

**Comments Received**  
**Former Reynolds Metals, Longview Site**  
**Draft Cleanup Action Plan, Consent Decree,**  
**and SEPA Determination of Nonsignificance**  
**Comment Period Held January 19 – March 18, 2016**

The Department of Ecology (Ecology) received a large number of comments on the draft Cleanup Action Plan (CAP), Consent Decree (CD), and State Environmental Policy Act (SEPA) Determination of Nonsignificance (DNS) for the former Reynolds Metals Site in Longview, Washington. The comment period took from January 19 through March 18, 2106. Ecology received comments in a variety of ways:

- E-mail
- Oral testimony during the public hearing held on March 9, 2016
- Petition and written comments received at the public hearing

Attached are the comments received. Many of the comments received were identical e-mail comments. In the interest of space, identical comments have not been included multiple times, and the comments that follow are the “unique” comments received. Anyone wishing to review the full comment record (including identical comments received multiple times) may contact Sue LaVoie at (360) 407-6916 or [susanne.lavoie@ecy.wa.gov](mailto:susanne.lavoie@ecy.wa.gov) to schedule an appointment to review the file or to make a public records request.

**From:** "Sandra Davis" <[abernathyfarm@q.com](mailto:abernathyfarm@q.com)>

**To:** "Guy Barrett" <[guy.barrett@ecy.wa.gov](mailto:guy.barrett@ecy.wa.gov)>

**Sent:** Wednesday, January 27, 2016 7:55:16 PM

**Subject:** Reynolds Cleanup in Longview

Hello, Guy,

It's been awhile since we've talked. I guess it's that time again!

After reviewing your CAP and Consent Degree, there were several questions that came to mind. Just thought it would be best to ask by email rather than at your Open House.

1. Will the Complaint that will be filed with the Decree be available for review during this comment period? Could I read it?
2. Do you know yet which Site Units will require an environmental covenant? Also, I can't remember - does the BMP already have a restricted deed filed with the county?
3. Were any of these Site Units lined? I assume not - given the history of Reynolds and no regulations in those days.
4. How deep is the fluoride in groundwater? It was stated that the existing water wells onsite were over 200 feet deep - so I would like a frame of reference.
5. Also how deep are the monitoring wells? It mentioned some were shallow and some were deeper. Is there a range?
6. Most all of my previous questions were answered in your Responsiveness Summary. However, when I asked the question about depth of the contaminated soil on each site unit after consolidation and protective caps added, I also asked about the height of these consolidated areas and how they would be prevented from shifting or eroding. Will there be a berm or some structure to keep this material together? With all of our rain in this area and over years and years, it seems these site units would eventually erode away.
7. The \$1,644,000 set aside for long-term monitoring and O&M seems a small amount considering all of the variables that could happen through the years. Right now Millennium and especially Kristen Gaines have been in compliance and performed well as far as managing that property. What if.....Millennium is no longer the tenant and/or Alcoa sells the property. There would be a new tenant or owner. We've seen what happened with Chinook Ventures and the disaster they created when they were left to self-monitor this property. I suppose Ecology could hire professionals to perform all monitoring, but that costs money. Also, will this dollar amount be able to cover all repairs, replacement and damages through the years? How many years? Is there another alternative if this money runs out?

8. What is the timeline from start to finish - I believe Margaret Green mentioned two years.....completing in 2018.

So far our Daily News has not published an announcement of this cleanup or your Open House on Tuesday. It would be helpful if the cleanup process was clarified since The Daily News previously commented that the cleanup choice had been chosen last year. The turnout may be small on Tuesday - but, regardless, I'll see you then.

Sandra

From: Art Birkmeyer [mailto:art.birkm@gmail.com]  
Sent: Friday, February 05, 2016 8:46 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Comment on Reynolds Property Cleanup Plan

Mr. Barrett,

I've always felt that individuals should be held accountable for their actions. In this case I feel that Alcoa, who purchased the land fully aware of the cleanup liabilities) should be held to the degree of cleanup that can be referred to as - ZERO IMPACT!

Over the years Reynolds Metals processed and produced aluminum on the property involved in the Reynolds Metals Property Cleanup Plan. The operation of this facility over the years Reynolds Metals Company not only contaminated and fouled the land/property but also made millions/billions of dollars in profits over the years.

Its my strong belief that the land should be cleaned up to it's original state prior to Reynolds use regardless of the present zoning set on the property by Cowlitz County.

Art Birkmeyer  
2802 Northlake Ave.  
Longview, WA

From: Ed or Harriet Griffith [mailto:eh.griffith@yahoo.com]  
Sent: Saturday, February 20, 2016 3:05 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Comments Reynolds clean up

Attached is the comment of the New Progressive Alliance concerning the Reynolds Aluminum clean up. If there are any questions, please let us know.

Sincerely,

Ed Griffith  
New Progressive Alliance



February 20, 2016

Department of Ecology – Industrial Section  
P.O. Box 47600  
Olympia, WA 98504

The New Progressive Alliance at <http://newprogs.org/> joins Columbia Riverkeeper, the Sierra Club, and Landowners and Citizens for a Safe Community in urging the Department of Ecology for a level six clean up of toxic pollution for Reynold Aluminum in Longview, Washington.

From 1941 – 2000 Reynolds Metals constructed and operated an aluminum smelter and cable mill on the Columbia River in Longview, WA. Their operations permanently closed in February 2001. The Reynolds smelter and cable mill left a toxic legacy on the Longview waterfront. Portions of the site show elevated levels of flouride, cyanide and polycyclic aromatic hydrocarbons (PAHs) and total petroleum hydrocarbons (TPHs). The groundwater contains fluoride, cyanide and PAHs.

This should have already been decided. Cleanup at the highly contaminated Reynolds Aluminum site in Longview is years behind schedule. While other aluminum smelters along the Columbia were cleaned up and converted to new industrial operations, Alcoa—owner of the Reynolds site—hasn't finished investigating the site to understand the extent of pollution or proposed a cleanup plan for the Longview site.

On June 1, 2014, Ecology released a report stating the six levels of clean up that the site could receive. Citizens from Cowlitz County and throughout the Columbia River packed a hearing room on July 16, 2014 on the clean up at the old Reynolds site. Not a single person who testified asked for anything less than a level six clean up. At this level, the most toxic pollution leftover from decades of aluminum production would be excavated and taken to a certified landfill.

Unfortunately by only listening to current site owner Chinook Ventures and site operator Millennium Bulk Terminals, Ecology is recommending only a level four clean up.

This is clearly inadequate for the following reasons.

- There is a long record throughout the United States of companies escaping the consequences of their pollution and leaving local governments responsible for the clean up.
- Leaving Alcoa to monitor its own clean up contains an obvious conflict of interest and is a recipe for disaster.
- Chinook Ventures—the company that leased the property before Millennium—promised to clean up the site and produce jobs. Instead, Chinook made matters worse by polluting the site further and covering up contamination it discovered.
- Millennium has no experience cleaning up a Hazardous Waste Site.
- To further confuse matters, Millennium coal wants permission to build one of the nation's largest coal export terminals at the site which would further delay this process.

There have already been major delays in the clean up process and Ecology is right to push for closure, but wrong to ask for a level four instead of a level 6 clean up. At the very least, Ecology should charge Alcoa to pay for a contractor to monitor sampling results, oversee cleanup operations, and review cleanup plans.

Sincerely,

Ed Griffith

New Progressive Alliance

1000 17th Ave. #107

Longview, WA 98632-2357

United States of America

From: KnowWho Services [mailto:noreply@knowwho.services]  
Sent: Tuesday, March 01, 2016 1:04 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Clean up Reynolds for good!

