923 Willow Grove Rd
Longview, WA 98632
360-636-3137

From: [Louis LaPierre](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, July 31, 2014 11:59:01 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

At the July 16 hearing in Kelso, WA, The Anchor OEA scientist, Mark Larsen, said something like "fluoride, like in toothpaste" in a tone as if implying that fluoride is harmless and of little concern. His statement was false and misleading. What else in their report is similarly false?

The list of the contaminants found at the Reynolds site that exceed either MTCA (Model Toxics Control Act) levels or WAC (Washington Code) levels is long and diverse AND fluoride is among them.

Levels of fluoride in your toothpaste are harmless -- although children should not ingest even those levels -- but the levels found at the Reynolds site are THOUSANDS of times higher than in toothpaste.

Please critically review the Remedial Investigation/Feasibility Study produced by Anchor OEA and determine if any other blatantly false or misleading statements are made.

Louis LaPierre
2833
Nichols Blvd.
Longview, WA 98632
3604312386

From: [Louis LaPierre](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, July 31, 2014 11:46:54 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

As a college instructor of environmental science, I hear from students frequently that they are concerned about the pollution in air, water, and buried in the soil of Longview and adjacent industrial areas. Specifically, the high levels of pollutants at the former Reynolds property is well known among my students. The general sentiment among my students is one of little hope that much will ever change. PLEASE PROVE THEM WRONG!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a CERTIFIED landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Louis LaPierre
2833
Nichols Blvd.
Longview, WA 98632
3604312386

From: [Pamela Wright](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, July 31, 2014 5:41:19 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

I have worked as an environmental consultant for more than ten years. I think it should be non-negotiable that a certified contractor oversees the cleanup of the Reynolds site, and that the contractor be responsible to the Department of Ecology, NOT Alcoa or Millennium. It's impossible to prevent a conflict of interest if those cleaning up are accountable to those paying the bill.

Further, the site needs to be cleaned up so that it can be used for the highest and best use. Consideration must be given to the site location on a major river that supports threatened endangered species. Also the potential for global climate change to shift precipitation patterns, and potentially increase flooding along the river, require that the Department act with the utmost caution in cleanup standards. We are seeing unexpected weather events with increased frequency; it is not acceptable to be "surprised" by a larger than historically typical event that results in pollution contaminating our river, food supply and communities.

Finally, the economically disadvantaged community in the immediate vicinity of the site (both in Longview, the County and downstream) must be protected from landowners who would dodge full responsibility for a thorough cleanup based on the assumption that much of the community is so impoverished as to not care/know better/have any energy or time to complain. Environmental justice concerns must be thoroughly explored given the community at risk from an incident on this site.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Pamela Wright
2833 Nichols Blvd
Longview, WA 98632

From: ddick@cni.net
To: [Barrett, Guy E. \(ECY\); ECY RE Reynolds Cleanup Comments](#)
Subject: Former Reynolds Metals Aluminum Smelter (Northwest Alloys and Millennium Bulk Terminals) Draft Remedial Investigation/Feasibility Study Formal Comments
Date: Thursday, July 31, 2014 4:58:34 PM

July 31, 2014

Guy Barrett
Washington State Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett,

Re: Former Reynolds Metals Aluminum Smelter (Northwest Alloys and Millennium Bulk Terminals) Draft Remedial Investigation/Feasibility Study Formal Comments

Alternative 6 should be the chosen plan for the cleanup of the former Reynolds Metals Reduction Plant in Longview, Washington. The lesser levels of cleanup in the other plans do not provide as much protectiveness, permanence, or long-term effectiveness as that provided in Alternative 6. Considering the past and current uses of the property, there is no reason to believe short-term risk management and implementability cannot be satisfactorily managed under Alternative 6. Public concern has been demonstrated to support the most thorough cleanup plan available.

While the law requires cleanup actions use the most permanent solutions to the maximum extent practicable, Alternative 4 would leave all toxic materials on site, except for a half acre of the more than 40 acres, not including the BMP . None of the on-site locations have been shown to meet the specifications of a certified landfill for toxic waste. Per the draft RI/FS, all the impacted media are suitable for dry or wet excavation. Excavation and off-site removal is an effective remediation and is implementable.

On-site management plans of the toxic wastes do not take into consideration the hydrogeological instability of the site. This site is in a known hazard area for high intensity earthquakes. The soil structure places it in a high risk for liquefaction during such earthquakes. The site is on the shores of a biologically diverse river of high water quality behind a ninety-year old levee. It is drained by a man-made ditch system dependent on constantly maintained pumps which then discharge groundwater back into the river.

All of the fill deposits in the East Groundwater Area, about half of the site areas, are in contact with or sit beneath groundwater elevations at least seasonally. This is the current situation with the CDID and levee system operational. The depth of Site Unit 6 is not even known. What the RI/FS does not consider in this miserable situation is the reasonable expectation that sea level rise will cause the Columbia River to rise in this area at least two feet and probably three feet by the end of the century by Department of Ecology's own conservative estimates and NOAA sea level rise mapping. This will certainly affect groundwater levels at the site, even without factoring in possible effects from surface water changes.

The only permanent, protective, and effective long-term solution to the management of toxic wastes is to completely remove them to a certified landfill not subject to the climatic

and geologic hazards of the Reynolds property. All of the site units are subject to hydrogeological hazards and all should be excavated and removed off-site. The closed black mud pond should also be reevaluated for excavation and removal.

As to the management of short-term risks and implementability, Alcoa has already shown they are capable technically, administratively, and financially by their track record of cleaning up other toxic waste sites, including at Vancouver and Troutdale, Oregon. Millennium has shown itself capable of maintaining operations while at the same time conducting current cleanup efforts, including removing 200,000 tons of material, by their own estimates. Millennium's continued demolition on major portions of the property speaks to their commitment to cleanup and their ability to manage large volumes of waste material. Considering most of the former Reynolds property sat virtually unused for over a decade, some of it never used and undeveloped, a short restoration timeframe should be of minimal significance. Indeed, now, while demolition and clearing of the property is proceeding, would be a perfect time and opportunity to accomplish a high standard of remediation.

Public concern for the most thorough cleanup plan has been strong and consistent. It was public concern that moved the process along after years of inactivity. Citizens have diligently participated in the Community Advisory Board and through meetings between Department of Ecology and Landowners and Citizens for a Safe Community. At the recent Department of Ecology hearing over 30 citizens gave oral testimony and all requested the highest level of cleanup, Alternative 6.

While the former Reynolds Metals Reduction Plant property was in the past used and abused by heavy industry, the current use, despite zoning, of most of the surrounding area continues to be wetlands, agriculture, or vacant and undeveloped. The aquifer under the site is shared with the drinking water aquifer of the community. The ditches draining the site run through residential areas. That which affects the Columbia River affects all of us who live in this region. We have an opportunity to do the right thing, to clean up a toxic mess. We should do it in the best way we know how. Alternative 6 is not the perfect cleanup plan, but it is a plan we can accomplish with no regrets.

Yours truly,

Diane L. Dick
13 St. Helens Lane
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #14
Date: Thursday, July 31, 2014 4:40:18 PM

Dear Mr. Barrett:

Thank you to the Dept. of Ecology, to Garin, Guy, James and Kim for all your assistance in answering my unending questions about the cleanup process in Longview. You all have taken so much time to lend your expertise in this very complex process. It is very much appreciated. I found this to be very difficult to review, especially, for someone who is new to the MTCA rules and requirements for industry. You all have shown true professionalism

and patience.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Rd
Longview, WA 98632

KELSO LONGVIEW CHAMBER OF COMMERCE

July 31, 2014

Guy Barrett
Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
e-mail: guy.barrett@ecy.wa.gov
Fax: (360) 407-6102

Comments submitted with respect to the proposed actions for the Reynolds Metals cleanup site

The Kelso Longview Chamber of Commerce is aware of the Remedial Investigation/Feasibility Study of the Reynolds Aluminum Facility and opportunity for public comment. The Longview Daily News published a letter on July 27, 2014 (below) from elected officials representing this area and we confirm that the views expressed in that letter are an accurate reflection of the sentiments of this Chamber.

Accordingly, the Kelso/Longview Chamber of Commerce recommends adoption of Option 4 as the preferred alternative of the Washington State Department of Ecology for the environmental cleanup of the Reynolds Facility.

Sincerely



William G. Marcum
CEO
Kelso/Longview Chamber of Commerce
105 Minor Rd
Kelso, WA 98626
bmarcum@kelsolongviewchamber.org

July 27 Letters to the Editor

Six legislators on board

Cleaning up the old Reynolds site is important to all of us. That's why we have closely monitored the plans and activities for clean-up of this site, and two of us regularly participated in the meetings of Northwest Alloys' Longview Community Advisory Board for the past two years. With that background, we offer support and recommend the decision to move forward with clean-up Option No. 4, the scientifically backed blend of technologies proposed by the Department of Ecology, Northwest Alloys (an Alcoa subsidiary) and Millennium Bult Terminals. Ecology has worked diligently to assess this site and we feel the science, environmental protection and economics of this alternative are a benefit to all involved.

The liable companies have voluntarily committed to the clean-up and agreed to Option 4, with an estimated cost of nearly \$28 million. This preferred alternative in the draft feasibility study has a high degree of permanence and is protective of the environment and our community. It includes redundant protective technologies that have proven effective at many other sites, such as Vancouver, and will re-establish this industrial site as part of a healthy industrial port area that Cowlitz County and this trade-dependent state desperately needs.

Further, by removing certain wastes, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, the preferred clean-up alternative protects the environment, human health and surrounding life, and strikes an appropriate and reasonable balance within the range of remediation alternative technologies.

This is an industrial property and should be treated accordingly. It will be cleaned up to all levels required under Ecology's MTCA regulations and by Cowlitz County land use requirements.

State Sen. Brian Hatfield

State Sen. John Braun

State Rep. Dean Takko

State Rep. Ed Orcutt

State Rep. Brian Blake

State Rep. Richard DeBolt

From: jgreen2317@aol.com
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comment
Date: Thursday, July 31, 2014 2:35:55 PM

Comment from:

John Green
1318 25th Avenue
Longview, WA

If the Department of Ecology cannot accept Alternative 6 for the Reynolds site, then I would propose the following action:

The old fill areas and all the pollution scattered throughout the property should be consolidated into one site atop the 33 acre closed black mud pond. This would allow the citizens of Cowlitz County to have less encumbered land (by deed restriction) and thus more tax dollars. Possibly this would allow more land to be used for economic development and job creation.

From: jgreen2317@aol.com
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comment
Date: Thursday, July 31, 2014 2:32:00 PM

Comment from:

John Green
1318 25th Avenue
Longview, WA

The Cowlitz County Assessor's office devalued the Reynolds/Alcoa/Millennium site by \$12,000,000 for the 2014 tax year. This has resulted in loss of real estate tax dollars for the county and its citizens. The reason given for this devaluation was that the property is polluted. The result of loss of tax income for the county is layoffs and reductions in services for its citizens.

By adopting Alternative 4, we are not cleaning up the property, but rather consolidating the toxins into fewer locations on site. This ensures that property values will remain low and result in deed restrictions and pollution on site.

This sends a message to corporations that pollution pays because it reduces your property taxes. Is this the message the Department of Ecology wants to send to communities in 2014?

Because of deed restrictions, potential employment at the property will be less as well.

Option 6 is the best for our community and our state.

From: [Jeffrey Washburn](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Millennium
Date: Thursday, July 31, 2014 2:08:46 PM

July 28, 2014

Dept of Ecology
Industrial Section
[P.O. Box 47600](#)
[Olympia, WA 98504-7600](#)

To: Guy Barrett

I write to you on behalf of hundreds of our members who live and work in Cowlitz County. Please consider this a formal comment on the Draft Remedial Investigation/Feasibility Study for the former Reynolds Metals property.

A healthy community is a priority for the Building Trades and Construction of Kelso/Longview. This contaminated site is in our backyard and its cleanup creates an opportunity for more jobs in and around Longview.

I believe the preferred alternative (number 4) put forward in the draft Feasibility Study is protective of the environment and our community. It includes redundant protective measures and technologies that have proven effective at other sites of former smelters along the Columbia River.

By removing certain wastes, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, Ecology has developed a preferred cleanup alternative that strikes an appropriate balance between cost and further removal of contaminated materials consistent with its MTCA Rules.

While some in our community want to politicize this process because of their dislike of coal, please keep in mind that this site is an industrial property.

I ask that you allow the best science and common sense to win out and protect our community by choosing alternative 4. We look forward to building whatever comes next for this site.

Sincerely,

Jeff Washburn
President
Building and Construction Trades Kelso/Longview

Jeff Washburn
Business Agent
UA Local26- Western Washington

Sent from my iPhone

From: [Michael Wallin](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: comments for Draft Remedial Investigation/Feasibility Study of Reynolds Metals Site
Date: Thursday, July 31, 2014 10:33:43 AM
Importance: High

July 31, 2014

Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

To: Guy Barrett

The citizens in Longview and Cowlitz County have been waiting for a generation to have the former Reynolds Metals site cleaned up and put back to work. As a millennial who grew up in this area, I know the importance of jobs and economic growth all too well.

This letter should be regarded as a comment on the Draft Remedial Investigation/Feasibility Study of that site.

Ecology's preferred alternative put forward in the draft Feasibility Study is most importantly protective of the environment and our community, which is important to us all. Its redundant protective measures and technologies have been proven effective at other sites of former smelters in the Northwest.

By removing certain wastes, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, Ecology has developed a preferred cleanup alternative that strikes an appropriate balance between cost and further removal of contaminated materials consistent with its MTCA Rules. This balance is key to clean up and putting Longview residents back to work.

As a Longview City Councilmember and small business owner in Longview, I am pleased that this process is finally moving forward and it is my hope that the Department of Ecology focuses on science and not politics. This process should have nothing to do with coal, but Clean Up!

Please keep in mind that this site is an industrial property and I am looking forward to an expanded working waterfront in our community.

Thank you for your consideration

Sincerely,

Mike Wallin

Comments Re: Reynolds Metals Cleanup

Submitted to: Department of Ecology

July 31, 2014

Mr. Guy Barrett

Thank you for the opportunity to submit comments regarding the proposed clean up of the former Reynolds Metals Longview Reduction site. I worked for Reynolds from 1967 to retirement and now work at the site as a consultant.

In general I support the chosen FS MTCA preferred alternative which is Alternative 4. Alternative 4 is in fact overly protective. Some of the requirements in Alternative 4 are not necessary to provide adequate environmental and health protection. However is Northwest Alloys and Millennium are in agreement to fund A4 the local citizens should be supportive.

I do not believe that moving wastes from “one hole in the ground to another hole in the ground” is wise. Many of the wastes on site have been there for decades; moving these wastes off site makes no sense and is a waste of monetary resources. Consolidation and/or providing a protective cover do make sense and will protect the environment.

I like the idea of permeable reactive barriers for groundwater treatment. The fluoride levels in most of the groundwater on the site are below treatability. The plant has operated a groundwater treatment plant. This facility targets fluoride; thus the plant has experience treating and removing fluoride. Additional “pump and treat” would be a waste of time because the removal efficiency would be very low. Permeable reactive barriers will capture fluoride in place and in my opinion are worthwhile.

Dredging in the river will take place. The 5000 cubic yards that will be removed will more than take care of the contamination in the sediments. It is unnecessary to take this material to an off-site landfill. Testing of the dredged material will likely show extremely low levels of contamination and should meet MTCA and HW requirements.

This clean up could be precedent setting. Ecology needs to encourage voluntary clean up such as this one. Other industrial facilities in the state will be watching. Longview has at least three industries near the former Reynolds plant, Weyerhaeuser, Longview Fibre, and the Port of Longview. These facilities will not propose clean up under MTCA if Ecology chooses to require expensive and unnecessary actions.

In summary, Alternative 4 provides more than adequate environmental and health protection. Additional actions such as those in Alternative 6 are unnecessary and would discourage future clean up activity from other industries in the state.

Thank you for allowing me to comment,

Tom Dickey

3133 Wildwood Drive

Longview, WA 98632

From: tedine@comcast.net
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds cleanup
Date: Wednesday, July 30, 2014 8:47:04 PM

To: Guy Barrett, Dept. of Ecology, WA
From: Tedine Roos, Vancouver, WA
Date: July 30, 2014

e presentation in Longview July 16 was very informative. The options for clean up were clearly explained and the reasoning for Alternative 4 also. However, I disagree that this is a satisfactory decision for the following reasons.

1. The capping alternative may be satisfactory in a situation on flat land in the Midwest say. Rain or flood water ponds and settles into the ground leaving the cap intact. The water moves vertically through the cap. This is not the case on a river. The Reynolds site is not only on a river but it is on a tidal river. In the event of an extreme weather event, now ever more likely, the cap would be subject to water washing horizontally over the cap. This cap would not stay in place and the entire lower Columbia river would be contaminated.

2. This entire area is a high earthquake region. Earthquake means shaking and a permeable cap and permeable barrier would not be exempt from this shaking.

Alternative 6 is the only acceptable cleanup choice.

From: [Gary Lindstrom](#)
To: [Barrett, Guy E. \(ECY\)](#)
Cc: [Ross Macfarlane](#)
Subject: Reynolds Clean UP - Amended
Date: Wednesday, July 30, 2014 7:52:26 PM

Hello Guy,

I am resending my "public comment" of July 29 for two reasons. One, my LTE was published in today's The Daily News Viewpoint section titled "Taking the high road." Secondly in the body of my comment I meant to say "elected officials" and not "public servants" as elected county and state officials as well as the newspaper made their comments public in the local newspaper. I would like to have the record reflect these changes. Thank you.

Amended from Gary Lindstrom email of July 29, 2014

The following letter from me to the editor (LTE) of The Daily News reflects my view and vision for the Reynolds "clean up". This letter titled "Taking the high road" was published today. The position of the newspaper and **elected officials** aside, there is a large number of people in our community who believe that level 5 and or 6 should be advocated for the future of this land and its ensuing marketability and vitality for the community and the State of Washington.

LTE

Dear Editor,

"It is our land, not disconnected, not only Alcoa's property. The land belongs to our community and to those connected along the Columbia. Alcoa is a property owner and they agree as they should to clean up the property and the material in the river. We do not have to set a limitation or a dollar value. This 540 acres is an economic powerhouse and everyone knows it. This land along the mighty Columbia River with a deep water berth is an amazing economic opportunity for heavy and more probably light industrial development. This vision can be fully explored if the earth and water is cleaned up and made marketably ready. The timeframe to return the property clean comes but once and that time is now. Let's work hard to insist Ecology and Alcoa take the high road and bring this exhausted earth back to a state as nearly clean as the aluminum industry found it in the 40's. This land is sacred to us and the river. Alcoa should fully clean up the property and return the land to the community via the Port of Longview for future development." GWL

While this comment period is noted to be not a time to comment on coal, understandable, I can't help but feel the underlying link, like undertow, although I also believe that the permit process for Millennium and coal is separate and under intense review by your department.

I see a different vision for the use of the land and its future ownership, or lessee.

In the case of Evergreen (Vanalco) in Vancouver, much of the property was taken over by the Port of Vancouver. In the case of Alcoa in Troutdale, the property went to the Port of Portland. I believe that the Kaiser facility in Tacoma went to the Port of Tacoma. In my view, and as the former Director of Marketing for the Port of Longview, for 17 years and retired in 2008, the Alcoa property and its future should be handled, similarly, by the Port of Longview as a public steward for this land, use and economic development, not only for this community but also for the State of Washington and the communities along the Columbia River.

I can understand that Alcoa is an important employer and economic driver for the State of Washington with two active mills at Wenatchee and Ferndale. The alumina comes through the old Reynolds bulk unloading system and into storage where it is later transported to the two Alcoa production facilities. This the Port can maintain services.

Thank you for allowing the Public comment period, for the hearing opportunity at the Red Lion and the information process provided by the department. It is most appreciated and I'm sure that much input has been received. This property has an important role to play in the future economy of Cowlitz County and the State of Washington and I believe that it will best serve us all if we can get to level 5 or best option 6 for clean up. Thank you again.

Gary Lindstrom
1403 18th Ave.
Longview, WA 98632
Owner, Lindship Maritime Services
Cargo Surveyor
[360-431-8653](tel:360-431-8653)

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LINDSHIP Maritime Services
1403 18th Ave.
Longview, WA 98632
360-431-8653
lindship@gmail.com
www.lindship.com

From: [Ann Mottet](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Option 6
Date: Wednesday, July 30, 2014 7:44:06 PM

Hi, I just realized the comment period ends tomorrow and wanted to share my opinion before I miss the chance. I am a 61 year old woman who was born here in Cowlitz County and who continues to live here. I love my community and my life here.

It is mandatory that no corners be cut in this clean up. There is no reason I can conceive for anything less than returning the land to the same cleanliness level prior to Reynolds/Alcoa using it to turn handsome profits. We should not be left with their dirty mess.

I would never dream of polluting my land and not cleaning it up when I was finished. Just walk away and leave the hazard and filth for the citizens and flora and fauna that remain? On what planet, in what neighborhood is that acceptable? It simply is not.

I was taught in my family and as a Girl Scout growing up that you always leave your campsite in better condition than you found it. That's what should apply to this toxic manufacturing site, too. They should have to clean it completely and do habitat restoration and take it to as near the pristine river site it was before they polluted, and dumped and exploited the land and waters as is possible. Anything less is unacceptable and unfair to those of us who choose to live and work and play and raise our families here. There should be no question.

There should be only one standard. God trusted us to be stewards of and to live in this paradise. We must get it right this time. Thanks for listening to me. Force them to do the moral and the just thing: clean it all up, at least to level 6. More, actually.

Ann Mottet
1329 19th Ave
Longview WA 98632
360 355-4696
anncmottet@msn.com

From: jgreen2317@aol.com
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comments
Date: Wednesday, July 30, 2014 5:46:27 PM

Comments from:
Margaret Green
1318 25th Avenue
Longview, WA

Site Characterization and Future Conditions

The RI/FS gave extensive explanations of site soil characteristics and hydrology, but I could find no discussion of seismic conditions and soil liquefaction, both of which should be considered in order to support the Permanence and Long-term Effectiveness of the remediation technologies being proposed. Since MTCA requires that future conditions be considered, this is a major omission in the report. (If I have missed these references, please advise the sections where these issues are covered.) I would like to see further study of the potential for migration of contaminants in the likelihood of a future and severe earthquake. I would like to see this study include the affect, if any, of soil liquefaction, and potential shift in the aquifer below the site that may impact the new Longview water facility nearby or the 80-year old dikes protecting the site and our community from water incursion. The extensive research conducted by DNR should be studied in relation to the site. Preferably this would be done by a qualified geologist or an engineer with geotechnical expertise.

Ground water mobility/Carrying of Contaminants

Much of the RI/FS is dedicated to explaining the natural attenuation of fluoride, the reduction of infiltration and transport by application of engineered caps, and fluoride's destruction as it moves with groundwater through permeable reactive barriers. I am unclear how these technologies reduce the elevated concentration of the other contaminants found on site (per the RI: PAH's, Arsenic, Cadmium, Chromium, Benzopyrene, Naphthalene, TPH's, and PCB's, Carbazole, Dibenzofuran) or prevent them from migrating off site into the CDID ditches and the Columbia River. For this reason, I am not comfortable leaving any of these contaminated soils on site and advocate for Alternative 6.

Permeable Reactive Barriers and Backfill

The Feasibility Study recommends permeable reactive barriers (PRB) and backfill as source controls for greater long term effectiveness, reduced time frame to achieve water cleanup levels, and to destroy fluoride as it moves in ground water. These are recommended, depending on the Alternative selected, at various locations. My preferred alternative would be Alternative 6, for reasons of Protection and Permanence. However, if that Alternative is not selected, I strongly support a more extensive use of the PRB's.

1. During the Chinook Venture's tenancy, it was found that the closed black mud

pond was leaking and in 2007 a portion was removed. Alternatives 4, 5, and 6 recognize this location as a risk and place a PRB at the NW corner.

Contaminants identified in this location are PCBs, mercury, fluoride, cyanide, sulfate, arsenic, cadmium, chromium, copper, and lead. For this reason, (if this material is not going to be removed to an off site location (preferred)) I would like to see a PRB placed around the entire perimeter, or at the very least, along the complete northern and western boundaries of the location, as these are in close proximity to CDID ditch #14.

2. The highest concentration of fluoride contamination was found in the northeastern site units (white & black mud ponds, etc), but yet Alternative 4 does not use PRB technology between those units and the ditches. It is imperative that this technology be used if the contaminated soils are to be left on site. The desired placement is recommended in Alternative 5, on both the northern and eastern border of these site units.
3. With the highest and deepest concentrations of fluoride in the northeastern site units, I am unclear why Alternative 6 does not use reactive backfill in site units 6, 7, & 8 to reduce the time frame to achieve compliance with groundwater cleanup levels. Please explain.

Fluoride Toxicity

I have great concerns regarding the fluoride found in soils and groundwater on site. I have recently read about studies which indicate that exposure to high fluoride concentrations can cause stunted brain development and emotional problems in infants and children.

http://www.cnn.com/2014/02/14/health/chemicals-children-brains/index.html?hpt=hp_t2

“At greatest risk? Pregnant women and small children, according to Grandjean. According to the review, the biggest window of vulnerability occurs in utero, during infancy and early childhood. The impact is not limited to loss of IQ points.

"Beyond IQ, we're talking about behavior problems -- shortening of attention span, increased risk of ADHD," Landrigan said.

"We're talking about emotion problems, less impulse control, (being) more likely to make bad decisions, get into trouble, be dyslexic and drop out of school. ... These are problems that are established early, but travel through childhood, adolescence, even into adult life."

The RI/FS clearly stated that only Alternative 6 allows groundwater to meet acceptable levels (section 8.5.3 pg. 230). Considering that the groundwater levels at the northeast site units is at -.3' and -.9', and that the ditches are below river levels, and with groundwater on site flowing away from the river toward the ditches, I see this as a serious issue requiring the highest level of remedial action in order to prevent migration of contaminants off site toward the community*. Because of the uncertain outcome of the remedial action recommended by Alternative 4, the seriousness of the implications for fluoride's effect on children, and because the RI/FS, itself said Alternative 6 is the only way to achieve cleanup levels for this toxin, I support the highest level cleanup.

On another level, a news article in The Oregonian (http://www.oregonlive.com/silicon-forest/index.ssf/2014/07/intel_and_the_air_reconciling.html), reported findings that the Intel sites near Portland had been releasing atmospheric fluoride at levels exceeding Oregon law. The significance of this article is that it also reported that in the 1990's, the Troutdale Reynolds aluminum smelter was allowed to release fluoride at levels 100 times last year's release by Intel. Though, I do not have data on the Longview plant releases, I conjecture that it would have been equivalent. The Troutdale releases caused documented and serious health problems. Living in Longview during my formative years, I feel connected to this community's legacy of pollution and the elevated cancer rates and other health issues we currently experience. It is time this community be given a chance at full health. This is another reason I support the highest level of cleanup.

*The Highlands Community (an at risk population) and new walking path runs along the length of a CDID ditch north and east of the Reynolds site.

Building Demolition

Many of the buildings on site are being torn down in preparation for construction of the future project proposed for this site. Since most of the production processes were within the buildings and at below ground level, wouldn't testing of these soils be necessary to ensure that there is no further soil or groundwater contamination found? I would like to be sure that all contaminants on site have been identified and included in the remedial actions.

SU11, Flat Storage Area

The 2012 Draft RI/FS, Figure 8.1 indicated this area was 1.2 acres. The 2014 Draft RI/FS, figure 8.1 indicates the area is now .2 acres. This site unit contains PAHs and benzopyrene. Why did this area change in size without a CAP decision?

Natural Attenuation as a Cleanup Technology

Natural attenuation is an important piece of the Alternative 4 cleanup plan. MTCA states that natural attenuation can be considered permanent under certain conditions, one of which (173-340-370 7(c) indicates that degradation must occur at a reasonable rate. Ecology staff has told me that a "reasonable rate" is 30 years. The RI/FS charts used to show fate and transport of fluoride indicate that concentration of fluoride in the NE fill areas (SU's 3,4,5, 6, 7 & 8) (currently at 1000 times the accepted level) will still be at 40 (10 times the accepted level) after 2000 years. This indicates to me that the contamination will be nearly permanent, rather than the remediation being permanent. For this reason, I prefer Alternative 6 as a more permanent fix.

From: tndgardens@comcast.net
To: [ECY_RE_Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup
Date: Wednesday, July 30, 2014 5:06:16 PM

To the Members of the Department of Ecology:

Dear Members,

The cleanup at the former site of the Reynolds Aluminum Plant in Longview is of interest and concern to all of us who live along the Columbia River. Many communities have similar situations where a company has left a polluted site which needs to be cleaned up so it can be used for something else.

A good example is another former Reynolds site in Troutdale, Oregon. It was cleaned up successfully and is now a busy FedEx facility.

We do not know what future needs Longview will have. We do know that coal is not the fuel of the future, and, at some point, maybe 50 or 60 years from now, this site will need to be used for something else.

I feel it is important in this, and all similar instances, to do the best cleanup job possible. When Reynolds and other companies began operations many years ago perhaps we did not understand how very toxic, carcinogenic, and harmful the chemicals (for example, fluoride, cyanide, polycyclic aromatic hydrocarbons, petroleum hydrocarbons, caustic sodium hydroxide, polychlorinated biphenyls, mercury, sulfate, arsenic, cadmium, chromium, copper, lead) used are. But now we do and it is in our best economic interests to do a cleanup that will stand the test of time.

Washington law requires that we take future considerations into account. Alternative 6 presents our best shot at that. Having certified contractors in charge of removing polluted river sediment to a certified landfill and replacing it with clean sand will protect the health of the river and its inhabitants as well as people who live and recreate nearby. Not only will Alternative 6 preserve Longview's future options but it will provide more jobs along the way and possibly more tax revenue in the future.

Choosing an alternative for this site is important for the future economy of Longview, Cowlitz County, and the region. Alternative 6 is an example of how cleanups should be handled, now and in the future.

Please choose Alternative 6 for Longview.

Diana Gordon
642 I Street

From: jgreen2317@aol.com
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comments on Amendment to Agreed Order No. 8940
Date: Wednesday, July 30, 2014 5:02:07 PM

Comments from:
Margaret Green
1318 25th Avenue
Longview, WA 98632

Amendment to Agreed Order 8940

1. The sediments in SU12, located near an outfall for this site (002A), were found to contain PAH's, PCB's, Carbazole, and Dibenzofuran in levels in exceedence of either MTCA industrial soil standards or Sediment Cleanup Objectives. I support the decision to immediately remove this sediment from the river as proposed but do not support consolidation of these sediments upland on site. Consolidation would raise the contamination levels of these chemicals upland, increasing the chance of worker exposure and migration to ground water, then potentially offsite to CDID ditches, and finally back into the Columbia River. Also, if moved upland, disposition must wait for finalization of the Cleanup Action Plan, thus delaying final remedial action. I support Alternative 4 for this Amended Order.
2. In reviewing the costs provided for the Amended Order Alternatives, I am unclear why the \$723,000 cost for source control actions (removing accumulated solids in the drain lines and retention pond) is included. A working stormwater treatment facility is required for conducting business and not directly related to remedial actions. The actual cost to carry toxic soils offsite is \$459,000 (approximately \$420,000 greater than moving them to a location on site). This is very worth the benefit of removing these serious toxins to a certified landfill.
3. I would like to question the benefits listed for preferred Alternative 3.
 - a. Saying these soils will be reused beneficially as upland fill, when they are moved to an already existing fill area, which would then have to be temporarily capped until the final CAP is written, in my opinion, is not beneficial to the site or operations. Would this not require additional monitoring, when offsite removal would require no monitoring?
 - b. Since the final CAP may be a year away, how can we depend on an undetermined plan as acceptable remediation, if the sediment is consolidated upland.
 - c. The Short-term Effectiveness for Alt. 3 is 7, and for Alt. 4 is 5, with only longer hauling distance as the reason for the difference. There is no consideration for interim exposure onsite where the contaminated sediment will be stored until final disposition is determined. Please reevaluate this score.
 - d. Implementability for Alt 3 is 8, and for Alt. 4 is 7. And yet the report repeatedly says standard practices are already developed and easily

implemented and that local contractors and regional landfill operations are available. Alternative 4, is a quicker route to Permanence, Protectiveness, and Long-term Effectiveness. Please reevaluate this score.



July 30, 2014

Mr. Guy Barrett
Dept. of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett:

As a business leader and concerned citizen of Southwest Washington, I am writing to express my support for the process, review and current direction of the Former Reynolds Longview Facility clean-up. Having followed the extensive process that the Ecology-led remediation has taken, I feel confident that Alternative #4 is the best and most reasonable choice to clean this former smelter site up and prepare it for the next phase of economic vitality. I appreciate the comprehensive set of facts presented in the draft RI/FS.

Alcoa and Millennium, the site PLPs, are participating in this clean-up voluntarily. While there are community members and activists from surrounding areas that would like to tie this clean-up to coal export and believe demanding a more expensive clean-up will hurt Millennium, the fact remains that this clean-up is a wholly separate process from any development activity at the site. After reviewing the disproportionate cost analysis, the preferred Alternative #4 put forward in the draft Feasibility Study offers a very high level protection of the environment, permanence, short term risk management and implementability. The benefit score of Alternative #4 reaches a level in-line with Alternatives #5 or #6. Especially when considering the cost difference, short term risk management and implementability. How much benefit does Alternative #6, which some seem to be calling for, buy us? .2, not a whole lot in proportion to the cost.

By removing certain deposits at the site, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, the preferred cleanup alternative offers a reasonable, comprehensive and responsible solution.

Facts are persistent: the preferred alternative includes technologies that have proven very effective at other sites, including Vancouver. It offers a “belt and suspenders” approach to dealing with the constituents of concern, using redundant technologies including the following elements that have been added since the 2012 RI/FS draft to address Ecology concerns:

- Incorporates permanent solutions to the maximum extent practicable as required by MTCA.
- Permeable reactive barrier to treat groundwater at the northwest corner of the Closed BMP Facility.
- Excavation of the east cryolite area and consolidation with other fill deposit material, and backfilling of the area with reactive media to treat groundwater.
- Upgrade of caps to low permeability soil covers on fill deposits and landfills.

The Former Reynolds Longview Facility site is an industrial property and should be cleaned-up to that level, appropriate to all levels required by the regulatory authorities.

I urge you to please move forward with the clean-up, approving and implementing Alternative #4.

Sincerely,

Dan Guglielmo
Business Development



July 30, 2014

Mr. Guy Barrett
Dept. of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Barrett:

As a business leader and concerned citizen of Southwest Washington, I am writing to express my support for the process, review and current direction of the Former Reynolds Longview Facility clean-up. Having followed the extensive process that the Ecology-led remediation has taken, I feel confident that Alternative #4 is the best and most reasonable choice to clean this former smelter site up and prepare it for the next phase of economic vitality. I appreciate the comprehensive set of facts presented in the draft RI/FS.