Dear Longview comments email,

Cleaning up industrial pollution at the former Reynolds site is a top priority for our community. People rely on groundwater located near the site and value Columbia River fish and wildlife. We expect corporations to clean up their mess. The aluminum industry is in a tailspin and Alcoa recently announced plans to shutter its Wenatchee aluminum smelter. Ecology must ensure that Alcoa provides comprehensive, court-enforceable financial assurances to follow-through on decades of cleanup and post-cleanup monitoring. This includes funds to address pollution discovered during the cleanup process or by future site owners.

Sincerely,

First\_washington Last\_washington  
180 Nickerson St Ste 202  
Seattle, WA 98109-  
test+washington@sierraclub.org  
(111) 111-1111

From: Lauren Goldberg [mailto:[lauren@columbiariverkeeper.org](mailto:lauren@columbiariverkeeper.org)]  
Sent: Wednesday, March 02, 2016 10:28 AM  
To: Schrieve, Garin (ECY); Toteff, Sally (ECY); Barrett, Guy E. (ECY)  
Subject: Coalition Public Comment on Reynolds Aluminum Cleanup Action Plan, Consent Decree

Garin, Sally, and Guy:

I am submitting the attached public comment on behalf of Columbia Riverkeeper, Washington Physicians for Social Responsibility, Climate Solutions, Sierra Club, Washington Environmental Council, and Oregon Physicians for Social Responsibility. I would greatly appreciate if you could confirm receipt of the comment.

Regards,

Lauren

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Lauren Goldberg | Staff Attorney  
Columbia Riverkeeper | 111 Third St. Hood River, OR 97031  
541.965.0985 | [lauren@columbiariverkeeper.org](mailto:lauren@columbiariverkeeper.org)  
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March 2, 2016

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Washington Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600  
[stot461@ecy.wa.gov](mailto:stot461@ecy.wa.gov)

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*Via Email*

**RE: Public Comment on Draft Cleanup Action Plan and Consent Decree for the Former Reynolds Aluminum Plant, Longview, WA.**

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

Columbia Riverkeeper, Washington Physicians for Social Responsibility, Climate Solutions, Sierra Club, Washington Environmental Council, and Oregon Physicians for Social Responsibility (collectively "Commenters") submit the following comments on the Washington Department of Ecology's (Ecology) Draft Cleanup Action Plan and Consent Decree for the former Reynolds Metals Reduction Plant in Cowlitz County, Washington (the Site). 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 also offers over 400 acres of industrial-zoned, waterfront property in Cowlitz County. Cleanup success is critical: The only way to attract modern and sustainable business plans is to ensure the site is clean and ready for use.

This comment period is the culmination of a multi-year effort by Cowlitz County residents to prioritize cleanup at the Site. Commenters appreciate Ecology's efforts to improve

community engagement in cleanup decisions. Turnout at public hearings and the volume of public comments received demonstrate strong public interest in protecting valuable groundwater, surface water, and soil resources.

In 2014, Columbia Riverkeeper, Sierra Club, and Landowners and Citizens for a Safe Community filed detailed comments on the Draft Remedial Investigation/Feasibility Study (hereafter “coalition comments”). The coalition comments, along with the overwhelming majority of public comments, urged Ecology to adopt Alternative 6, which required the most comprehensive cleanup of soil and groundwater contamination. This included aggressive removal and offsite disposal of contaminated soils, sediment removal, some reliance on natural attenuation, and institutional controls. The Final RI/FS selected a less costly, less aggressive cleanup option: Alternative 4. The draft Cleanup Action Plan details plans for implementing the selected alternative.

Rather than repeat comments provided on the Draft RI/FS, Commenters highlight three issues of particular concern moving forward: (1) the adequacy of financial assurances to guarantee fully-funded cleanup, (2) the delay in removing nearly an acre of contaminated sediment in the Columbia River, and (3) the need for an additional reactive barrier above SU7.

### **Financial Assurances**

Ecology must hold corporate polluters responsible for damaging soil and water resources. The Cleanup Action Plan fails to describe how Ecology will ensure Northwest Alloys and Millennium pay for the projected \$27.7 million cleanup. Commenters urge Ecology to exercise its full authority to ensure Northwest Alloys and Millennium:

1. Set aside funds for complete funding of the proposed Cleanup Action Plan.
2. Provide reserve funds in the event contractors discover previously unknown site contamination or cleanup remedies do not perform as anticipated.
3. Fully fund long-term monitoring of the selected remedy’s performance.

The public’s interest in cleanup funding is understandable: Both Northwest Alloys and Millennium face questionable futures.

A brief history of site ownership demonstrates the public’s well-founded concerns about cleanup funding. For nearly sixty years, the Reynolds Metals Company operated an aluminum smelter through its subsidiary, Longview Aluminum, LLC. Alcoa purchased Reynolds Metals in

2000.<sup>1</sup> In January 2001, Alcoa sold most of the fixed assets and improvements to Longview Aluminum, LLC. Alcoa retained ownership of the real estate.

Since 2003, property ownership and management has been in flux. In March 2003, Longview Aluminum 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 wholly-owned subsidiary of Alcoa.

Chinook Ventures operated the site from 2004 to January 2011. During its tenure, Chinook Ventures violated numerous 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, an undocumented deposit of "black mud" (toxic sludge from the aluminum operation's cryolite plant) located within a forested wetland.

In 2010, Ambre Energy—an Australia-based coal mining and export start-up—developed plans for the site through its then wholly owned subsidiary Ambre Energy North America which in turn owned Millennium Bulk Terminals-Longview, LLC (Millennium), a limited liability company. In January 2011, Millennium purchased Chinook's lease to the real estate and its ownership of the buildings on site with plans to build and operate what would be the nation's largest coal export terminal. The same month, Arch Coal, Inc. acquired a thirty-eight percent stake in Millennium.<sup>2</sup>

Millennium'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. Millennium launched a public relations campaign to paint itself as the "white knight" of cleanup. In truth, Millennium has no experience cleaning up hazardous waste sites, let alone one of the most contaminated sites on the Lower Columbia River.

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<sup>1</sup> See Agreed Order NO. DE 4263.

<sup>2</sup> <http://news.archcoal.com/phoenix.zhtml?c=107109&p=irol-newsArticle&ID=1515428>.

The two original coal export proponents, Ambre Energy and Arch Coal, are both either gone or insolvent. Ambre Energy sold all of its North American coal business to its largest creditor, a private equity firm registered in the Cayman Islands called Resource Capital Funds, for the cost of its other largest debts.<sup>3</sup> Ambre Energy North America has since been renamed Lighthouse Resources, Inc. Arch Coal declared bankruptcy on January 10, 2016.<sup>4</sup> The coal industry has tanked and analysts roundly reject the viability of significant capital expenditures to support coal exports.<sup>5</sup>

Millennium has not obtained any permits to operate a coal terminal. In the interim, Millennium uses the site as a transloading facility for other commodities. As Ecology is well aware, Ambre's coal export proposal faces unprecedented opposition from Columbia River communities, political leaders, Tribes, non-governmental organizations, and citizens across the Pacific Northwest.

Northwest Alloys' interest in the future of the Site is also uncertain. Northwest Alloys' parent company, Alcoa, experienced significant setbacks in 2015. In October 2015, Alcoa bonds plummeted after the company announced plans to split itself in two.<sup>6</sup> The next month, Alcoa announced plans to shutter its Wenatchee, Washington, smelter, and lay off 400 workers at its Ferndale, Washington, facility.<sup>7</sup> Prior to Alcoa's November 2015 announcement, Alcoa used the Reynolds site dock to transport alumina from ships to trains bound for Wenatchee. For years, Alcoa emphasized the connection between its investment in the future of the Reynolds site and the Wenatchee smelter. That connection no longer exists.

The public has a strong interest in understanding the financial instruments and legal agreements that Ecology will use to protect taxpayers from future cleanup costs. While the draft Consent Decree addresses financial assurances briefly, the Cleanup Action Plan lacks any description of how Ecology plans to apply the Consent Decree language in practice or, if those details are unknown, Ecology's options for ensuring the Northwest Alloys or Millennium pay for

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<sup>3</sup> <http://www.sightline.org/2014/11/26/ambre-energy-bungles-news-of-its-own-demise/>.

<sup>4</sup> *Id.*

<sup>5</sup> <http://www.bloomberg.com/news/articles/2015-07-13/the-latest-sign-that-coal-is-getting-killed>;  
<http://www.bloomberg.com/news/articles/2015-11-08/global-coal-consumption-headed-for-biggest-decline-in-history>; <http://www.sltrib.com/home/3420366-155/global-markets-dont-want-us-coal>;

<sup>6</sup> <http://www.bloomberg.com/news/articles/2015-09-28/alcoa-debt-plunges-as-bond-investors-question-future-after-split>

<sup>7</sup> <http://www.bellinghamherald.com/news/local/article42310680.html>

cleanup. Commenters request that Ecology provide additional information to facilitate public input on how the state will ensure Millennium and Northwest Alloys' pay for cleanup.

### **Delay in Removing Columbia River Contamination**

Millennium and Northwest Alloys' failure to complete cleanup of contaminated river sediment during the 2014 and 2015 in-water work windows is highly problematic. In 2014, Ecology identified the need for expedited cleanup of 0.7 acres of polluted river sediment near the wastewater outfall. Specifically, the 2014 amendment to Agreed Order No. 8940 called for removing 5,000 cubic yards of contaminated sediment during the 2014 in-water work window and, if permits were not obtained in time, during the 2015 work window. To date, Millennium and Northwest Alloys have not received permits necessary to complete the cleanup.

Millennium and Northwest Alloys' failure to obtain permits raises significant questions. First, did Millennium and Northwest Alloys' respond timely to requests for information from state and federal agencies? It is unclear if the companies are responsible for the delay in obtaining permits. Second, how can Ecology ensure that known sources of river pollution are addressed in a timely manner? In 2014 Ecology recognized the need for a rapid response cleanup and amended Agreed Order No. 8940. It is unclear how the agency worked with its sister agencies to facilitate permits for cleanup.

Moving forward, Commenters urge Ecology to work with stakeholders, Tribes, and federal and state agencies to identify specific reasons for the cleanup delay. Based on this information, Ecology should evaluate steps to ensure that the delays plaguing river cleanup at the Site are not replicated at other sites along the Columbia River or in other waterbodies.

### **Improving the Reactive Barrier above SU7**

Commenters request that Ecology add a reactive barrier in the northeast corner above SU7 to prevent contaminants that would flow north from the Columbia River through soil contaminants in SU6. A cap, by itself, does not prevent the horizontal flow of groundwater through waste; it only controls the vertical entry of water into the waste. SU6 contains high concentrations of PAHs. In turn, Ecology should consider requiring an additional reactive barrier above SU7 to reduce the movement of contaminants of concern.

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## Conclusion

The former Reynolds aluminum property is an important industrial site in Cowlitz County. Cleanup is critical to attract modern and sustainable businesses. Commenters look forward to continued opportunities for public understanding and input about this important and complex Columbia River cleanup. Please direct any questions to the undersigned at [lauren@columbiariverkeeper.org](mailto:lauren@columbiariverkeeper.org).

Sincerely,

A handwritten signature in cursive script that reads "Lauren Goldberg".

Lauren Goldberg  
Staff Attorney, Columbia Riverkeeper  
*On behalf of Columbia Riverkeeper,  
Washington Physicians for Social Responsibility,  
Climate Solutions, Sierra Club,  
Washington Environmental Council, and  
Oregon Physicians for Social Responsibility*

From: KnowWho Services [mailto:noreply@knowwho.services]  
Sent: Wednesday, March 02, 2016 1:14 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Clean up Reynolds for good!

Dear Longview comments email,

Communities deserve to be free of industrial toxic waste. Alcoa should be responsible for cleaning up industrial pollution at the former Reynolds site.

The Department of Ecology must ensure that Alcoa provides comprehensive, court-enforceable assurances to follow through on decades of cleanup and post-cleanup monitoring. This includes funds to address pollution discovered during the cleanup process or by future site owners.

Sincerely,

Jean Avery  
13314 SE 19th St.  
Vancouver, WA 98683-  
jeanmavery@gmail.com  
(214) 923-4149

From: Ken Cachelin [mailto:ken.cachelin@cdid1.org]  
Sent: Tuesday, March 08, 2016 1:02 PM  
To: ECY RE Reynolds Cleanup Comments  
Cc: Judi Strayer  
Subject: Reynolds Metals Aluminum Smelter - Longview Cleanup Action Plan

Dear Mr. Barrett,

The purpose of this e-mail is to notify the Department of Ecology that a number of proposed alternative actions and site units are located within the Columbia River Levee ROW. As such, all work within this area (SU1, SU2, SU10, and some monitoring wells) will be required to undergo encroachment review by CDID #1 and the Portland District US Army Corps of Engineers (USACE). Due to new Section 408 levee encroachment review rules at the USACE, it is estimated that this process could take upwards of 6 months and will involve both a comprehensive technical and environmental review.

If you have any questions please let me know.

Regards, Ken

**KEN M. CACHELIN, P.E.**

**District Engineer**

**360.423.2493**



Reynolds Metals Oral Testimony  
Kelso Red Lion Hotel  
March 9, 2016

I'm Angela Fritz, Hearings Officer for tonight. This evening we're conducting a hearing on the draft Cleanup Action Plan, Consent Decree, and SEPA Determination of Nonsignificance related to those two documents, for the former Reynolds Metals aluminum smelter cleanup site.

Let the record show it is 7:52 p.m. on March 9, 2016 and this hearing is being held at the Kelso Red Lion Hotel, 510 Kelso Drive, in Kelso, WA.

Notices of this hearing were published in The Daily News in English on January 19, 2016 and Tu Decides in Spanish on January 22, 2016. In addition, notices of the hearing were mailed to 1,766 interested people, and e-mail notices were sent to 595 interested people.

I will call people who wish to provide oral comment up based on the order that you signed in. Once everyone who has said they would like to testify has had the opportunity to do so, I will open it up for others.

Remember, we've agreed that comments should be about 3 minutes long. 30 seconds before you reach that limit, I will ask you to summarize your comments so the next person can come up to testify.

When I call your name, please come on up, sit next to me, state your name, and also contact information if we don't already have it, for the record. If you'd like to remain anonymous, you may do so. Speak clearly, so that we can get a good recording of your testimony. For that same reason, I ask everyone to please use only silent shows of support or opposition during commenting. It is very difficult for us to hear and transcribe the recording when there is noise in the background.

We will begin with Linda Horst, who is followed by Sandra Davis.

Linda Horst: Thank you Angie. Ah, good evening. My name is Linda Horst and I live in Kelso. One very common dictate of good parenting skills is teaching our children to take responsibility for cleaning up after themselves. If you make a mess, clean it up. The question then is, as adults shouldn't we practice as we have preached? For nearly 60 years Reynolds Metals created a toxics mess at their aluminum smelter operation near Longview. The time for them to clean it up is long overdue. This community expects and deserves the most thorough and permanently secure cleanup. I urge the Department of Ecology, as our guardians, to require the level number 6 option. Permeable reactive barriers for the treatment of groundwater, removal of all contaminated sediments and offsite disposal of all waste materials. The level of cleanup must be what is right for the public not what is financially preferable for industry.