Alcoa and Millennium, the site PLPs, are participating in this clean-up voluntarily. While there are community members and activists from surrounding areas that would like to tie this clean-up to coal export and believe demanding a more expensive clean-up will hurt Millennium, the fact remains that this clean-up is a wholly separate process from any development activity at the site. After reviewing the disproportionate cost analysis, the preferred Alternative #4 put forward in the draft Feasibility Study offers a very high level protection of the environment, permanence, short term risk management and implementability. The benefit score of Alternative #4 reaches a level in-line with Alternatives #5 or #6. Especially when considering the cost difference, short term risk management and implementability. How much benefit does Alternative #6, which some seem to be calling for, buy us? .2, not a whole lot in proportion to the cost.

By removing certain deposits at the site, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, the preferred cleanup alternative offers a reasonable, comprehensive and responsible solution.

Facts are persistent: the preferred alternative includes technologies that have proven very effective at other sites, including Vancouver. It offers a "belt and suspenders" approach to dealing with the constituents of concern, using redundant technologies including the following elements that have been added since the 2012 RI/FS draft to address Ecology concerns:

- Incorporates permanent solutions to the maximum extent practicable as required by MTCA.
- Permeable reactive barrier to treat groundwater at the northwest corner of the Closed BMP Facility.
- Excavation of the east cryolite area and consolidation with other fill deposit material, and backfilling of the area with reactive media to treat groundwater.
- Upgrade of caps to low permeability soil covers on fill deposits and landfills.

The Former Reynolds Longview Facility site is an industrial property and should be cleaned-up to that level, appropriate to all levels required by the regulatory authorities.

I urge you to please move forward with the clean-up, approving and implementing Alternative #4.

Sincerely,

Rob Harris
Vice President

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #13
Date: Wednesday, July 30, 2014 1:10:28 PM

Dear Mr. Barrett:

Below is my statement regarding Alcoa's site cleanup plan. Please include this in my comments.

Alcoa's future

In 2000 Alcoa, Inc. purchased the assets of Reynolds Metals Company, which included worldwide aluminum production plants, packaging and consumer business (Reynolds Wrap), manufacturing operations and bauxite reserves (which are processed into alumina). With this purchase Alcoa also knowingly acquired the responsibility for environmental remediation at numerous closed Reynolds aluminum production plants.

Alcoa President and CEO Klaus Kleinfeld said in 2009, "Our values guide our behavior at every level across Alcoa worldwide. We are proud of the continued recognition of Alcoa as a company respected for our strong character and principles."

Alcoa is to be commended for their comprehensive cleanup of contaminated property at the Reynolds facilities in Troutdale, Oregon and Vancouver, Washington. The Troutdale cleanup took the nation's top honor for a reclaimed industrial site. Longview deserves this same level of industrial cleanup as Troutdale and Vancouver. As a global leader, Alcoa should also desire the same improvements to their Longview property; it just makes good business sense.

Thank you.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #12
Date: Wednesday, July 30, 2014 1:01:33 PM

Dear Mr. Barrett:

Below is an additional comment on the old Reynolds site cleanup plan.

Consolidation of Contaminated Soils

Please provide further information explaining what the total depth would be of contaminated soil on each site unit after proposed consolidation and protective caps are added. Would these areas be much greater in height than other inland soils and how would they be contained and prevented from shifting or eroding?

Thank you for your consideration to my question.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #11
Date: Wednesday, July 30, 2014 12:39:17 PM

Dear Mr. Barrett:

Below is an additional comment on the old Reynolds site cleanup project.

Existing Operations

In the 2014 Draft RI/FS, Alternative 5 and 6 are noted as less implementable because the large volume of material being removed would impact existing operations. What are those existing operations and how would they be impacted?

Thank you for your response.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #10
Date: Wednesday, July 30, 2014 12:37:10 PM

Dear Mr. Barrett:

Below is an additional comment on the old Reynolds site cleanup plan.

Liability

Ecology has stated that once the Cleanup Action Plan is completed, Millennium and Alcoa will have no further liability for a higher level of cleanup. This completed cleanup plan could determine the final condition of the Reynolds property. In 50 to 100 years from now, Alcoa may not be available for further cleanup actions should contaminants remain and plans fail. With this in mind, I hope the decision by the Department of Ecology will have the best protections in place to last many years and will not be a short-term solution.

Thank you for allowing the public to voice our concerns on this important cleanup project.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #9
Date: Wednesday, July 30, 2014 12:33:12 PM

Dear Mr. Barrett:

Below is an additional comment on the old Reynolds Site Cleanup plan.

Cost/Benefit Analysis - general

The Cost/Benefit Analysis does not explain how Alternative 4 and Alternative 5 could possibly have the same benefit score of 7.7 with one costing three times more than the other. The weighting and scoring for this analysis is difficult to understand and I would ask for a more thorough explanation of how the weighting of criteria and scoring of each were achieved.

Thank you.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #8
Date: Wednesday, July 30, 2014 12:30:07 PM

Dear Mr. Barrett:

Below are my additional comments on the old Reynolds site cleanup plan for your consideration.

Cost/Benefit Analysis - Weighting of Criteria

Protectiveness is given the highest weight of 30% in this analysis. Protectiveness is only an immediate achievement and is not the most important criteria to any industrial remediation. Without long-term effectiveness there would be no protection.

Permanence is weighted as 25%, but as stated, treatment actions that destroy contaminants (thereby reducing toxicity, mobility, and volume) are considered under the MTCA to be more permanent than containment actions (which only reduce the mobility). Please explain why Alternative 4 and 5 are given the same score of 8 when Alternative 4 removes 400 cy of soil for off-site disposal and Alternative 5 removes 134,000 cy of soil offsite. This scoring seems inconsistent.

Effectiveness over the Long Term is weighted with 20%, but should be the most important criteria in the analysis. Long-Term Effectiveness, I would think, is what environmental remediation is all about. Shouldn't Long-Term Effectiveness be given the highest weight in this analysis.

I would ask that Ecology please re-examine this analysis.

Thank you.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #7
Date: Wednesday, July 30, 2014 12:26:41 PM

Dear Mr. Barrett:

Below are additional comments on the old Reynolds Aluminum site cleanup plan.

Cost/Benefit Analysis - Total Estimated Costs

In reviewing the three Draft RI/FS reports showing Total Estimated Costs for the highest level of cleanup for the Reynolds property, I find the differences of costs hard to comprehend. The costs shown are:

Draft RI/FS 2007 of \$146,974,800

Draft RI/FS 2012 of \$236,084,100

Draft RI/FS 2014 of \$229,593,000

Of course, costs increase over time and additional testing has been required. Please explain why estimated costs in 2012 are higher than the estimated costs in 2014? Why would the Total Estimated Costs in 2014 be almost \$100,000,000 more than those in 2007; seven years later?

Thank you for your consideration.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds cleanup comment #6
Date: Wednesday, July 30, 2014 12:23:50 PM
Attachments: [NOV 2013 Northwest Alloys MBT Land Summary 61953 etc.pdf](#)

Dear Mr. Barrett:

Below are my comments on the old Reynolds Aluminum site cleanup plan.

Cost/Benefit Analysis - Loss/Benefits

Economic loss to the community from taxes and use of land are not considered in the Cost/Benefit Analysis. A \$12,000,000 reduction of property value has already been applied to this property because of the contamination. (Attached is a page from the Cowlitz County Tax Assessor's 2013 Notice of Valuation which shows this \$12,000,000 reduction of value.) In Alternatives 4 and 5, over 60 acres of contaminated property would be left onsite (figuring in your proposed consolidation plans). In 2013 the Tax Assessor's Office gave each acre of this industrial property a value of \$87,120. Using that figure, over \$5,000,000 in property value would be lost due to deed restrictions and unusable land. Property taxes on this \$5,000,000 devaluation would also be lost each year. Cowlitz County will never recoup this loss with Alternative Cleanup Plans #4 or #5 since this devaluation would be a permanent condition of that property.

The capped areas remaining on site in Alternative Cleanup Plans #4 or #5 would not allow construction or uses for many business operations. Future land users would have to pay thousands of dollars and go through an extensive process in order to build or engineer portions of that contaminated property for their business purposes. Future businesses would certainly be deterred by that process.

Economic benefits from future property taxes and jobs are not considered in the Cost/Benefit Analysis. This property is valuable, waterfront property; there are very limited numbers of deep water ports on the Columbia River that can accommodate industrial projects. By cleaning up to the highest standard, Cowlitz County would have a huge economic benefit from land that brought a bigger tax base, was more marketable and had the potential to provide many jobs for this area.

Future benefits to the community by removing contaminants offsite are also not considered in the Cost/Benefit Analysis. These include preventing future migration of toxins which could add pollution to an area already fighting for a healthier environment.

Thank you for allowing public concerns to this important project.

Sincerely yours,

Sandra M. Davis
1002 Abernathy Creek Road
Longview, WA 98632

NORTHWEST ALLOYS - LAND (MILLENNIUM BULK TERMINALS SITE)

Description	parcel	acres	\$/sq ft	\$/per acre	value	adj %	Adjustment per parcel	Land Value less adjustment
Main manufacturing site								
Crumline Ladue DLC T-9	61953	86.81	2.00	87,120	7,563,000	20.8%	(2,493,465)	5,069,500
Crumline Ladue DLC T-9	619530400	271.55	2.00	87,120	23,657,000	65.0%	(7,799,799)	15,857,200
Crumline Ladue DLC T-6 61950 + WI3110006	61950	59.42	2.00	87,120	5,177,000	14.2%	(1,706,736)	3,470,300
		417.78			36,397,000	100%	(12,000,000)	
LESS: Adjustment for site Remedial Costs					(12,000,000)			
Land Value Main Site (land between Col. River and Ind. Way)					24,397,000			\$ 24,397,000

Total site acreage has increased from 417.72 to 417.78 due to rounding and improved CAD measuring. Main factor is felt to be the dike parcel 61950 that borders the Columbia River.

From: tndgardens@comcast.net
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Proposals
Date: Wednesday, July 30, 2014 11:14:02 AM

Department of Ecology
Director Maia Bellon
Garin Schrieve
Guy Barrett

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please make Millennium and Alcoa cleanup the old Reynolds Metals site near Longview , Washington, to the highest possible level.

The Reynolds site RI/FS (Remedial Investigation/Feasibility Study) showed the soil has fluoride, cyanide, PAHs (polycyclic aromatic hydrocarbons) and petroleum hydrocarbons. The groundwater has fluoride, cyanide and PAHs, as do the black mud ponds. The white mud ponds have fluoride, cyanide and caustic sodium hydroxide. Plus, the closed mud pond has PCBs (polychlorinated biphenyls), mercury, fluoride, cyanide, sulfate, arsenic, cadmium, chromium, copper and lead.

The cleanup of this site should be done only by a company that is capable and licensed to do this kind of work.

Millennium and Alcoa will have no more liability once a cleanup plan is completed, unless more contaminants are found or known hazardous chemicals leak.

The land, if not cleaned properly, could have over 80 acres of the 540 total acres of this waterfront site decreed "deed restricted," which would result in lower property taxes and no chance for a wider range of businesses to lease there in the future.

The Reynolds site near Portland, Oregon, was cleaned up to a high standard and now has a good, viable industrial client base. This could be the future for the Longview Reynolds site.

Sincerely, Thomas Gordon

Thomas Gordon
642 I Street
Washougal, WA
98671
tndgardens@comcast.net
(360) 835-7748

From: [David and Ann Cordero](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Choose Alternative 6 for best cleanup
Date: Wednesday, July 30, 2014 9:16:43 AM

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept. of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site in Longview. I urge you to require that:

This cleanup meets the highest standard to protect future public health, workers' Health, and our Columbia River;
This cleanup excavates and removes polluted river sediment to a certified landfill; Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

Columbia River water needs protection from the pollution that has occurred at the former Reynolds Metals site and at other industrial sites near its shores. Excavation, removal and detoxification of polluted sediments is necessary to safeguard river water quality for fish and other aquatic life, for wildlife, and for human activity ranging from navigation to swimming to downstream water supply. Pollution in sediment within the river needs to be removed by dredging to restore water quality abused by this industry. Furthermore, the Reynolds site is in such close proximity to the river that changes in river level from flooding or sea level rise would introduce pollutants that are not removed directly into the river system. There is also potential at the site for groundwater pollution. An intensive cleanup is also necessary to assure the health of future users of the site and prevention of contamination of commodities stored and processed there.

We therefore support Alternative 6 which describes the most thorough cleanup for the area. We request that the cleanup also includes detoxification wherever possible to mitigate the effects of these chemicals at the certified landfill chosen for the sediments' relocation. We understand that the Reynolds site in Troutdale, Oregon, underwent a cleanup effort that was successful and we request a cleanup for the Longview site to the same standard or better than occurred at Troutdale.

David and Ann Cordero
2814 Lilac Street
Longview, WA 98632
corderoa@teleport.com

From: tndgardens@comcast.net
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Best Reynolds Cleanup Proposal
Date: Tuesday, July 29, 2014 10:21:14 PM

To the Members of the Department of Ecology Industrial Section:

Dear Members,

I live in Washougal, Washington, and am very concerned about the cleanup at the former site of the Reynolds Aluminum Plant in Longview because of its importance for the Columbia River and its tributaries like the Washougal River.

As I understand it, the soil there contains cyanide, fluoride, petroleum hydrocarbons, and polycyclic aromatic hydrocarbons (PAH), the groundwater contains PAH, fluoride, and cyanide, and the various kinds of mud ponds have these chemicals plus more.

I think that this site should be cleaned up to the highest possible standard, Alternative 6, to insure the future health of the Columbia River.

We cannot be sure of future natural events. We can already see sea level rise bringing higher tides up as far as Bonneville Dam. A major earthquake causing liquefaction along the Columbia is widely anticipated, unusual rain events causing flooding occur frequently.

Any, or all, of these events could happen and deliver the pollution from the Reynolds site to Washougal and other communities lining the Columbia River via tides or reverse river flow bringing catastrophic effects to wildlife and communities. When disaster strikes, it is too late to seek a remedy.

We must do everything possible to prevent the future degradation of the river. Removing polluted soils to a safe, certified landfill site and replacing them with clean sand is vitally important. Alternative 6 offers the best chance for the future of the river and for us all. Please choose it as the cleanup plan for the Reynolds site in Longview.

Diana Gordon
642 I Street

Washougal, Washington 98671
tndgardens@comcast.net
360-835-7748

From: tndgardens@comcast.net
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Tuesday, July 29, 2014 3:25:13 PM

Department of Ecology
Director Maia Bellon
Garin Schrieve
Guy Barrett

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

I urge that the cleanup of the former Reynolds Metals site near Longview meet the highest possible standard.

The 2012 Reynolds Site (RI/FS) identified fluoride, cyanide, PAHs (polycyclic aromatic hydrocarbons) and petroleum hydrocarbons in the soil. The presence of these contaminants in the soil, plus the potential to leach into the Columbia River over time, with cyanide, fluoride and PAHs in the groundwater now, make this site less desirable for whomever uses this site in the future. The more desirable, the higher the land value is, which means higher tax revenues.

Therefore, the highest possible cleanup action is best, not only for those use this site in the future and the tax base, but also for the Columbia River denizens, from birds to salmon, to the people that eat them.

Sincerely, Thomas Gordon

Thomas Gordon
642 I Street
Washougal, WA
98671
tndgardens@comcast.net
(360) 835-7748

From: ilwu92696@yahoo.com
To: [Barrett, Guy E. \(ECY\)](#)
Cc: [Aaron Toso](#)
Subject: Formal comment Reynolds Metals property
Date: Tuesday, July 29, 2014 10:01:11 AM

INTERNATIONAL LONGSHORE & WAREHOUSE UNION - LOCAL 21



617 14TH AVENUE - LONGVIEW, WA 98632 - PH: (360) 423-0950 - FAX: (360) 423-5498 - E-MAIL: ilwu21@qwestoffice.net

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July 28, 2014

Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

To: Guy Barrett

This letter is a formal comment on the Draft Remedial Investigation/Feasibility Study for the former Reynolds Metals property.

ILWU Local 21 has hundreds of members in Cowlitz County and the Columbia River is our lifeblood. We work up and down the Columbia River manning the docks and moving goods. In fact, we are currently working at the site that is the focus of my letter to you today.

This site was contaminated generations ago, but its cleanup represents a chance for more trade and jobs in and around Longview today. This is good for our members and our local economy.

The preferred alternative put forward in the draft Feasibility Study strikes the right balance of environmental benefits and economic costs. It includes redundant protective measures and technologies that have proven effective at other sites of former smelters along the Columbia River.

Ecology has developed a preferred cleanup alternative that, by removing certain wastes, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, will make improve our community.

It is clear that certain special interests want to slow the cleanup process because of a coal proposal on other parts of the property, I ask that Ecology remains consistent with its MTCA Rules. This site is an industrial property and we hope it remains that way.

In solidarity,

A handwritten signature in black ink, appearing to read "Jason Lundquist".

Jason Lundquist
President
International Longshore and Warehouse Union Local 21



From: [Gary Lindstrom](#)
To: [Barrett, Guy E. \(ECY\)](#)
Cc: [Ross Macfarlane](#)
Subject: Reynolds Clean Up
Date: Tuesday, July 29, 2014 8:13:51 AM

Hello Guy,

The following letter from me to the editor (LTE) of The Daily News reflects my view and vision for the Reynolds "clean up". This recent letter is not as yet published. The position of the newspapers and public servants aside, there is a large number of people in our community who believe that level 5 and or 6 should be advocated for the future of this land and its ensuing marketability and vitality for the community and the State of Washington.

LTE

Dear Editor,

"It is our land, not disconnected, not only Alcoa's property. The land belongs to our community and to those connected along the Columbia. Alcoa is a property owner and they agree as they should to clean up the property and the material in the river. We do not have to set a limitation or a dollar value.

This 540 acres is an economic powerhouse and everyone knows it. This land along the mighty Columbia River with a deep water berth is an amazing economic opportunity for heavy and more probably light industrial development. This vision can be fully explored if the earth and water is cleaned up and made marketably ready. The timeframe to return the property clean comes but once and that time is now. Let's work hard to insist Ecology and Alcoa take the high road and bring this exhausted earth back to a state as nearly clean as the aluminum industry found it in the 40's. This land is sacred to us and the river. Alcoa should fully clean up the property and return the land to the community via the Port of Longview for future development." GWL

While this comment period is noted to be not a time to comment on coal, understandable, I can't help but feel the underlying link, like undertow, although I also believe that the permit process for Millennium and coal is separate and under intense review by your department.

I see a different vision for the use of the land and its future ownership, or lessee.

In the case of Evergreen (Vanalco) in Vancouver, much of the property was taken over by the Port of Vancouver. In the case of Alcoa in Troutdale, the property went to the Port of Portland. I believe that the Kaiser facility in Tacoma went to the Port of Tacoma. In my view, and as the former Director of Marketing for the Port of Longview, for 17 years and retired in 2008, the Alcoa property and its future should be handled, similarly, by the Port of Longview as a public steward for this land, use and economic development, not only for this community but also for the State of Washington and the communities along the Columbia River.

I can understand that Alcoa is an important employer and economic driver for the State of Washington with two active mills at Wenatchee and Ferndale. The alumina comes through the old Reynolds bulk unloading system and into storage where it is later transported to the two Alcoa production facilities. This the Port can maintain

services.

Thank you for allowing the Public comment period, for the hearing opportunity at the Red Lion and the information process provided by the department. It is most appreciated and I'm sure that much input has been received. This property has an important role to play in the future economy of Cowlitz County and the State of Washington and I believe that it will best serve us all if we can get to level 5 or best option 6 for clean up. Thank you again.

Gary Lindstrom
1403 18th Ave.
Longview, WA 98632
Owner, Lindship Maritime Services
Cargo Surveyor
360-431-8653

Thank you



--

LINDSHIP Maritime Services
1403 18th Ave.
Longview, WA 98632
360-431-8653
lindship@gmail.com
www.lindship.com



WALSTEAD MERTSCHING

— ATTORNEYS AT LAW —

July 28, 2014

Guy Barrett
Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

**SENT VIA FIRST CLASS MAIL AND
E-MAIL: Reynoldscleanup.comments@ecy.wa.gov**

Re: Cleanup of Reynolds Metals Aluminum Smelter in Longview

Dear Mr. Barrett:

I am writing to express my concern that Alternative 4 selected by the Department of Ecology, for the above-referenced cleanup, as the MTCA preferred alternative fails to comply with the Model Toxics Control Act and the associated sections of the Washington Administrative Code. Under the circumstances here, Alternative 6 would be the only one of the six that would comply with the current law.

RCW 70.105D.030(1)(b) provides in pertinent part that “the department shall give preference to permanent solutions to the maximum extent practicable.” Alternative 4, with all due respect, is in no sense of the word a permanent solution, either as defined in the MTCA or the related WACs. Although there are a number of problems with Alternative 4, the primary problem is the proximity of the Columbia River to the site. Although Alternative 4 could be a suitable practicable solution if the river were not so close, it is not an appropriate alternative here.

The problem of course is that the area containing hazardous waste to be cleaned up, being very low relative to the river and being adjacent to the river, is subject to groundwater flow, flooding and subject to the tremendous hydraulic forces of the river itself. The Department of Ecology’s reliance on the dike for protection is misplaced. There was discussion at your recent meeting in Kelso that the dike was designed to protect against a 500 year flood. First of all, I believe the 500 year flood standard is a misnomer since no one truly knows what height or strength the dike at that site needs to be to protect against a once in a 500 year flood. Moreover, it is not possible to know whether any given year, even this year, might be the year that we actually have a “500

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FOUNDING PARTNERS: Howard J. Atwell (1880-1962), Ronald Moore (1897-1968), Jerome Walstead (1913-1981)

Norman C. Dick

Frank F. Randolph

Nicole M. Tideman

Of Counsel

John A. Barlow

year flood.” Consequently, if Alternative 4 were used rather than Alternative 6, and a flood, earthquake or some other calamity occurred, the hazardous waste that is now all in one spot relatively, would become so spread out that it would be impossible to clean up. Of course, this would probably occur in such a short time that there would be no way to stop it.

With the river being so close to this very low site, it is only a matter of time before the waste site ultimately comes in contact with the Columbia River. Selection of Alternative 6 would avoid such an eventuality.

Nor does Alternative 4 meet the definition of a “permanent cleanup action or permanent solution” as defined in WAC 173-340-200, given the likelihood of eventual failure of containment which could result from groundwater movement, site flooding, earthquake, or other calamity which would result in hazardous waste flowing into the Columbia River. You simply cannot comply with the statutory requirement of a permanent cleanup action or permanent solution in this lowland area, so close to the Columbia River, without using the offsite storage of waste as provided for in Alternative 6.

Another factor that is a problem under the proposed Alternative 4 is the flow of groundwater in the area. As I understand it, Alternative 4 relies on mechanical pumping of the ditches in the area to create a groundwater flow away from the river. Of course, mechanical pumps can fail, and will fail in time, particularly in emergency situations when power is cut. Moreover, it is not clear to me that the water which is being pumped out of the ditches to create the negative flow is being properly treated before it is allowed back into the river.

In analyzing this matter, the Department of Ecology has failed to factor into its “disproportionate cost analysis” the gargantuan cost of cleaning up the site after the hazardous waste has been spread around due to the action of the river, flood, earthquake, etc. Currently, of course, the waste is reasonably well confined on the site. Whereas, after river action, flooding, etc., it likely would be impossible to clean up the hazardous waste after it was spread down the river. But in any case, if the cost of such a massive clean up were factored into the “disproportionate cost analysis,” it would be apparent that Alternative 6 would be the most practicable solution. The statute and WACs require such an analysis.

The people of the state of Washington expect the state to enforce the law to make sure these waste sites are cleaned up properly. Sometimes that will be expensive. Very expensive. This is apparently one of those times. Who will pay the cost if some calamity, like flooding or earthquake, allows this hazardous waste to be carried downstream by the Columbia River if

Guy Barrett
July 28, 2014
Page 3

Alternative 4 is chosen here? There will simply be no way to clean it up then. The citizens of the state, the fish, and other wildlife will pay the tremendous cost for years to come. This risk is unacceptably high. The "costs" of the losses if this occurs are unacceptably high. If that cost was factored into the "disproportionate cost analysis," Alternative 6 would be seen to be the best alternative here.

Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Norman C. Dick". The signature is fluid and cursive, with the first name "Norman" and last name "Dick" clearly distinguishable.

Norman C. Dick
E-Mail: dick@walstead.com

NCD/dlh

From: brandyannkays@gmail.com
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Site clean up
Date: Friday, July 25, 2014 4:44:29 PM

I feel that it is the duty of the organization to make the responsible choice and clean up the mess they have made. I believe that it may cost time & money to do so but will be beneficial in the end.

Come on guys Clean it up!

Brandy Kays
RE/MAX Premier Group
(360) 442-9448
bkays@remax.net

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From: [Cathryn Chudy](#)
To: [ECY RE Reynolds Cleanup Comments; Barrett, Guy E. \(ECY\)](#)
Subject: Re: Longview CleanUp
Date: Friday, July 25, 2014 2:50:24 PM

Guy Barrett
Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

To WA Dept. of Ecology, RE: Cleanup at the Reynolds site in Longview, WA:

I am submitting my comments to urge you to clean up the Reynolds site to the highest standard possible. ***This means selecting a Level 6 cleanup for the property.***

I believe it is necessary to remove all of the the contaminated materials to an off site landfill in order to afford the most enduring and safe outcome for the citizens of Longview, as well as for all SW WA citizens who rely on the Columbia River and surrounding region remaining safe from contamination.

While a level 4 cleanup may be considered "cost effective" in the short term by the company bearing the financial responsibility, it clearly does not take into account future risks (the site is in a liquifaction zone, flood plain, and Tsunami zone, all of which make the level 4 cleanup inadequate for ensuring the long term safety and protection of the area.) Pollution barriers considered adequate in present time would not withstand the sequence of events that will unfold with a subduction earthquake event likely in the coming years.

Level 4 cleanup keeps most of the contamination on site and although the Level 4 plan suggests that most of the site would then be usable, it is clear that a wider and more enduring range of economic uses for the site would be best served with a Level 6 cleanup. Polluting industries should be held accountable for the damage they do, and restoring rather than covering over the site should be the priority in selecting the clean up standard. An environmentally unstable area subject to the potential devastation of natural events cannot be protected by half way measures such as what is being proposed by the Level 4 proposal.

The decision should be made on the basis of what would make the site permanently safe for residents and businesses over the long haul. The economy of the region and protection of the local community would be best served with a long term solution (Level 6) rather than a short term fix (Level 4). The expense of the undertaking should not be the driving force behind this decision.

Sincerely,

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment \$5
Date: Friday, July 25, 2014 12:57:26 PM

Dear Mr. Barrett:

Below are my comments on the Reynolds Metals Aluminum Smelter Cleanup Site ID 11796. Thank you for allowing public comment on this important issue in Longview, Washington.

Landfill Caps

According to the Center for Public Environmental Oversight:
"Landfill caps are most effective where most of the underlying waste is above the water table." . . . "Landfill caps have a limited life span. They are estimated to last from 50 to 100 years."

Soil Covers, Low Permeability Soil Caps or Composite Caps will eventually deteriorate over time. The 2014 Draft RI/FS does not take into consideration the effect of leaving hazardous materials onsite and the outcome of protective covers in 50 to 100 years. Nothing in this report is being considered if extreme weather conditions occur on the site. The groundwater could rise, the levees could fail, or the area could flood. Nothing short of removal of contaminated soil will be a permanent fix.

Studying the attenuation of fluoride in the groundwater over 2,000 years as shown in the RI/FS, doesn't completely eliminate the fluoride or lower the fluoride to acceptable levels. Should we wait and see what happens to compromise the soil caps and reactive barriers in the future?.....in 2,000 years?.....or solve the problems on this property now.

Sincerely,

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #4
Date: Friday, July 25, 2014 12:52:39 PM

Dear Mr. Barrett:

Below are my comments on the Reynolds Metals Aluminum Smelter Cleanup Site ID 11796. Thank you for allowing public comment on this important issue in Longview, Washington.

33-Acre Closed Black Mud Pond

The Closed Black Mud Pond was reported to have a clay soil liner in the bottom of this pond to prevent leakage of contaminants. However, no information can be located to suggest the thickness of clay or the type of clay material used for this liner. The lack of information on the construction for containment of the Closed Black Mud Pond when it was first established brings into question the strength, quality and permanence of this liner. Concerns should be raised as to the stability and possible cracking of this liner. With time, this liner will fail.

The 2007 Draft RI/FS contained plans for removal of 5,500 tons of contaminated soil from the NW corner of the Closed Black Mud Pond due to high levels of fluoride and cyanide in groundwater monitoring wells. Obviously, there is leakage from this pond and the need to monitor the area will be endless.

Further study needs to be performed to secure the confidence of the public for their safety from these toxins. Removal of contaminants in the Closed Black Mud Pond seems to be the only permanent solution.

Sincerely,

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #3
Date: Friday, July 25, 2014 12:46:33 PM

Dear Mr. Barrett:

Below are my comments on the Reynolds Metals Aluminum Smelter Cleanup Site ID 11796. Thank you for allowing public comment on this important issue in Longview, Washington.

Levees and Flooding

As stated in FEMA's website Floodsmart.gov dated January 2008:

"It is important to note that no levee provides full protection from flooding – even the best flood-control system or structure cannot completely eliminate the risk of flooding. Levees are designed to provide a specific level of protection, and larger flood events can cause them to be overtopped, or fail. Levees also decay and deteriorate over time. Regular maintenance and periodic upgrades are needed to ensure that they retain their level of protection and continue to perform to their design. Maintenance can become a serious challenge as a levee system gets older. When levees do fail, they fail catastrophically – the damage may be more significant than if the levee wasn't present."

It should be noted the levees in Longview were built in the 1920s - making them over 80 years old. This fact must be taken into consideration in plans for cleanup of hazardous material from the Reynolds property. Capping of contaminated areas will not provide any protection to the public or our environment when these levees fail.

Ecology's final cleanup actions must be able to withstand extreme weather conditions and earthquakes and the impacts they could bring to this area. Not removing contaminated material at the Reynolds site now will lead to catastrophic consequences in the future at a high cost to human health and the safety of our community.

Climate warming is happening and a sea level rise of only one foot could cause these levees to fail. We must plan for the future; we must be prepared for the inevitable.

I ask for the complete removal of toxic wastes from the Reynolds Aluminum site.

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #2
Date: Friday, July 25, 2014 12:43:27 PM

Dear Mr. Barrett:

Below are my comments on the Reynolds Metals Aluminum Smelter Cleanup Site ID 11796. Thank you for allowing public comment on this important issue in Longview, Washington.

Amendment to Agreed Order No. 8940 - Outfall 002A (SU12)

Chinook Ventures leased the Reynolds facility from 2004 through 2010. It was suggested that their Wastewater Treatment Plant at times was not operational and could have caused chemicals to be dumped in the Columbia River. It is also noted in Millennium's renewal application for a NPDES permit that this Wastewater Treatment Plant was out of commission for many months after a fire occurred at this site in June 2011.

Regardless of the manner in which these contaminants were dumped into the Columbia River, it is important to address their removal as soon as possible. It should be noted that the source of the City of Rainier's public water supply comes from the Columbia River across from the Reynolds site. Area fishermen continually fish off the Reynolds site waterfront area. With the high concentrations of contaminants (PAHs, PCB Aroclors, Dibenzofuran, and Carbazole) found in soil tests at Outfall 002A during testing in 2012, this area should be classified as an immediate risk to human health. (The Material Safety Data Sheet states that Carbazole is toxic to aquatic organisms and may cause long-term adverse effects in the aquatic environment.)

I would like to see the excavation and off-site disposal to a certified landfill of these harmful contaminants as outlined in Alternative 4 to the Interim Action Work Plan. Dumping of hazardous materials inland and consolidating with another landfill would be totally unacceptable.

Sincerely,

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [Sandra Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Cleanup Comment #1
Date: Friday, July 25, 2014 12:22:45 PM

Dear Mr. Barrett:

Below are my comments on the Reynolds Metals Aluminum Smelter Cleanup Site ID 11796. Thank you for allowing public comment on this important issue in Longview, Washington.

Flat Storage Area (SU11)

A one-acre area of contaminated soil on the Flat Storage Area (SU11) was excavated when the concrete pad under the petroleum coke pile was removed and decommissioned by Millennium in December 2012. The 2014 Draft RI/FS states this material was disposed of in a Hillsboro (solid waste) landfill. Please provide a more specific reference in the RI/FS to report the removal and disposal of this acre of contaminated soil by Millennium from Site Unit 11.

The results from the 2012 Draft RI/FS soil samplings of the Flat Storage Area state that benzo(a)pyrene (U022) and total carcinogenic PAHs exceed the screening levels for soil. Please explain why the contaminated soil in the Flat Storage Area was given the classification of solid waste when the Federal EPA lists benzo(a)pyrene as hazardous waste?

Sincerely,

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632

From: [JoAnne Baker](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Clean-up
Date: Thursday, July 24, 2014 3:37:12 PM

Dear Mr. Barret:

After attending a couple local meetings with the personnel from the Department of Ecology, and meeting members of the well-informed staff there, I feel comfortable sharing my insights regarding the cleaning up of the Alcoa-Reynolds/Millennium site.

When Alcoa-Reynolds was built in the 1940's, the emphasis was on jobs. Little was known about environment hazards. We have since learned over the years of the dangers of damaging chemicals. And we should be aware that we have even more to learn in the future. Plus the site is on an earthquake fault, making it even more prone to disaster. Covering the toxic materials and leaving them on-site is a poor solution as shown in Option Number Four.

Therefore, I feel strongly that Option Number Six should be used in cleaning up the site.

JoAnne Baker
3545 Fairway Lane
Longview, WA 98632
360-636-5968

From: [Kathleen Robson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds site cleanup
Date: Thursday, July 24, 2014 12:35:34 PM

Dear Guy Barrett & Washington Department of Ecology Staff,

The Reynolds site should be cleaned to the maximum level – level 6. The location would be excellent for future manufacturing and shipping, and the local citizens could certainly use the economic boost, but before this can happen, all contaminants, including contaminated soils, must be removed from the site and cleaned. Hauling contaminated soils from the river to the shore, and then burying and capping them is not sufficient, especially considering that climate change is likely to cause storm surges and higher river levels, jeopardizing the integrity of the toxic soil dump site. Polluted groundwater should be pumped and treated before being returned to the aquifer or river. Level 4 remediation is too little. It may be the preferred alternative in the opinions of the past polluters, but this is just the typical corporate strategy: internalize the profits, and externalize the costs. In this case, the costs would be externalized to the citizens and taxpayers of the Longview/Kelso area while the perpetrators walk away. Level 6 is the preferred remediation alternative, not level 4. Yes, it makes the “cost of doing business” a bit higher for the industrial polluters, but they must be responsible for cleaning up their own messes and not leaving the pollutants they created for the local citizens to clean up or live with. Washington Department of Ecology, I strongly urge you to demand a thorough cleanup of the Reynolds site and insist on level 6 remediation.

Sincerely,

Kathleen A. Robson, PhD

From: [Scot Walstra](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Public Comment- RE: Facility Site ID: # 29 Cleanup Site ID: 11796
Date: Wednesday, July 23, 2014 12:43:36 PM

Attn:
Guy Barrett
Dept of Ecology
Industrial Section

Ecology's leadership on this important remediation process is critical to this site being cleaned-up thoroughly in order to protect human health and environment while preparing it for the next phase of economic development in the region.