Thank you

Angie: Thank you Linda. Next we will have Sandra followed by Roy Staples.

Sandra Davis: I'm Sandra Davis. In 1923, Cowlitz County constructed thirty-five miles of sloughs and ditches to protect the 11,000 acre valley from flood threats of the river and to control stormwater runoff. The majority of these ditches run through neighborhoods in low-lying areas of west Longview and along the Highlands neighborhood.

Water is periodically pumped back into the Columbia River to protect homes from flooding. Let us hope these ditches or canals will not end up becoming a pathway for migrating toxins from the Reynolds site traveling into our backyards and eventually into the Columbia River.

An additional permeable reactive barrier is warranted in the northeast corner of Reynolds' property for this very reason. Even though tests presently show there are acceptable levels of toxins in the groundwater, Ecology has shown that the groundwater flows north from the Columbia River through Site Units 6 and 7. After consolidation, these two site units will contain contaminated soil approximately 18 feet deep, with high concentrations of fluoride and PAH's, known as known carcinogens. Through the years this contaminated soil could easily move with the northerly flow of groundwater. The proposed caps of these two site units do not prevent this horizontal flow of groundwater through toxic wastes. These wastes would eventually end up in our CDID ditches and the Columbia River.

No person and no agency can truly guarantee that toxins will not migrate north from this property. We need this preventive measure to be put in place now, for the protection of our communities forever in the future.

Thank you.

Angie: Thank you, Sandra. Roy followed by Chris Hill.

Roy Staples: Good Evening. Um, my name is Roy Staples, a teacher and child welfare worker in the community. I've lived here since 2005, and I am now Co-President of Landowners and Citizens for a Safe Community, a citizen-supported group who has spoken regularly, out in the community, where we find wide spread opposition to the coal project and the hope that better industries will find a home in Longview's ports and provide safe growing and financially stable jobs and long term careers for our children and grandchildren.

Now this can only be done if the Reynolds Alcoa site is cleaned up completely of its toxic contamination. And that can only be done if we remove those contaminants. Your level 4 cleanup does not do that, so we must have monitors and be sure contaminants are not leaking or moving, and other measures are there to deter their movement um into the river or into our groundwater such as, a Permeable Reactive Barrier above site unit 7 in the northeast corner of the site.

We also need a Financial Fund for possible cleanup if and when contaminants move. And we need, and why do we need that? Really, ideally, this site, this site should be um sellable to anybody, not just a coal export terminal.

My opinions and policy recommendations are not just my own. Ninety-three supporters have agreed with these steps and have voiced their support in letters and petition signatures of which I have brought here and I will leave with you Alisha, Angie sorry.

Ah um to the Department of Ecology, I hope you take these urgent steps to protect our health and our economic future.

Thank you.

Angie: Thank you, Roy. All right, we have Chris Hill who is followed by Les Anderson

Chris Hill: Ah thank you, and thanks for the opportunity to provide input on this Reynolds cleanup plan. My name is Chris Hill and I am a resident of Cowlitz County. I will be very brief, I only have a couple of paragraphs.

Um reading through the volumes of information in the plan I cannot find any references to the potential for seismic activity, except a brief vague passage that I believe says monitoring at the site will be increased after a seismic event. I also cannot find any discussion of whether such potential seismic activity is factored into the cost-benefit analysis that was conducted and used to select option 4.

Is the not-so-inconsequential probability of the site experiencing liquefaction or partial liquefaction even acknowledged in the study? Has any modeling been done to determine the likelihood of groundwater or riverine contamination from such an episode given the large amount of toxic waste that will be left on this site rather than properly removed to a full containment locations?

I purchase earthquake and damage insurance for my home. Can Cowlitz County purchase similar insurance for our water supply and for the Columbia River downstream from this contamination? I ask that question to Ecology and I'll cede the rest of my time to Les.

Thank you.

Angie: Do you want to leave me your comments? All right we have Les followed by Lisa Waldvogel

Les Anderson: Hello, my name is Les Anderson. I've lived in this community for over 20 years. I moved up here because I knew that the Reynolds Aluminum was going out and I didn't figure they'd be dumb enough to bring something in that would be worse than that, but I ah was wrong.

I've got a couple of things that I'm concerned about. The third reactive barrier by site 7 ah to protect the ah CDID ditch ah from the fluoride migration and then the leak detectable cover on SU1, SU2, SU6, SU7, ah you know an additional little permeable cap I believe would helpful there.

Ah you know, Millennium came into town and they not only lied to our community, but they lied to Ecology. They Ecology had a little area there says do you have any plans to expand, they had plenty of plans to expand, and they lied to Ecology, that's why they pulled their own permits voluntarily because they were exposed. So moving forward with this, it's hard for the community really to trust all aspects of this. I know Ecology has worked awfully hard. We're awfully lucky in this state to have you, ah We're very supportive of Ecology. Ah however when you're dealing with rascals like these guys ah they just can't be trusted so I, I really feel that self-

bonding isn't the way to go. We looked into ah Montana where they did self-bonding then went bankrupt at Arch Coal ah then went bankrupt ah you know within two months after, it was all planned. Ah they ah they got a little help from ah, they ah about 250 million dollars help from a bankruptcy ah judge in ah Missouri and they've ah ah are going to be required to pay 15 million towards their reformation that actually is hundreds of millions. So when you say that we have protections in bankruptcy, ah maybe not so much. So our concern isn't with the, the work that Ecology's doing, we think they are doing a fine job and were very supportive. But ah we don't ah think we can trust self-monitoring or self-bonding or anything that they say over at Millennium because they've lost credibility in our community.

Thank you.

Angie: Thank you Les

Les: You're welcome

Angie: Lisa followed by Diane Dick

Lisa Waldvogel: Hello my name is Lisa Waldvogel and I'm a Longview resident. I think we were requested to provide contact information, that is um, I don't know, e-mail [lisa.waldvogel@gmail.com](mailto:lisa.waldvogel@gmail.com).

So, I attended the Department of Ecology's recent open house, I think it was either at the beginning of February or at the end of March, and you know, quite frankly, let me just say I'm not a science person. I'm, you know, the first to admit, um I am a member of LCSC, Landowners and Citizens for a Safe Community, but I went to the event with an open mind um you know just with the intention of learning and I spoke to the very nice gentlemen seated um to the right and, I thank you for the time you took to you know explain things to me. And you know, quite frankly, I left the event feeling you know pretty good, I'm like, hey, you know, really what they say makes um quite a bit of sense. Um and I happened to be speaking to my next door neighbor who's not in LCSC, but he happens to be a science teacher um in the Toutle School District and you know I was talking to him about what I discovered and I said, "Well, you know, Vince, what do you think?" I said, "This, you know, seems pretty sound to me, you know, it would cost like close to 50 million dollars for them to gut everything, like, we, you know, would like." And um Vince said, "Well Lisa, um not so much." So I wrote a letter to the Editor and you know I kind of explained in my letter to the Editor what I'm saying to you tonight. But you know, there was something that that letter um that that Editor left out. Um and you know I asked a question in my Letter to the Editor. I said, "Engineer, and this is thanks to Vince, engineered caps poorly contained waste toxins and leachate at Hanford, Arlington, and the new county Weyerhaeuser dump." So you know that was left out of my letter to the editor and then like 2 weeks later there was that article in the newspaper that talked about, low and behold, um this ah situation at the county dump where the county needed to pump the leachate out, I hope I'm saying that word correctly, pronouncing that, into tanker trucks because the drain pipe to the Three Rivers Regional Wastewater Treatment Plant in Longview couldn't handle all of the runoff. So like apparently this county dump um actually has a pump, you know ah you know a long pipe to remove all that leachate. Um so anyhow, so I wrote Mr. Parish an e-mail, "Mr. Parish, guess what, you know I think in light of this new article you should rerun my letter

to the editor in full.” Um, I’ve yet to hear from Mr. Parish, but my closing, do I, how many seconds do I have, 3 seconds, 30 seconds.