The current draft of the RI/FS is comprehensive and extensive, detailing years of sampling, studying, characterization and engineering design. I am writing to offer support of Alternative #4, the Alternative proposed and preferred by Ecology, Northwest Alloys (Alcoa) and Millennium.

Northwest Alloys and Millennium, the site PLPs, have signed an agreed order and are participating in the clean-up voluntarily.

The disproportionate cost analysis is very clear; the preferred Alternative #4 put forward in the draft Feasibility Study offers a very high level protection of the environment, high level of permanence, significantly minimized short-term risk and high degree of ability to implement. The cost of Alternatives #5 and #6 in comparison to the benefit (0 and .2, respectively) is not reasonable nor cost-effective.

I would like to see this process remain keenly focused on the science and process, taking necessary steps to permanently address contaminants at the site to ensure protection of human health, along with the environment and ecology of the region. This comprehensive process has included over 18,000 chemical measurements of within all required areas of the site along with additional testing in accordance with state clean-up regulations; we do not believe stones remain unturned by the parties involved.

By removing certain deposits at the site, consolidating and capping less hazardous materials, and providing for groundwater treatment at key locations, the preferred cleanup alternative offers a reasonable, comprehensive and responsible solution.

The preferred Alternative includes technologies that have been proven at other successfully remediated sites, including Vancouver. Redundant technologies and methodologies are incorporated into the plan dealing with the constituents of concern, including the following elements that have been added since the 2012 RI/FS draft to address Ecology concerns:

- Incorporates permanent solutions to the maximum extent practicable as required by MTCA.
- Permeable reactive barrier to treat groundwater at the northwest corner of the Closed BMP Facility.
- Excavation of the east cryolite area and consolidation with other fill deposit material, and backfilling of the area with reactive media to treat groundwater.
- Upgrade of caps to low permeability soil covers on fill deposits and landfills.

The Former Reynolds Longview Facility site is an industrial property and should be treated accordingly, appropriate to all levels required by all environmental regulators and land-use

authorities.

Please move forward with the clean-up, approving and implementing Alternative #4. We wish to see this clean-up performed right the first time and Alternative #4 seems will accomplish all necessary environmental and health goals while taking one giant step toward the site once again becoming part of a healthy working waterfront for this region.

Respectfully,

S c o t

Scot Walstra, Vice President
Cowlitz Economic Development Council

1452 Hudson Street, Suite 208

Longview, WA 98632

(360) 423-9921 office

(360) 921-4534 mobile

walstra@cowlitzedc.com

www.cowlitzedc.com



From: [Craig Brown](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comment RE: Reynolds Metals Cleanup - Longview
Date: Wednesday, July 23, 2014 8:04:42 AM

In a 2005 study by the U.S. Geological Survey (USGS), **Local Tsunami Hazards in the Pacific Northwest from Cascadia Subduction Zone Earthquakes**, author Eric L. Geist determines that there is inadequate research to specify the actual effect of a large earthquake and resulting tsunami in the northwest region.

Leaving toxic material covered only along the banks of the Columbia River at the Alcoa/Reynolds/Millennium site is playing loose with a potential future disaster.

Option 6 of the proposed treatment of spoils left at the site seems to be the only solution for being sure that any future earthquake or the possible rising of the Columbia River due to backflow caused by a resulting tsunami will protect the local environment from catastrophic damage. And, that potential damage would be beyond "cleanup."

I beseech the Department of Ecology to require Northwest Alloys, Inc. and Millennium Bulk Terminals to remove the hazardous materials identified at the old Reynolds Plant and place them at a secure location well away from the Columbia River and any place that could be impacted by a future earthquake or resulting tsunami.

Please acknowledge receipt of this comment.

- Craig Brown

From: [Glenn Hudson](#)
To: [ECY_RE_Reynolds_Cleanup_Comments](#)
Subject: Alternative6
Date: Tuesday, July 22, 2014 9:53:32 AM

Please support the maximum cleanup of the Longview Reynolds site! We desperately need an improved environment in this area.

From: [Sierra Club](#) on behalf of [Trina Sherwood](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, July 21, 2014 2:47:29 PM

Jul 21, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Our children's children are entitled to a clean, safe water sources.

Thank you for listening.

Sincerely,

Trina Sherwood
1281 N Brownstown Rd
Wapato, WA 98951-9140

From: [Kathleen Patton](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Alcoa owes us Level 6 clean up
Date: Monday, July 21, 2014 2:01:43 PM

I am concerned about the long-term safety and economic value of the former Reynolds property.

- **Safety:** it seems clear to me that the only way to ensure that no water (our City well water, local ditches, or the Columbia River) is contaminated by toxins is to remove them from proximity to water.
- **Economic value:** Millenium will go, whether this year or twenty years from now. Coal export is a very volatile business, and there is reason to question whether the proposed terminal will be approved at all. WHEN they do go we will want to make that site available to clean business at full market value. Having polluted areas unsuitable for building makes the site less valuable and less attractive to employers.
- **Moral and Legal Accountability:** Alcoa actually owes this to us and to the environment. Why would we want to accept less than what is owed to us legally and morally?
- **Affordable for Alcoa:** Furthermore, Alcoa can easily afford to clean up their entire mess. They have funds set aside for this purpose, not to mention tens of billions of dollars of annual profit.
- **Short term economic benefit:** A more thorough clean up also provides more good local jobs in the short run. After leaving this mess that rendered the site unusable for years, this seems like a just recompense.

I cannot see any good reason why Alcoa should not be expected to leave the property as they found it so that it can attract the best possible family wage employers for our community when Millenium is prevented from or finished polluting Longview.

Faithfully, Kathleen

The Rev. Kathleen Patton
St. Stephen's Episcopal Church, Longview WA
kpatton@sslv.org
360 423-5600 office
360 751-5849 cell

From: [Dave Hanson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Comments on level of cleanup
Date: Saturday, July 19, 2014 8:23:31 PM

Dear Department of Ecology,

After attending the public hearing last Wednesday and reviewing the information both of the posters and the testimony I want to add my comments. I am a resident of Longview.

I would support the highest level (Level 6) of cleanup based on what I have heard. I had been originally looking at Levels 4 and 5 but after consideration believe that these are not enough. Not removing the contaminated material from the site that is next to the Columbia River puts us at risk in the case of some type of breach of the dike or in the case of the expected earthquake that is to hit the region. From the research that I did there is the tsunami that would likely accompany earthquake, the area on the river also looks to be a liquefaction zone and from the information from the 1700 earthquake the ground would be expected to subside something in the area of 5 feet. All of these seem to make this not a good place for long term storage of contaminated materials.

One of the arguments that was made for not removing the contaminated material from the site was hauling the material. When I see the proposal for the coal terminal it seems that millions of tons of coal are proposed for delivery annually to the site. To me this also means that transport from the site is also possible. The amount to be removed is far smaller than what is proposed for delivery in even one year.

Additionally, leaving the contaminated material on the site also then leaves the legacy of issue on the site. If like the Troutdale smelter site it might be able to make the land sometime in the future suitable for at least commercial instead of industrial.

The final issue that I have in the way that these sites are treated is actually more of a global/policy issue on how the community is treated. Longview is a community situated on the Columbia but due to the history we are more of a land locked river community. The largest portion of the river is taken up with sites that are allowed to be left with contamination such that we as the citizens of the community have little access to the river bank and with leaving contaminated sites this legacy is continued. In the case of the former Reynolds site leaving the contaminated material on the site will likely make this site never usable again by the public. By cleaning up the site and taking a long term view for the public is best achieved by a through cleanup of the site.

Thank you for your time.

Best regards,

Dave Hanson, PhD

From: [Sierra Club](#) on behalf of [Kristin Meijer](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, July 19, 2014 7:38:12 PM

Jul 19, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We need your help to be healthy, that one can not tell if dirty water or air! Why not prevent problems down the road please?

Thank you for listening!

Mrs Kristin Meijer
Kirkland, WA

Sincerely,

Kristin Meijer
14830 119th Ave NE
Kirkland, WA 98034-4604

From: [Mark Leed](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds site cleanup
Date: Friday, July 18, 2014 10:18:18 AM

I urge you to require a Level 6 cleanup for the Reynolds aluminum smelter site in Longview. The site is adjacent to the Columbia River and near Longview's drinking water sources; we must remove the PCB, PAH and Fluoride pollution in order to protect the river and the city's wells. Despite the depth of the drinking water wells, pollutants could migrate to the aquifer over an extended period.

The site is underlain by sediments that would be subject to liquefaction in a subduction zone earthquake, which could lead to release of toxins into the Columbia and other local water bodies.

A Level 6 cleanup is important to prepare the site for sustainable industries that could create employment opportunities in the Longview/Kelso area. The thorough cleanup of the Alcoa smelter site in Vancouver is an example of what must occur at the Reynolds site.

Mark Leed
3419 E. 21st St., Unit 4
Vancouver, WA 98661

(360) 735-9451

From: [Don Steinke](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Our Children's Toxic Legacy in Longview
Date: Thursday, July 17, 2014 10:59:12 AM

To the Department of Ecology
ReynoldsCleanup.comments@ecy.wa.gov

Regarding the Reynolds Clean-up in Longview

I urge you to require a Level-6 cleanup for the Reynolds property in Longview.

The property is in a liquefaction zone, flood plain, and Tsunami zone.

Simply capping the pollution may work until the next subduction event off the mouth of the Columbia River. But the one-two-punch resulting from earthquake and Tsunami will destroy the pollution barriers.

If business owners don't do it correctly now, then the people of Longview will be stuck with the expense later on.

Something similar is happening right now at the Port of Portland. Industry has said that residential sewer customers share the responsibility for cleaning up the contaminated sediments, and consequently my son has been paying \$20 per month on his sewer bill for years.

Now it has been confirmed by *independent* scientists, that the sediments were contaminated mostly by industry.

We need to get it right the first time.

The Reynolds property in question is in a liquefaction zone, near a major subduction zone, in a Tsunami zone, and our water and food supply. Simply capping the pollution is not very farsighted.

When your subcontractor (?Anchor) presents a cost benefit analysis, we need to realize they could not know the benefits of removing the pollution before the next big earthquake, so on their graph of benefits, please recognize that those numbers might be too low.

I urge a level 6 clean-up.

Don Steinke<crVancouverUSA@gmail.com>

From: [Jasmine Hibberd](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup
Date: Wednesday, July 16, 2014 10:49:02 PM

I think that the former Reynolds Metals aluminum smelter near Longview definitely needs a cleanup, but I don't think it requires a budget bigger than a level four. Thank you for allowing the public to comment on this action.

Sincerely,
Jasmine Hibberd

From: childersclan@comcast.net
To: [ECY_RE_Reynolds Cleanup Comments](#)
Date: Wednesday, July 16, 2014 8:32:03 PM

Reynolds does need

From: [Glenn Hudson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Aluminum site cleanup in Longview, WA
Date: Monday, July 14, 2014 2:09:43 PM

Millenium must clean this site 100% and not be allowed to re-pollute it again with coal. This area is dirty enough already! Quality of life is very important and we have other ways to provide more, cleaner jobs. Let's not sell out to big money and foreign powers!

From: [Sierra Club](#) on behalf of [Sandy Wood](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, July 10, 2014 6:45:28 PM

Jul 10, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Our drinking water and the Columbia River need to be protected!!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Sandy Wood
PO Box 871660
Vancouver, WA 98687-1660

From: [Sierra Club](#) on behalf of [Sharon DAmico](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, July 07, 2014 6:48:36 PM

Jul 7, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I strongly urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. To protect our planet, people in your position must stand up and have the courage to make these companies pay for the damage they have done. Our children and theirs will thank you!

Sincerely,

Sharon DAmico
10418 NE 52nd St
Kirkland, WA 98033-7601

From: [Susan Schwartz](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Date: Sunday, July 06, 2014 4:54:30 PM

I (Susan Lee Schwartz) is asking for a Level 6 Clean-up. I believe the Fluoride, Cyanide, PAHs, Caustic Sodium Hydroxide, Mercury, Sulfate, Arsenic, Cadmium, Chromium, Copper and Lead taken away from the Columbia River. The 540 acres of prime waterfront property should be cleaned up the same as Vancouver Washington and Troutdale Oregon. Level 6 will be of the most benefit to the residents of Cowlitz County.

I live in Longview Washington.

Sent from Windows Mail

From: [Constance Voget](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Tuesday, July 01, 2014 8:50:08 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

I am concerned about the levels of cyanide, fluoride and petro by-products in soil and groundwater at the site that exceed acceptable limits. Accordingly I ask you for a clean up that:

- meets the highest standard to protect future public health, workers' health, and our Columbia River;
- excavates and removes polluted river sediment to a certified landfill.

Also, I ask that:

- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions. Millenium lacks the expertise required.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Thank you very much.

Constance Voget
1615 North 41st Street
Seattle, WA 98103

RECEIVED

JUL - 1 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals —oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

I've lived in Longview for 50 years, raised two boys and owned my business downtown for 30 years. I have a vested interest and deep concern regarding the utmost health of our land, rivers and air. I feel there is no doubt the Reynolds site must be cleaned to the highest level for all citizens of Longview and the surrounding communities up and down river from the toxic property. I feel air quality should also be monitored as I live within 2 miles of this site. 14 years of monitoring is not long enough, it must be longer.

Mr. Louise "Penny" Lightfoot
Name

2733 Fir Street, Longview, WA 48632
Street Address City State Zip

pennylightfoot@comcast.net
Email

360-425-5851
Phone

From: [Mary Ferm](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Tuesday, July 01, 2014 12:23:17 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Alcoa and Millennium should be held accountable for the cleanup at the former Reynolds site.

As a preschool teacher, this is something I try to teach 4-years olds. You clean up your own mess. Grownups should already know this.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Mary Ferm
5062 New Sweden Rd NE
Bainbridge Island, WA 98110

From: [Sierra Club](#) on behalf of [Dallas Hoopes](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Tuesday, July 01, 2014 12:22:16 PM

Jul 1, 2014

Director Maia Bellon
WA

Dear Director Bellon,

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Let's require them to do it right.

Sincerely,

Dallas Hoopes
8714 31st St W
University Place, WA 98466-2243
(253) 564-4311

From: [REDACTED]
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Tuesday, July 01, 2014 11:52:58 AM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

[Privacy request: please do not publish my name and address in any public record.]

The environment is my top priority. For too long companies such as Alcoa and Millennium have been able to pollute with little cost to them - we the public pay the cost.

I urge you to hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site, including requiring that the cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
excavates and removes polluted river sediment to a certified landfill;
and the work is overseen by Certified contractors—not Millennium Bulk Terminals or Ambre Energy.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Thank you for this opportunity to comment.

[REDACTED]

From: [Jim Steitz](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 9:55:35 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

These companies must not be allowed to outsource the cost of waste cleanup and remediation to the citizens and government of Washington. I urge you to hold Alcoa and Millennium responsible for the full task of restoring the Reynolds site to a constructive, beneficial use.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Jim Steitz
564 Esslinger Drive
Gatlinburg, TN 37738

From: [Stephen Bachhuber](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 5:14:07 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

As a former resident of Longview and a physician who practiced there for nearly a decade, I can attest to the effects of industrial pollution on myself, my family, and my patients. I made a difficult personal decision to move from the Longview area due to its toxic environment. There is now an opportunity to remediate some of this toxic legacy.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Stephen Bachhuber
10561 SE Idleman Rd.
Happy Valley, OR 97086

From: [Gayle Janzen](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 4:48:02 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

I urge you to make sure this site is cleaned up properly and not put the polluters in charge since they will do a half assed job. They care only about profits and polluting the environment is just part of doing business for them, so it would not be in their best interests to do a thorough cleanup of this site.

Therefore, please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Gayle Janzen
11232 Dayton Ave N
Seattle, WA 98133

From: [David & Judith Laws](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 4:01:05 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

DO THE RIGHT THING!

David & Judith Laws
1718 Valencia Street
Bellingham, WA 98229

From: [Janet Duecy](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 1:34:18 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Tremendous profits have been realized over the decades by Millennium and Alcoa. They must be required to thoroughly clean up the toxic wastes they've left. Our drinking water and our river are not free toilets for irresponsible corporations to dump and forget their refuse. Real clean up must be a cost of doing business.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Janet Duecy
1302 31st Ave. So.
Apt. A
Seattle, WA 98144

From: [martin donohoe](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 1:08:11 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

I am a physician, educator, and most important, a father, who is very concerned about the quality of the Columbia River and our local drinking water.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

martin donohoe
50151 foothills rd
lake oswego, OR 97034

From: [Thelma Follett](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 12:47:36 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,
Ambre shouldn't be there in the first place! -for many reasons but I will just give you one:

"Keep it in the ground!"

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Thelma Follett
2605 Lakeridge Lane
Bellingham, WA 98226

From: [Cort Brumfield](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 12:20:08 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. Your support is absolutely vital.

Cort Brumfield
9002 N. E. Webster Street
Portland, OR 97220

From: [Karin Engstrom](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 11:49:09 AM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

You are also responsible for the cleanup at Hanford - the Department must consider all the cumulative impacts of these pollutants to our river - source of water, food, transport, energy and more.

Consider the profits that Reynolds gained from the use of this sight. No company should be allowed to use any of our resources without cleaning up after itself. That's what we are taught when we are little kids - to clean up after ourselves. Why should a big corporation that is considered a person be any different?

Karin Engstrom
6911 - 34th Avenue SW
Seattle, WA 98126

From: [Mike Zotter](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 11:41:51 AM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. And please do not cave to corporate influence- you are not beholden to them, but to citizens like me.

Mike Zotter
1038 SE 29th Ave.
Portland, OR 97214

From: [Ilene Le Vee](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 11:32:05 AM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

Should Alcoa/Millennium/Ambre refuse to comply with the previous, Washington State and Department of Ecology must mandate self indemnification of companies that store/load and/or transport coal:

- proactively contribute to a hazard/spill mitigation fund, to compensate for any/all direct loss or damage to Washington State or any county, municipality and/or resident resulting from a coal hazard/spill; and
- provide security for financial mitigation in all cases (public and/or private) of specified and verifiable hazard/spill associated loss.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup and/or citizen/environment proactive protection.

Ilene Le Vee
2030 Wingate Dr. SE
Olympia, WA 98513

From: [Margaret Berger](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Monday, June 30, 2014 11:13:37 AM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Longview deserves a thorough clean up by a qualified clean-up company that will keep the Columbia River chemical-free. Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals or Ambre Energy—oversee and undertake all cleanup actions.

Not only would a thorough clean-up ensure safe drinking water for Longview and a cleaner Columbia River, it would also employ more people through the process, boosting the local economy. This prime riverfront property should be put to its highest and best use to benefit our economy. Cleaning up the toxic mess would attract more economically viable and socially and environmentally responsible proposals than the current proposal to export dirty coal through this site.

We can and must do better, and cleaning up this toxic contamination is the first step. To protect the Longview community, Ecology must exercise its full authority to require the highest level of cleanup.

Margaret Berger
507 28th Ave
Apt 201
Seattle, WA 98122

From: [Sierra Club](#) on behalf of [Ruth Flucke](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Sunday, June 29, 2014 3:51:47 PM

Jun 29, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Please clean up this site before we find ourselves in real trouble with a sick earth and a sick population. Dirty & Contaminated water are the worst possible circumstances.

Sincerely,

Ruth Flucke
443 15th St
Bellingham, WA 98225-6127

From: [Ted Kozlowski](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, June 28, 2014 7:42:18 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions. (The legacy of disgrace from past industrial installations consists of the frequent escape by the owners from their obligation to clean up the pollution their factories, etc, produced. Don't let this happen in Longview. Longview is an attractive town, having been well planned back around a century ago. We personally prefer driving through and sometimes stopping on our way north, by crossing over from Oregon route 30.)

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Ted Kozlowski
1312 SW Texas St
Portland, OR 97219
971-212-1159

From: [Sierra Club](#) on behalf of [Bryan Bremner](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, June 28, 2014 4:49:38 PM

Jun 28, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Our goal should be: If it wasn't here when Lewis and Clark came down the river, it shouldn't be here now.

Sincerely,

Bryan Bremner
1 Bremner Ln
Republic, WA 99166-9521
(509) 775-0162

From: [Sierra Club](#) on behalf of [Miles Newton](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, June 28, 2014 2:49:30 PM

Jun 28, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

As a resident of Washington, I expect you to make sure that industry does not destroy our environment without any excuses. Big business made the mess and should not get big pass on cleanup!

Sincerely,

Miles Newton
2916 161st Ave SE
Bellevue, WA 98008-5612

From: [Sierra Club](#) on behalf of [Catherine & Hal Martinez](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, June 28, 2014 12:19:04 PM

Jun 28, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. This issue is about life, not politics and money. Thank you for your attention.

Sincerely,

Catherine & Hal Martinez
24382 Catamount Ln NW
Poulsbo, WA 98370-9454
(206) 913-7914

From: [Sierra Club](#) on behalf of [Gianna Vaccaro](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Saturday, June 28, 2014 8:48:52 AM

Jun 28, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

WATER is essential to all living beings and should be clean and safe. Would you want your family to drink unclean and unsafe water?

Sincerely,

Gianna Vaccaro
3725 P Loop
Washougal, WA 98671-5194
(360) 891-5236

From: [Sierra Club](#) on behalf of [Paula Arms](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 7:48:25 PM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. These companies purchased/leased this site knowing all the implications. Please make sure that they clean it up.

Sincerely,

Paula Arms
PO Box 491
Castle Rock, WA 98611-0491
(360) 274-4003

From: [Sierra Club](#) on behalf of [Mary Huff](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 7:47:53 PM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We can do better than "middle of the road" and we should. If we're going to commit time, resources, and effort to cleaning up this site, let's do it RIGHT. We owe that to current and future generations of people and the other flora and fauna with whom we share this earth and on whom our ability to thrive is so closely intertwined.

Sincerely,

Mary Huff
2522 Mitchell Ave
Dupont, WA 98327-8761

From: [Sierra Club](#) on behalf of [Andrea Matzke](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 6:47:45 PM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site.

We taxpayers rely on the Department of Ecology to protect our waters for the public, not special interest big business. We need to re-prioritize the focus of the Dept of Ecology. Protecting people, fish, wildlife, and quality of life is critical to the economy of Washington.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Andrea Matzke
2716 Mayfair Ave N
Seattle, WA 98109-1742
(206) 285-7785

From: [Sierra Club](#) on behalf of [Sharyn Pennington](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 12:47:29 PM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Please help insure clean water for us, our children and all future generations.

Thank you.

Sincerely,

Sharyn Pennington
20711 SE 335th St
Auburn, WA 98092-2287

From: [Sierra Club](#) on behalf of [Mark Roziewski](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 12:17:31 PM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Do the right thing.

Sincerely,

Mark Roziewski
18150 60th PI NE
Kenmore, WA 98028-8901

From: [Sierra Club](#) on behalf of [Penny Gates-Christianson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 11:17:00 AM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

For me, my kids and future generations living in WA, please take the appropriate actions and clean up this toxic site.

Sincerely,

Penny Gates-Christianson
1214 32nd St NE
Auburn, WA 98002-2361

From: [Sierra Club](#) on behalf of [Thomas Comish](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Friday, June 27, 2014 9:47:13 AM

Jun 27, 2014

Director Maia Bellon
WA

Dear Director Bellon,

As a concerned resident of Washington, I insist that you hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect nearby communities, Ecology must exercise its full authority to require the highest level of cleanup.

Thank you.

Sincerely,

Thomas Comish
PO Box 436
Republic, WA 99166-0436
(509) 231-2674

From: [Sierra Club](#) on behalf of [Jane Kepner](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 8:46:11 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We'll be watching to see that these measures are carried out!

Sincerely,

Jane Kepner
128 Sanborn Rd
White Salmon, WA 98672-8220

From: [Sierra Club](#) on behalf of [Cialita Keys](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 2:15:02 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Please do not allow the millions of taxpayer dollars spent on salmon/habitat restoration to be paid on vain. All life that goes from the mainland to the ocean and back require that this project be completed to the highest standards. I do not want Millennium to have this contract--they are more concerned with \$\$ than the quality of life and water in OUR area.

Please hear my prayer for justice for the land, water and life.

Sincerely,

Cialita Keys
PO Box 576
White Swan, WA 98952-0576

From: [Sierra Club](#) on behalf of [T Brown](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 1:45:12 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

There have been far too many corporations allowed to get away with dumping toxins into our drinking waters for far too long. Many people have become sick with all sorts of cancers and infections at an alarming rate.

We must take action against these heinous acts against mankind before it's too late for our health and livelihood.

Sincerely,

T Brown
1743 E Liberty Ave
Spokane, WA 99207-4769

From: [Sierra Club](#) on behalf of [Judith Rudolph](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 1:14:49 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect not only our community but our state, country and oceans of the world, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Judith Rudolph
80 Sand Rd
Port Townsend, WA 98368-9064
(360) 385-3266

From: [Sierra Club](#) on behalf of [Karen Verrill](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 12:45:03 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

It seems urgent that we do everything necessary to get and keep our environment clean and healthy for all of the lives in the water and on the shore!

Karen Verrill

Sincerely,

Karen Verrill
7806 Manzanita Dr NW
Olympia, WA 98502-9342
(360) 866-6187

From: [Sierra Club](#) on behalf of [Carlyn Hansen](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 11:45:50 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Due to legislative malfeasance nationally our air water and oceans continue to be big industry's toilet. To willingly allow the deterioration of human and environmental and animal health to deteriorate to secure political campaign contributions is immoral. The voters have long memories.

Stand and be counted declaring you will not be bought.

Sincerely,

Carlyn Hansen
532 Dexter Ln
Friday Harbor, WA 98250-6123

From: [Sierra Club](#) on behalf of [Christy Lewis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 11:45:15 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.
I have been boiling my drinking water for 15 years!

Sincerely,

Christy Lewis
1131 Hazel Ave NW
Bremerton, WA 98312-2243
(360) 479-2043

From: [Sierra Club](#) on behalf of [Keith Stracchino](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 11:14:33 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium fully accountable for the cleanup at the former Reynolds site. All clean-up and associated costs must be borne by the polluters, not by the long suffering tax-payers.

Again and again we see the disgusting scenario where a company is deliberately careless and negligent with its emission of assorted pollutants, gaseous, liquid and solid, in order to reduce its cost of doing business and increasing its profits. Government regulatory bodies are lax in their duties and do not enforce adequately the laws and regulations applicable to the case. When, eventually, the pollution becomes so bad that it cannot be ignored any longer, the company pleads poverty and an inability to pay the costs of a thorough clean-up. Having been cheated and defrauded by the company and by lax regulators, suddenly, and often surrepticiously, the costs of the cleanup are transferred to the long-suffering tax payers.

To protect our community and the much exploited tax payers, the Department of Ecology must exercise its full authority to require the highest level of cleanup providing both short and long term protection for the affected communities and the Columbia River.

Sincerely,

Keith Stracchino
10508 E Cimmaron Dr
Spokane Valley, WA 99206-8649
(509) 922-0274

From: [Sierra Club](#) on behalf of [Virginia Metcalf](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 10:45:08 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Your help is urgently needed. Our waters and oceans are already showing signs of massive pollution. We must protect this essential resource. Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. Please hold high standards for clean up and assure polluters are held responsible for their pollutants.
Thank you for your efforts.

Sincerely,

Virginia Metcalf
8814 30th Street Ct NW
Gig Harbor, WA 98335-6015

From: [Sierra Club](#) on behalf of [Keith Stracchino](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 10:44:46 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium fully accountable for the cleanup at the former Reynolds site. All clean-up and associated costs must be borne by the polluters, not by the long suffering tax-payers.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Keith Stracchino
10508 E Cimmaron Dr
Spokane Valley, WA 99206-8649
(509) 922-0274

From: [Sierra Club](#) on behalf of [Lydia Cooper](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 9:44:53 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Dear Maia Bellon,

Keeping our drinking water from the Columbia River safe is a no-brainer. Not to do so will have huge detrimental ripple-effects on everything in our state. From tourism, to health costs, to industries, to good jobs, to ecological effects that have massive effects on our state citizens' well-being and ability to live in a wonderful environment.

Please hold Alcoa and Millennium responsible for truly adequate cleanup at the former Reynolds site.

Please follow the suggestions noted below by the Sierra Club.

Sincerely, Lydia B. Cooper

.....

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

.....

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and

undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Lydia Cooper
2141 Dellesta Dr
Bellingham, WA 98226-7823
(360) 738-1786

From: [Sierra Club](#) on behalf of [William Looney](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 9:15:04 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Our water, our choice!

Sincerely,

William Looney
PO Box 3845
Silverdale, WA 98383-3845
(360) 697-3518

From: [Sierra Club](#) on behalf of [Lorraine Marie](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 8:44:59 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

As a person with a history of suffering from environmental contamination, I know firsthand the importance of a clean environment for everyone.

Sincerely,
Lorraine Marie
P.O. Box 546
Colville, WA 99114

Sincerely,

Lorraine Marie
PO Box 546
Colville, WA 99114-0546
unlisted

From: [Sierra Club](#) on behalf of [Mary Duvall](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 7:44:32 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. This dirty site is a threat to the entire lower Columbia system, the fish, the people, the wildlife. The river is not a sewer for irresponsible corporations. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Mary Duvall
73151 Lost Creek Rd
Clatskanie, OR 97016-2516
(503) 728-2959

From: [Sierra Club](#) on behalf of [Melodi Wynne](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 7:14:37 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup uses the cleanest technology in the process;
- Certified local contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.
- Original peoples of the land (First Peoples/Native Americans) be hired as advisers to, and witnesses of the entire process.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Melodi Wynne
2718 W Bridge Ave
Spokane, WA 99201-1503

From: [Sierra Club](#) on behalf of [Melodi Wynne](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 7:14:37 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup uses the cleanest technology in the process;
- Certified local contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.
- Original peoples of the land (First Peoples/Native Americans) be hired as advisers to, and witnesses of the entire process.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Melodi Wynne
2718 W Bridge Ave
Spokane, WA 99201-1503

From: [Sierra Club](#) on behalf of [Jerilynn Gordon](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 2:13:46 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. Industry that pollutes our environments need to be made responsible for the hazards they create. The public is deserving of industry doing their own cleanups. The public taxes that are paid by the CITIZENS of the U.S. should not be squandered on wasteful spending while big business is off 'hoarding' their \$ in overseas banks and not paying their fair share of taxes. As long as these conditions continue and the cleanup funds come from the 'real taxpayers' of America then 'big business' isn't being 'good citizen' practitioners and MUST be required to pay for the damage they have done to the countries (all citizens of Americas property) various landscapes. The Reynolds Company is big enough to pay for their own cleanup or need to find a different business to go into that is 'green'. This company recieved profit from the mess they created not the American public.

Sincerely,

Jerilynn Gordon
606 W Casino Rd Unit B108
Everett, WA 98204-1708
(425) 404-3145

From: [Sierra Club](#) on behalf of [Marianne Mabbitt](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 12:13:57 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Besides the toxic waters around Fukushima, Japan, and the FL Gulf, the Columbia River is poisoned. NO ONE CAN LIVE WITHOUT CLEAN WATER! Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Marianne Mabbitt
13699 Olympic View Rd NW
Silverdale, WA 98383-9717
(360) 204-5118

From: [Sierra Club](#) on behalf of [Julia Glover](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Thursday, June 26, 2014 12:13:57 AM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

PLEASE hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

THIS REALLY, REALLY MATTERS! , Ecology must exercise its full authority to require the highest level of cleanup -- our community deserves to be protected!.

Sincerely,

Julia Glover
7292 Maxwellton Rd
Clinton, WA 98236-8814
(360) 579-3665

From: [Sierra Club](#) on behalf of [Beth Marsau](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 11:43:54 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Hi, I'm glad to see that clean-up plans might be in the near future for some of our contaminated waters. I personally hope that we can prioritize clean up projects like this because if we don't our planet is doomed for sure. People might not think that clean up projects are "profitable" but it is essential for survival of everyone on earth.

I will endorse the following statements which were suggested to me to send to you. I will emphasize that we desperately need organized clean up projects such as this and hope that you implement them.

- Beth Marsau, Ferndale, WA

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Beth Marsau
PO Box 234
Ferndale, WA 98248-0234
(360) 384-6494

From: [Sierra Club](#) on behalf of [J McLaughlin](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 11:13:51 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

No one should even have to ask you, much less petition you, to do the right thing.

Sincerely,

J McLaughlin
16740 Dodd Ln SW
Rochester, WA 98579-9588
(360) 357-8334

From: [Sierra Club](#) on behalf of [Rhodila Allred](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:43:47 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

This needs to be taken care of!!

Sincerely,

Rhodila Allred
200 NE Riverhill Ln
Belfair, WA 98528-9683

From: [Sierra Club](#) on behalf of [Joann Pena](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:43:46 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

While your investigating, I urge you to check out the soil near the vacant Alcoa plant in Addy, WA and neighboring town Chewelah large scat hills are left to blow away.

The other area that needs critical clean up is at Northport WA where Canada has dumped heavy metal waste contaminating the Columbia River and the soil around Northport.

Sincerely,

Joann Pena
1117 E Nora Ave
Spokane, WA 99207-2466

From: [Sierra Club](#) on behalf of [Ms K. Riley](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:43:29 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

All life needs clean water and air to survive.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Ms K. Riley
630 E Mission Ave
Spokane, WA 99202-1918

From: [Sierra Club](#) on behalf of [Joseph Mcnolty](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:14:25 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Thanks for riding this project closely and insuring the clean up for generations to come.

Joe

Sincerely,

Joseph Mcnolty
1122 SW 322nd St
Federal Way, WA 98023-5557
(253) 517-7572

From: [Sierra Club](#) on behalf of [Daryl Bulkley](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:14:24 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I have lost faith in signing these requests because I wrote letters of concern about Hanford. to this day none of the problems there have been resolved.

It is an utter disgrace!

Sincerely,

Daryl Bulkley
619 Clay St Apt 206
Port Townsend, WA 98368-5802
(350) 379-1002

From: [Sierra Club](#) on behalf of [Andrea Blake](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:14:23 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We're counting on you to protect all of the life that depends on this water. Please do your best to protect us.

Sincerely,

Andrea Blake
1321 N 26th St Apt 324
Mount Vernon, WA 98273-2777
(360) 630-6172

From: [Sierra Club](#) on behalf of [Melody Risner](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:58 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We deserve clean water over what the companies want, they need to be find and clean up the mess.

Sincerely,

Melody Risner
1040 Michael Way
Camano Island, WA 98282-6522
(360) 387-7556

From: [Sierra Club](#) on behalf of [Dixie Edwards](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:57 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I have lived in Longview all my life. I know there are contaminants in the soil and water around the old Alcoa mill. A fellow classmates family owned a dairy close to the mill. Over the lifetime of that dairy they lost a total of three herds of milk cows from the contaminants that blew in from the mill.

That milk was in our food supply! The contaminants are still there. The clean up of the site needs to be very careful and thorough.

Sincerely,

Dixie Edwards
2039 44th Ave
Longview, WA 98632-5005
(360) 423-6456

From: [Sierra Club](#) on behalf of [Dixie Edwards](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:56 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I have lived in Longview all my life. I know there are contaminants in the soil and water around the old Alcoa mill. A fellow classmates family owned a dairy close to the mill. Over the lifetime of that dairy they lost a total of three herds of milk cows from the contaminants that blew in from the mill.

That milk was in our food supply! The contaminants are still there. The clean up of the site needs to be very careful and thorough.

Sincerely,

Dixie Edwards
2039 44th Ave
Longview, WA 98632-5005
(360) 423-6456

From: [Sierra Club](#) on behalf of [Judith Hockman](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:56 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I moved to Washington from the East Coast, and there are many times when I have been amazed and glad that I did, and I am glad that I helped Gov. Inslee get elected. Please make me just as glad that you are in charge of Washington's Department of Ecology!

Sincerely,

Judith Hockman
PO Box 1345
Tonasket, WA 98855-1345
(509) 486-4452

From: [Sierra Club](#) on behalf of [Carlos Westergaard](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:51 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.
- Companies should not be allowed to close up shop leaving behind a public hazard. Same with strip mall that fall after the fad passes. Maybe to build commercial property in otherwise vacant areas investors need to put up a bond. Or contribute to a fund to see the land can be passed on to beneficial use once the business moves on or shuts down.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Please look out for us, the people the children and are beautiful state, we need leadership, we need a hero. We need fresh clean water and yes this should be our top priority.

Sincerely,

Carlos Westergaard
14104 Dogwood Court Kp N
Gig Harbor, WA 98329-5516
(253) 303-0658

From: [Sierra Club](#) on behalf of [Pamela Harris](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 10:13:28 PM

Jun 26, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Keep Washington Green!

Sincerely,

Pamela Harris
3404 S 176th St
Seatac, WA 98188-4024

From: [Sierra Club](#) on behalf of [Barbara Perry](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 9:13:24 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

ALSO, PLEASE CLEAN UP THE ALUMINUM PLANT AT CHERRY POINT WITH TOXINS GOING INTO PUGET SOUND POISONING THE MANY FISH PEOPLE AND ANIMALS EAT. ALSO, BE READY TO CLEAN UP THE TOXIC OIL AND COAL TRAINS.

Sincerely,

Barbara Perry
1115 Lenora Ct
Bellingham, WA 98225-6816
(360) 734-7541

From: [Katherine Shields](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 9:01:18 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I have a relative who worked in the Aluminum industry and was struck by near fatal cancer in his early twenties. He and his wife watched two friends and co-employees die of cancer, leaving their children orphans. The toxins in the Aluminum industry are not trivial. They pose a lasting threat to life and safety of those in their area. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals —oversee and undertake all cleanup actions.

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Katherine Shields
12885 nw westlawn terrace
Portland, OR 97229
503-358-6345

From: [Sierra Club](#) on behalf of [Jane Haugen](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 8:15:32 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. There is no halfway with clean water. Now that this toxic site is identified, removing toxic soil and restoring the site serves everyone now and in the future.

Sincerely,

Jane Haugen
217 Alder St Apt 204
Edmonds, WA 98020-3531
(425) 774-8768

From: [Sierra Club](#) on behalf of [Eileen Lamar](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 8:13:56 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Companies cannot be allowed to dump waste products in public places - they need to pay the real cost of doing business and do the right thing by taking care of proper disposal of waste.

Sincerely,

Eileen Lamar
8320 Camano Loop NE
Lacey, WA 98516-6256
(360) 413-1211

From: [Sierra Club](#) on behalf of [Charlene Canonica](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 7:14:14 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

EPA failed to do the job so I hope we are smarter in our state to do what needs to be done. Please make them clean up the mess they created and made millions off of it.

Sincerely,

Charlene Canonica
11806 mvd sw
Burien, WA 98146

From: [Sierra Club](#) on behalf of [Carol Davidek-Waller](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 6:45:31 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

There can be no ethical reason for settling for less than a complete clean up of the site. Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Carol Davidek-Waller
95th St.
Kirkland, WA 98033-5101
(206) 947-0286

From: [Sierra Club](#) on behalf of [Terry Parkhurst](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 6:43:37 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

I grew up in Tacoma, the site of the old ASARCO (sic) smelter, which contaminated the air and the ground upon which it set, for years; even after it was shut down, it took years of soil remediation to clean up that site. The same thing has occurred with the Reynolds facility.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Terry Parkhurst
9800 5th Ave NE Apt A2
Seattle, WA 98115-2102
(206) 525-7024

From: [Sierra Club](#) on behalf of [Tamara Turner](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 6:43:22 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

It's our water, not just a dumping site for another penalty-free corporate crime.

Sincerely,

Tamara Turner
1931 E Calhoun St
Seattle, WA 98112-2644
(206) 325-9481

From: [Sierra Club](#) on behalf of [James Pierson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 6:15:22 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for a quality cleanup at the former Reynolds site. :

This is required as a cost of doing business, and to keep the natural environment as well as humans free of human caused pollutants.

Thank you.

Sincerely,

James Pierson
3138 Overhulse Rd NW
Olympia, WA 98502-3884
(843) 609-6076

From: [Sierra Club](#) on behalf of [Michael Mann](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 6:14:07 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please don't KILL the COLUMBIA RIVER !!!!!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Michael Mann
12800 NE 4th St Apt 136
Vancouver, WA 98684-7011
(360) 219-8495

From: [Sierra Club](#) on behalf of [Joseph Connell](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:46:02 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Good citizenship require us all to correct whatever damage we have caused. Our future society depends on it.

Sincerely,

Joseph Connell
3416 S Conway Ct
Kennewick, WA 99337-3053
(509) 582-0114

From: [Sierra Club](#) on behalf of [Joe Chasse](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:43:24 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We would never trust Ambre, the Australian coal company to EVER do a decent clean up!

BESIDES THAT, I thought we were working to get OFF carbon based energy?
So the coal gets shipped to China, where it is burned and comes back on the jet streams. BRILLIANT PLAN.

Sincerely,

Joe Chasse
22313 V St
Ocean Park, WA 98640-3513
(360) 665-3135

From: [Sierra Club](#) on behalf of [Digi Frennson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:14:19 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

One more thing: having clean water trumps your right to pollute it. Water is needed by ALL life on this planet, and spending millions trying to lobby against doing your job will actually cost more than just doing it.

Sincerely,

Digi Frennson
7009 Cady Rd
Everett, WA 98203-5042

From: [Sierra Club](#) on behalf of [Graham Greenlee](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:13:54 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that you begin the cleanup as soon as humanly possible, with the goal of achieving the highest possible standards in order to protect the future health of both the people of our state and the Columbia River;

The polluted river sediment must be removed by certified contractors and placed in a certified landfill;

To protect our community and our state, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Graham Greenlee
3703 S Edmunds St
Seattle, WA 98118-1728

From: [Sierra Club](#) on behalf of [Diane Brown](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:13:52 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

We have seen many contaminated sites in Washington state that have not been cleaned up to the highest level and some of those areas are still causing risk for water supplies and the health of our citizens.

To protect this community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Diane Brown
39 Rancho Villa
Walla Walla, WA 99362-4377

From: [Sierra Club](#) on behalf of [George Smith](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:13:16 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

The citizens of Cowlitz County deserve a return of this property to the cleanest, highest standards achievable so that GOOD, LONG TERM jobs can be established there and not turned back into a RE-POLLUTED industrial site needing cleaning up over and over again.

Sincerely,

George Smith
3003 Pennsylvania St
Longview, WA 98632-4325

From: [Sierra Club](#) on behalf of [Jean Davis](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 5:13:09 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Thank you for investigating the contamination on this toxic site.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Jean Davis
303 Cottage Ave
Hoquiam, WA 98550-1005
(360) 538-0680

From: [Sierra Club](#) on behalf of [Michael Russell](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:44:23 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I was born in 1948 and grew up until I went to college in Kelso/Longview. In that entire time friends and relatives who worked at the various mills in Longview, including Longview Fibre, Weyerhaeuser, Reynolds Aluminum and others, reported that all of the mills played fast and loose with Federal and State agencies that preceded the current environmental agencies. They were usually warned about timing of inspections and pollution sampling and would withhold their ugly waste products until after the officials went away, then they dumped it into the Columbia, as was the usual practice. Reynolds Aluminum was just as bad as the sawmills and paper mills. I'm glad it was closed. Year by year my father, who was a commercial fisherman on the Columbia and my brother and I watched as the fish runs dwindled and "gunk" and other pollution coated our nets as we pulled them up, out of the river. I also wonder how much secret, radioactive Hanford discharge we were exposed to. Please make sure the Reynolds company does a thorough environmental clean up before any other entity moves onto the site, so there can be no evasion of responsibility for environmental degradation that might subsequently be found. -Mike Russell

Sincerely,

Michael Russell
913 N 35th St
Seattle, WA 98103-8818
(206) 612-2283

From: [Sierra Club](#) on behalf of [Lewis Sikes](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:44:23 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

It isn't right for the taxpayer to have to pay for this cleanup. Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Lewis Sikes
PO Box 122
Grapeview, WA 98546-0122
(360) 275-5649

From: [Sierra Club](#) on behalf of [Elizabeth Sloss](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:44:02 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. You are our representative and we depend on you to do the right thing!

Sincerely,

Elizabeth Sloss
2228 40th Ave E
Seattle, WA 98112-2406

From: [Sierra Club](#) on behalf of [Carl Robinson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:43:46 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

It is very important for our children's future that you please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Carl Robinson
2815 Eastlake Ave E Ste 300
Seattle, WA 98102-3086
(206) 545-1990

From: [Sierra Club](#) on behalf of [Berinda Van Cleave](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:15:12 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

The rest of us are held accountable so they damn right they should be held accountable!

Sincerely,

Berinda Van Cleave
15709 NE 249th St
Battle Ground, WA 98604-9707
(360) 687-4367

From: [Sierra Club](#) on behalf of [Sally Newell](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:14:17 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

I have lived along the Columbia River my whole long life. I swam in it with my horses as a kid, have taken my children and grandchildren down to it, fished it, sailed its waters . . . it defines the word "river," in my world.

I grew up in The Dalles, Oregon, where most of my friends' dads worked for the aluminum company (Harvey Aluminum, later Martin Marietta, later something else). It must have been a pretty good business, because another aluminum plant went in upstream, south of Goldendale, Washington. These plants are long closed now, and I wonder how well their toxic legacies were laid to rest.

Now I live in Underwood, WA., still along my river, 20 miles downstream from The Dalles. I'm delighted that you are working now to get the toxins out of the river near Longview.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. Corporate polluters reap the profits and those profits should pay for any environmental damage their manufacturing processes create. How did Reynolds get off the hook? Corporations should never be allowed to leave the taxpayers responsible for their messes.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Sally Newell
142 Dona Rd
Underwood, WA 98651-9107
(509) 493-3624

From: [Sierra Club](#) on behalf of [Paul Franzmann](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:14:02 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. It's your job and you have nothing better to do.

Sincerely,

Paul Franzmann
420 Catherine St Apt 12
Walla Walla, WA 99362-3192

From: [Sierra Club](#) on behalf of [Kristin Meijer](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:13:45 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We all need clean drinking water and deserve clean water.

Mrs Kristin Meijer

Sincerely,

Kristin Meijer
14830 119th Ave NE
Kirkland, WA 98034-4604
(425) 488-6625

From: [Sierra Club](#) on behalf of [Ray Grace](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:13:32 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Yes its time for big busines to take bigresponsibility and big action to clean up their big mess.
We are handing our children and grandchilren a bunch of crap to deal with... Oh well, at least these companies have just enough money to do the right thing... CLEAN IT UP!!

Sincerely,

Ray Grace
1419 36th Ave NE
Olympia, WA 98506-2410
(360) 353-4772

From: [Sierra Club](#) on behalf of [William Walcott](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 4:13:26 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Please don't allow polluters to continue to destroy our environment, or to evade the responsibility of clean-up after they have done their damage.

Sincerely,

William Walcott
14136 Woodcrest Loop NW
Silverdale, WA 98383-9530
(360) 697-6900

From: [Sierra Club](#) on behalf of [William Selig](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:45:10 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

They broke it. They should be responsible for the cost of fixing it to like new condition based on our assessment of that, not theirs.

Sincerely,

William Selig
15517 12th Ave NE
Shoreline, WA 98155-6225

From: [Sierra Club](#) on behalf of [Mark Whitaker](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:27 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

As a former Cowlitz County resident, this is an issue I consider highly important. To do nothing is the same as trying to say there is not a problem, this is totally unacceptable given the known harm that these toxins can cause to the environment and to the citizens exposed to these toxins.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Mark Whitaker
14537 NE 40th St Apt H201
Bellevue, WA 98007-3379
(425) 881-6260

From: [Sierra Club](#) on behalf of [David Gross](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:16 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. For the sake of future generations I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

David Gross
6558 38th Ave NE
Seattle, WA 98115-7437
(206) 525-8179

From: [Sierra Club](#) on behalf of [Patricia Daly](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:06 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Longview deserves better!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Patricia Daly
707 18th Ave E
Seattle, WA 98112-3927
(206) 323-8977

From: [Sierra Club](#) on behalf of [Mayellen Henry](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:06 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

These companies took the profits while contaminating our state. They should be required to make the community whole. None of a sort-of cleanup is at all acceptable. Also do not put a fox in charge of the cleanup. Chickens WILL be eaten and the cleanup will not be well-done.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Mayellen Henry
16651 SE 17th St
Bellevue, WA 98008-5123
(425) 746-5959

From: [Sierra Club](#) on behalf of [Debra Golden](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:05 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

I have young grandchildren living downriver on the Columbia. Therefore, please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Debra Golden
10012 NE 37th Ct
Kirkland, WA 98033-7877
(425) 454-3063

From: [Sierra Club](#) on behalf of [Patricia Schwartz](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:44:00 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions. Seems like a conflict of interest to entertain the idea of a coal company as a clean up contractor. Would you want to drink the water? Would you trust them with your health?

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Patricia Schwartz
10612 NW Lower River Rd Slip 1
Vancouver, WA 98660-1046

From: [Sierra Club](#) on behalf of [Terry Van Scotter](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:45 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

The company's are held accountable, charged in court and fined accordingly!.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Also they need to look at the pollutants coming from big rigs that travel the highway right next to the river, the solid carcinogens fall right into the water!
the diesel world has been over looked and cars or gas engines dont pollute near as bad as the diesels! thick black goo that never leaves your lungs! wow!.

Also what about all the fertilizer plants right next to the water! crazy! these places should be miles away from the water! cant believe it! what happens when one of these tanks start leaking and leaching into the river (like handford) these people need to think before allowing these kinds of pollutants to be located right next to a body of water! totally stupid!.

Sincerely,

Terry Van Scotter
928 20th Ave
Clarkston, WA 99403-3114
(509) 758-7606

From: [Sierra Club](#) on behalf of [Sue Moon](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:32 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

My hometown deserves better than this.

Sincerely,

Sue Moon
1300 Lake Washington Blvd S
Seattle, WA 98144-4018
(206) 322-2177

From: [Sierra Club](#) on behalf of [Valerie Alexander](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:31 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Also, please direct your staff who is supposed to be investigating Stordahl at Yacolt Mountain to do their job and protect the people's water near their gravel mine. Too bad we have to sue them under the federal laws when the state laws are there to do the same.

Sincerely,

Valerie Alexander
2404 NW Coyote Ridge Rd
La Center, WA 98629-3728
(360) 263-2521

From: [Sierra Club](#) on behalf of [Gary Albright](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:21 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. Clean water is our right and our responsibility.

Sincerely,

Gary Albright
21613 Echo Lake Rd
Snohomish, WA 98296-7857
(425) 881-3048

From: [Sierra Club](#) on behalf of [Lorna St John](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:18 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

This is a no brainer. The Columbia is such an important part of our region.

Please take action.

Sincerely,

Lorna St John
7208 E Bigelow Gulch Rd
Spokane, WA 99217-9604
(509) 483-2389

From: [Sierra Club](#) on behalf of [Stephan Grumm](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:13 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

This community has supported and trusted the aluminum industry in their area for decades. Now that it is time to pay for the residue on the quality of life for these residents please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Stephan Grumm
2613 NW 63rd St
Seattle, WA 98107-2454
(206) 922-3361

From: [Sierra Club](#) on behalf of [Misty Speck](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:43:05 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site...their lack of stewardship of the environment should come at a high cost.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--NOT Millennium Bulk Terminals--oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Stand up for Washington's lands and waterways!

Sincerely,

Misty Speck
913 20th Ave
Seattle, WA 98122-4735

From: [Sierra Club](#) on behalf of [Jonathan Stratman](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:15:42 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

It doesn't make economic or legal sense to allow a company to profit from an area or a natural resource, and not be required to leave it as they found it. "This land was made for you and me" ... not just for them!

Sincerely,

Jonathan Stratman
1143 Benton St
Port Townsend, WA 98368-6423

From: [Sierra Club](#) on behalf of [Julie Bennani](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:15:39 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. This is critical and these organizations need to be accountable for clean, responsible operations.

Sincerely,

Julie Bennani
1527 NE 76th St
Seattle, WA 98115-4373
(206) 789-6345

From: [Sierra Club](#) on behalf of [Kylie Loynd](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:15:36 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

As a mother of two growing daughters, I am extremely concerned with our water quality - essential building-block for long-term health.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Kylie Loynd
725 Mill Ave
Snohomish, WA 98290-2537

From: [Sierra Club](#) on behalf of [Nick Zeller](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:15:30 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

How can your agency justify it's existence without doing this kind of vital work, what is your purpose if this action is not required?

I am so upset that industry can ruin our environment without any serious consequences, it undermines our entire concept of society when this kind of egregious violation of the commonweal is allowed.

Sincerely,

Nick Zeller
702 Wauna Lake Club Rd
Stevenson, WA 98648-6043

From: [Sierra Club](#) on behalf of [Francis Joy](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:15:18 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I thought Nixon set

up a super fund to clean up this type of mess! If Congress has defunded the clean air, and water act, by letting these corporations off the hook, then sue the congress for the money! The Washington tax payers should not be responsible for any clean-ups caused by corporate greed, to manipulate the cost of doing business...

Sincerely,

Francis Joy
1608 186th Ave E
Lake Tapps, WA 98391-6465
(253) 447-8922

From: [Sierra Club](#) on behalf of [Barbara Voss](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:14:08 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. Please protect our water; it's our greatest resource and is needed for our lives.

Sincerely,

Barbara Voss
7001 NE 137th St
Kirkland, WA 98034-5010

From: [Sierra Club](#) on behalf of [Sandy Wood](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:13:06 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Clean water is mandatory, not the toxic contaminants already there, then adding coal or oil companies contaminants. Cleaning the site, and using it appropriately, not for another polluter, is to everyone's benefit and advantage.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Sandy Wood
PO Box 871660
Vancouver, WA 98687-1660
(360) 892-1443

From: [Sierra Club](#) on behalf of [La Belle Urbanec](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:13:02 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

We ALL drink this water. It is critical to keep our water clean and safe.

Sincerely,

La Belle Urbanec
2159 Lummi Shore Rd
Bellingham, WA 98226-9243
(713) 822-1649

From: [Sierra Club](#) on behalf of [helen fristrom](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 3:12:47 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.
It's high time a state raises the bar and takes the lead in implementing high standards and quality in the process to clean up the environment. Let us not have another HanDFORD.....do your job.....it is our tax money and your responsibility.....so just fight the big boys! If the federal government can't and won't.....our state owes it to their citizens.

Sincerely,

helen fristrom
16797 Chumstick Canyon Hwy
Leavenworth, WA 98826
(509) 548-0203

From: [Sandy Wood](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:50:33 PM

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

The clean up needs to be complete and to the highest standard, not "swept under the rug" and polluted more!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals —oversee and undertake all cleanup actions.

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Sandy Wood
PO Box 871660
Vancouver, WA 98687
3609896825

From: [Sierra Club](#) on behalf of [Ellis Pascual](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:44 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the Toxic material should never be given any chance to spread to the residents of this region. Result: non-descript diseases can develop and make people sickly, needing medical attention, costly medical bills, affecting their ability to work, Nobody wants the State of Washington to be populated with sickly people, unable to work, etc. Of course, other people who may want to move to Washington will decide to stay out. We all want to have Washington the Evergreen, GREEN state. God is watching how we care for our state, .

Sincerely,

Ellis Pascual
7122 45th Ave S
Seattle, WA 98118-3812
(206) 723-7968

From: [Sierra Club](#) on behalf of [Kate Nielson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:36 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please help our communities that depend on this river!

Hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Kate Nielson
18 Ponderosa Park Dr
Kettle Falls, WA 99141-9495
(509) 738-9238

From: [Sierra Club](#) on behalf of [Julie Holtzman](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:16 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup. The future of my young grandchildren's health could be at stake.

Sincerely,

Julie Holtzman
1018 13th St Apt 35
Snohomish, WA 98290-2053
(360) 348-5531

From: [Sierra Club](#) on behalf of [Nathan Huerkamp](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:15 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Let's make this site and the downstream areas safe for our communities for generations to come.

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Nathan Huerkamp
8737 Greenwood Ave N Apt 7
Seattle, WA 98103-3639

From: [Sierra Club](#) on behalf of [Lisa Drost Nash](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:13 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

It will be a significant improvement for the Columbia River, the surrounding environment and our children's future. Surely these should carry some weight in the face of corporate profit.

Sincerely,

Lisa Drost Nash
10753 Palatine Ave N
Seattle, WA 98133-8726
(206) 363-2678

From: [Sierra Club](#) on behalf of [Arthur Grunbaum](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:08 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

As a SW Washington Region resident. I implore you to hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- 1) This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- 2) This cleanup excavates and removes polluted river sediment to a certified landfill;
- 3) Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.
- 4) Monitoring of at least 20 years to assure there are no unexpected or unintended consequences from these actions.

Ecology must exercise its full authority to require the highest level of cleanup.

Protect our communities and those who visit them.

Sincerely,

Arthur Grunbaum
1128 State Route 105
Aberdeen, WA 98520-9516
(360) 648-2476

From: [Sierra Club](#) on behalf of [Fred Fraase](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:45:03 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Also, I'm a brewer and we can not make good beer without good CLEAN water!

Sincerely,

Fred Fraase
3606 S Alaska St
Tacoma, WA 98418-1815

From: [Sierra Club](#) on behalf of [Steve Thompson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:44:24 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I grew up in Longview and know how haphazardly toxic materials were handled at that plant. The clean up now should be complete. Not haphazard.

Sincerely,

Steve Thompson
9050 Avondale Rd NE
Redmond, WA 98052-3304

From: [Sierra Club](#) on behalf of [Polly Tarpley](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:43:51 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Alcoa apparently dumped much more than its workers!!! Force is the order of the day, as many of these corporate "soilers" and dumpers are quick to turn away, deny, evade! This must not be allowed, and they must be held accountable!!!

Sincerely,

Polly Tarpley
848 NW Bracken Ct
Poulsbo, WA 98370-6956
(360) 394-8344

From: [Sierra Club](#) on behalf of [Bj Hedahl](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:43:47 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

USE VOLUNTEERS !?!!

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Sincerely,

Bj Hedahl
4332 15th Ave S
Seattle, WA 98108-1446
(206) 306-4816

From: [Sierra Club](#) on behalf of [Kathleen Hancock](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:43:29 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I work in the drinking water industry and know that we must all be good stewards of our water supplies. Drinking water is precious.

Sincerely,

Kathleen Hancock
46451 Baker Loop Rd
Concrete, WA 98237-9558
(360) 770-4633

From: [Sierra Club](#) on behalf of [JR Holland](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 2:43:16 PM

Jun 25, 2014

Director Maia Bellon
WA

Dear Director Bellon,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors--not Millennium Bulk Terminals --oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

"Don't tell me what you believe,
Tell me what you do,
And then I will tell you what you believe!!"

Sincerely,

JR Holland
3209 NE 124th Ave
Vancouver, WA 98682-7836

From: [Kelly McConnell](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)
Date: Wednesday, June 25, 2014 1:30:30 PM

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. They made millions of dollars by creating that mess and it's past time for THEM to pay for the cleanup. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and OUR Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified INDEPENDENT contractors—not Millennium Bulk Terminals —oversee and undertake all cleanup actions.

To protect our community and Columbia River, Ecology must exercise its full authority to require the highest level of cleanup.

Stop letting the greedy rich a\$\$hole\$ off the hook for the degradation of OUR environment that THEY profited from.

Kelly McConnell
11375 SW Erse
Tigard, OR 97223
5038914668

From: [Jeff Wilson](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: Reynolds Longview
Date: Saturday, June 07, 2014 9:41:45 PM

After reviewing the information regarding the proposed remedial activities at the former Reynolds Metals facility in Longview I want to urge Ecology to support all the responsible parties for the proposed removal of contaminates located outside the dike to be removed from the Columbia River areas as identified in the discovery process.

It would seem sensible, that no other alternatives exist that are superior to the proposed removal of contaminates in the Columbia, therefore I support Ecology to approve such action.

Thank you,

Jeff Wilson

1-360-431-7864
www.tpitoilets.com

From: [Fritz, Angela \(ECY\)](#)
To: [ECY RE Reynolds Cleanup Comments](#)
Subject: FW: Dept of Ecology comment notice: Former Reynolds Metals aluminum smelter cleanup
Date: Friday, June 06, 2014 6:23:36 AM

From: ellen noramac [enoramac@yahoo.com]
Sent: Thursday, June 05, 2014 7:08 PM
To: Fritz, Angela (ECY)
Subject: Re: Dept of Ecology comment notice: Former Reynolds Metals aluminum smelter cleanup

Dear Ms. Fritz,

I'm a retired electrician and worked at this smelter for a contractor for a short time back in the seventies and as I recall there was a large amount of mercury that had been spilled on the ground as the result of a tear out at the electrical sub-station site located at the west end of the project. No on going clean-up was in progress and I quit soon after fearing contamination to myself while engaged in installing electrical equipment.

My comment would suggest the drilling of core samples around the perimeter of this site for estimation of the depth of penetration of the mercury and other contaminants used at the smelter. Thanks for your interest in contacting me. though i have little information to offer, I do care about about our environment and the constant battles we have with industry concerning contamination.

Our chief concern in this area is with coal companies wishing to build exporting sites for coal shipments to Asia. Considering the contamination to Puget Sound, the endangered marine species and the health of our citizens plus adding CO-2 contamination to the atmosphere, makes the whole idea of exporting coal truly an insane venture, to say the least.

Sincerely,
Douglas and Ellen Cameron
enoramac@yahoo.com

On Mon, 6/2/14, Fritz, Angela (ECY) <anfr461@ECY.WA.GOV> wrote:

Subject: Dept of Ecology comment notice: Former Reynolds Metals aluminum smelter cleanup
To: "Fritz, Angela (ECY)" <anfr461@ECY.WA.GOV>
Received: Monday, June 2, 2014, 2:03 PM

Dear Interested Party:

The Department of Ecology (Ecology)
invites you to comment on two actions for the cleanup of the
former Reynolds Metal aluminum smelter in Longview,
WA.

.
Draft
Remedial Investigation/Feasibility Study, investigating

contamination from past activities and identifying cleanup options for the site.

.

An amendment to Agreed Order No. 8940, and the associated Interim Action Work Plan and State Environmental Policy Act Determination of Nonsignificance related to this action. This would require removal of contaminated sediments from a small area of the Columbia River next to the site, with work expected to be complete by the end of 2014.

We will accept comment June 2 – August 1, 2014. Visit our webpage and read the public comment notice for information on where to find copies of the documents and how to comment.

Your contact information appears on our mailing list of people who want to know about the work Ecology's Industrial Section does with certain industrial facilities. Thank you for your interest in the health of our State's environment.

Sincerely,

Angie Fritz
Dept of Ecology
Public involvement
coordinator

From: [Sandra Davis](#)
To: [Barrett, Guy E. \(ECY\)](#)
Subject: Reynolds cleanup in Longview
Date: Wednesday, June 04, 2014 1:10:15 PM

Hello, Guy,

Thank you for being available for questions on the draft Reynolds RI/FS document. In reviewing the Alternative Cleanup Plans, it is very confusing to me to understand what exactly is the long-term monitoring period for each plan. When we previously met with Garin, we were told there would be 30 years of monitoring and also extended monitoring passed that time. Alternative Plan #4 mentions a fourteen-year monitoring for the West Groundwater area as well as fourteen years for the East Groundwater area.

This next sentence has me puzzled, tho, since I am not aware of the definition of "restoration timeframe."

Monitoring events would occur in a step-wise fashion with 5 to 10 years of quarterly events, followed by 4 to 9 years of annual events and by monitoring every 5 years thereafter throughout the restoration timeframe.

Will there be continuous monitoring of this property in perpetuity? And who will pay the costs for this?

Thank you again.

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632
360-577-1043



Board of Commissioners

County Administration Building
207 Fourth Avenue North
Kelso, WA 98626
TEL (360) 577-3020
FAX (360) 423-9987
www.co.cowlitz.wa.us

COMMISSIONERS

Michael A. Karnofski
District 1

Dennie P. Weber
District 2

James R. Mianer
District 3

CLERK OF THE BOARD

Tiffany Ostrelm

July 11, 2014

Daily News
Letter to the Editor

The Cowlitz County Board of County Commissioners supports the Washington State Department of Ecology proposal for remediation of former Reynolds Aluminum industrial site in Longview. We support the DOE's recommendation for Option 4 because it protects the health, safety and wellbeing of the citizens of Cowlitz County. The "clean up" will result in property which can be used to further regional economic development.

In addition, the dredging of the contaminated sediment at the site's outfall this year is in the best interest of the fish recovery strategies adopted by the State of Washington and Lower Columbia Fish Recovery Board. We do request that any material dredged during this remediation be removed from the site for disposal. The onsite treatment of the upland contaminated soils is the best method to reduce exposure that could occur if the soils are removed from the site for disposal.

We ask that the Citizens take the time to education themselves on the proposal.

cc: Department of Ecology

Testimony for Alcoa Cleanup

July 16, 2014

Harvey Williamson *NW*
8535 OCEAN BEACH *14W*
LONGVIEW WA 98632

The site where Alcoa's former Longview plant now sits was not polluted prior to construction.

Now Alcoa, under its subsidiary Northwest Alloys, is asking to partially clean up the site by the use of capping areas and building permeable barriers to mitigate (read cover up) rather than clean up the polluted areas. If we, the people of Cowlitz County, do not insist on the removal of the contaminants, future businesses will be restricted in their ability to use the

site or else they will have to be responsible for cleaning up the rest of Alcoa's mess. This is unacceptable for the Cowlitz County community and for its present and future industrial partners.

The removal of the site contaminants is positively the best solution for the industrial community that will remain in Cowlitz County. For in the long view of future development, as a prime industrial value-added export site, all of the present site should be made available to development, not just a mitigated site with portions site available for development. The industrial

roots of Longview will then be free to grow where they will, with a more complete clean-up of the Alcoa site. Alcoa can then move on to other horizons, while Longview's industrial horizons will be preserved for the future.

We cannot bring back the pristine conditions of the pre-industrialization of the Alcoa site even at Level #6 site restoration. (The site cannot even be used by the public as a park—a wonderful waterfront park—at Level #6 clean-up.) Yet it is incumbent on the citizens of Cowlitz County, in accordance with Washington State laws, regulations and values shared by

all the people of the state, to ensure the Alcoa site be cleaned up to the highest standard possible so that new industries will have the freedom to make the most of our deep water port and access to 100% of the Alcoa site land.

This clean-up is not a burden on the taxpayer. It only becomes a burden if Northwest Alloys is permitted to get away with a level 4 cleanup. It is up to the citizens of Cowlitz County to hold government and industry to the standards set by Washington State law and the citizens of Longview and Cowlitz County.

Clean-up at level#4 is not up to the industrial standards of the
people of Cowlitz County... Alcoa Can And Must Do Better!

6-18-14

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill; Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

I am seriously concerned about 70 years of contaminated material being taken from one site and dumped into another. I'm very mistrustful about "certified" contractors and "certified" landfill.

Question: Why Reynolds/Alcoa wasn't held responsible?

Jo Ann Baker
Name

3545 Fairway Lane Longview WA 98632
Street Address City State Zip

wbjbbaker@q.com
Email

360-636-5968
Phone

PUBLIC COMMENT SHEET

NAME Jeff Wilson
ADDRESS 4723 mt Solo Rd Longview, WA 98632
EMAIL wilsonjith@msn.com

COMMENTS (Please use as many sheets as needed)

The portion of the remediation work in the Columbia River needs to happen this year - in 2014 during the window to work in the river areas.

My choice is option #4 for the other aspects of the on-site remediation work.

PUBLIC COMMENT SHEET

NAME Elaine Sharp

ADDRESS 1609 22nd Ave Longview, WA

EMAIL

COMMENTS (Please use as many sheets as needed)

There is only one choice - one decision - 100% clean up!

Troutdale was cleaned/restored to 100%. We (Longview) deserve the same.

Thank you!

PUBLIC COMMENT SHEET

NAME E. Sharp

ADDRESS 1609 22nd Ave Longview WA

EMAIL

COMMENTS (Please use as many sheets as needed)

I feel the benefit score of 7.9 for a full cleanup is too low.

There has to be more benefits when clean up is 100%.

Question for Oregon
PUBLIC COMMENT SHEET

NAME Ann Cordero

ADDRESS 2814 Lilac, Longview, WA 98632

EMAIL corderoa@teleport.com

COMMENTS (Please use as many sheets as needed)

I would like to know what process was used for the cleanup at Troutdale and which of the longview alternatives that process approximates.

Department of Ecology, 16 July 2014, Kelso WA

Re: Reynolds Metals Clean-up, Longview WA

In college i rowed in Crew in a shell, which silently & smoothly sliced thru water, leaving no trail behind. After college I continued rowing & paddling, mostly on rivers. When i "took out", whether raft or kayak or canoe, i looked back on the water i had joyfully played upon, & saw no sign that i had been there. That was cool. Rivers taught me that i could interact with & benefit from nature, without harming it. How good it would be if certain corporations understood that lesson. To come, accept nature's gifts, & then go, with nothing left behind. Reynolds Metals did not understand that lesson. As far back as the forties, people & environment suffered from corporate recklessness. Seventy years later, the mess remains with us. Seventy years too long. Ecology can address this, by requiring highest standard of clean-up, of both land & water, including what has polluted the Columbia, -- Chinookan Wimahl. Highest standard & fastest schedule: there is no good reason to direct anything less. A song goes: "River, take me along, in your sunshine, sing me your song, ever moving & wild & free, you rolling old river, you changing old river, let's you & me river run down to the sea." What kind of people abuse the planet. What kind of people let them. What are we doing, to air & land & river & sea, & to ourselves. Every time we "take out" from wherever we joyfully played – or worked – we should look out over where we had been, & see nothing that we have left behind.

Den Mark Wichar, Science Teacher

711 W 25 St, Vancouver WA 98660

360-694-3703, deedub@webtv.net

Reynolds Property Remediation
Ecology Hearing - Public Comments on July 16, 2014

I would like to express my sincere thanks to the Department of Ecology for giving us so much of your time and attention with this important cleanup.