I’m from the Midwest, um I’m 49 years old and you know what, Reynolds aluminum foil has been a household name ever since I was a little girl. And what I’m saying to ya is that 50, close to 50 million I mean how long have these guys been making profits, they have been selling a lot of people a lot of aluminum foil for many years all over the place, I think they can afford 50 million to give we the citizens a feeling of safety and comfort.

Thanks.

Angie: Thank you Lisa, do you want to leave all that with me?

Lisa: Ah Well I mean it’s not really in comment form, but I can put it in comment form.

Angie: Or it can just be support documents to your comment

Lisa: Okay, sure

Audience: Good job Lisa

Angie: Alright, we have Diane followed by Mary Lyons

Diane: Thank you Angie, good evening gentlemen.

I’m Diane Dick, I’m a Cowlitz County resident. And Lisa I can answer your question about that county landfill. The reason they can collect the leachate up there is because they have um an underground um, what do you call it, the bottom, a liner, they’ve got a liner, so the water goes in they have to pump it out. Over here at Alcoa it’s just going to keep going.

So um According to the draft Cleanup Action Plan, Figure 2-2, the entire site will be subject to groundwater controls and deed restrictions. It follows that a higher level of cleanup, such as Alternative 5, which expands off-site removal and more groundwater treatment, would lessen future restrictions on the site and provide more permanent treatment, leading to a higher benefit.

This is especially important given the site is located in a moderate-to-high hazard risk zone for liquefaction in the event of an earthquake. Neither the Remedial Investigation/Feasibility Study nor the CAP has addressed this geological risk. Neither has addressed the risk of levee failure in the event of an earthquake, though recently a port development meeting it was reported the levee, the same levee, just west of this site sits atop a possibly unstable slope. The only earthquake risk assessed was the slope of the capped on-site disposal areas. Given the likelihood of a severe Cascadia subduction zone earthquake within the operation time of the disposal sites, the lack of uh a more thorough earthquake risk assessment should be considered a deficiency of the draft Cleanup Action Plan.

Sea level rise and flood events will also affect groundwater level. There is little reason to believe the CDID drainage ditches and pumps will be sufficient to maintain current groundwater levels, which this Cleanup Action Plan assumes, as these events are beyond what the ditches were built

to mitigate.

Some sites, such as SU6 and 7, sit at or below groundwater level yet will not be excavated and removed under Alternative 4. The bottom of Fill deposit B-1, also known as SU-6, is unknown. I quote, “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.” That’s from the RI/FS 4.3.2.

When future climate and geologic risks are uncertain, but likely, I would urge you to err on the side of caution, rather than economics, and select a cleanup alternative better than Alternative 4.

Thank you.

Angie: Thank you. Now we will have Mary followed by Don Steinke

Mary Lyons: My name is Mary Lyons, I am Co-President with Roy Staples of LCSC here in Longview. The ah um the decision to move to Longview ah 12 years ago from Seattle had to do with wanting to ah get out of the city, ah find a quieter life, um a lot of things have stopped that. But it was also because of the environment um learning about actually when I, I told um some very, very well to do and, and well educated individuals in Seattle that I was going to move to Longview, especially one man’s response was, “Oh but it’s so polluted.” And um I don’t know that he had ever been to Longview. And I think that, that um the actions of the part of Ecology, um need to be larger, and a lot more visible, then um level 4. And a lot of that has to do with the stigma and with the damage that has been done to this community, it’s a reputation and I think that um, first of the all the ah permanent reactive barrier to protect the groundwater migrating um offsite would be good at um Site unit 7 and 6. Um leak detection system would help us be proud of this site as opposed to just not talking about it. Um I think one of the things that can happen in this cleanup is a pivot for this community, um and an acknowledgement, and a very visible acknowledgement of learning, of um good intentions on the part of the state and part of the community to um believe the science and to turn this community into a cleaner place and into a more um socially and an health conscience environment than it has been in the past. In the past, it has only been about jobs. It didn’t matter how dirty the jobs were, it didn’t matter how dangerous the jobs were. It didn’t matter. The people’s health wasn’t important, it was the money. And the health crisis that were seeing in our community is a direct result of that lack of ownership of future, for future generations. And I think that the turn that this community can make with the Department of Ecology by going higher than level 4 or at least having the um the landfills ah being clean and safe enough for other industries to be on top. I have a vision of solar panels on those landfills and how wonderful it would be to take people by there and say, “Look at what we’ve done. Look what we made out of something that was bad.” And it’s going to take more than just the standard level 4 for that.

Thank you.

Angie: Thank you Mary, we will have Don followed by Cathryn Chudy

Don Steinke: Hello I’m Don Steinke, from ah 4833 NE 238th Ave, Vancouver, WA.

Um a Native American friend of mine ah chided me about a week ago. He said, “Don’t use the word “cleanup.” They never clean it up. They can’t clean it up.”

And so I would like to encourage you to treat this property like a Yucca Mountain nuclear waste repository, and have a budget which will finance surveillance, forever, including a leak detection system, repairs and replacement of the caps, monitoring of groundwater and soil.

I think you you kind of covered some of that stuff already, but ah I don’t have time to revise my remarks.

Ah I’d like you to require an additional reactive barrier in the northeast corner of the property above Site Unit 7 ah to prevent the northern horizontal flow of groundwater through toxic wastes which could eventually end up in the ditches and in the Columbia River.

I testified at the first hearing here. Since then I’ve learned about mudflows from Mt. St. Helens. Apparently, mudflows have come down the Cowlitz repeatedly over the last several thousand years, even as recently as in 1981. And they block the Columbia River, even as recently as 1980, as 1980. Parts of the town of Rainier across the river from here are built on one of the mudflows.

And I have a question, that I don’t expect you to answer, but uh are hydrologic studies of ah mudflows that would affect the contaminated site included in the, in, in your study?

My geology advisor says that a thunderstorm on Mt. St. Helens could trigger another mudflow. That’s all it would take, a thunderstorm. I suspect that hazardous material is located, right now those spots are former mudflows, but I don’t know.

A green economy is going to arrive faster than most people realize. Just this morning the Vancouver Columbian reported on the city of Vancouver’s six year plan, and I was pleased to notice that uh down near the bottom it said we would like to minimize coal trains through the city of Vancouver, and uh we can ah, ah bury ourselves in the past or, or go for the clean energy economy. And uh think 200 years down the road, what are we going, what are these contaminants going to be, ah, how are they, what’s going to happen to them, are they going to just disappear or is it a problem forever?

Thank you.

Angie: Thank you Don, we have Cathryn followed by David Goldberg

Cathryn Chudy: My name is Cathryn Chudy. I live in Vancouver, Washington and I am testifying on behalf of myself and the Oregon Conservancy Foundation.

While the Department of Ecology notes on its website that, quote “a thorough investigation and cleanup of this site is a high priority for Ecology,” it contradicts its own assertion by selecting Alternative #4 as its Cleanup Action Plan. This plan removes very little of the hazardous waste offsite, leaving the onsite property containing contaminants that will pose a long term risk to the health and safety of the citizens living in the area.

In 2014, I was one of many citizens who packed the public hearing on the six alternative plans

that were proposed for this cleanup. Everyone who spoke urged no less than a level #6 cleanup, to have the contaminants excavated and removed, given that none of the proposed caps will withstand the inevitable test of time. Here we are again urging you to do the right thing for the protection of not just Longview citizens, but for all of us affected by pollution impacts along the Columbia River.