As you know, any property located near water is susceptible to flooding and ground saturation. Our climate is changing - we're seeing extreme weather events around the world.

My husband and his family have lived at our Abernathy Creek property since the early 60s. In January 2009, we experienced a severe rainstorm that resulted in flooding. Water did not reach the 100-year floodplainit reached the 500-year floodplain! This shocked everyone since it had never happened before. We were unprepared then - but we have made changes and are better prepared now.

In making a decision on the cleanup of the Reynolds property, these extraordinary weather occurrences have to be considered. If hazardous materials are left onsite, the likelihood of a severe weather event is very strong and flooding and ground saturation would cause pollutants to move. Fluoride, cyanide and carcinogens can cause irreparable harm if they migrate into the Columbia River, internal waterways or our groundwater. What happens on that property will impact us all.

Leaving pollutants onsite would not be a permanent solution. Capping contaminated areas would not be a permanent solution. The only way to ensure the safety of citizens in this area and people using the river to fish or recreate is to eliminate contaminants from this property.

No one can foresee the future; but we can prevent the worst from happening. I am asking Ecology tonight to require that contaminated materials be moved to a certified offsite landfill.

Sandra Davis
1002 Abernathy Creek Road
Longview, WA 98632

July 16, 2014

To Washington Department of Ecology

Good evening. I am Diane Dick, a 30 year resident of Cowlitz County and Vice President of Landowners and Citizens for a Safe Community.

I request first, that all contaminated sediments from Outfall 002A be removed to an offsite disposal facility. I ask you choose Alternative 6 for the Reynolds cleanup plan. I urge you to reevaluate for removal the closed black mud pond.

The most stringent level of cleanup is justified because it will remove most of the toxic waste materials off the site. This is extremely important because the site is environmentally unstable and subject to natural events of unknown proportion. I mean volcanic eruptions, subduction zone earthquakes, floods, and now large rises in sea level within the century.

The in place mitigations are planned for the current water and soil conditions of the site. If our overdue Cascadia subduction zone earthquake occurs the hydro-geology could change in the blink of an eye. According to WA Department of Natural Resources maps the Reynolds plant site sits in a well-known liquefaction zone. I've been told, according to geo-tech reports, this means near shore areas could suddenly sink and shift into the Columbia River.

That would be bad enough, but this area was diked less than a hundred years ago. Do we know if the levees protecting this area from floods will remain structurally sound in the event of a large earthquake?

If this is not enough to justify off site removal, consider your own agency, Department of Ecology, has conservatively predicted at least 2 feet of sea level rise by the end of the century. This will impact the function of the levees, the CDID drainage ditches, and groundwater levels. The groundwater is already so high some of the toxic laden landfills on the site are sitting in groundwater. You've yet even to find the bottom of Fill Deposit B-1. (RI/FS p.87)

There is no certainty about environmental conditions for this site either five years from now or 100 years from now on which to base permanent toxic hazard mitigation other than to remove all toxic wastes and contaminated sediments off site.

Please select Alternative 6 to make this site environmentally safe for the future health and well-being of our community, and for those who live downstream.

Thank you.

Diane L. Dick, Vice President
Landowners and Citizens for a Safe Community

13 St. Helens Lane
Longview, WA 98632
360.636.5276
dldick@cni.net

Some of the environmental monitoring wells exhibited unusually high groundwater elevations in comparison to adjacent wells. These conditions have been noted at wells G6-S and RLSW-4, which are located along the CDID levee near the Columbia River. The water elevations in these wells also have not correlated well with river stage in comparison to deeper-screened wells in these areas (see Plate 4-7). The observations from these wells suggest that groundwater in this area is perched on low permeability silt and clay layers, as noted in the boring logs for these wells. In December 2012 (and to a certain extent October 2012), relatively high groundwater elevations were observed at wells R-1S, R-4S, and G1-S, which are also located along the CDID levee near the Columbia River.

Figure 4-3 shows the estimated bottom elevations of landfill and fill deposits and how they are influenced by groundwater during wet weather conditions. Figure 4-3 was developed using information contained in Appendix D-6. In the East Groundwater Area, solid media in Fill Deposit A, Fill Deposit B-2, and Landfill #1 is in contact with or beneath the wet weather groundwater elevations. The test pits excavated within Fill Deposit B-1 were not able to fully penetrate the fill deposit (see Appendix D); therefore, the bottom elevation is unknown. Fill in this deposit may extend below the maximum water table elevations depicted by the groundwater elevation contours in Figure 4-3. None of the fill deposits in the West Groundwater area appear to be in contact with groundwater during wet weather conditions.

4.3.2 Tidal Effects

As discussed in Section 4.2, the water levels within the Columbia River fluctuate with the tides. These fluctuations were documented during a 96-hour tidal study conducted in late September and early October of 2012. During that tidal study, the Columbia River elevation fluctuated over 5 feet (see Plate 4-7).

The extent of tidal influences on groundwater within the Longview/Kelso basin has been evaluated by others. Tidal influences tend to propagate furthest in the coarse-grained Lower Alluvium and to a much lesser degree within the fine-grained Upper Alluvium or in the surficial soils.

Roy P. Staples
2049 Bloyd Street
Kelso, Washington 94626

Washington State Department of Ecology

Public Hearing, Kelso Red Lion Inn

July 16, 2014

Thank you for following the democratic process, and listening to citizens concerns.
Dear Department of Ecology,

I'm Roy Staples, a father, and a teacher.

I've been a teacher of young people, particularly high school students, and I'm concerned about their future. I feel this process is our only chance to get Alcoa – the 3rd largest producer of aluminum in the world¹ – to commit to a full cleanup of its property in our town. I'm asking you to hold Alcoa to a LEVEL 6 cleanup, so that all toxic chemicals are relocated in a safe landfill away from the old site, away from the Columbia River, and away from our groundwater.

I've looked over the different cleanup alternatives in your document², and a BIG CONSIDERATION that is missing is what we leave our next generation, our children and grandchildren.

Are we going to leave them with a clean business site? – one that can attract clean jobs, one that can protect their river and their water quality?

Or, are we going to take a chance on things, let Alcoa off with just moving wastes around on the property, putting a cover on it, and hoping the toxic waste doesn't come in contact with rising water levels in the future? Are we going to leave our children with a toxic time bomb that they will have to take care of, they will have to pay to cleanup?

Only the LEVEL 6 cleanup described on page 29 of your executive summary comes close to a fully responsible cleanup:

- Offering future businesses with a clean site to build on without worrying about toxic wastes to expose its workers to;
- Offering our children the safe relocation of toxic wastes to an appropriate landfill.

The cost is high - \$344.4 million – but for Alcoa, a company with \$23 billion of revenue last year³ - this is very do-able.

This is the time to push for a complete cleanup. According to investors, Alcoa is “set to gain big profits⁴” in the coming years. Let us hold Alcoa to a complete cleanup now, while we have the chance. Let's leave a clean site, and a clean river for our children and grandchildren.

¹ Source: <https://en.wikipedia.org/wiki/Alcoa>, accessed on July 16, 2014

² Source: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11796>, accessed July 16, 2014

³ Source: <https://en.wikipedia.org/wiki/Alcoa>, accessed on July 16, 2014

⁴ Source: <http://seekingalpha.com/article/2279603-alcoa-is-set-to-gain-big-profits>, accessed July 16, 2014

7/16/14

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

The site and any after effects should be brought back as nearly as possible to original condition. Any effects or impact on city groundwater and the waters of the Columbia River should be fully addressed. Our family and friends use the Columbia River for recreation, swimming, boating and fishing. We deserve a clean river. The firm that caused the need for site clean up should do everything possible to return site to a safe and clean condition. Oversight should be provided by the state and costs billed to the responsible party.

Stephen J. Hulick
Name

16607 N.E. 197th Ave Brush Prairie, WA 98606
Street Address City State Zip

Kaweah50@gmail.com
Email

360-535-9503
Phone

Mail comments on or before August 1, 2014

7/16/14

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

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- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

our beautiful community cannot attract healthy, sustainable industries & businesses to this valuable (post access) land if it remains in this toxic condition

Linda Horst
Name

1020 Koal Rd, Kelso, WA. 98626
Street Address City State Zip

Email

360-423-5061
Phone

7/16/14

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

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To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

it serves to protect the community from contaminated drinking water in the future. Our industrial area has been one in which many polluting industries have made multiple fortunes, leaving when economic forces change and leaving behind contaminated messes for taxpayers to clean up. Why should Longview risk ground water contamination so a new industrial polluter can come in & pollute some more?

Pat Freiberg
Name

8324 NE 54th St Vancouver WA 98662
Street Address City State Zip

oaxpat@gmail.com
Email

360-553-6409
Phone

Mail comments on or before August 1, 2014

7/16/14

John Green
1318 25th Avenue
Longview, WA 98632
360-575-9238

My name is John Green and I have lived in Longview for the past 12 years.

Longview and Cowlitz County have long been leaders in Washington State in unemployment and unhealthy living. We have higher than national and state averages in cancer rates. We would like to turn around these alarming statistics. A good start would be to clean up the Reynolds –Alcoa-Millennium site. Besides, community health, I am concerned for our community's economic health, which would improve quality of life. The RI/FS cost-benefit analysis does not weigh how the environment impacts economic health, and it should. Since it can only be weighed through citizen concern and that is why I am here.

If this prime waterfront property were cleaned up to level six, we would move forward to a more vibrant economy. Two former Alcoa sites, one in Vancouver and one in Troutdale were cleaned up and now employ 800-1000 people each. A level six cleanup, moving toxic soils off site instead of moving them around at the property, would put us on the road to a cleaner and healthier environment and ending Longview's toxic legacy. Less deed restricted acreage means more available property to support more jobs, as well as generating more tax dollars for Cowlitz County.

According to its web site, Alcoa won awards for its cleanup at Troutdale. Alcoa has accepted its responsible for cleaning up the site and that money would not be a deterrent. In fact Alcoa's balance sheet shows it has reserved billions of dollars for just this purpose.

Does Longview deserve to be treated any differently than Vancouver or Troutdale? Wouldn't it be wonderful if Alcoa won an award for its cleanup in Longview.

I support the highest level of cleanup at this site.

7/16/2014

Guy Barrett

Dept of Ecology

Industrial Section

PO Box 47600

Olympia, WA 98504-7600

Mr. Barrett,

Thank you for the opportunity to express my thoughts on the clean-up of the old Reynolds Aluminum plant site.

As a citizen of Cowlitz County for the past 20 years, I have been present during times of prosperity when Reynolds employed many of our local residents, and paid them a fine family wage. I have witnessed the despair that followed the sale of the plant that led to bankruptcy and the loss of employment for those same residents. I've been aware of the devastation that followed the mismanagement of a supposed "clean-up" by Chinook Ventures. The only constant has been the value of that piece of property as one of the last deep water ports on the Columbia, the proximity of the railway for shipping and the ready workforce of people just waiting for the chance to get back into light industrial manufacturing.

To do anything less than a complete clean-up, as expressed in Alternative 6 of the RI/FS would be a disservice to the entire population of Cowlitz County. Alcoa knew what they were buying when they acquired that piece of property. The money invested by Alcoa, one of the top ten corporations in the world, in a complete cleanup can be recouped through the sale of the property to industries that recognize its value.

Alternatives 4 and 5 allow for the consolidation of contaminated soils, leaving them onsite. What guarantees do we have that NW Alloys, aka Alcoa, will not be able to import more toxic waste from other sites and deposit it here?

Studying the maps developed by Anchor QEA showing the ground water flowing from the river inland at the site may be comforting to some who observe that the fluoride is trapped and attenuated before reaching the ditches surrounding the property. With climate change being a "when" rather than an "if", what happens when the site is inundated by river water in the not so distant future?

Sincerely,

Gayle Kiser

7/16/14

PUBLIC COMMENT SHEET

NAME Terence P. Condy
ADDRESS 2125 48th Ave, Longview, WA 98632
EMAIL —

COMMENTS (Please use as many sheets as needed)

It seems to me that the best way of dealing with the mess would not be a bad job of cleaning up the site would be a wasted effort if any of the poisons left would be a bad job if it was left on site. Who feels that the coal get on the Columbia bank it would leach back in the Columbia if piled up on shore.

Thanks for the ~~the~~ chance to tell my point the coal is going to ruin my property.

7/16/14

PUBLIC COMMENT SHEET

NAME Becky Myhre
ADDRESS 61 Heritage Blvd
EMAIL abecm28@gmail.com

COMMENTS (Please use as many sheets as needed)

I lived and taught ^{here} since 1976. My memories of Longview/Kelso include the joys of gathering smelt from the Cowlitz. Fishing and other wildlife yielded plentiful bounty. That isn't so anymore, due to polluting.

Reynolds and other businesses cared too little about the environmental impact. Thus, we have contaminated the water and land.

Let's remove the disaster (like Hanford is removing the contaminated mess). A full level #10 cleanup will give us more pleasant future surprises. That's when we can say we gave "something good" to this area.

7/16/14

PUBLIC COMMENT SHEET

NAME Marilyn Carey
ADDRESS 2125 48th Ave, Longview, WA - 98632
EMAIL mjcarey2@msn.com

COMMENTS (Please use as many sheets as needed)

I am a concerned homeowner & citizen of
Cowlitz County. I believe the clean-up of
the old Reynolds site should be cleaned up
(a level 6). Anything less leaves
hazardous material on the shores of the
Columbia River and cannot be certain the
contaminations won't enter the Columbia River
at a future date. (earthquakes, are more than a possibility.)
This should not be a matter of how much
it will cost — It's a matter of doing a
proper job of protecting our local environment
and other areas along the Columbia River.
Having our Government Agencies, working for
the health of society is one benefit. I
appreciate and have always held faith in,
Please call ^{for} full clean up of the site.

7/16/14

PUBLIC COMMENT SHEET

NAME RAY VAN TONGEREN
ADDRESS 2303 JENWFIELD PL
EMAIL RAYVAN TONGEREN @ YAHOO.COM
RAY VAN TONGEREN

COMMENTS (Please use as many sheets as needed)

CLEAN UP THE SITE TO A LEVEL 6

7/16/14

PUBLIC COMMENT SHEET

NAME Chris Turner

ADDRESS 8 CEDAR HATES RD Longview WA 98632

EMAIL —

COMMENTS (Please use as many sheets as needed)

The contaminated sediment removal "Interim action" for the outfall areas should move forward this year.

The remedial alternative #4 seems to be the best clean up procedure for the cost involved

7/16/14

PUBLIC COMMENT SHEET

NAME Dorie Stewart

ADDRESS 16318 NE Gabriel Rd. Yacolt wa 98675

EMAIL

COMMENTS (Please use as many sheets as needed)

There has been extensive research and testing at this site. I support Ecology's position on #4

If we lose MBT you will probably lose anyone who will want to clean up this site. Then where will we be???

7/16/14

PUBLIC COMMENT SHEET

NAME Robert Stewart
ADDRESS 16318 NE Gabriel Rd. Yacot WA
EMAIL R.Stewart@m.henriumbulk.com

COMMENTS (Please use as many sheets as needed)

There has been extensive studies at
the Reynolds site. I support Dept.
of Ecology's position on alternative #4

7/16/14

PUBLIC COMMENT SHEET

NAME Joe Dunlap

ADDRESS 33202 S.W. EM WAYS Rd, Seapooose, OR 97056

EMAIL J49.Dunlap@yahoo.com

COMMENTS (Please use as many sheets as needed)

I Support Alternative # 4 - As the more Feasible means of long term remediation for the Site - Florides, PAH's are not transient in the Ground Waters - and can be Adequately Controlled and monitored.

Full Removal only disturbs Present dump sites and moves the wastes to another Area - VERY Expensive with HIGH Risk with little Gain in Ratio -

7/16/14

PUBLIC COMMENT SHEET

NAME John F. Doyle
ADDRESS 630 16th Av, Longview WA 98632
EMAIL jdoyle51763@yahoo.com

COMMENTS (Please use as many sheets as needed)

- 1) Remember the Golden Rule.
- 2) Prior to the 1970's asbestos was often used in building, this causes Mesothelioma and gets the exposed one 20 yrs. later.
- 3) Transporting contaminated soil is dangerous, but depositing it somewhere else is not an optimal solution.
- 4) I'm not an engineer, and it seems like a colossal project to dredge soil from the Columbia River bank and bed w/o releasing contaminants... see question 4).
- 5) Chief Seattle claimed we're earth's caretakers!!!
Questions Be conscientious!!!
- 1) Is there any asbestos (at all) still at Reynolds' site?
- 2) What safeguards will be taken by truck or rail transport?
- 3) When contaminated soil arrives at its destination, will it be neutralized/treated or just dumped?
- 4) How will the river water not get one drop of contamination/ what measures and back up plans will be taken/stand in place ready?
- 5) Would you reside in a house in the nearby proximity during and after clean-up?



Longview named one of the top ten prettiest towns in America by Forbes - March 29, 2012

P.O. Box 128
Longview, WA 98632-7080
www.mylongview.com

RECEIVED

AUG 07 2014

Ecology W2R-Ind

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWRCRA	Eng
Cleanup	Sub
SW	
HWP2	

July 30, 2014

Guy Barrett
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

RE: Reynolds Metals Aluminum Smelter
Remedial Investigation/Feasibility Study Comments

Dear Mr. Barrett,

The City of Longview appreciates and supports the efforts by the Department of Ecology, Northwest Alloys, and Millennium Bulk Terminals to investigate the extent of contamination at the former Reynolds Aluminum plant, and to develop and implement a Cleanup Action Plan. After review of the draft Remedial Investigation/Feasibility Study, we have the following comments.

1. The City recently constructed a new groundwater supply wellfield and water treatment plant in the Mint Farm Industrial Park near the site of the former Reynolds Aluminum plant, to provide municipal drinking water to our customers. During the feasibility study for our new municipal water supply, we conducted an extensive hydro-geological investigation to determine the source and characteristics of the target aquifer, and the presence of any pollutants. Our findings corroborate the findings of Anchor QEA - that groundwater transport in the vicinity of the former Reynolds plant site is from the deeper elevations upward into the shallow groundwater, and then migrating to the Consolidated Diking Improvement District No. 1 drainage ditches.

Our findings also confirmed the presence of a thick, low permeability, confining layer between the deeper aquifer and the shallow groundwater. This layer, along with the direction of groundwater flow, serves to prevent downward migration of pollutants and protect the quality of the deeper aquifer. Our feasibility study included installation of eight shallow and nine deeper monitoring wells around the Mint Farm site to sample and test for water quality. Our testing included all pollutants regulated for drinking water, plus a variety of pollutants identified as associated with the Reynolds and other

Reynolds Metals Aluminum Smelter Remedial Investigation/Feasibility Study Comments

nearby industrial activities. No industrial pollutants were detected in the deeper groundwater. The only pollutants detected were naturally occurring iron, manganese, and arsenic. Our feasibility study findings corroborate the findings of Anchor QEA that the deeper groundwater is well protected from the shallow contamination found at the Reynolds plant site.

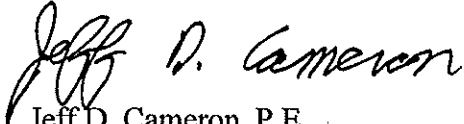
2. As part of the City's development of its new groundwater supply at the Mint Farm Industrial Park, the City Council adopted Ordinance No. 3209 establishing a Wellhead Protection Area around the new municipal water supply wellfield and codifying the Wellhead Protection Area and supporting regulations in Longview Municipal Code (LMC) Chapter 17.100, Water Supply Protection. The Reynolds plant site is within the boundaries of the Wellhead Protection Area. We request that the cleanup alternative selected and the Cleanup Action Plan implement the highest level of cleanup feasible for the site in order to protect the viability and safety of Longview's municipal water supply.
3. Because the Reynolds site is outside of Longview's jurisdictional boundary, Longview does not have authority to apply LMC 17.100 to the Northwest Alloys/Millennium Bulk Terminals site. Because the site represents a potential risk to our municipal water supply, we request that the cleanup alternative selected and the Cleanup Action Plan require the property owner and all tenants and lease-holders to comply with the provisions of LMC 17.100.
4. In addition to establishing our Wellhead Protection Area, we have implemented a Wellhead Protection Plan to regularly sample our monitoring wells to identify any pollutants that may be migrating toward our wellfield. Because of the proximity of the Reynolds site to our new municipal water supply, we request that the long-term monitoring identified in the cleanup alternative selected and the Cleanup Action Plan require the property owner to install at least one permanent monitoring well into the deeper aquifer in the north-easterly corner of the property at the East Groundwater Area. This well should be constructed to the standards of the City's other monitoring wells. In addition, the Cleanup Action Plan should require the property owner to sample the well in accordance with the frequency and pollutants monitored in the City's ongoing wellhead protection monitoring program, and to provide those test results to the City upon receipt so the City can incorporate that information into its monitoring program. If pollutants of concern to the City's municipal water supply are detected, the frequency of testing will be increased to assist the City in determining the extent of the problem, rate of migration, and an appropriate response action plan. Additionally, the Cleanup Action Plan should require the property owner and all tenants and lease-holders to provide access to the monitoring well so the City may conduct its own additional sampling if desired.

Guy Barrett
July 30, 2014
Page 3 of 3

Reynolds Metals Aluminum Smelter Remedial Investigation/Feasibility Study Comments

Thank you for the opportunity to review and comment on the RI/FS, and for considering our comments. I have enclosed a map showing our wellhead protection area, a copy of Longview Municipal Code 17.100, and a copy of our current sampling protocol for our monitoring wells.

Sincerely,

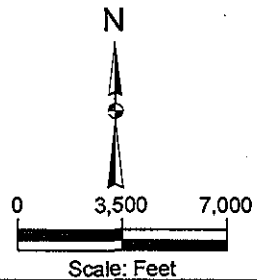
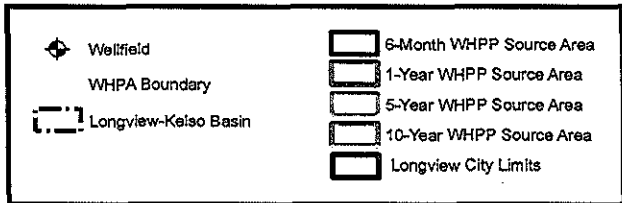
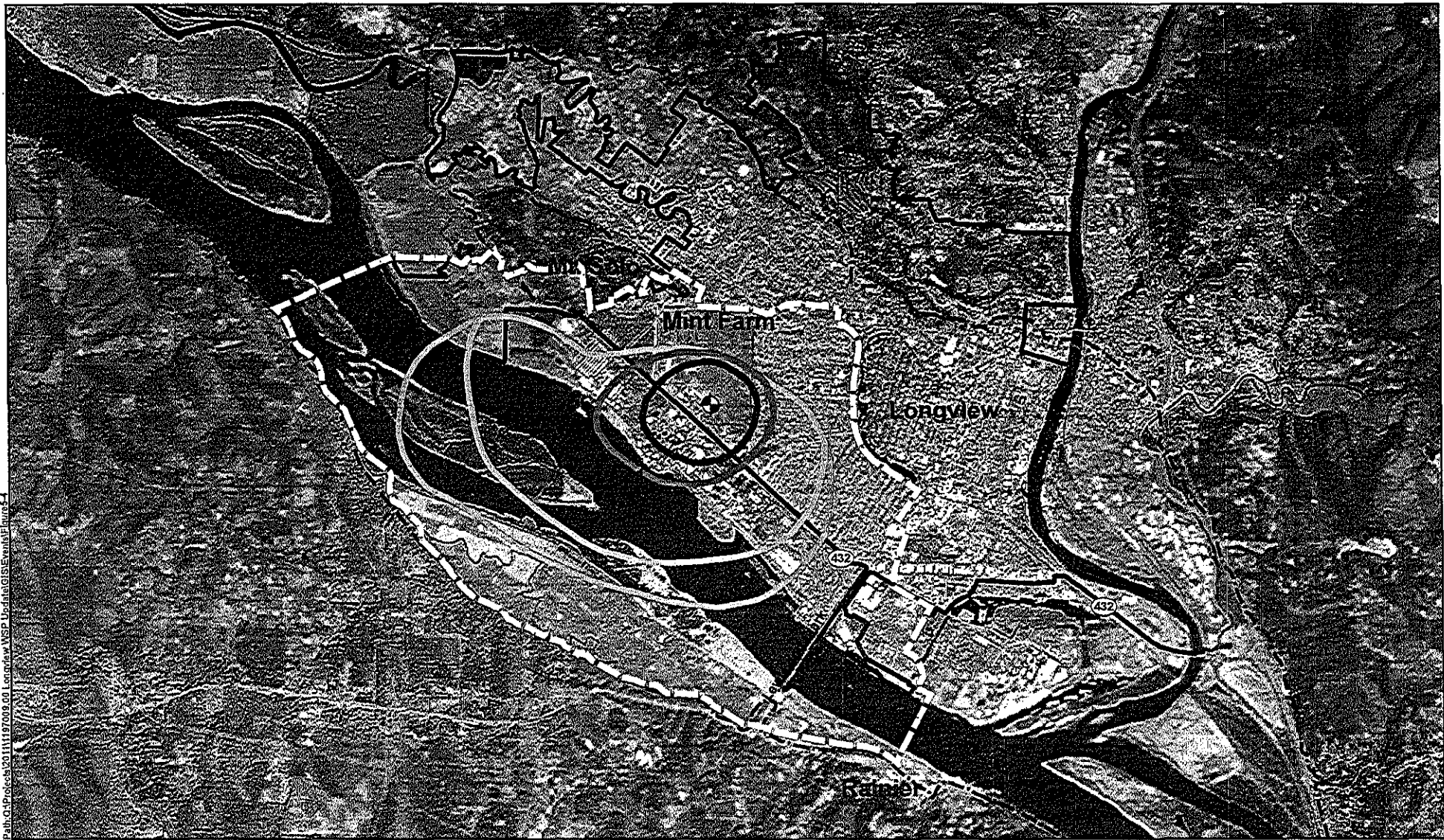


Jeff D. Cameron, P.E.
Public Works Director

Enclosures

cc: City Council
Bob Gregory, City Manager
David Campbell, Asst. City Manager

Path: G:\Projects\30111197009_001\Content\WSP_Updated\GIS\Event\Figure 5-4



Kennedy/Jenks Consultants
 Comprehensive Water System Plan Update
 Longview, Washington

Wellhead Protection Area (WHPA)
Mint Farm Wellfield

K/J 1197009*00
 February 2012

Figure 5-4



WALSTEAD MERTSCHING
— ATTORNEYS AT LAW —

RECEIVED

JUL 30 2014

Ecology W2R-Ind

July 28, 2014

Guy Barrett
Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

**SENT VIA FIRST CLASS MAIL AND
E-MAIL: Reynoldscleanup.comments@ecy.wa.gov**

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

Re: Cleanup of Reynolds Metals Aluminum Smelter in Longview

Dear Mr. Barrett:

I am writing to express my concern that Alternative 4 selected by the Department of Ecology, for the above-referenced cleanup, as the MTCA preferred alternative fails to comply with the Model Toxics Control Act and the associated sections of the Washington Administrative Code. Under the circumstances here, Alternative 6 would be the only one of the six that would comply with the current law.

RCW 70.105D.030(1)(b) provides in pertinent part that "the department shall give preference to permanent solutions to the maximum extent practicable." Alternative 4, with all due respect, is in no sense of the word a permanent solution, either as defined in the MTCA or the related WACs. Although there are a number of problems with Alternative 4, the primary problem is the proximity of the Columbia River to the site. Although Alternative 4 could be a suitable practicable solution if the river were not so close, it is not an appropriate alternative here.

The problem of course is that the area containing hazardous waste to be cleaned up, being very low relative to the river and being adjacent to the river, is subject to groundwater flow, flooding and subject to the tremendous hydraulic forces of the river itself. The Department of Ecology's reliance on the dike for protection is misplaced. There was discussion at your recent meeting in Kelso that the dike was designed to protect against a 500 year flood. First of all, I believe the 500 year flood standard is a misnomer since no one truly knows what height or strength the dike at that site needs to be to protect against a once in a 500 year flood. Moreover, it is not possible to know whether any given year, even this year, might be the year that we actually have a "500

AN AV RATED CIVIL PRACTICE FIRM • PROFESSIONAL SERVICE CORPORATION • ESTABLISHED IN 1925

Matthew J. Andersen*
Chelsea C. Baldwin
Mark S. Brumbaugh
Michael A. Claxton*
Barry J. Dahl

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Longview (360) 423-5220 • Woodland (360) 225-6339 • Vancouver (360) 694-0606 • Fax (360) 423-1478

Email: info@walstead.com Website: www.walstead.com

FOUNDING PARTNERS: Howard J. Atwell (1880-1962), Ronald Moore (1897-1968), Jerome Walstead (1913-1981)

Norman C. Dick
Frank F. Randolph
Nicole M. Tideman
Of Counsel
John A. Barlow

year flood.” Consequently, if Alternative 4 were used rather than Alternative 6, and a flood, earthquake or some other calamity occurred, the hazardous waste that is now all in one spot relatively, would become so spread out that it would be impossible to clean up. Of course, this would probably occur in such a short time that there would be no way to stop it.

With the river being so close to this very low site, it is only a matter of time before the waste site ultimately comes in contact with the Columbia River. Selection of Alternative 6 would avoid such an eventuality.

Nor does Alternative 4 meet the definition of a “permanent cleanup action or permanent solution” as defined in WAC 173-340-200, given the likelihood of eventual failure of containment which could result from groundwater movement, site flooding, earthquake, or other calamity which would result in hazardous waste flowing into the Columbia River. You simply cannot comply with the statutory requirement of a permanent cleanup action or permanent solution in this lowland area, so close to the Columbia River, without using the offsite storage of waste as provided for in Alternative 6.

Another factor that is a problem under the proposed Alternative 4 is the flow of groundwater in the area. As I understand it, Alternative 4 relies on mechanical pumping of the ditches in the area to create a groundwater flow away from the river. Of course, mechanical pumps can fail, and will fail in time, particularly in emergency situations when power is cut. Moreover, it is not clear to me that the water which is being pumped out of the ditches to create the negative flow is being properly treated before it is allowed back into the river.

In analyzing this matter, the Department of Ecology has failed to factor into its “disproportionate cost analysis” the gargantuan cost of cleaning up the site after the hazardous waste has been spread around due to the action of the river, flood, earthquake, etc. Currently, of course, the waste is reasonably well confined on the site. Whereas, after river action, flooding, etc., it likely would be impossible to clean up the hazardous waste after it was spread down the river. But in any case, if the cost of such a massive clean up were factored into the “disproportionate cost analysis,” it would be apparent that Alternative 6 would be the most practicable solution. The statute and WACs require such an analysis.

The people of the state of Washington expect the state to enforce the law to make sure these waste sites are cleaned up properly. Sometimes that will be expensive. Very expensive. This is apparently one of those times. Who will pay the cost if some calamity, like flooding or earthquake, allows this hazardous waste to be carried downstream by the Columbia River if

Guy Barrett
July 28, 2014
Page 3

Alternative 4 is chosen here? There will simply be no way to clean it up then. The citizens of the state, the fish, and other wildlife will pay the tremendous cost for years to come. This risk is unacceptably high. The "costs" of the losses if this occurs are unacceptably high. If that cost was factored into the "disproportionate cost analysis," Alternative 6 would be seen to be the best alternative here.

Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Norman C. Dick". The signature is fluid and cursive, with the first name being the most prominent.

Norman C. Dick
E-Mail: dick@walstead.com

NCD/dlh

POSTMARKED

AUG 01 2014

Ecology W2R-Ind



Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWIR/CRA	Eng
Cleanup	Sub
SW	
HWP2	

July 31, 2014

Guy Barrett
 Department of Ecology
 Industrial Section
 P.O. Box 47600
 Olympia, WA 98504-7600

RECEIVED

AUG 04 2014

Ecology W2R-Ind

Dear Mr. Barrett:

Thank you for the opportunity to comment on the draft Remedial Investigation/Feasibility Study, and draft sediment remediation interim action, for the Reynolds Metals site near Longview. Although the Washington Public Ports Association has no direct interest in this MTCA cleanup, we are commenting in order to support the choice of a remedy option that aligns with key cleanup policies that our state's port districts were instrumental in developing when they were added to MTCA in 1994. Those requirements relate to the use of industrial cleanup standards at industrial sites, along with other changes to the law designed to facilitate and expedite the cleanup and return of contaminated industrial lands to productive use.

WPPA worked to craft policies that move "brownfields" cleanups and projects forward before that term even came into the lexicon. The 1994 amendments to MTCA, which were enacted through ESSB 6123, were prompted by concerns that requirements related to the recently enacted MTCA statute would push commercial and industrial development onto undeveloped property. I have attached the House Bill Report, which gives some additional background.

Among the changes to MTCA brought about by ESSB 6123 was a requirement that Ecology allow the use of industrial cleanup standards at industrial properties, provided those properties would remain industrial and the cleanup would not create problems on adjoining non-industrial properties. This sensible approach ensured that Ecology would allow liable parties to address cleanup in a fashion that would be protective but not needlessly costly. It also gave those crafting cleanup plans a much greater opportunity to design the cleanup in a fashion that dovetails with future industrial site uses. This is critical for Washington's ports, as waterfront properties were where the first industrial development occurred and almost always need remediation of some kind before they can be re-developed for port purposes.

In reviewing the proposed cleanup plan for the former Reynolds Metals site in Longview, we were pleased to note that ESSB 6123 appears to still be working, 20 years later. The proposed cleanup alternative uses industrial cleanup standards for this industrial site, and strikes a good balance between the on-site consolidation and off-site removal of waste materials. In particular, the beneficial re-use at the site of sediments to be dredged from the Columbia River as part of the sediment cleanup interim action provides a win/win/win solution that cleans up the aquatic portion of the site, aids in the capping of consolidated upland waste materials, and helps prepare the site for future re-use. Because sediment cleanup standards are much more stringent than upland soil cleanup standards, sediments that must be removed from the aquatic environment can often be safely and effectively used as a component of an upland industrial facility cleanup. The alternative of hauling away the dredged sandy sediments to a commercial landfill and bringing back in freshly-quarried sand for the first layer of the cleanup cap is exactly the kind of approach we need to avoid if we want shoreline industrial property owners such as public ports to continue their efforts to clean up and redevelop industrial properties.

We understand that Ecology has received a great many public comments on this site's RI/FS asking for a "full" cleanup involving the removal of all contaminated materials from the property at a cost of over \$300 million. One of the rationales given for why such an extraordinary cleanup should be required is, ironically enough, that a full cleanup is needed to support future property re-use. We are confident that you will not take this approach to an otherwise-unremarkable shoreline industrial property cleanup. In the most trade-dependent state in the country, the ability of ports and other industrial shoreline property owners to quickly and efficiently address contamination issues, and move under-utilized properties forward towards economically beneficial uses, is absolutely critical. This fact, along with the requirements added to MTCA by ESSB 6123, appears to be lost on those asking Ecology to require a cleanup with an unprecedented and unwarranted scope. Rather than supporting property re-use, moving away from a sensible approach to shoreline industrial property remediation would result in precisely the ills ESSB 6123 was enacted to prevent -- more pressure on undeveloped land while existing industrial properties languish as underutilized eyesores.

Instead of bowing to public pressure to require a cleanup that can only be described as punitive, we encourage Ecology to stay true to MTCA and its underlying policies. The preferred cleanup alternative will provide a comprehensive, protective remedy that will support further industrial activity. A thorough cleanup is needed, of course, and that is exactly what Ecology has proposed in the draft RI/FS and the sediment interim action. It is now time to move ahead with the cleanup as proposed.

Thank you for the opportunity to provide comments on the Reynolds Metals site RI/FS.

Very truly yours,



Gerry O'Keefe
Assistant Director, Environmental Affairs

RECEIVED

AUG 04 2014

July 31, 2014

Ecology W2R-Ind

Guy Barrett
Washington State Department of Ecology
Industrial Section
PO Box 47600
Olympia, WA 98504-7600

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

Dear Mr. Barrett,

Re: Former Reynolds Metals Aluminum Smelter (Northwest Alloys and Millennium Bulk Terminals) Draft Remedial Investigation/Feasibility Study Formal Comments

Alternative 6 should be the chosen plan for the cleanup of the former Reynolds Metals Reduction Plant in Longview, Washington. The lesser levels of cleanup in the other plans do not provide as much protectiveness, permanence, or long-term effectiveness as that provided in Alternative 6. Considering the past and current uses of the property, there is no reason to believe short-term risk management and implementability cannot be satisfactorily managed under Alternative 6. Public concern has been demonstrated to support the most thorough cleanup plan available.

While the law requires cleanup actions use the most permanent solutions to the maximum extent practicable, Alternative 4 would leave all toxic materials on site, except for a half acre of the more than 40 acres, not including the BMP . None of the on-site locations have been shown to meet the specifications of a certified landfill for toxic waste. Per the draft RI/FS, all the impacted media are suitable for dry or wet excavation. Excavation and off-site removal is an effective remediation and is implementable.

On-site management plans of the toxic wastes do not take into consideration the hydrogeological instability of the site. This site is in a known hazard area for high intensity earthquakes. The soil structure places it in a high risk for liquefaction during such earthquakes. The site is on the shores of a biologically diverse river of high water quality behind a ninety-year old levee. It is drained by a man-made ditch system dependent on constantly maintained pumps which then discharge groundwater back into the river.

All of the fill deposits in the East Groundwater Area, about half of the site areas, are in contact with or sit beneath groundwater elevations at least seasonally. This is the current situation with the CDID and levee system operational. The depth of Site Unit 6 is not even known. What the RI/FS does not consider in this miserable situation is the reasonable expectation that sea level rise will cause the Columbia River to rise in this area at least two feet and probably three feet

by the end of the century by Department of Ecology's own conservative estimates and NOAA seal level rise mapping. This will certainly affect groundwater levels at the site, even without factoring in possible effects from surface water changes.

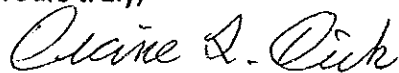
The only permanent, protective, and effective long-term solution to the management of toxic wastes is to completely remove them to a certified landfill not subject to the climatic and geologic hazards of the Reynolds property. All of the site units are subject to hydrogeological hazards and all should be excavated and removed off-site. The closed black mud pond should also be reevaluated for excavation and removal.

As to the management of short-term risks and implementability, Alcoa has already shown they are capable technically, administratively, and financially by their track record of cleaning up other toxic waste sites, including at Vancouver and Troutdale, Oregon. Millennium has shown itself capable of maintaining operations while at the same time conducting current cleanup efforts, including removing 200,000 tons of material, by their own estimates. Millennium's continued demolition on major portions of the property speaks to their commitment to cleanup and their ability to manage large volumes of waste material. Considering most of the former Reynolds property sat virtually unused for over a decade, some of it never used and undeveloped, a short restoration timeframe should be of minimal significance. Indeed, now, while demolition and clearing of the property is proceeding, would be a perfect time and opportunity to accomplish a high standard of remediation.

Public concern for the most thorough cleanup plan has been strong and consistent. It was public concern that moved the process along after years of inactivity. Citizens have diligently participated in the Community Advisory Board and through meetings between Department of Ecology and Landowners and Citizens for a Safe Community. At the recent Department of Ecology hearing over 30 citizens gave oral testimony and all requested the highest level of cleanup, Alternative 6.

While the former Reynolds Metals Reduction Plant property was in the past used and abused by heavy industry, the current use, despite zoning, of most of the surrounding area continues to be wetlands, agriculture, or vacant and undeveloped. The aquifer under the site is shared with the drinking water aquifer of the community. The ditches draining the site run through residential areas. That which affects the Columbia River affects all of us who live in this region. We have an opportunity to do the right thing, to clean up a toxic mess. We should do it in the best way we know how. Alternative 6 is not the perfect cleanup plan, but it is a plan we can accomplish with no regrets.

Yours truly,



Diane L. Dick

13 St. Helens Lane

Longview, WA 98632

329 Bunker Hill Rd.
Longview, WA 98632
July 30, 2014

RECEIVED

AUG - 1 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Director Bellon, Garin Schriever and Guy Barrett
WA Dept. of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on Reynolds Cleanup proposals in Cowlitz County

I am a resident of Cowlitz County and live near the Columbia River a few miles downstream from the Reynolds cleanup site. The cleanup proposal that is being recommended by the Draft RI/FS for the Reynolds site does not appear to be sufficiently thorough to address long-term property uses or health and environment concerns of the citizens of the lower Columbia region.

The recommended cleanup proposal relies heavily on an "Environmental Benefit Score" derived from a matrix that considers six remedial alternatives. The scoring of these alternatives appears highly arbitrary, especially in the favorable weighting of Alternative # 4. In categories of "Protectiveness", "Permanence" and "Long-Term Effectiveness" the scoring among alternatives does not appear to address any significant benefit from contamination removal or any risk from potential future occurrence such as earthquake or extraordinary flooding. While pollution risks associated with excavation and transportation of contaminants are evaluated in the matrix, there is no such consideration noted for the risks from natural disasters. Furthermore, no significant benefit is scored for long-range planning alternatives for the property should contaminants actually be removed.

Without considering these elements, a focus on "capping" contaminants produces an Environmental Benefit Score almost as high as their "removal" from the site. In fact, when calculations in the matrix are carried to 2 decimal places, Alternative # 5 illogically achieves a lower Environmental Benefits Score than Alternative # 4.

Without a fair assessment of future property uses or the risks associated with natural disturbances to the site, the scoring matrix as applied in the Draft RI/FS is a flawed decision-making mechanism.

I urge the Department to revise its analytical matrix to reflect potential future occurrences. In doing so, removal of contaminants will be shown in a more favorable light and a more credible permanent solution will result.

Thank you for considering these comments.


Harold Cockrell

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Mail on or before August 1, 2014

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

Longview residents deserve to have the area cleaned to the highest standards. It is easy to try to do this by only doing "good enough" but that will only help the corporations save a little money. That is not what is best for the people who work and play in the community. It would be unethical to not clean up this site to the full extent and would be detrimental to the future of the community, the river, & wild life, which deserve to be protected.

Jodie Brewer

Name

1308 24th Ave Longview WA 98632

Street Address

City

State

Zip

jbrewer1881@gmail.com

Email

316-213-5289

Phone

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Mail on or before August 1, 2014

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes ^{all} polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions, to prevent a conflict of interest.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

The profits of the past businesses should not come at
the cost of the health to the people of Longview
communities down stream, and our natural ecosystem.
As residents and community members, we have a
right to have this site completely cleaned

Clay Peet
Name

1308 24th Ave, Longview, WA 98632
Street Address City State Zip

cdpeet@yahoo.com
Email

Phone

RECEIVED

AUG 01 2014

Ecology W2R-Ind

RECEIVED

JUL 31 2014

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

WE, THE PEOPLE OF COWLITZ COUNTY AND THE AREAS PHYSICALLY SURROUNDING THE SITE ON EITHER SIDE OF THE COLUMBIA RIVER, DEMAND THE SITE BE CLEANED TOTALLY TO THE "LEVEL 6" AS PORTRAYED BY YOUR STUDY. WE DEMAND: LISTEN TO THE PEOPLE; YOUR RAISON D'ETRE IS TO SERVE THE PEOPLE. CORPORATIONS CREATED THE ENVIRONMENTAL DISASTER—NOW, WITH THEIR \$\$\$, CLEAN IT UP WHILE EVERYTHING IS HERE) TO LEVEL 6. INVOLVE DEW!

P.S. SINCE THE RIVER/DREDGE IS THERE WHY NOT SLURRY THE SPECIFIC AREAS & SUCH CHEAPER! BETTER! & ALL GONE!
the spoils up with the dredge & barge all of it in one trip?

Name GARY WALLACE
179 Lodgepole Rd KALAMA WA 98625
Street Address City State Zip

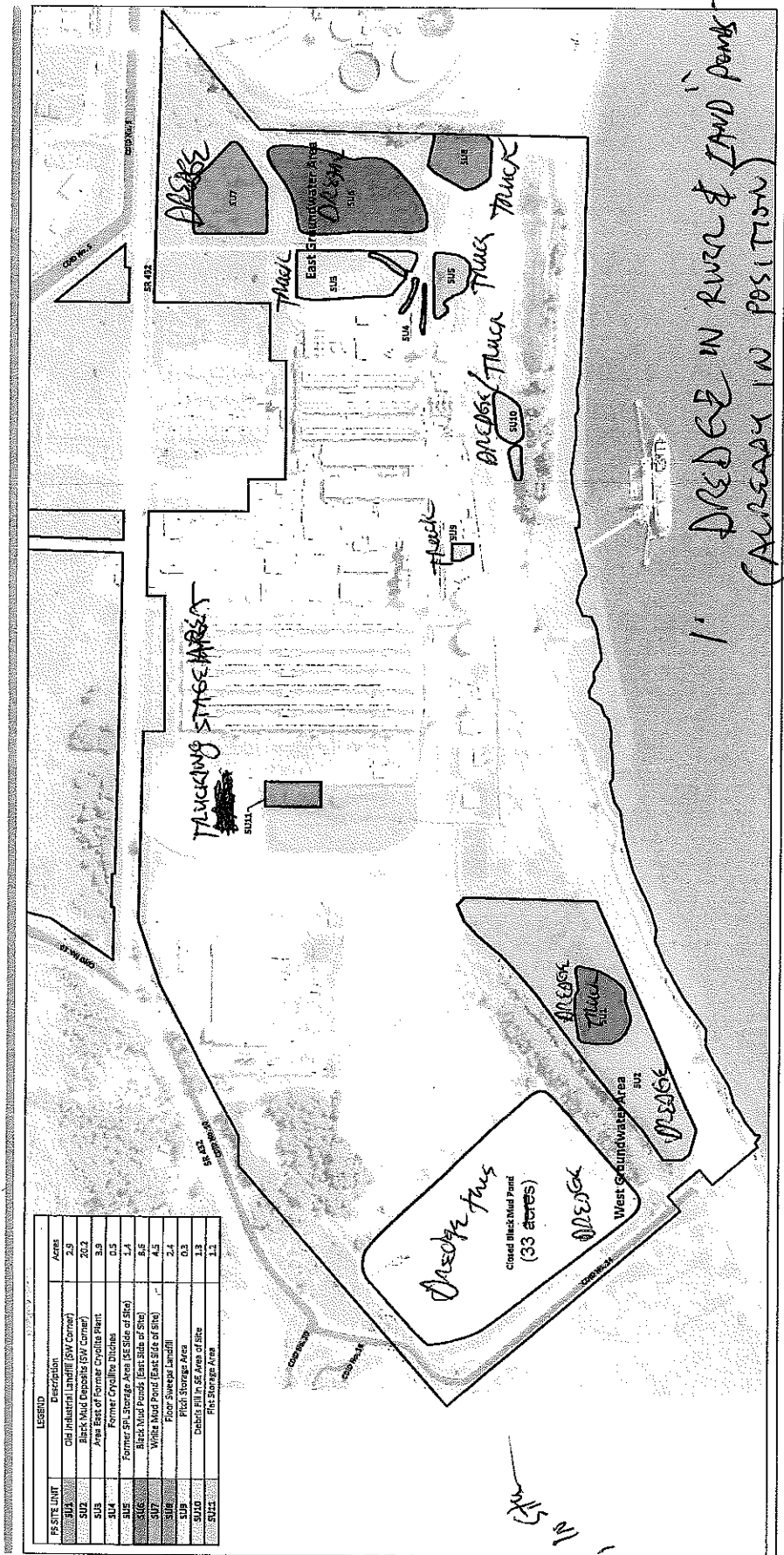
Email
360 673-4408
Phone

Lifelong Resident

Corporations DO NOT RUN MY ENVIRONMENT! Not Me.

SAVE! Do it all at once & correctly! Too easy?

COLORED AREAS SHOW THE CONTAMINATION ON THE OLD REYNOLDS ALUMINUM SITE
 (Dept. of Ecology says there are over 85 acres containing hazardous material)



For more information, go to Dept. of Ecology's website on Reynolds Metals Toxic Cleanup Plan at: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11796>

1. DREDGE IN RIVER & LAUND POND (ALREADY IN POSITION)

2. THEN, SWIMWAY EACH SITE IN SITE, BARGE ALL OF THE WASTE AWAY

3. HAUL VIA SURFER/TRUCKS

ANCHOR
 OEA

Figure 8-1
 FS Site Units
 Remedial Investigation/Feasibility Study
 Former Reynolds Metals Reduction Plant - Longview, Washington

REMANANTS / NON-SLURRY WASTE

We must ask Ecology for the highest standard of cleanup!
There is only this one chance to get it right!
This summer Dept of Ecology needs to hear from you!

SUGGEST THIS GARY WACCACE 360 673 KAYUM-WA. GOAL LOCAL & WORLD EMISSIONS WIN

Dawn Cemulini
2950 Madrona Drive
Longview, WA 98632

July 28, 2014

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section Ecology W2R-Ind
P.O. Box 47600
Olympia, WA 98504-7600

POSTMARKED

JUL 29 2014

Ecology W2R-Ind

RECEIVED

JUL 30 2014

RECEIVED

JUL 29 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Re: Reynolds Metals Cleanup Proposals (draft remedial investigation/feasibility study and amendment to agreed order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

We need to clean up the former Reynolds site as best as it can be to meet the most stringent guidelines. I want it done right the first time. I do not want it done halfway and then need further clean up later.

My city's water source is no more than 1 mile away from this toxic property. Therefore, it is unacceptable to allow most of the pollution to remain onsite and have the continued possibility of these pollutants leaching into our drinking water. These harmful materials need to be removed and disposed of properly by independent qualified knowledgeable people.

If this property were not polluted, it would be valuable and desirable industrial land. Our small community has a struggling economy and we need opportunities created for us. Having this location on the federal clean up list deters people and businesses from living and investing in Longview. I want this barrier removed and this site cleaned up to the highest level.

The cleanup is vital to our community's economy and health as a whole. Please hold Alcoa and Millennium accountable for the highest standard of cleanup at the former Reynolds Metals site.

Thank you,



Dawn Cemulini

RECEIVED

JUL 03 2014

RECEIVED

JUL - 1 2014

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Ecology W2R-Ind

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWRCRA	Eng
Cleanup	Sub
SW	
HWP2	

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

I've lived in Longview for 50 years, raised two boys and owned my business downtown for 30 years. I have a vested interest and deep concern regarding the utmost health of our land, rivers and air. I feel there is no doubt the Reynolds site must be cleaned to the highest level. All citizens of Longview and the surrounding communities up and down river from the toxic property. I feel air quality should also be monitored as I live within 2 miles of this site. 14 years of monitoring is not long enough, it must be longer.

Mr. Louis "Penny" Lightfoot
Name

2733 Fir Street, Longview, WA 48632
Street Address City State Zip

pennylightfoot@comcast.net
Email

360-425-5851
Phone

RECEIVED

JUL 10 2014

Ecology W2R-Ind

July 8, 2014

To: Guy Barrett

Dept. of Ecology

I am writing to request that the Reynolds Metals Cleanup be made to the highest standard because as a resident of Longview Washington I am deeply concerned about the fact that this highly toxic site is between the Columbia River and Longview's main water source. I am really disturbed that the state is not being more proactive in making sure the entire site is cleaned of all toxic materials. Please count this letter as a strong request for a level 6 cleanup.

Thank-you,



Sara L. Parkin

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWRCRA	Eng
Cleanup	Sub
SW	
HWP2	

RECEIVED

JUL 14 2014

Ecology W2R-Ind

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

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- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

Waterfront property should be cleaned to the level ~~is~~ alternative is ordered to ensure that our water and ~~site~~ remains potable and our fisheries remain edible AND our property remains profitable.

Please keep our waterfront property pristine.

Marie Tabara

Name

5724 NW Elroy Canyon WA 98607

Street Address

City

State

Zip

Email

(360) 210-5719

Phone

Facility:	
Year:	Left Right
	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWRCRA	Eng
Cleanup	Sub
SW	
HWP2	

Mail comments on or before August 1, 2014

RECEIVED

JUL 18 2014

Ecology W2R-Ind

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

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- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

- (1) Drinking water could be affected.
- (2) The River belongs to 2 states and is tidal. Contamination during flooding affects thousands of people.
- (3) A clean site will attract more suitable businesses and employ more people.
- (4) The polluters are responsible for leaving the site the way they found it.

MARION WARD
Name

735 SW ST. CLAIR AVE, APT 1610, PORTLAND
Street Address City State Zip 97205

MALLOY 75@GMAIL.COM
Email

(503) 224-0097
Phone

Mail comments on or before August 1, 2014

7/16/14

Guy Barrett
Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

2602 Cascade Way
Longview, WA 98632
July 15, 2014

Re: Comment on proposed cleanup actions for the Reynolds Metals Site at Longview

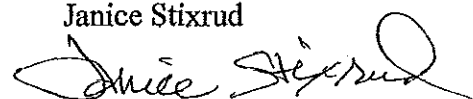
In reviewing the proposed alternatives for cleanup of the former Reynolds Aluminum Plant in Longview, we believe alternative 5 to be the best solution, provided the sediments around the outfall 002A are managed by off-site disposal. Should alternative 5 not include off-site disposal of this sediment, then alternative 6 would be the best solution.

Our suggestion is based on the following considerations:

- The site is and will continue to be an industrial/port site far into the future. Clean up activities should provide for the greatest flexibility for future uses with the greatest amount of land available for those uses. (Access to shipping lanes is a very limited commodity.) The economic future of our county depends upon safe industrial sites with healthy working conditions.
- The Columbia River is a dynamic system rather than static. Its interaction with its hyporheic component can and will change which could impact on-site storage and treatment of contamination facilities. For example, in 1996, the river was above flood stage for three months, causing significant impacts to shorelines. In addition, the river at this point provides habitat for all of the ESA listed fish species within its basin. It is absolutely imperative to prevent any contamination from reaching the water.
- The adjacent lands to the west are a closed industrial waste site, which has had some clean up and monitoring problems in the past. Leaving contaminated materials at the Reynolds site could compound the problems.

Thank you for your consideration,


Joel Rupley

Janice Stixrud


RECEIVED

JUN 24 2014

Director Maia Bellon
Garin Schrieve
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Ecology W2R-Ind

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schrieve, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

CONDITIONS AT THE SITE HAVE A HISTORY OF POLLUTION ALONG OUR BEAUTIFUL COLUMBIA RIVER FOR DECADES; CLEAN-UP AND REMOVAL OF SEDIMENT TO A CERTIFIED LANDFILL A MUST. THE JOB IS HUGE AND COSTLY, BUT WHY DO A PARTIAL CLEAN-UP AND THEN HAVE TO DO IT AGAIN LATER IF INDEED WE STILL HAVE THAT OPTION?

MICHAEL G. SOUSA
Name

934 22ND AVE. LONGVIEW WA 98622
Street Address City State Zip

NONE
Email

360-425-7063
Phone

RECEIVED

POSTMARKED

JUN 24 2014

JUN 20 2014

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Ecology W2R-Ind

Ecology W2R-Ind

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

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- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

THE POLLUTION AT THE SITE IS WELL KNOWN &
 THE ALTERNATIVE SIX IS THE MOST COMPLETE
 SOLUTION TO A LONGTERM PROBLEM. WHY DO A
 JOB HALF WAY? IF NOT NOW, WHEN DO WE GET
 IT RIGHT?

Toni M. Hamilton
Name

2255 E. LYNWOOD DR. LONGVIEW WA 98632
Street Address City State Zip

NONE
Email

360-430-7671
Phone

RECEIVED

JUN 30 2014

25 June 2014

Ecology W2R-Ind

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

To: Guy Barrett, Dept. of Ecology

From: B.E. Wheeler, 1149 21st, Longview, WA. 98632

I strongly believe that Alcoa and Millennium should be held accountable for restoring the former Reynolds Metals site to its condition before the industrialization of the area took place.

This once pristine area had clean water and soil that was not contaminated with highly toxic chemicals as it is now. I hold a BS degree in Chemistry and am a licensed Professional Chemical Engineer in this state. I am well aware of the actual and potential dangers of such things as fluorides, cyanides, caustic soda, and heavy metals (lead, mercury, arsenic, etc.) that now contaminate the area.

Please insist on the highest standard of cleanup on the old Reynolds Aluminum site

Thank you.

RECEIVED

JUL 02 2014

Ecology W2R-Ind

Dear Guy

Facility:	Year:	Left	Right	Corr	Reports	Permit	Enf	Sub
Air	Water	APDES	WET-TOX	DW/RCRA	Cleanup	SW	HWP2	

6/28/14

I have lived in Longview for the past 37 years. I live about 2 miles from the Alcoa plant. In 2010 I was diagnosed with stage IV lung cancer. I have never smoked + I've lived a very healthy life style

Perhaps I just lived too close to the industrial section of Longview. I understand Lowitz County has one of the highest levels of cancer in the state.

I would like to see the Alcoa plant cleaned up to a level six. I'd like the children in our

town to have clean air, water and food. I don't want anyone to go through what I'm going through.

New research is showing air pollution is responsible for millions of deaths from lung cancer world wide, but other pollutants found at the Alcoa site may contribute also.

I would like the site returned to the cleanest environment possible

Thank you,
Lottie Free

RECEIVED

JUL 07 2014

Ecology W2R-Ind

Director Maia Bellon
Garin Schriever
Guy Barrett
Dept of Ecology Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Or email Reynoldscleanup.comments@ecy.wa.gov

Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DWRCRA	Eng
Cleanup	Sub
SW	
HWP2	

RE: Reynolds Metals Cleanup Proposals (Draft Remedial Investigation/Feasibility Study and Amendment to Agreed Order 8940)

Dear Director Bellon, Mr. Schriever, and Mr. Barrett,

Please hold Alcoa and Millennium accountable for the cleanup at the former Reynolds Metals site. I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors—not Millennium Bulk Terminals—oversee and undertake all cleanup actions.

To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

I support the best cleanup plan available because:

MY CONCERN IS THAT IF THE FORMER REYNOLDS SITE IS NOT CLEANED UP TO THE FULLEST EXTENT, THE TAXPAYERS WILL EVENTUALLY PAY THE BILL. IF THE COAL MARKET THRIVES FOR A YEAR OR TWO, THEN TANKS, THE ORIGINAL PROBLEM WILL HAVE TO BE SOLVED, AT TAXPAYER EXPENSE FOR HEALTH REASONS.

KEITH ERICKSON
Name

894-33rd LONGVIEW WA 98632
Street Address City State Zip

EKEITH95@HOTMAIL.COM
Email

360 6364717
Phone

1 March 2013

Technical Memorandum

To: Ms. Amy Blain, City of Longview
From: Janet Snedecor and Dan Sander
Subject: Monitoring Well Analytes and Department of Health Test Panels
K/J 0997003*01

A review of the previous City of Longview (City) deep monitoring wells test results and analytes was completed to provide recommendations for the City's ongoing deep monitoring well sampling events. It was decided to utilize the recently established Washington State Department of Health (DOH) Test Panels for future monitoring. These test panels were established based on U.S. Environmental Protection Agency (EPA) approved test methods and are commonly used among DOH certified drinking water laboratories. Each test panel will provide results for various analytes as shown on the attached Table 1- DOH Test Panels and Analytes of Special Interest. These panels also reflect analytes for which there are known health effects, or that are being currently studied for potential health effects. In addition to the DOH test panels, Table 1 includes additional test analytes which have been selected based on either citizen concerns or their value in determining potential changes in aquifer water quality.

The following table provides anticipated costs based on information provided by Chris Leaf of ALS Environmental (ALS) in Kelso, Washington. This analytical laboratory has performed, or subcontracted, the previous monitoring well analysis.

Recommendation: Continue to monitor deep wells DW 1, 2, 5, 6, 7, and 9.

Schedule: It is recommended the City implement annual and semi-annual testing for 2013 and 2014 based on the schedule indicated in Table 2 below. Following completion of the October 2014 analysis, the results of the tests should be evaluated along with the pre-MFRWTP results, and consideration be given to eliminating some additional test panels, or changing them to an annual schedule.

Costs: Based on the suggested testing frequency and panels, it is estimated the City's annual deep monitoring well test cost will be approximately \$25,132 for all six deep monitoring wells. ALS offers a 10 percent multiple samples discount; the laboratory must receive more than three samples simultaneously in order to receive the discount. Table 2 summarizes the estimated costs both annually per well, as well as combined.

Technical Memorandum

Amy Blain, City of Longview
 1 March 2013
 0997003*01
 Page 2

Table 2: Annual and Semi-Annual Testing Schedule and Costs

Test Panel	Semi-Annual (May & October)	Annual (October)	Annual Per Well Costs
Fumigant	\$80		\$160
Endo		\$165	165
Glyph		\$180	180
Herb1	\$165		\$330
Insect1	\$180		\$360
IOC	\$260		\$520
PCB and Pest1	\$295		\$590
Phth	Yes, included in 525.2 (PCB /Pest1)		
Quat	\$172		\$344
Rads (add Gross Beta)	\$200		\$400
VOC1	\$100		\$200
Coliform Bacteriological Analysis	\$25		\$50
Special Interest	\$380		\$760
Special Interest (Chlorinated phenolics)		\$595	595
Subtotal Per Well	\$1,857	\$940	\$4,654
ALS Discount multiple samples (10%)			\$465
Total Per Well			\$4,189
Estimated Annual Costs			
Based on six (6) wells tested	\$22,284	\$5,640	\$27,924
ALS discount (10%)	\$2,228	\$564	\$2,792
Total Costs	\$20,056	\$5,076	\$25,132

Enclosure (1):
 Table 1- DOH Test Panels and Analytes of Special Interest

**DOH Test Panels and Analytes of Special Interest
Mint Farm Regional Wellfield Monitoring Well Sampling Program**

February 2013

Table 1: DOH Test Panels and Analytes of Special Interest

Test Panel	Method	DOH #	Analyte
TOTAL COLIFORM			TC (E. coli / Fecal if TC+)
FUMIGANT TEST PANEL	EPA Methods 504.1, or 551.1)	0102	EDB (Ethylene Dibromide)
		0103	DBCP (Dibromochloropropane)
		0079	1,2,3 Trichloropropane
ENDO TEST PANEL	EPA Method 548.1)	0151	Endothall
GLYPH TEST PANEL	EPA Method 547 or SM 6651	0152	Glyphosate
HERB1 TEST PANEL	EPA Methods 555, 515.1, 515.2, 515.3, 515.4, 524.3 or ASTM D5317-93)	0037	2,4 - D
		0038	2,4,5- TP (Silvex)
		0134	Pentachlorophenol
		0137	Dalapon
		0139	Dinoseb
		0140	Picloram
		0225	DCPA (Acid Metabolites)
		0222	Total DCPA
		0138	Dicamba
		0135	2,4 DB
		0223	Acifluorfen
		0224	Chloramben
		0226	3,5 - Dichlorobenzoic Acid
INSECT1 TEST PANEL	Carbamate Insecticides by EPA Methods 531.1, 531.2, or SM 6610)	0146	Carbofuran
		0148	Oxamyl (Vydate)
		0142	Aldicarb
		0145	Carbaryl
		0147	Methomyl

**DOH Test Panels and Analytes of Special Interest
Mint Farm Regional Wellfield Monitoring Well Sampling Program**

February 2013

Test Panel	Method	DOH #	Analyte
IOC TEST PANEL	Complete Inorganics	0004	Arsenic
		0005	Barium
		0006	Cadmium
		0007	Chromium
		0011	Mercury
		0012	Selenium
		0110	Beryllium
		0112	Antimony
		0113	Thallium
		0116	Cyanide
		0019	Fluoride
		0114	Nitrite-N
		0020	Nitrate-N
		0161	Total Nitrate/Nitrite
		0008	Iron
		0010	Manganese
		0013	Silver
		0021	Chloride
		0022	Sulfate
		0024	Zinc
		0014	Sodium
		0015	Hardness
		0016	Conductivity
		0017	Turbidity
		0018	Color
		0026	TDS-Total Dissolved Solids
		0111	Nickel
0009	Lead		
0023	Copper		
PCB TEST PANEL (PCB as Decachlorobiphenyl)	EPA Method 508A	0401	PCB (as Decachlorobiphenyl)
PEST1 TEST PANEL (General Pesticides)	EPA Methods 525.2, 551.1, 505, 508, 508.1, et al.)	0033	Endrin
		0034	Lindane (BHC - gamma)
		0035	Methoxychlor
		0036	Toxaphene
		0117	Alachlor

**DOH Test Panels and Analytes of Special Interest
Mint Farm Regional Wellfield Monitoring Well Sampling Program**

February 2013

Test Panel	Method	DOH #	Analyte
		0119	Atrazine
		0120	Benzo (a) pyrene
		0122	Chlordane (total)
		0124	Di (2-ethylhexyl) adipate
		0125	Di (2-ethylhexyl) phthalate
		0126	Heptachlor
		0127	Heptachlor epoxide
		0128	Hexachlorobenzene
		0129	Hexachlorocyclopentadiene
		0133	Simazine
		0134	Pentachlorophenol
		121	Butachlor
		0123	Dieldrin
		0130	Metolachlor
		0131	Metribuzin
		0132	Propachlor
		0254	Fluorene
		0153	PCB (as total arochlors)
		0173	Arochlor 1221
		0174	Arochlor 1232
		0175	Arochlor 1242
		0176	Arochlor 1248
		0177	Arochlor 1254
		0178	Arochlor 1260
		0179	Bromacil
		0180	Arochlor 1016
PHTH TEST PANEL (Phthalates)	EPA Method 506)	0124	Di (2-ethylhexyl) Adipate
		0125	Di(2-ethylhexyl) Phthalate
		0258	Benzyl Butyl Phthalate
		0259	Di-N-Butyl Phthalate
		0260	Diethyl Phthalate
		0261	Dimethyl Phthalate
QUAT TEST PANEL (Diquat and Paraquat)	EPA Method 549.2)	0150	Diquat
RADIONUCLIDES TEST PANEL	Beta Emitters		
		165	Gross alpha
		166	Radium 228

**DOH Test Panels and Analytes of Special Interest
Mint Farm Regional Wellfield Monitoring Well Sampling Program**

February 2013

Test Panel	Method	DOH #	Analyte
		39	Radium 226 (only if gross alpha activity plus radium 228 activity is greater than 5.0 pCi/L)
		105	Uranium** (mass) (if gross alpha activity is greater than 15.0 pCi/L)
		105	Uranium** (activity)
		40	Radium 226 + 228 (Depending on the foregoing data)
		40	Gross alpha*** + radium 228
		41	Gross alpha minus uranium and Radon
VOC1 TEST PANEL (Volatile Organic Compounds)	EPA Methods 524.2, 524.3 or 502.2)	0045	VINYL CHLORIDE
		0046	1,1 DICHLOROETHYLENE
		0047	1,1,1 TRICHLOROETHANE
		0048	CARBON TETRACHLORIDE
		0049	BENZENE
		0050	1,2 DICHLOROETHANE
		0051	TRICHLOROETHYLENE
		0052	Para-DICHLOROBENZENE
		0056	METHYLENE CHLORIDE (DICHLOROMETHANE)
		0057	TRANS- 1,2 DICHLOROETHYLENE
		0060	CIS- 1,2 DICHLOROETHYLENE
		0063	1,2 DICHLOROPROPANE
		0066	TOLUENE
		0067	1,1,2 TRICHLOROETHANE
		0068	TETRACHLOROETHYLENE
		0071	MONOCHLOROBENZENE
		0073	ETHYLBENZENE
		0074	M/P XYLENES (MCL FOR TOTAL)
		0075	O- XYLENE (MCL FOR TOTAL)
		0076	STYRENE
		0084	Ortho- DICHLOROBENZENE
		0095	1,2,4 TRICHLOROBENZENE
		0160	TOTAL XYLENES
		0079	1,2,3 TRICHLOROPROPANE
		0027	CHLOROFORM [screening]
		0053	CHLOROMETHANE
		0054	BROMOMETHANE
		0058	1,1 DICHLOROETHANE
		0078	BROMOBENZENE
		0081	O- CHLOROTOLUENE
		0085	FLUOROTRICHLOROMETHANE

**DOH Test Panels and Analytes of Special Interest
Mint Farm Regional Wellfield Monitoring Well Sampling Program**

February 2013

Test Panel	Method	DOH #	Analyte
		0086	BROMOCHLOROMETHANE
		0089	1,3,5 TRIMETHYLBENZENE
		0091	1,2,4 TRIMETHYLBENZENE
		0092	SEC-BUTYLBENZENE
		0096	NAPHTHALENE
		0102	EDB (Ethylene Dibromide) [screening]
		0103	DBCP [screening]
		0104	Dichlorodifluoromethane
MINT FARM SPECIAL INTEREST	SM4500-P-F		Orthophosphate
	EPA 200.7		Silica (different method used see below)
	EPA 200.7		Aluminum
	SM2320B		Alkalinity
	EPA 200.7		Magnesium
	EPA 200.7		Calcium
	EPA 350.1		Ammonia
	EPA 200.7		Potassium
	EPA 314		Perchlorate
	EPA 300		Bromide
	EPA 1630		Methyl mercury
	EPA 1653		Chlorinated phenolics
	Field		pH
			Hydrogen Sulfide

ORDINANCE NO. 3209

AN ORDINANCE REPLACING CHAPTER 17.100, "WATER SUPPLY PROTECTION" OF THE LONGVIEW MUNICIPAL CODE, IN ITS ENTIRETY AND PROVIDING FOR PROTECTION OF THE MUNICIPAL GROUNDWATER SUPPLY FOR THE CITY OF LONGVIEW, AND REPEALING ORDINANCE NO. 3127.

WHEREAS, the Longview City Council approved development of a municipal groundwater supply to provide potable water to customers in the City of Longview and Beacon Hill Water and Sewer District water service areas, to replace the existing surface water supply from the Cowlitz River; and

WHEREAS, the Council believes it is important to strike a balance between protection of the critical groundwater aquifer resource, private property rights, and the need for economic development; and

WHEREAS, this ordinance is intended to increase water supply protection and prevent the potential for contamination of the groundwater aquifer being developed as the source of municipal supply, to protect the health, safety and welfare of the citizens.