Having a vested economic interest in a less costly partial cleanup, Northwest Alloys and Millennium Bulk Terminals support alternative number 4 which is insufficient for full environmental protection. It is disturbing that the Department of Ecology ignored the overwhelming majority of public input and settled on a cleanup plan that may not be adequate or sustainable.

We urge you to do the following:

Number 1: implement a stronger cleanup process that includes long term independent monitoring. Um Millennium hiring a consultant to do the monitoring, which may be checked by Ecology, is not independent monitoring.

Number 2: establish financial provisions so that current and long term cleanup costs do not fall on citizen taxpayers. Northwest Alloys and Millennium must be held accountable by the Department of Ecology for the safety of the site. The cleanup fund must be sufficient to cover the costs of monitoring groundwater and soils, as well as maintaining, and eventually replacing, the caps as they age and wear out.

Please use your authority to protect the public interest by implementing a cleanup process that is fully sustainable.

Thank you.

Angie: Alright, we'll have David followed by Alona Steinke

David Goldberg: My name is David Goldberg from Vancouver, uh I was speaking with a Department of Ecology staffer in the hall and was told that the meeting and question and answer session was organized due to the large public interest in this cleanup project.

Since the question before us is the choice between cleanup alternatives 1 through 6 and the DOE has based their choice of alternative number 4 on the cost and benefit analysis in the RI/FS report, DOE's presentation should have focused on this analysis. If you want meaningful public participation the Department of Ecology needs to focus on the crux of this matter and the decision was made in the cost analysis benefit uh, uh in the RI/FS report um at least I learned that, that's where the action is and I look forward to submitting comments on that report by March 18<sup>th</sup>.

Thank you

Angie: Thank you David, Alona followed by Alex Harris

Alona Steinke: I'm Alona Steinke from Vancouver, Washington

As citizens of this country, we are fortunate to have agencies that are designed to protect our health by overseeing the quality of the air we breathe and the water that we drink. Lately, it seems, these agencies have time and again betrayed us.

In Michigan, the EPA knew as early as April that Flint's residents were at risk for lead contamination and that their health was in jeopardy, especially the health of their children. They did not publicize their concern. Instead, they tried to get the DEQ to act. Both the Feds and the State let the people down.

Some of the residents of southeast Portland are now facing a public health emergency due to cancer-causing, toxic air pollution. Senators Wyden, Merkley and Blumenauer asked the EPA to intervene. The DEQ knew about the problem of high levels of lead, cadmium and arsenic, but kept the information secret for 8 months.

The soil and groundwater at the former Reynolds Aluminum site are heavily contaminated and now have to be cleaned up. Surely, we can count on the Department of Ecology to do the right thing to protect the community of Longview by recommending a thorough cleanup.

But wait, they're only asking for minimal treatment, insuring that this land will forever be contaminated. No clean industry will ever want to locate here. Our air, water and precious Earth are being poisoned, seemingly with the complicity of the very agencies designed to protect. It has been said that these agencies become captured by the industries that they regulate.

Now that the decision has been made, we are asking that Ecology will guarantee the funding will be available to cover the cost of monitoring the groundwater and soils and maintaining the caps in perpetuity. Ensure that the remaining site units will have a leak detection system, and require an additional reactive barrier to prevent the flow of groundwater through toxic waste, which could end up in the Columbia River.

This is the least you can do.

Angie: Alright, we'll have Alex followed by Anita J. Thomas

Alex Harris: Hello my name is Alex Harris and I live in Portland, Oregon.

I would first like to say how impressed I am by the community here. It is so powerful to hear the preparation that has gone into these comments um and I really look forward to the Spring when we see a lot of this same energy transferred into the coal proposal itself. Ah it's going be a very powerful experience um for the entire region to participate in that mobilization effort.

I moved to Portland about 6 months ago and as a young person who doesn't, didn't, have a relationship with the Columbia River, I was so shocked to see such a beautiful and mighty force ah in the Pacific Northwest so degraded and so disrespected. It was so normal for industry to take place along this river and for ships to continually be ah going up and down transferring ah you know goods and commerce and people are so so used to it that they had forgotten maybe that um this was a very special and and sacred place. Um and it still is shocking to me, more and more I get used to it, I become callused like we all do, we get used to things that we see all the time, but it is ah still outstanding to me. Um and so that I'm I'm telling you this because I want

to call into question the mentality of doing the bare minimum, uh, to meet standards that, uh, are, are inadequate. I think it's, it's the mentality that has been started by the industry, it favors the industry, it allows the industry to continue to do what they've always done and will always do unless we do something about it. And I think that mentality is toxic. And when that mentality interacts with something like the Columbia River, I react. And ah I would really expect ah an agency such as Ecology, which generally does such amazing work, to apply a stronger form of scrutiny on this, on, on this project, on, on this cleanup proposal, ah because of what, what is at stake.

Thanks.

Angie: Thank you Alex, Okay we will have Anita J. Thomas come up and she will be followed by Laura Stevens.

Anita J. Thomas: My name is Anita J. Thomas. I live in Vancouver, Washington and I moved here 3 years ago. Ah, absolutely captivated by the beauty of this area, which I did see when I could still see. There are ah three points I hope to get to.

Point number 1. In your cost benefit analysis ah truly, ah friends here at Department of Ecology, I think you've been as conscientious as you know how to be, I, I really get that. But friends, an ounce of prevention is worth a ton of cure in this case. Because I noticed that when questions arise, "What if this problem happens, what if that problem happens, what if there is severe flooding, what if there is an earthquake." The answer has been, "Well, we'll see what the damage is after the fact and do whatever remediation is necessary." Ah if I lived here, I think I would be pretty uncomfortable with that answer. I think that it makes more sense to get things away from the Columbia River because I also don't think, point 2, that the questions about soil liquefaction in the case of a major earthquake, and we didn't even get to a tsunamis, ah was addressed with this at all. The only hope in such as case is to get that contaminated soil away from the Columbia River.

And point number 3. Living in Vancouver, my primary focus has been on the proposed oil facility that they want to put on the Columbia just down the street from me. And it is, it has been instructive to watch the process. One of the things that really got to me was that when Tesoro Savage did a hopelessly inadequate environmental impact statement, that they ah EFSEC people rejected outright, then they were ah required to bring in an independent consultant. And, ah, I heard that same language here and I was pretty uncomfortable because Cardno, ah the independent, supposedly, consulting agency, three of their major people working on this statement worked for BNSF, the railway that brings all that oil through the Bakkan Shale fields into the proposed facility So ah please be quite sure that any independent consultant does not have that kind of blatant conflict of interest, preferably none at all, and if you can actually police them, that would be so much the better. So ah please consider that, and, at the very least, put in some sort of leak ah detection system, that barrier in the northeast corner and the other things that are really needed to mitigate it if you just can't see your way to do what needs to be done and get that soil out of here.

Thank you.

Angie: Alright we have Laura, and followed by Diana Golden, Gordon.

Laura Stevens: Thank you very much Angie. Ah my name is Laura Stevens, I'm an organizer for the Sierra Club. I want to give a shout out to Sandy Davis for her sustained leadership on this issue. Um it's been, I know, a community effort, but Sandy is especially to thank.

Um I'm a lifelong Pacific Northwesterner, but my parents came from Philadelphia. They met there and wanted to get away from the east coast and so they drove across the country and they narrowed it down to two places, Vermont and, and um Oregon. And you know, and you know who you know not surprisingly why. Philadelphia is, you know, big and polluted and they wanted to get away from that and, and they settled here because my mom doesn't like the snow. And um and so I really, this was really instilled in me as I grew up that this is, that this is a very special place that does not exist everywhere and is, and is increasingly rare on our planet. And so we have to be stewards of this place. Especially now as we know look at the statistics of how many miles of river are contaminated and, and, and we can't you know global action is sometimes difficult but we can take care of what is right in front of us. We have to be good stewards of what is right in front of us.