NOW THEREFORE, The City Council of the City of Longview do ordain as follows:

Section 1. In order to preserve the health, safety and welfare of all the public and the customers of the City of Longview and Beacon Hill Water and Sewer District water utilities, that Longview Municipal Code Chapter 17.100 shall be, and is hereby, deleted and replaced in its entirety to read as follows; provided manifest and numbering errors shall be corrected prior to publication:

CHAPTER 17.100

WATER SUPPLY PROTECTION

Sections:

- | | |
|-------------------|--|
| 17.100.010 | Background and Purpose |
| 17.100.020 | Interpretation |
| 17.100.030 | Definitions |
| 17.100.040 | Additional Authority |
| 17.100.050 | Adoption of Other Regulations and Standards |
| 17.100.060 | Applicability |

- 17.100.070 Discharges to Wellhead Protection Area
- 17.100.080 Minimum Standards
- 17.100.090 Application of Greater Standards
- 17.100.100 Greater Standards for Hazardous Materials Operations
- 17.100.110 Restrictions
- 17.100.120 Administrative Programs
- 17.100.130 Enforcement
- 17.100.140 Liability for Damages
- 17.100.150 Trade Secrets and Confidential Records
- 17.100.160 Alternative Practices
- 17.100.170 Adjustments and Variances
- 17.100.180 Appeals
- 17.100.190 Halogenated Solvent Table
- 17.100.200 Severability

17.100.010 Background and Purpose

Residents and businesses in the City of Longview and Beacon Hill Water and Sewer District water service areas have relied on surface water from the Cowlitz River for all or the majority of their potable water. On January 28, 2010, the Council approved development of a municipal groundwater supply to provide potable water to customers in the City of Longview and Beacon Hill Water and Sewer District water service areas, to replace the existing surface water supply from the Cowlitz River. Construction of this new groundwater supply is in progress and scheduled to be commissioned in October 2012.

Groundwater is contained in underground layers of permeable rock, sand, gravel and/or soil called aquifers. These aquifers are important public resources and fundamental components of the overall hydrological cycle. Aquifers serve as reservoirs for storing, transmitting, and yielding water through wells, and they provide natural filtration for groundwater, which is especially important for potable water supplies. The percolation of water through the layers of the aquifer filters many impurities and improves the quality of the groundwater.

It is important for the health, safety and welfare of all to protect aquifers from activities that may cause contamination or unacceptably increase the potential for contamination, and especially aquifers providing water for municipal water systems. The aquifer targeted for development as the City's municipal water supply is a gravel aquifer located underneath the area known as the Mint Farm Industrial Park in the city of Longview. The target aquifer is typically located between a protective confining layer of silts and clays and a bedrock formation, and is generally encountered from 230 feet to 380 feet below ground surface near the southern boundary of the Mint Farm Industrial Park.

(1) The purpose of this chapter is to protect the municipal water supply by establishing development regulations and minimum standards to reduce the risks of contaminants entering the water supply source aquifer.

(2) In furtherance of this purpose, the City prohibits the discharge of contaminants within the wellhead protection area as set forth in Section 17.100.070 and requires certain operations to utilize best management practices as set forth in Sections 17.100.080, 17.100.090, and 17.100.100.

(3) The City also recognizes that efforts to achieve successful contaminant control must include a groundwater pollution prevention education component for businesses, industries, and the general public. In implementing this chapter, the City will offer education and technical assistance to businesses, industries, and the general public to explain how to implement water resource protection and pollution control practices. Enforcement actions will normally be implemented when:

- (a) Education and technical assistance measures are unsuccessful at protecting the public interest;
- (b) Best management practices are not followed; or
- (c) Persons willfully contaminate or attempt to contaminate the drinking water or drinking water source of the City.

(4) It is not the intent of this chapter to have the City pursue enforcement actions against businesses, industries, or persons whose actions or activities result in the discharge of de minimus amounts, as defined at Section 17.100.030 herein, of contaminants onto the ground or into the groundwater in the wellhead protection area.

(5) The City finds this chapter necessary to protect the health, safety, and welfare of the residents of the City and the integrity of the water supply for the benefit of all City and Beacon Hill Water and Sewer District consumers.

(6) The City recognizes the importance of maintaining economic viability while providing necessary environmental protection. This chapter helps achieve both goals.

17.100.020 Interpretation

The provisions of this chapter shall be liberally construed by the City to serve the purposes of this chapter.

17.100.030 Definitions

- (1) "Aquifer" means a soil formation containing layers of rock, sand, gravel, and/or soil that stores, transmits, and yields water.
- (2) "Best management practices" or "BMPs" means the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Washington State Department of Ecology and/or the City of Longview that, when used singly or in combination, control, prevent, or reduce the release of pollutants and other adverse impacts to waters of Washington State.
- (3) "Bulk Petroleum Fuel Operation" means an operation that manages a cumulative total of 12,000 gallons or more of petroleum fuel on-site in tanks capable of holding volumes of at least 4,000 gallons.
- (4) "CAS" numbers are unique numerical identifiers assigned by the Chemical Abstracts Service to every chemical described in the open scientific literature including elements, isotopes, organics and inorganic compounds, ions, organometallics, metals and nonstructurable materials (ie., materials of unknown, variable composition or biological origin).
- (5) "Chemical Lagoons and Pits" means any earthen basin or uncovered concrete basin or depression, lined or unlined, containing hazardous materials.
- (6) "City" means the City of Longview.
- (7) "Closure of Operation" means the cessation of activity such that hazardous materials are no longer managed at the operation. For the purposes of this chapter, an operation is considered closed if it has been non-operational for a continuous period of two years.
- (8) "Connection" means a link or channel between two otherwise separate conveyance systems whereby there may be flow from one system to the other.
- (9) "Container" means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.
- (10) "Dangerous Waste" means waste designated in the Washington State Dangerous Waste Regulations (WAC 173-303) as dangerous or extremely hazardous due to its physical, chemical, or biological properties.
- (11) "De Minimus Amounts" means a small or miniscule amount of contaminant in a discharge that is determined not to be harmful to the environment.
- (12) "Direct Infiltration Facility" means any mechanism that is intended to direct stormwater or process wastewater directly into the ground without providing treatment. Examples include, but are not limited to, drywells, ponds, trenches, and perforated pipe systems.
- (13) "Director" means the director of the City of Longview Public Works department or designee.

- (14) "Discharge" means the release of materials such that the materials may enter or be emitted to the air, land, surface water or groundwater.
- (15) "Disposal" means discharging, discarding, or abandoning materials into or on any land, air, surface water or groundwater.
- (16) "Disposal Site" means an area of land or an excavation in which wastes are placed for permanent disposal, and which is not a land application site as defined in Section 17.100.030 herein, surface impoundment, injection well, or waste pile.
- (17) "Drywell" means a hole, pit, or precast concrete manhole with perforations, created and/or installed below ground surface with drain rock or other material to provide for exfiltration of surface water runoff or other drainage to the subsurface.
- (18) "Existing Operations, Uses, Activities" means operations, uses, or activities established prior to the effective date of this chapter.
- (19) "Groundwater" means water in a saturated zone or stratum beneath the surface of the land or below the bed of a surface water body.
- (20) "Hard Chrome Plating" means chrome plating applied in a sufficient thickness to provide a hardened protective surface rather than merely a decorative surface. A hard chrome shop is more likely to be a large single-purpose plating shop with higher quantities of hazardous plating materials onsite; whereas, facilities which do decorative plating may do so as just one of the steps in their manufacturing process.
- (21) "Hazardous Material" means any product, substance, commodity, or waste in liquid, solid, or gaseous form that exhibits a characteristic that presents a risk to drinking water. Risk may be due to ignitability, toxicity, reactivity, instability, corrosivity, or persistence. This definition extends to all "dangerous wastes" and "hazardous substances" that are defined in WAC 173-303 (State Dangerous Waste Regulations). It also includes the chemicals and/or substances defined in the federal Emergency Planning and Community Right to Know Act (EPCRA) and/or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- (22) "Hydraulic fracturing" or "fracking" means a human-caused technique of cracking or fracturing rocks and other geologic formations to create, restore, or increase the capacity or rate at which fluids or gases such as petroleum oil, natural gas, or water, can be stored in, transmitted through, or withdrawn from the geologic formations. Hydraulic fracturing frequently involves introducing materials, chemicals, and compounds into the geologic formations to promote the cracking process and to maintain the cracks in an open condition.
- (23) "Illicit connection" means any man-made conveyance connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include, but are not limited to, sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the stormwater drainage system.
- (24) "Illicit discharge" means any discharge to a municipal separate storm sewer that is not composed entirely of storm water, except discharges pursuant to a NPDES permit (other than

the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

(25) "Land Application Site" means a place where wastes such as sludge or gray water are applied to the land.

(26) "Leachable Constituents" means these constituents are determined using the Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846.

(27) "Manage" means a general term that includes, but is not limited to, the use, transfer, storage, processing, and re-packaging of materials. This does not include the active or immediate transportation of materials.

(28) "Mint Farm Aquifer" means the aquifer targeted by the City of Longview for development as a municipal water supply, identified as the gravel aquifer boundary in Figure 3-1, Delineation of Source Area for the Mint Farm Wellfield, of the City of Longview Mint Farm Regional Water Treatment Plant Preliminary Design Report prepared by Kennedy/Jenks Consultants, dated March 2010.

(29) "Municipal Waste" means general residential and commercial wastes, including the waste collected by garbage haulers and the waste delivered to transfer or disposal sites by the waste generators themselves (self-haul).

(30) "Municipal Water Supply Well" means a City-owned drinking water well supplying a water system meeting the definition of a Group A community water system as defined by WAC 246-290-020, and/or a City-owned water well supplying water to maintain or improve water quality in Waters of Washington State. Locations of such wells are depicted on the well head protection area maps maintained by the City.

(31) "National Pollutant Discharge Elimination System" or "NPDES" means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring, and enforcing permits, and imposing and enforcing pretreatment requirements under the Federal Clean Water Act for the discharge of pollutants to waters of the State from point and non-point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington State Department of Ecology.

(32) "New development" means land disturbing activities, including Class IV general forest practices, that are conversions from timber land to other uses; structural development, including construction or installation of a building or other structure; creation of impervious surfaces; and subdivision, short subdivision, and binding site plans, as defined and applied in Chapter 58.17 RCW. Projects meeting the definition of redevelopment shall not be considered new development.

(33) "New Operations, Uses, Activities" means operations, uses, or activities established on or after the effective date of this chapter. Development or activities requiring a building or other permit are new operations, uses, or activities. In addition, when a change in an operation places that operation into a higher classification per Section 17.100.090 paragraph (1), the operation shall be considered and treated as a new operation.

(34) "Operation(s)" means any industrial, commercial, institutional, or residential activity, whether publicly or privately-owned and operated, that involves the use of stationary or portable facilities, equipment, transport vehicles, or transfer equipment. To the extent allowed by state or federal law, this definition includes all federal, state, or local government entities.

(35) "Outdoor Wood Preservation" means the act of pressure treating wood products for weather resistance and outdoor use, using organic-based preservatives such as creosote or pentachlorophenol, typically used to treat poles or heavy timbers, and inorganic-based preservatives such as chromium, copper, and arsenic typically used to treat dimension lumber.

(36) "Permeable surface" means soil or other ground cover with a sufficiently rapid infiltration rate so as to reduce or eliminate surface runoff.

(37) "Person" means any human being, firm, labor organization, partnership, corporation, unincorporated association, trustee, trustee in bankruptcy, receiver, or any other legally recognized entity.

(38) "Petroleum Fuel" means petroleum-based liquid products refined from crude oil specifically for fuel purposes. Fuel includes, but is not limited to, all grades and blends of vehicle fuel, aviation and agricultural fuel, diesel, heating oil, and kerosene, and includes ethanol and similar fuel products and additives prior to blending.

(39) "Potentially Harmful Materials" means hazardous materials as defined at Section 17.100.030 as well as other materials including, but not limited to, the following, which if discharged or improperly disposed, may present a risk to drinking water:

Petroleum products including but not limited to petroleum fuel and petroleum based coating and preserving materials; oils containing PCBs; antifreeze and other liquid automotive products; metals, either in particulate or dissolved form, in concentrations above established regulatory standards; flammable or explosive materials; radioactive material; used batteries; corrosives, acids, alkalis, or bases; paints, stains, resins, lacquers, or varnishes; degreasers; solvents; construction materials; drain cleaners and other toxic liquid household products; pesticides, herbicides, fungicides, or fertilizers unless applied in accordance with local, state, and federal standards; steam cleaning and carpet cleaning wastes; pressure cleaning wastes; car wash water; laundry wastewater; soaps, detergents, or ammonia; swimming pool backwash; chlorine, bromine, and other disinfectants; heated water; domestic animal wastes; sewage; recreational vehicle waste; animal carcasses, excluding salmonids; food wastes; collected lawn clippings, leaves, or branches; trash or debris; silt, sediment, or gravel; dyes; and untreated or unapproved wastewater from industrial processes.

(40) "Process Wastewater" means wastewater discharged from one or more industrial processes or industrial cleanup procedures.

(41) "Redevelopment" means, on a site that is already substantially developed (i.e., has 35 percent or more of existing impervious surface coverage), the creation or addition of impervious surfaces; the expansion of a building footprint or addition or replacement of a structure; structural development including construction, installation, or expansion of a building or other structure; replacement of impervious surfaces; and land disturbing activities.

(42) "Releasing" or "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment including, but not limited to, the abandonment or discarding of barrels, containers, and other closed receptacles.

(43) "Responsible Government Official" means a person employed by the federal, state, or a local government with authority to protect the public health and safety of drinking water. Examples include, but are not limited to, persons employed by the City, law enforcement or fire department personnel, and employees of the Washington State Department of Ecology, Washington State Department of Health, the United States Environmental Protection Agency, Cowlitz County, and Cowlitz County Public Health.

(44) "Sewage Disposal Cesspool" means a lined excavation in the ground which receives the discharge of a drainage system, designed to retain solids and organic matter while permitting liquids to seep through the sides and bottom.

(45) "Stormwater" means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

(46) "Stormwater Drainage System" means constructed and natural features that function together as a system to collect, convey, channel, hold, inhibit, retain, detain, infiltrate, divert, treat, or filter stormwater.

(47) "Stormwater facility" means a constructed component of a stormwater drainage system, designed and constructed to perform a particular function or multiple functions. Stormwater facilities include, but are not limited to: pipes, swales, ditches, open channels, culverts, street gutters, detention ponds, retention ponds, constructed wetlands, storage basins, infiltration devices, catch basins, manholes, dry wells, oil/water separators, biofiltration swales, and sediment basins.

(48) "Stormwater Manual" means the most current version of the City of Longview Stormwater Manual, which adopts and supplements the Stormwater Management Manual for Western Washington prepared by the Washington State Department of Ecology.

(49) "Stormwater Treatment Facility" means a stormwater facility that is intended to remove pollutants from stormwater. Stormwater treatment facilities include, but are not limited to, wetponds, oil/water separators, biofiltration swales, and constructed wetlands.

(50) "Surface Water" means water that flows across the land surface, in channels, or is contained in depressions in the land surface, including but not limited to ponds, lakes, rivers, and streams.

(51) "Tank" means a portable or stationary device designed to contain liquids used or stored at an operation which may include hazardous materials, chemicals, or dangerous wastes and which is constructed primarily of non-earthen materials to provide structural support.

(52) "Toxicity" means having properties that cause or significantly contribute to death, injury, or illness in humans or wildlife. A material exhibits the characteristic of toxicity if it contains certain leachable constituents at sufficient concentrations to be considered dangerous to human health.

and the environment. Leachable constituents and toxicity concentrations are referenced in the Toxicity Characteristic List of WAC 173-303-090(8) as amended.

(53) "Transfer Warehouse" means any enclosed and covered transportation-related warehouse where shipments of products, which may be hazardous materials but not dangerous wastes, are held in portable containers for transfer.

(54) "Underground Injection Control" or "UIC" well means a manmade subsurface infiltration system designed to discharge fluids into the ground, consisting of an assemblage of perforated pipes, drain tiles, or other similar mechanisms, or a dug hole that is deeper than the largest surface dimension. Subsurface infiltration systems include drywells, pipe or french drains, drain fields, and other similar devices.

(55) "Water Resources" means surface water, storm water, and groundwater.

(56) "Wellhead Protection Area (WHPA)" means the area surrounding or contributing to the City's municipal water supply wells, including a buffer area, designated for special protection as established by a hydrogeological model, and identified on wellhead protection area maps maintained by and available from the City.

17.100.040 Additional Authority

The City may impose additional requirements whenever specific circumstances applicable to an operation threatening municipal water supplies are documented.

17.100.050 Adoption of Other Regulations and Standards

(1) For purposes of regulation of activities subject to this chapter, the City hereby adopts 173-303 WAC, Dangerous Waste Regulations.

(2) At least one copy of the Dangerous Waste Regulations adopted by this chapter shall be filed in the Office of the City Clerk for use and examination by the public.

(3) Where provisions of this chapter conflict with other provisions of the Longview Municipal Code, the more stringent requirements which have the most protective effect on water supply and quality, shall apply.

17.100.060 Applicability

(1) Operations: All operations are subject to the provisions of this chapter. Each operation shall meet the Minimum Standards defined in Section 17.100.080. Operations that manage hazardous materials may also be required to meet the Greater Standards for Hazardous Materials Management, as defined in Sections 17.100.090 and 17.100.100.

(2) Development and Redevelopment: The City shall apply development and redevelopment restrictions as defined in Section 17.100.110 to activities inside the WHPA.

(3) Emergency Response Exclusion: Emergency response activities shall be excluded from the requirements of this chapter, if and only if such an activity is initiated and completed within a timeframe too short to allow for full compliance with this chapter. This exclusion shall only apply

to immediate actions that are undertaken in response to an imminent threat to drinking water, public health, or safety. This exclusion shall not apply unless a responsible government official as defined in Section 17.100.030 is notified and agrees the event is a qualifying emergency.

17.100.070 Discharges to Wellhead Protection Area

(1) Prohibited Discharges: No person or operation shall discharge any potentially harmful materials within the WHPA. Persons or operations shall use all known, available, and reasonable means and BMP's to prevent the discharge of any potentially harmful materials within the WHPA.

(2) Illicit Connections:

(a) Any connection that could allow conveyance and discharge any solid, liquid, or gaseous material not composed entirely of surface and storm water, into the WHPA is considered an illicit connection and is prohibited, except:

- i. Connections conveying allowable discharges as set forth in Section 17.100.070 paragraphs (3) and (4) herein;
- ii. Connections conveying discharges pursuant to a National Pollutant Discharge Elimination System (NPDES) permit or a state waste discharge permit; and
- iii. Connections conveying effluent from permitted or authorized onsite sewage disposal systems to subsurface soils.

(b) Floor drains shall not be installed inside an operation which stores or uses hazardous materials unless approved by the City for connection to sanitary sewer. Existing floor drains connected to storm drains or to surface water drains located in or near indoor hazardous material storage or use areas are considered unauthorized connections and shall be sealed or removed to prevent liquid entry, piped to the sanitary sewer (with approval and appropriate shut-off valves), or be directed to additional containment or treatment systems meeting the standards of this chapter.

(3) Allowable Discharges to Stormwater Drainage System: The following types of discharges shall be permitted unless the City determines these discharges (whether singly or in combination with others) are causing unacceptable contamination of the municipal water supply:

- (a) Uncontaminated water from crawl space/basement pumps or footing drains;
- (b) Runoff from materials placed as part of an approved habitat restoration or bank stabilization project;
- (c) Natural uncontaminated surface water or ground water;
- (d) Flows from riparian habitats and wetlands;

- (e) City-approved dye testing;
- (f) Any discharge allowed by an operation's National Pollutant Discharge Elimination System (NPDES) permit or other authorized discharge permit;
- (g) Any discharge specifically allowed in writing by a local, state, or federal agency for remedial action in an agreed order, a consent decree, or in a voluntary cleanup effort.

(4) Allowable Discharges to Permeable Surfaces. The following types of discharges shall be permitted onto a permeable surface unless the City determines these discharges (whether singly or in combination with others) contain greater than de minimus amounts of contaminants:

- (a) All allowable discharges specified in Section 17.100.070 (3);
- (b) Potable water;
- (c) Potable water line flushing;
- (d) Landscape watering;
- (e) Residential car and boat washing;
- (f) Residential swimming pool and spa water;
- (g) Common flushing practices from water wells and distribution systems.

(5) Non-stormwater Discharges to the Stormwater Drainage System Prohibited Unless Conditions Met. The following categories of non-stormwater discharges are prohibited discharges to the Stormwater Drainage System unless the stated conditions are met:

- (a) Discharges from potable water sources, including water line flushing, hyperchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be de-chlorinated to a concentration of 0.1 ppm or less, pH-adjusted, if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the Stormwater Drainage System.
- (b) Discharges from landscape watering and other irrigation runoff. These shall be minimized through, at a minimum, public education activities and water conservation efforts.
- (c) Chlorinated swimming pool discharges. The discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted and reoxygenated if necessary, volumetrically and velocity controlled to prevent re-suspension of sediments in the Stormwater Drainage System. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the Stormwater Drainage System.

- (d) Street and sidewalk wash water, water used to control dust, and routine external building wash down that does not use detergents. The City shall reduce these discharges through, at a minimum, public education activities and/or water conservation efforts. To avoid washing pollutants into the Stormwater Drainage System, the City must minimize the amount of street wash and dust control water used.
- (e) Other non-stormwater discharges. The discharges shall be in compliance with the requirements of a stormwater pollution prevention plan received by the City, which addresses control of construction site de-watering discharges.

17.100.080 Minimum Standards

(1) Operational Best Management Practices (BMPs): All operations shall adopt the following best management practices to ensure their operations minimize potential risks to drinking water.

- (a) Precautions: The owner/operator shall take precautions to prevent accidental releases of hazardous materials. Hazardous materials shall be separated and prevented from entering Stormwater Drainage Systems, septic systems, and drywells.
- (b) Hazardous Materials Management: Hazardous materials shall be managed so they do not threaten human health or the environment, or enter drinking water or the WHPA.
- (c) Hazardous Material Releases: All hazardous materials that have been released shall be contained and abated immediately, and the hazardous materials shall be recycled or disposed of properly. The City shall be notified immediately of any release of hazardous materials that has the potential to impact the municipal water supply, but no later than 24 hours after the release. The Stormwater Manual provides applicable operational BMPs for spills of oils and hazardous substances.
- (d) Oil/Water Separators: Oil/water separators shall be inspected, cleaned, and maintained as stipulated in the Stormwater Manual. The City may allow an operation to modify the frequency of cleaning if the operation can demonstrate to the City's satisfaction that the separator operates effectively at less frequent cleaning intervals.
- (e) Pesticide and Fertilizer Management. All pesticides, herbicides, fungicides, and fertilizers shall be applied and managed according to the applicable BMPs for landscaping and lawn/vegetation management in the Stormwater Manual.
- (f) Stormwater Treatment Systems: Stormwater Drainage Systems and treatment facilities including, but not limited to, catch basins, wetponds, vaults, biofilters, settling basins, and infiltration systems shall be cleaned and maintained by the responsible party according to the applicable operational BMPs for the maintenance of stormwater, drainage, and treatment systems specified in the Stormwater Manual.
- (g) Decommissioning Water Wells: Any water well which is unusable, abandoned, or whose use has been permanently discontinued, or which is in such disrepair that its continued use is impractical or is an environmental, safety, or public health hazard, shall be decommissioned according to the provisions of the Washington Administrative Code WAC 173-160-381.

- (h) Operation Closure: At the closure of an operation, all hazardous materials shall be removed from the closing portion of the operation and disposed of in accordance with local, state, and federal laws.
- (i) Mobile Washing and Pressure Cleaning: Operations which engage in activities such as pressure washing, steam cleaning, carpet cleaning, and equipment and vehicle washing shall apply best management practices according to applicable BMPs in the Stormwater Manual. Mobile washing operations shall ensure all of their employees are knowledgeable of proper discharge practices. Washwater from such operations shall be captured and directed to an approved discharge location. Non-approved washwater shall not be discharged into the City's Stormwater Drainage System.
- (j) Operations constructing pilings, piers, and other structural supports requiring excavation and drilling shall submit to the City a geotechnical report demonstrating that these activities will not result in a conduit or pathway allowing potential contaminants into the Mint Farm Aquifer underlying the WHPA.

(2) Commercial Operations Requiring Additional BMPs: Operations which engage in the following commercial activities shall implement the applicable source control BMPs from the Stormwater Manual: Commercial animal handling, commercial composting, printing operations, fueling stations, log sorting, railroad yards, recyclers, scrap yards, and wood treatment facilities.

(3) Specific Activities Requiring Additional BMPs: Operations performing the following activities shall implement the applicable source control BMPs from the Stormwater Manual and shall comply with the requirements of WAC 173-303: construction/repair/maintenance of boats/ships, airfield/street deicing, dust control, landscaping, loading/unloading of trucks and railcars, repair/maintenance/parking of vehicles/equipment, erosion control at industrial sites, maintenance of utility corridors, maintenance of roadside ditches/culverts, outdoor manufacturing, mobile fueling of vehicles/equipment, painting/coating of vehicles/buildings/equipment, storing dangerous wastes, and managing raw materials.

17.100.090 Application of Greater Standards

(1) Classifications: Certain non-residential operations present a greater potential risk to the groundwater supply because of the volume and type of hazardous materials that are managed. These non-residential operations are classified in Table 90 A and are subject to the stipulated actions defined in this section.

Table 90 A - CLASSIFICATIONS	
Classification	Definition
Class I Operations	Operations that at any time within a one year time period will manage over 220 pounds in total of the following: A. Hazardous materials, including any mixtures thereof, that contain constituents referenced in the Code of Federal Regulations, 40 CFR 302.4 (referenced in Section 103(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)); or B. Hazardous materials, including any mixtures thereof, that contain

	<p>constituents from the lists specified for Class II Operations (below).</p> <p><u>Concentration Declassification.</u> A Class I operation shall no longer be a classified operation if the Class I constituents (40 CFR 302.4) contained in a product or waste are individually present at less than one percent by weight for non-carcinogenic hazardous materials, and less than 0.1 percent by weight for known or suspected carcinogenic hazardous materials. (Operators should review the Material Safety Data Sheet for the hazardous materials to make this determination).</p> <p><u>Consumer Quantity Declassification.</u> A Class I operation shall no longer be a classified operation if both of the following conditions are met:</p> <ul style="list-style-type: none"> A. The operation is focused on research, education, distribution, or consumer oriented activities, including but not limited to laboratories, hospitals, schools, cargo handlers, distributors, warehouses, or retailers; and B. Products containing Class I or Class II hazardous materials are managed in closed containers or sealed bags with individual capacities of no more than 10 gallons for a liquid material and no more than 80 pounds for a dry or solid material. <p><u>Metal and Metal Alloy Declassification.</u> Solid metals and solid metal alloys, including but not limited to roll stock, bar stock, sheet stock, and manufactured articles such as equipment, parts, building materials, and piping that contain one or more metals listed in 40 CFR 302.4 or WAC 173-303-090(8) shall be declassified; except where machining, forming, grinding, cutting, melting, or other activities produce residues such as shavings, grindings, swarf, fume, or other finely divided particulate forms of a listed metal or metal alloy that may present a threat to the municipal water supply, such residues shall not be declassified.</p> <p><u>Personal and Commercial Vehicle Fuel Tank Declassification.</u> The greater standards of Sections 17.100.090 and 17.100.100 shall not be applied to personal and commercial vehicles designed to hold quantities of fuel that would otherwise cause them to be classified under this section.</p>
<p>Class II Operations</p>	<p>Operations that at any time within a one year time period will manage over 2,200 pounds in total of the following:</p> <ul style="list-style-type: none"> A. Hazardous materials, including any mixtures thereof, that exhibit the characteristic of toxicity because they contain leachable constituents from the Toxicity Characteristic List of WAC 173-303-090(8) as amended; or B. Hazardous materials, including any mixtures thereof that contain constituents referenced in the Halogenated Solvent Table set forth in Section 17.100.190.

	<p><u>Site Cleanup Reclassification.</u> A Class II operation shall be reclassified as a Class I operation if the primary activity is site remediation or cleanup pursuant to an approved settlement agreement or a remedial action under RCW 70.105B.</p> <p><u>Concentration Reclassification.</u> A Class II operation shall be reclassified as a Class I operation if the Class II constituents (from WAC 173-303-090(8) or the Halogenated Solvent Table set forth in Section 17.100.190) are present in the hazardous materials being managed at concentrations of less than five percent by weight.</p> <p><u>Transfer Warehouse Reclassification.</u> A Class II operation shall be reclassified as a Class I operation if the following conditions are met: A. The operation is a transfer warehouse; and B. Containers of hazardous materials are not opened at the site under any circumstance; and C. Products containing Class II hazardous materials are managed in containers with individual capacities of no more than 400 gallons.</p> <p><u>Consumer Quantity Declassification.</u> A Class II operation shall no longer be a classified operation if both of the following conditions are met: A. The operation is focused on research, education, distribution, or consumer-oriented activities, including but not limited to laboratories, hospitals, schools, cargo handlers, distributors, warehouses, or retailers; and B. Products containing Class I or Class II hazardous materials are managed in closed containers or sealed bags with individual capacities of no more than 10 gallons for a liquid material and no more than 80 pounds for a dry or solid material.</p> <p><u>Personal and Commercial Vehicle Fuel Tank Declassification.</u> The greater standards of Sections 17.100.090 paragraph B and 17.100.100 shall not be applied to personal and commercial vehicles designed to hold quantities of fuel that would otherwise cause them to be classified under this section.</p>
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(2) Stipulated Actions and Timelines: Class I and II operations shall implement the Greater Standards for Hazardous Material Operations defined in Section 17.100.100, according to the following stipulations:

- (a) New Operations: New Class I and Class II operations shall implement the Greater Standards on or prior to the date of issuance of the certificate of occupancy or as otherwise specified in accordance with the provisions of this chapter.

- (b) Existing Operations: Existing Class I and Class II operations shall implement the Greater Standards within 180 days of the effective date of this chapter.
- (c) Change of Class or Tenant: The City shall be notified as soon as possible and no later than 30 days after:
 - i. A change in classification of an operation as defined as Table 90 A.
 - ii. Occupation of an existing Class I or II operation by a new tenant or change in ownership.

17.100.100 Greater Standards for Hazardous Materials Operations

(1) Best Management Practices (BMPs): All Class I and II operations shall implement the provisions of this section on or prior to the date of issuance of the certificate of occupancy. Operations that change in classification from unclassified to either Class I or Class II shall implement the provisions of this section within 90 days of the change in classification.

- (a) Design and Construction: Facilities shall be designed, constructed, maintained, and operated to minimize the possibility of an unplanned release of hazardous materials to soil or surface water or groundwater.
- (b) Container/Tank Management: A container or tank holding a hazardous material shall always be closed, except to add or remove materials. Hazardous materials shall also be managed so they do not damage the structural integrity of the operation or devices containing the material.
- (c) Container/Tank Condition: All containers and tanks shall be maintained in such a manner as to assure effective operation and prevent the release of hazardous materials.
- (d) Container/Tank Identification: The owner/operator shall label all containers and tanks containing hazardous materials to identify the major risk(s) associated with the contents. This labeling shall conform to applicable sections of the Uniform Fire Code, Occupational Safety and Health standards and/or the State of Washington's Dangerous Waste Regulations.
- (e) Ancillary Equipment: Any leaking pipe, pump, or other ancillary equipment shall be repaired or replaced promptly. Ancillary equipment associated with hazardous materials shall be supported and protected against physical damage and excessive stress.
- (f) Compatibility: The owner/operator shall use a container or tank made of, or lined with, materials which are compatible with the hazardous materials to be stored and any dilution or mixing process associated with its storage.
- (g) Containment: Container and tank storage areas shall have a secondary containment system capable of collecting and holding spills and leaks. This containment shall:
 - i. Be constructed of an impervious surface with sealed joints.

- ii. Joints between concrete slabs and slab/foundation interfaces should be eliminated or minimized in the operation;
 - iii. Provide pollution control measures to protect surface water and groundwater, including run-off collection and collection of discharges from active areas;
 - iv. Be designed to provide secondary containment of 110 percent of the container's or tank's capacity; or in areas with multiple tanks, 110 percent of the largest tank or 10 percent of the aggregate tank volumes, whichever is larger. Secondary containment shall be provided in all areas where hazardous materials are loaded/unloaded, transferred, accumulated, or stored;
 - v. Be compatible with the materials being handled; and
 - vi. Be routinely inspected as defined in Section 17.100.100 paragraph (3).
- (h) Loading Areas: Loading and unloading areas shall be designed, constructed, operated, and maintained to:
- i. Contain spills and leaks that might occur during loading/unloading;
 - ii. Prevent releases of hazardous materials to surface or ground water;
 - iii. Contain wash waters (if any) resulting from the cleaning of contaminated transport vehicles and load/unload equipment; and
 - iv. Allow for removal as soon as possible of any collected hazardous materials resulting from spills, leaks, and equipment cleaning.
- (i) Closure: At closure of an operation, all remaining structures, containers, tanks, liners, and soil containing or contaminated with hazardous materials at concentrations above state and federal regulatory thresholds shall be decontaminated and properly disposed of or managed.

(2) Spill and Emergency Response Plan (SERP):

- (a) All Class I and II operations shall develop and implement a Spill and Emergency Response Plan (SERP) on or prior to the date of issuance of the certificate of occupancy. Operations that change in classification from unclassified to either Class I or Class II shall implement the provisions of this section within 90 days of the change in classification from unclassified to either Class I or Class II. Other operations may also be required to develop and implement a SERP if the City determines this action will help prevent releases of hazardous materials to surface or ground water.
- (b) The SERP shall be maintained on site, and shall be made available to the City upon request.
- (c) The SERP shall be updated at least every five years or as needed to reflect significant changes in operation or practices.

(d) At a minimum, the SERP shall include the following information:

i. Spill Prevention.

- A. Drawings including the layout of the operation, a floor plan, direction of drainage, entrance and exit routes, and areas where hazardous materials are received, stored, transported, handled, or used in operations.
- B. Listings of all hazardous materials on site including types, volumes, locations, and container types and sizes.
- C. The location and purpose of spill prevention related equipment, including equipment which serves to detect releases of potential drinking water contaminants.

ii. Emergency Response.

- A. Chain of command and procedures for spill response.
- B. Phone list of response agencies including federal, state, and city emergency contact numbers and environmental cleanup companies.
- C. Procedures for treating and disposing of spilled hazardous materials.

iii. Certification.

- A. The SERP shall include a certification signed by an authorized representative of the operation stating: "I certify that the information provided in this document is to the best of my knowledge true and complete, and the spill prevention equipment and emergency response measures described herein are as stated." The signed certificate shall include the authorized representative's name (printed), title, and contact information.