And this is it, this is it. Um there's a Cree prophecy that I'm probably going to butcher, but it says um that when the last, something like, only when the last tree is cut down and the last the last fish is caught and the last river is polluted, only then will you realize that you cannot eat money.

And um I had this on my wall for a number of years, and it's still, it's almost a haunting saying, because I think this is, this is, this is kind of where we were headed, right? If things continue ah um like they seem to be continuing right now. But we have, we can, we we have um the ability to be complete stewards of our rivers and clean things up completely. I mean I was just shocked to see the um, um, that graph, that the benefits of levels of 4, 5 and 6 were so close together, there was just a hairline difference in there, and that's just shocking to me. I mean if to keep all that contaminated waste right there by the Columbia River versus hauling it offsite to an appropriate landfill where it can be monitored, um, it absolutely to me seems like a no brainer

So um I do thank you very much for your hard work, I know it's, it's a lot of hard work and I appreciate you making this extra opportunity for public comment and um ah please do, do everything that you possible can um within you're your authority to clean this up to the best of the, the cleanest it possible can be.

Thank you very much.

Angie: Thank you Laura. Alright, we have Diana, and Diana will be followed by, I believe its Sharon.

Diana Gordon: Thank you, hi um I don't understand all the financial stuff. I'm, I'm Diana Gordon I live in Clark County. Um as I said I don't understand all the financial stuff, but I was very disappointed to hear that Alternative 4 was chosen for the cleanup of the old Reynolds Aluminum Plant in ah Longview. I do not feel that this is adequate, an adequate toxic, I do not feel that it is an adequate, adequate for a toxic cleanup on the, of this magnitude, on the shores of a major waterway like the Columbia. The Port of Longview had the foresight to refuse a new oil

refinery and propane facility, and I feel they deserve the best cleanup available to this contaminated site.

We know with continuing climate change, the sea level is sure to rise in the future. Predictions I have heard call for a 2 foot, or possibly 3, on the coast by twenty, uh, 2100; Tides will carry that water up the river and flood marshes and wetlands near the Port. That water will, in turn, return to the river carrying cyanide, petroleum hydrocarbons, and so on, with it. Climate change also brings with it more catastrophic storm events, like major floods, with a similar result. Municipal water supplies are at stake, as well as prime habitat in wetlands, wetlands, along the Columbia River and in the Columbia River Estuary.

Further, bedrock at the Reynolds' site is about 400 feet down, and that area is covered with alluvial soils. Alluvial soils are especially vulnerable to liquefaction in the case of an earthquake, thus spreading the contamination even further.

This area should be a Superfund Site because we know that climate change and earthquakes are going to happen. But at least, there are a few steps that can be taken to protect the huge resources of the Columbia and preserve for the Port, for of the Port of Longview, the greatest potential for the future use of this site and jobs for the community.

There must be a source of revenue, a trust, that will cover the cost of replacing soil caps in the event that groundwater or soils are found to contain contaminants. This can never end. If the contaminated soils are not hauled away, as in Alternative 6, this area must be monitored forever.

There must also be a leak detection system in the site unit covers, and special precautions for Site Unit 7 which has the problem of the horizontal flow of groundwater through toxic wastes.

Alternative 4 leaves, lets the community of Longview and the Port of Longview down. They deserve better. However, I hope we'll do all that we can to maximize the possibilities for a clean future for this site.

Thank you.

Angie: Alright we have Sharon Miller

Sharon Miller: Good evening, thank you for spending your evening with us and hearing us out.

Ah my name is Sharon Miller. I'm a resident of Vancouver Washington. Um I um, my parents moved to Longview in 1949, coming here from California because of the beauty of the northwest. Ah they hoped to live their lives out in Longview, but in the early eighties my mother's breathing ah was so labored from living ah near two pulp mills, a nuclear power plant, a coal plant, and then Mt. St Helens blew, which was just the straw that broke the camel's back. So they moved to Vancouver and lived their life out there.

I as a child, ah, back in the early 50's, assumed that all vehicles had rusted out fenders and bumpers because all of our cars here were rotted by the, ah residue that was coming from the pulp mills. I also assumed that air smelled like rotten eggs because that's what I'd grown up with. And as I aged and realized that, gee, you know, not every city was like this, um I was very

pleased to return and see that through actions from the EPA, the Department of Ecology, government regulation, people who were really concerned about having clean air and an environment for our children, had accomplished changes that Longview looked much better than it did when I was a child. Um but I also know that it wasn't the industries that made those changes, that the dollar drove their decisions, and it wasn't out of their concern for the people who worked for them that these changes were made. And I had been told that ah we were a mill town and that there would not be changes made, because people were dependent um on supporting their families and that's just the way it had to be. Now I know that that isn't the way that is has to be. But I also feel like if we sit back and don't be vigilant and protect our communities, that change will not happen.

So when um I heard that Reynolds was going to actually clean up the site that they had contaminated, I was ecstatic, thinking, you know, maybe industry ah will be responsible. And now I hear that they're actually not going to clean up the site, that the mess that they left behind is going to remain on that site, and that we as citizens of this community are still responsible for ah managing ah ah having a Department of Ecology that will manage, overseeing that site, and that they can walk away and leave their waste behind. That I don't understand, therefore I would advocate for actually making Reynolds be responsible, or industries be responsible, for cleaning up the sites and not giving them a message that when they leave, we will still be responsible for the mess.

Angie: Thank you

Is there anyone else who wishes to provide testimony? Ok.

Besides um oral testimony, we are still accepting written comments. And if anyone would like to send Ecology written comments, please remember they are due by March 18, 2016 at 5 p.m.. You will send them to, as up here on the screen:

Guy Barrett  
Department of Ecology  
Industrial Section  
P.O. Box 47600  
Olympia, WA 98504-7600  
Or by e-mail to [Reynoldscleanup.comments@ecy.wa.gov](mailto:Reynoldscleanup.comments@ecy.wa.gov)  
Or by Fax to (360) 407-6102

All testimony received at this hearing, along with all written comments received by March 18, 2016 will be part of the official record for this Cleanup Action Plan and Consent Decree.

Ecology will send notice of the availability of the Responsiveness Summary, that's the response to comments, to:

- Everyone that provided written comments or oral testimony
- Everyone that signed in at the two public events we held, and
- Other interested parties on the Agency's contact list for this action.

The Responsiveness Summary will contain the Ecology's response to questions and issues of concern raised during the public comment period. If you would like to receive notice when this is available, but you did not sign in, or I don't have your contact information, please see me after the hearing and we'll get that taken care of.

The next step is to consider the comments and finalize the Consent Decree and Cleanup Action Plan once this comment period has ended. We will look at all the comments, all the comments, other appropriate documentation, and staff recommendations as we make our final decisions on this action.

If we can be of further help to you, please do not hesitate to ask or you can contact Guy if you have any other questions.

On behalf of the Department of Ecology, thank you all for coming tonight. I appreciate your courtesy and your cooperation.

Let the record show that this hearing is adjourned at 8:44 p.m..

### **Oral testimony from the Alder Room**

I'm Judy Schwieters and we're in the Alder Room listening, Alder Room listening station for the hearing on the Former Reynolds Metals, Longview aluminum smelter draft Consent Decree and Cleanup Action Plan.

Let the record show that it's 7:55 p.m. on March 9<sup>th</sup>, and this hearing is being held at the Kelso Red Lion Hotel, 510 Kelso Drive in Kelso, Washington.

So now we have, would you give me your name and contact information please if you'd like.

Elaine Sharpe, Longview Washington.