(3) Operational Inspections:

- (a) All Class I and II operations shall implement the provisions of this section on or prior to issuance of the certificate of occupancy. Operations that change in classification from unclassified to either Class I or Class II shall implement the provisions of this section within 90 days of change in classification from unclassified to either Class I or Class II. Other operations may also be required to implement these provisions if the City determines this action will help prevent releases of hazardous materials to surface or ground water.
- (b) Schedule: The owner/operator shall develop a written schedule for inspecting all monitoring equipment, safety or emergency equipment, security devices, and any other equipment that helps prevent, detect, or respond to water resource-related hazards.
- (c) Regular Inspections: The owner/operator shall perform site inspections to identify malfunctions and deterioration of equipment or containers, operator errors, discharges,

or any other condition that may cause or lead to the release of hazardous materials to drinking water. The owner/operator shall conduct these inspections often enough to identify problems in time to correct them before they impact surface water or groundwater. Inspections shall be completed in all areas where hazardous materials are managed and a written record of those inspections made at least annually.

- (d) Water Resource-Related Hazard Mitigation: The owner/operator shall remedy any problems revealed by the inspection. Where a water resource-related hazard is imminent or has already occurred, remedial action shall be taken immediately.

(4) Training Program:

- (a) All Class I and II operations shall implement the provisions of this section on or prior to issuance of certificate of occupancy. Operations that change in classification from unclassified to either Class I or Class II shall implement the provisions of this section within 90 days of change in classification from unclassified to either Class I or Class II. Other facilities also may be required to implement these provisions if the City determines this action will help prevent releases of hazardous materials to surface water or groundwater.
- (b) Operations shall develop a training program or amend an existing training program to inform employees at least once each year of any possible risks to surface water or groundwater associated with on-site operations. The owner/operator shall ensure that all employees know and understand:
- i. The location of hazardous materials managed at the operation and the associated potential risks to surface water and groundwater;
 - ii. The location of material safety data sheets (MSDS) at the operation;
 - iii. How employees can detect the presence or release of hazardous materials;
 - iv. How employees can protect themselves through work practices, emergency procedures, and use of personal protective equipment;
 - v. How to locate and use the operation's SERP; and
 - vi. How to prevent the pollution or contamination of surface and groundwater.

(5) Closure Plan:

- (a) Each new Class II operation shall prepare and submit to the City a Closure Plan within six months of the date of issuance of the certificate of occupancy. Each existing Class II operation shall prepare and submit such a plan within six months of the effective date of this chapter. Class II operations shall ensure their facilities are closed in a manner that prevents the release of hazardous materials during closure, protects surface water and groundwater, and prevents post-closure escape of hazardous materials.
- (b) Plan Requirements: The Closure Plan shall detail the means by which the operation will remove and properly dispose of hazardous materials, and perform an investigation to

confirm the presence or absence of hazardous materials in the soil and ground water, if potential contamination is indicated. Specifically, the Closure Plan shall include the following:

- i. A listing of the types and quantities of hazardous materials reasonably expected to be present on-site during the operating life of the operation.
- ii. A description of the plan for removal and disposal of hazardous materials.
- iii. A description of the plan to decontaminate containment systems and ancillary equipment.
- iv. An estimate of the cost to implement the Closure Plan, using the assumption that a third party will conduct removal and disposal activities.
- v. A certification signed by an authorized representative of the business/industry submitting the Closure Plan stating, "I certify that the information provided in this document is to the best of my knowledge accurate and the closure measures described herein will be implemented as stated." The signed certificate shall include the authorized representative's name (printed), title, and contact information.

(c) Report Update. The owner/operator of an operation shall update the Closure Plan every five years to re-certify the information and estimates. The Closure Plan shall also be updated if operating procedures change in such a way that the volume/mass of hazardous material is increased by 25 percent or more.

(6) Engineering and Operating Report: When the City identifies a need for additional information regarding an operation's practices, the City may require the operation to submit an engineering and operating report for the City's review. The report shall provide the following information:

- (a) The type of industry or business including the kind and quantity of finished products.
- (b) A process flow diagram illustrating the process flow of water and materials in a normal operating day. This will include details on the operation's plumbing and piping and where specific chemicals are added to processes.
- (c) A discussion of any discharges to the Stormwater Drainage System.
- (d) A discussion of any discharges through land applications, including seepage lagoons, irrigation, and subsurface disposal. This discussion should include the depth to ground water and anticipated overall effects and risk assessment of the operations on the quality of surface water and groundwater.
- (e) Provisions for any plans for future expansion or intensification.
- (f) A certification signed and dated by an authorized representative of the operation stating:

"I certify that the information provided in this document is to the best of my knowledge true and complete." The signed certificate shall include the authorized representative's name (printed), title, and contact information.

(7) Records & Reports:

- (a) Operations shall maintain records of required inspection, training, cleaning, and maintenance events. Where operations are otherwise required by the City or another agency to maintain such records, those records shall satisfy this requirement. All operations shall maintain these records on site for at least three years and shall make them available to the City upon request.
- (b) Plans, reports, or other documentation concerning the management of hazardous materials shall also be made available to the City upon request.
- (c) Information provided to the City will be available to the public. Information may be claimed as confidential by the operation as outlined at Section 17.100.150. If no claim is made at the time of submission, the City will make the information available to the public when requested.

(8) Protections for Stormwater: All Class I and II operations shall implement the applicable BMPs of the Stormwater Manual prior to the date of issuance of the certificate of occupancy.

17.100.110 Restrictions

(1) General Prohibitions:

- (a) Due to the use of materials, chemicals, and compounds that may be harmful to human health and to prevent the potential for contamination of the City's municipal water supply, the practice of hydraulic fracturing is prohibited from use at all locations within or beneath the WHPA and corporate city limits.

(2) Prohibitions Within the WHPA: Regardless of operating status or location, the following uses and activities shall be prohibited within the WHPA:

- (a) Hard Chrome Plating Operations
- (b) Outdoor Wood Preservation Operations
- (c) Chemical Lagoons and Pits
- (d) Sewage Disposal Cesspools
- (e) Hazardous Material Disposal Sites
- (f) Radioactive Waste Disposal Sites
- (g) Municipal Waste Disposal Sites

(h) Any other activity that has the potential to reduce the aquifer recharge, flow, or water quality, or otherwise threaten the use of the municipal water supply, as determined by the Director.

(3) Development Limitation:

(a) New Operations. The following new operations are not permitted within the WHPA:

i. New bulk petroleum fuel operations except when:

A. All provisions of this chapter applicable to minimizing or eliminating contamination risk to the water supply are met to the City's satisfaction; and

B. The owner or operator provides an Engineering and Operating Report described in section 17.100.100 paragraph 6 to the City's satisfaction.

C. The Director approves an Adjustment in accordance with section 17.100.170.

ii. New Class II operations as defined in Table 125 A, except new Class II operations may occupy an existing structure or facility appropriate for the use when:

A. All provisions of this chapter applicable to minimizing or eliminating contamination risk to the water supply are met to the City's satisfaction; and

B. The owner or operator provides an Engineering and Operating Report described in section 17.100.100 paragraph 6 to the City's satisfaction; and

C. The Director approves an Adjustment in accordance with section 17.100.170.

(b) Existing Operations.

i. Existing bulk petroleum fuel operations are nonconforming uses. However, such existing bulk fuel operations within the WHPA may become conforming by:

A. Filing such a request with the City; and

B. Taking the necessary action(s) to meet all provisions of this chapter applicable to minimizing or eliminating contamination risk to the water supply to the City's satisfaction; and

C. The owner or operator provides an Engineering and Operating Report described in section 17.100.100 paragraph 6 to the City's satisfaction; and

D. The Director approves an Adjustment in accordance with section 17.100.170.

- ii. Existing Class II operations are nonconforming uses. However, an existing Class II operation may become conforming by:
 - A. Filing such a request with the City; and
 - B. Taking the necessary action(s) to meet all provisions of this chapter applicable to minimizing or eliminating contamination risk to the water supply to the City's satisfaction; and
 - C. The owner or operator provides an Engineering and Operating Report described in section 17.100.100 paragraph 6 to the City's satisfaction; and
 - D. The Director approves an Adjustment in accordance with section 17.100.170.

(4) Septic Systems:

- (a) New septic systems and replacement of existing septic systems shall not be permitted within the WHPA. An owner/operator may seek Adjustment from this prohibition by filing with the City a request accompanied by an analysis prepared by a qualified professional addressing the potential for groundwater contamination at the site. This analysis may include a soils and groundwater evaluation if deemed necessary by the City. Such analysis and Adjustment are subject to City approval.
- (b) Projects and operations relying upon installation of a septic system in the WHPA are prohibited unless all of the following findings are approved by the City:
 - i. Connection to an existing sewer line is impossible or impracticable; and
 - ii. The property cannot be reasonably developed without use of a septic system; and
 - iii. The septic system design poses no significant risk of groundwater contamination.

(5) Heating Oil Tanks.

- (a) Installation of an underground heating oil tank within the WHPA is prohibited unless the following findings are made:
 - i. Connection to another source of fuel or energy is impracticable; and
 - ii. The proposed underground fuel tank poses no significant risk of groundwater contamination.

(6) Direct Infiltration Facilities:

- (a) New direct infiltration facilities and replacement of existing direct infiltration facilities shall not be allowed for Class I and Class II operations within the WHPA. An operation may seek relief from this prohibition by filing with the City a request for Adjustment accompanied by an analysis prepared by a qualified professional addressing the

potential for groundwater contamination at the site. This analysis may include a soils and groundwater evaluation if deemed necessary by the City. Such analysis and Adjustment are subject to City approval.

17.100.120 Administrative Programs

(1) Educational and Technical Assistance Program.

- (a) The City will work in conjunction with other agencies to implement an Education and Technical Assistance Program to assist property owners, business and industry owners and managers, residents, and other interested parties in understanding the importance of protecting the City's drinking water and in employing best management practices in pursuit of that goal.
- (b) The program directed toward business and industry will include but not be limited to technical assistance visits, informational fact sheets, self-audits, or workshops.
- (c) Additional education and assistance programs aimed at residences, public institutions, and low risk businesses shall include:
 - i. Education on the proper use of pesticides, herbicides, fungicides, and fertilizers;
 - ii. Discussions of the impacts of unauthorized discharges to drywells, catch basins, storm basins, and sanitary sewer;
 - iii. Activities to explain and promote the proper management and disposal of used oil and other contaminants; and
 - iv. The importance of properly abandoning wells in accordance with state law.

(2) Compliance Inspections:

- (a) City personnel may inspect any operation within the City limits known to manage (or may potentially manage) hazardous materials or is reasonably believed to be a potential source of an illicit discharge into the WHPA.
- (b) Inspections may be initiated as the result of a complaint or referral, or as defined by a routine schedule for compliance, or self-initiated by the City. Inspections will be used to determine if there is any risk to the water supply and to determine if an operation is in compliance with this chapter.
- (c) Inspections may involve a review of process equipment, structures, and operating practices; records or plan review; interviews with operators; photo documentation; and sampling. As such, operators shall allow representatives of the City, upon presentation of credentials, to:
 - i. Enter the premises where hazardous materials are being managed, or where records may be kept as required by this chapter. The owner/operator shall make necessary arrangements to allow access without delay. Unreasonable delay may constitute a violation of this chapter;

- ii. Have access to and copy, at reasonable times, any records that must be kept as required by this chapter;
- iii. Inspect at reasonable times any facilities, equipment (e.g., safety, monitoring, operating, or other equipment), practices, or operations regulated or required under the provisions of this chapter;
- iv. Sample and monitor at reasonable times, any substances or parameters at any location for the purposes of assuring compliance or as otherwise authorized by the provisions of this chapter. This requirement may involve the City's installation or erection of equipment to conduct sampling, inspection, compliance monitoring, or metering operations. As such, at the written or verbal request of the City, operators shall remove any temporary or permanent obstruction to safe and easy access to an operation to be inspected and/or sampled. The operator shall not replace such an obstruction without the City's consent.

17.100.130 Enforcement

- (1) It shall be unlawful to violate the provisions of this chapter. Enforcement of this chapter shall be governed by Chapter 1.30 LMC or any other means available by local, state and/or federal law.
- (2) Civil Infraction. Any person who undertakes any activity prohibited by this chapter shall be guilty of a Class I civil infraction and may be assessed a penalty pursuant to LMC 1.30.040(1)(a) and (2). Each violation of this chapter or approval or order issued pursuant to this chapter shall be a separate offense, and, in the case of a continuing violation, each day's continuance shall be deemed to be a separate and distinct offense. All costs, fees and expenses in connection with enforcement actions may be recovered as damages against the violator.
- (3) Criminal Penalties. In addition to other remedies, the director may forward to the office of city attorney a detailed factual background of the alleged violation with a recommendation that a gross misdemeanor charge be filed against the person responsible for any willful violation of any provision of this chapter. The court may order, in addition to any fine or jail time, that a person found to have committed a violation of this chapter shall make restitution to any person damaged by the violation.
- (4) Penalty Recovered. Penalties recovered for violations shall be paid to the water utility except for reimbursement of costs and expenses incurred by other departments of the city.
- (5) In addition to civil and criminal enforcement of this chapter, the City may utilize the following authority:
 - (a) The City Council of the City of Longview finds that an operation not in compliance with the requirements of this chapter constitutes a public nuisance under RCW 7.48, Nuisances.
 - (b) The City may use field notes, observations, photo documentation, sample logs, analytical results, or other information to define risk and to establish that an operation is in violation of this chapter.

- (c) The City may require the implementation of operational or structural best management practices, as defined through the provisions of this chapter. The City may also require the operator to sample and analyze any discharge, surface and storm water, ground water, and/or sediment in accordance with sampling and analytical procedures or requirements determined by the City. If the operator is required to complete this sampling and analysis, a copy of the analysis shall be provided to the City.
- (d) The City may impose additional requirements whenever documented specific circumstances (applicable to the operation) threaten the municipal water supply.
- (e) Notwithstanding any other provisions of this chapter, whenever it appears to the City that conditions regulated by this chapter require immediate action to protect the public health and/or safety, the City is authorized to enter such property for the purpose of inspecting, investigating and mitigating such emergency conditions.

(6) Enforcement by Director. It shall be the responsibility of the director to enforce the provisions of this chapter and any order or approval issued pursuant to this chapter. The director is authorized to issue notices of civil infraction for violations thereof. The issuance of a notice of civil infraction shall not preclude recourse to any other remedies permitted by law.

17.100.140 Liability for damages.

(1) City Liability. This chapter shall not be construed to hold the city of Longview, or any officer or employee thereof, responsible for any damages to persons or property by reason of the certification, inspection or non-inspection of any building, equipment or property as herein authorized.

(2) Violator Liability. The violator shall be liable for all damages to persons, property, and mitigation or remediation costs to the city to mitigate the impacts of any contamination of the municipal water supply due to violations of this chapter, including but not limited to the costs of additional treatment processes and chemicals, or development of a replacement water source for the municipal water supply.

17.100.150 Trade Secrets and Confidential Records

(1) Records Availability.

- (a) All surveys, reports, plans, diagrams, permits, and other documents, information, and data submitted to the City pursuant to this chapter, or information and data obtained by the City through sampling, monitoring, and enforcement activities shall generally be available for public inspection and copying.
- (b) Such information shall not be available for public inspection and copying if protected from public disclosure by the provisions of RCW chapter 42.56 as amended or other state and federal laws governing the dissemination of public records and information to the public, including but not limited to patent, trademark, and trade secret laws and regulations.
- (c) In no case shall an employee or agent of the City be liable to a business, industry, or person for the public disclosure of any surveys, reports, plans, diagrams, permits, and

other documents, information, and data submitted to the City pursuant to this chapter, or information and data obtained by the City through sampling, monitoring, and enforcement activities; unless such information or data has been clearly marked confidential by the business, industry, or person, or the business, industry, or person has requested confidentiality consistent with this chapter.

(2) Exemption from Disclosure Request.

- (a) Any business, industry, or person may request that specific and particular information or data in the possession of the City be exempted from public inspection and copying. The request shall be in writing and addressed to the City and the business, industry, or person shall bear the burden of establishing that the specific and particular information or data sought to be exempted is protected from public disclosure under state law. The City Attorney's office shall determine whether and which portions of such information are protected from public disclosure within 21 days of receipt of a request for confidentiality. The City shall not release for public inspection and copying that information and data for which a business, industry, or person has requested confidentiality until such time as the City has made a determination of whether the information is protected from public disclosure, unless the City determines in good faith that the request for confidentiality is frivolous or without merit.
- (b) The City may withhold records only if it finds:
- i. The record contains information that reflects valuable research data obtained by the City within five years of the date of the request and that disclosure would produce private gain and public loss. For purposes of this finding, "research data" means a body of facts and information collected for a specific purpose and derived from close, careful study, or from scholarly or scientific investigation or inquiring; or
 - ii. The record contains trade secret information because it includes a formula, pattern, compilation, program, device, method, technique, or process that:
 - A. Derives independent economic value, actual or potential, from not being generally known;
 - B. The information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy; and
 - C. The information is not readily ascertainable from another source.
- (c) As an alternative to the procedures specified in Section 17.100.150 (2)(b), the City Attorney's office may decline to make a determination of whether the record is exempt from public disclosure because it contains trade secret information. Where the City Attorney's office declines to make such a determination, the City shall provide the holder of the trade secret a reasonable amount of time, but in no case more than 21 days, to obtain an order from the superior court preventing disclosure of the record.
- (d) A business, industry, or person submitting information or data to the City for which the business, industry, or person intends to claim whole or partial confidentiality shall mark

those specific pages and sections of information or data asserted to be confidential with a conspicuous and legible marking indicating "TRADE SECRET" and/or "CONFIDENTIAL". The business, industry, or person shall then submit a request for trade secret protection to the City for the marked records within seven days of submitting such marked information or data.

(3) Availability of Confidential Information: Surveys, reports, plans, diagrams, permits, and other documents, information, and data submitted to the City pursuant to this chapter, or information and data obtained by the City through sampling, monitoring, and enforcement activities, which the City or a court of competent jurisdiction has determined are trade secrets and exempted from public inspection and copying, shall be available upon written request to local, state, and federal governmental agencies for uses related to this chapter, the NPDES program, state water quality monitoring and enforcement, and other enforcement proceedings involving the business, industry, or person.

17.100.160 Alternative Practices

(1) Where appropriate, the City may accept other local, state, or federal approvals, permits, or other authorization as satisfying certain provisions defined through this chapter. The City retains the sole authority to review plans, permits, and operating conditions to determine compliance.

(2) The City will accept an alternative practice, system, plan, or structure only if the owner/operator can demonstrate to the satisfaction of the City that the alternative will produce the same or a greater level of water supply protection.

17.100.170 Adjustments and Variances

(1) Authority. The Public Works Director may grant an adjustment or variance from the requirements of this chapter. In so granting, the Public Works Director may prescribe conditions that are deemed necessary or desirable for the public interest.

(2) Adjustments. An Adjustment is a technical variation in the application of a Minimum Requirement to a particular project. The City may grant Adjustments to this chapter only, under this section. No other Adjustments are authorized under this section. Adjustment approvals shall follow the following process:

(a) Adjustments to the Minimum Requirements may be granted by the City provided a written finding of fact is prepared showing compliance with the specified criteria.

(b) A request for an Adjustment shall be administratively processed in accordance with procedures specified in the General Requirements. The Public Works Director may grant an Adjustment upon demonstration by the applicant of compliance with the approval criteria contained in subsection (c) below. The Public Works Director shall maintain a record of such decisions and associated findings.

(c) Adjustments to this chapter may be granted only, under the following circumstances:

- i. Compliance with approval criteria must be documented with written findings of fact.
- ii. The Adjustment provides substantially equivalent environmental protection.

- iii. Based on sound engineering practices, the objectives of safety, function, environmental protection, and facility maintenance are met.
- iv. The Adjustment will not result in non-compliance with other Minimum Requirements.

(3) Variances. The Public Works Director may grant a variance to the requirements of this chapter; provided, that a written finding of fact is prepared that establishes the following:

- (a) The variance will not increase risk to the public health and welfare, nor be injurious to other properties in the vicinity, or to the quality of the groundwater supply; and
- (b) The variance is the least possible exception that could be granted to comply with the intent of the minimum requirements.

17.100.180 Appeals

(1) Appeals of enforcement of this chapter shall be filed in accordance with the administrative appeal process described in Longview Municipal Code Chapter 1.33 and governed by final order of the hearings examiner. An appeal to the decision of the hearings examiner must be filed to Cowlitz County Superior Court within 30 calendar days from the date the Hearings Examiner's decision was mailed to the person to whom the decision is directed, or is thereafter barred.

(2) Appeals under Section 17.100.110 relating to WHPA shall be consolidated with any open record hearing or appeal related to any underlying application, where such open record hearing or appeal is required, and shall be processed according to the procedures already established for that hearing. Where there is no underlying new development or redevelopment application requiring an open record hearing or appeal, appeals under Section 17.100.110 relating to WHPA shall be processed according to the procedures set forth in herein and in Longview Municipal Code Chapter 1.33.

17.100.190 Halogenated Solvent Table

Solvent	Synonym(s)	CAS No
Benzyl chloride	Chloromethylbenzene	100-44-7
Bis (2-chloroethyl) ether	Bis(-chloroethyl)ether	111-44-4
Bis(2-chloroisopropyl) ether	Bis(-chloroisopropyl)ether	108-60-1
Bromobenzene	Phenyl bromide	108-86-1
Bromochloromethane	Chlorobromomethane	74-97-5
Bromodichloromethane	Dichlorobromomethane	75-27-4
Bromoethane	Ethyl bromide	74-96-4
Bromoform	Tribromomethane	75-25-2
Carbon Tetrachloride	Tetrachloromethane	56-23-5
Chlorobenzene	Benzene chloride	108-90-7
2-Chloroethyl vinyl ether	(2-Chlorethoxy)ethane	110-75-8
Chloroform	Trichloromethane	67-66-3
1-Chloro-1-nitropropane	Chloronitropropane	600-25-9
2-Chlorophenol	o-Chlorophenol	95-57-8
4-Chlorophenyl phenyl ether	p-Chlorodiphenyl ether	7005-72-3

Solvent	Synonym(s)	CAS No.
Chloropicrin	Trichloronitromethane	76-06-2
m-Chlorotoluene		108-41-8
o-Chlorotoluene	2-Chloro-1-methylbenzene	95-45-8
p-Chlorotoluene		106-43-4
Dibromochloromethane	Chlorodibromomethane	124-48-1
1,2-Dibromo-3-chloropropane	DPCP	96-12-8
Dibromodifluoromethane	Freon 12-B2	75-61-6
1,2-Dichlorobenzene	o-Dichlorobenzene	95-50-1
1,3-Dichlorobenzene	m-Dichlorobenzene	541-73-1
1,1-Dichloroethane	1,1-DCA	75-34-3
1,2-Dichloroethane	Ethylene dichloride, 1,2-DCA	107-06-2
1,1-Dichloroethene	Vinylidene chloride 1,1-DCE	75-35-4
Trans-1,2-Dichloroethylene	Trans-1,2-DCE	456-60-5
1,2-Dichloropropane	Propylene dichloride	78-87-5
Cis-1,3-Dichloropropene	Cis-1,3-Dichloropropylene	10061-01-5
Trans-1,3-Dichloropropene	Trans-1,3-Dichloropropylene	10061-02-0
Ethylene dibromide	1,2-Dibromoethane, EDB	106-93-4
Hexachlorobutadiene	HCBD	87-68-3
Hexachlorocyclopentadiene	HCCPD	77-47-4
Methylene chloride	Dichloromethane	75-09-2
Pentachloroethane	Ethane pentachloride	76-01-7
1,1,2,2-Tetrabromoethane	Acetylene tetrabromide	79-27-6
1,1,2,2-Tetrachloroethane	Acetylene tetrachloride	79-34-5
Tetrachloroethylene	Perchloroethylene, PCE	127-18-4
1,2,4-Trichlorobenzene	1,2,4-TCB	120-82-1
1,1,1-Trichloroethane	Methyl chloroform, 1,1,-TCA	71-55-6
1,1,2-Trichloroethane	1,1,2-TCA	79-00-5
Trichloroethylene	TCE	79-01-6
1,1,2-Trichlorofluoromethane	Freon 11	75-69-4
1,2,3-Trichloropropane	Allyl trichloride	96-18-4
Trichlorotrifluoroethane	Freon 113	76-13-1

17.100.200 Severability

Should any section, clause or provision of this chapter or any code adopted hereby be declared by a court to be invalid, the same shall not affect the validity of the remainder, either in whole or in part.

Section 2. Severability. If any section, subsection, sentence, clause or phrase of this ordinance is, for any reason, held to be unconstitutional, such decision shall not affect the validity of the remaining portions of this ordinance and the same shall remain in full force and effect. The City of Longview hereby declares that it would have passed this ordinance, and each section, subsection, clause or phrase thereof, irrespective of the fact that any one or more sections, subsections, sentences, clauses and phrases be declared unconstitutional.

Section 3. Nothing in this ordinance hereby adopted, shall be construed to affect any suit or proceeding impending in any court, or any rights acquired, or liability incurred, or any cause or causes of action acquired or existing, under any act or ordinance hereby repealed and/or modified by this ordinance; nor shall any just or legal right or remedy of any character be lost, impaired or affected by this ordinance.

Section 4. The City of Longview City Clerk is hereby ordered and directed to cause this ordinance to be published.

Section 5. Any act consistent with the authority and prior to the effective date of this ordinance is hereby ratified and affirmed.

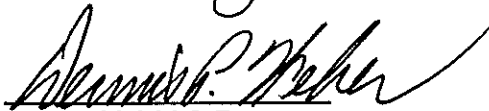
Section 6. Repeal. Ordinance No. 3127 is hereby repealed.

Section 7. Savings Clause. Ordinance No. 3127, which is repealed by this ordinance, shall remain in force and effect until the effective date of this ordinance.


Section 8. Effective. This Ordinance shall be in full force and effect from and after thirty (30) days from the date of its passage and publication as provided by law.

Passed by the City Council this 28 day of June, 2012.

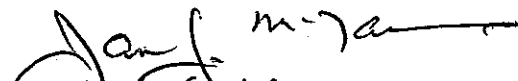
Approved by the Mayor this 28 day of June, 2012.


MAYOR

ATTEST:


City Clerk

Approved as to form:


City Attorney

Published: July 5, 2012

RECEIVED

JUN 24 2014

Dear Guy:

Ecology W2R-Ind

I am a resident of Longview Washington. I live less than two miles from the Reynolds site.

I'm concerned about the high level of pollution at the site for several reasons. The first is our city's drinking water is taken from an aquifer very close to the toxic Reynolds waste. If an earthquake occurred I believe our water supply would be contaminated. Even without an earthquake the tidal flows causes the ground water from the contaminated site to flow inland and the contamination with it.

I would like to see the site cleaned up at a level six. Alcoa should be held responsible to return the land to the least polluted level for the safety of our citizens.

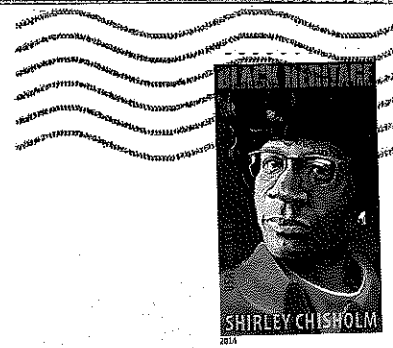
- Katie Yui

To: Director Bellon, Mr. Schriever, and Mr. Barrett

PORTLAND OR 970

RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
Feasibility Study and Amendment to Agreed Order 8940)

15 JUL 2014 PM 5 L



This summer, your agency has the opportunity—and the obligation—to hold Alcoa and Millennium accountable for toxic pollution at the former Reynolds site, located along the Columbia River.

RECEIVED

JUL 22 2014

Our area - Longview - has already had too many pollutants. I urge you to require that:

Ecology W2B Ind
Director Bellon, Garin Schriever
and Guy Barrett
WA Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors— not Millennium— oversee and undertake all cleanup actions.

We have enough water problems. This project is too close to our water supply to be careless.
I also urge you to reject any attempts to shortcut the highest possible cleanup standard. We can and should do better than limited cleanup of a site with polluted groundwater, soil and riverbanks. To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

RECEIVED

JUL 18 2014

NAME (please print) ALICE HACK

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

ADDRESS 466 22nd AVE

CITY LONGVIEW STATE WA ZIP 98632-1306

Mail on or before August 1, 2014

985047600



To: Director Bellon, Mr. Schriever, and Mr. Barrett

RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
Feasibility Study and Amendment to Agreed Order 8940)

This summer, your agency has the opportunity—and the obligation—to hold Alcoa and Millennium accountable for toxic pollution at the former Reynolds site, located along the Columbia River.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors— not Millennium— oversee and undertake all cleanup actions.

I also urge you to reject any attempts to shortcut the highest possible cleanup standard. We can and should do better than limited cleanup of a site with polluted groundwater, soil and riverbanks. To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

NAME (please print) JOHN GREEN

ADDRESS 1318 25th AVE

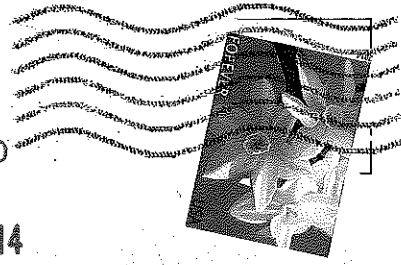
CITY LONGVIEW STATE WA ZIP 98632

Mail on or before August 1, 2014

I advocate for a level 6 cleanup
John Green

PORTLAND OR 970

31 JUL 2014 PM 6 L
RECEIVED



AUG 06 2014

Ecology W2R-Ind

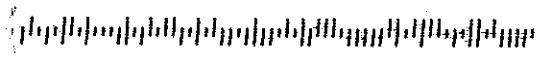
Director Bellon, Garin Schriever
and Guy Barrett

WA Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

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AUG -5 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

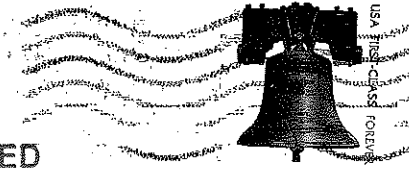


To: Director Bellon, Mr. Schriever, and Mr. Barrett

RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
Feasibility Study and Amendment to Agreed Order 8940)

PORTLAND, OR 972

AUG 06 2014 7:47 E



RECEIVED

AUG 06 2014

Ecology W2R-Ind

Director Bellon, Garin Schriever
and Guy Barrett

WA Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

This summer, your agency has the opportunity—and the obligation—to hold Alcoa and Millennium accountable for toxic pollution at the former Reynolds site, located along the Columbia River.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors— not Millennium— oversee and undertake all cleanup actions.

I also urge you to reject any attempts to shortcut the highest possible cleanup standard. We can and should do better than limited cleanup of a site with polluted groundwater, soil and riverbanks. To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

NAME (please print) Susi Hulbert

ADDRESS 530 Hillcrest Dr.

CITY Longview STATE WA ZIP 98632

Mail on or before August 1, 2014

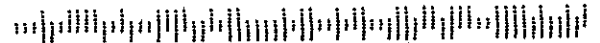
please!!

98504-7600

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AUG - 4 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR



To: Director Bellon, Mr. Schrieve, and Mr. Barrett

RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
Feasibility Study and Amendment to Agreed Order 8940)

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Urge you to require that:

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I also urge you to reject any attempts to shortcut the highest possible cleanup standard. We can and should do better than limited cleanup of a site with polluted groundwater, soil and riverbanks. To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

Thank You!

NAME (please print) William Wood

ADDRESS 12 Curtis Ln

CITY Langview STATE WA ZIP 98632

Mail on or before August 1, 2014

986047800



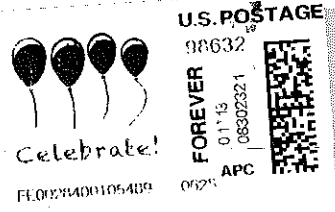
PORTLAND
OR 970
11 JUL '14
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RECEIVED

JUL 14 2014

Ecology W2R-Ind

Director Bellon, Garin Schrieve
and Guy Barrett
WA Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600



Facility:	
Year:	Left Right
Air	Corr
Water	Reports
NPDES	Permit
WET-TOX	Enf
DW/RCRA	Eng
Cleanup	Sub
SW	
HWP2	

To: Director Bellon, Mr. Schriever, and Mr. Barrett

RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
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NAME (please print) Jayme King

ADDRESS 215 N 50th Ave

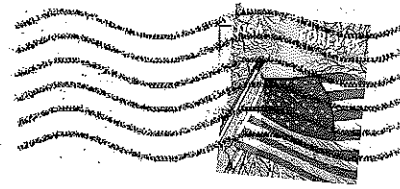
CITY Longview STATE Wa ZIP 98632

Mail on or before August 1, 2014

Lets be sure to keep the Reynolds site clean!

PORTLAND OR 970

24 JUL 2014 PM 2:1
POSTMARKED



JUL 29 2014

Ecology W2R-Ind

**Director Bellon, Garin Schriever
and Guy Barrett**

WA Dept of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

RECEIVED

JUL 30 2014

Ecology W2R-Ind

RECEIVED

JUL 29 2014

DEPARTMENT OF ECOLOGY
OFFICE OF DIRECTOR

Sierra Club
1821 SE Ankeny St.
Portland, OR 97214



NON-PROFIT
ORG US
POSTAGE PAID
PORTLAND, OR
PERMIT NO.
1090

*Hurry they started to
raze the Bldg today 7-10.
Sincerely*

Marshall Michael
137 Vision Dr
Kelso WA 98626-9533

*PS our "new" water
system is within
a few thousand yards!!!
on wells - Bad idea!!!*

Come to the hearing and share your concerns and questions on the proposed Reynolds cleanup plan!

To: Director Bellon, Mr. Schriever, and Mr. Barrett
RE: Reynolds Cleanup Proposals (Draft Remedial Investigation/
Feasibility Study and Amendment to Agreed Order 8940)

This summer, your agency has the opportunity — and the obligation — to hold Alcoa and Millennium accountable for toxic pollution at the former Reynolds site, located along the Columbia River.

I urge you to require that:

- This cleanup meets the highest standard to protect future public health, workers' health, and our Columbia River;
- This cleanup excavates and removes polluted river sediment to a certified landfill;
- Certified contractors — not Millennium — oversee and undertake all cleanup actions.

I also urge you to reject any attempts to shortcut the highest possible cleanup standard. We can and should do better than limited cleanup of a site with polluted groundwater, soil and riverbanks. To protect our community, Ecology must exercise its full authority to require the highest level of cleanup.

NAME (please print) Kathleen Foster
 ADDRESS 3820 Pacific Way
 CITY Longview STATE Wa ZIP 98632
 Mail on or before August 1, 2014
2053 Maple St,
Longview, WA 98632

PORTLAND, OREGON
 GREGOR, OREGON 97030
 AUG 20 2014
 AUG 21 2014
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 JGV
 Ecology W2R-Ind

Tribe!
Cowlitz!


Dead?
FISH!

LAST summer

Smart!
People!

Yes!

Good!



Petition with 414 signatures received July 16, 2014 from Landowners and citizens for a safe community.

TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY

SUBJECT: CLEANUP OF REYNOLDS ALUMINUM IN LONGVIEW

I strongly encourage you to require the highest level of cleanup to protect our water, air, workers at the site, community residents, and all fish and wildlife from the potential release of toxins from this historically contaminated site. We have only "one" chance to get this right to have the best outcome for the future of our citizens.

LANDOWNERS AND CITIZENS FOR A SAFE COMMUNITY

For more information, call 360-703-2200