Judy: Okay, alright so you can go ahead and give your comments.

Elaine: I think there should be a compromise between number 4 and number 5 cleanup. I think they should spend 50,000 dollars and clean up more than what they are planning to do right now. It would be better for the, um, environment, be better for the community. I think people would be more comfortable and trusting.

Judy: Thank you

March 9, 2016

TO: Washington Dept of Ecology  
RE: Reynolds Metals Smelter - Longview Cleanup

In 1923 Cowlitz County constructed thirty-five miles of sloughs and ditches to protect the 11,000 acre valley from flood threats of the rivers and to control stormwater runoff. The majority of these ditches run through neighborhoods in low-lying areas of west Longview and along the Highlands neighborhood.

Water is periodically pumped back into the Columbia River to protect homes from flooding. Let us hope these ditches or canals will not end up becoming a pathway for migrating toxins from the Reynolds site traveling into our backyards and eventually into the Columbia River.

An additional permeable reactive barrier is warranted in the northeast corner of Reynolds' property for this very reason. Even though tests presently show there are acceptable levels of toxins in the groundwater, Ecology has shown that the groundwater flows north from the Columbia River through Site Units 6 and 7. After consolidation, these two SUs will contain contaminated soil approx 18 feet deep with high concentrations of fluoride and polycyclic aromatic hydrocarbons - known carcinogens. Through the years this contaminated soil could easily move with the northerly flow of groundwater. The proposed caps for these two SUs do not prevent this horizontal flow of groundwater through toxic wastes. These wastes would eventually end up in our CDID ditches and the Columbia River.

No person and no agency can truly guarantee that toxins will not migrate north from this property. We need this preventive measure to be put in place now for the protection of our communities forever in the future.

Thank you for considering my request.

Sandra Davis  
1002 Abernathy Creek Rd  
Longview, WA 98632  
360-577-1043

~~WE NEED EMAIL ADD~~

Roy Staples

Good Evening

Name is Roy Staples, a teacher and child welfare worker in the community. I've lived here since 2005, and I am co-president of Landowners & Citizens for a Safe Community, a citizen-supported group who has spoken regularly out in the community — where we find widespread opposition to the coal project and the hope that better industries will find a home in Longview's ports and provide safe, growing and financially stable jobs and long term careers for our children and grandchildren.

\* This can only be done if the Reynolds/Alcoa site is cleaned up completely ~~and~~ of its toxic contamination.

And that can only be done if we remove those contaminants. Your level 4 cleanup does not do that, so we must have monitors to be sure contaminants are not leaking, and other measures to deter the movement of contaminants in river & groundwater.

Permeable Reactive Barrier

- above site unit?
- northeast corner of site

Who would buy it?

Financial Fund for possible cleanup if and when contaminants move.

WE NEED TO BE ABLE TO SELL TO A FEE

These assurances should match the amount of serious contamination. And this should begin now as Alcoa is undergoing changes in its business.

So, monitoring and financial assurances when and if contaminants moved.

My opinions and policy recommendations are not just my own.

93 supporters have agreed with these steps and have voiced their support in letters and petition signatures some of which I have brought here.

I leave these with the Dept of Ecology.

I hope you take these urgent steps to protect our health and our economic future.

Thank you.

Thank you for the opportunity to provide input on the Reynolds clean-up plan. My name is Chris Hill and I am a resident of Cowlitz County. I will be very brief.

Reading through the volumes of information in the plan I cannot find any references to the potential for ~~nearby~~ seismic activity, except a brief vague passage that I believe says monitoring at the site will be increased after a seismic event. I also cannot find any discussion of whether such potential seismic activity is factored into the cost-benefit analysis that was conducted and used to select option 4.

Is the not-so-inconsequential probability of the site experiencing a liquefaction or partial liquefaction episode even acknowledged in the study? Has any modeling been done to determine the likelihood of groundwater or riverine contamination from such an episode given the large amount of toxic waste that will be left on the site rather than properly removed to a full containment location?

I purchase earthquake damage insurance for my home. Can Cowlitz County purchase similar insurance for our water supply and for the Columbia River downstream from this contamination?

March 9, 2016

Guy Barrett  
Department of Ecology, Industrial Section  
P. O. Box 47600  
Olympia, WA 98504

Re: Reynolds Aluminum Draft Cleanup Action Plan

According to the draft Cleanup Action Plan Figure 2-2 the entire site will be subject to groundwater controls and deed restrictions. It follows that a higher level of cleanup, such as Alternative 5 which expands off-site removal and more groundwater treatment, would lessen future restrictions on use of the site <sup>if it</sup> provide more permanent treatment.

This is especially important given the site is located in a moderate to high hazard risk zone for liquefaction in the event of an earthquake. Neither the Remedial Investigation/Feasibility Study nor the CAP has addressed this geological risk. Neither has addressed the risk of levee failure in the event of an earthquake, though recently it was reported the levee just west of this site sits atop a possibly unstable slope. The only earthquake risk assessed was the slope of the capped on-site disposal areas. Given the likelihood of a severe Cascadia subduction zone earthquake within the operation time of the disposal sites, this should be considered a deficiency of the draft cleanup action plan.

Sea level rise and flood events will also affect groundwater level. There is little reason to believe the CDID drainage ditches and pumps will be sufficient to maintain current groundwater levels, <sup>which</sup> as this cleanup action plan assumes, <sup>as</sup> when these events are beyond what the ditches were built to mitigate.

Some sites, such as SU 6 and 7 sit at or below groundwater level yet will not be excavated and removed under Alternative 4. The bottom of Fill deposit B-1 (SU-6) is unknown. "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." RI/FS 4.3.2 p.

When future <sup>climate</sup> climatic and geologic risks are uncertain but likely, I would urge you to err on the side of caution rather than economics and select a cleanup alternative better than Alternative 4.

Thank you,



Diane L. Dick  
13 St. Helens Lane  
Longview, WA 98632  
Dickdl50@gmail.com

By Don Steinke – [crVancouverUSA@gmail.com](mailto:crVancouverUSA@gmail.com)

4833 ne 238 Ave

Vancouver WA 98682

360 892 1589

Native American — Don't say clean-up

- Treat this like Yucca Mountain, a nuclear waste repository – have a budget which will finance surveillance, forever, including a leak detection system, repairs and replacement of the caps, monitoring of ground water and soil.
- 
- Require an additional reactive barrier in the northeast corner of the property above Site Unit 7 to prevent the northern horizontal flow of groundwater through toxic wastes which could eventually end up in the CDID ditches and into the Columbia River.
- I testified at your first cleanup hearing. Since then I've learned about mudflows from Mt. St Helens. Apparently, mudflows have come down the Cowlitz repeatedly over the last several thousand years, even as recently as in 1981.

The mudflows have actually blocked the Columbia River, even as recently as during the 1980 eruption.

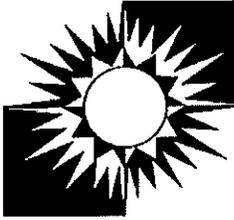
Parts of the town of Rainier across the river from here are built on one of the mudflows.

Have you done hydrologic studies to ascertain how a mudflow would affect the contaminated site.

My geology advisor says a thunderstorm on Mt. St. Helens could trigger another mudflow. I suspect the hazardous material is located in a former mudflow.

The green economy will arrive faster than most people realize.

City of Vancouver  
100 years



# The Oregon Conservancy Foundation

19140 SE Bakers Ferry Rd., Boring Oregon 97009-9158

P. O. Box 982, Clackamas, Oregon 97015

Email: [cnsrvncy@cascadeaccess.com](mailto:cnsrvncy@cascadeaccess.com)

Phone: (503) 637- 6130

## Before the Washington Department of Ecology

### Testimony of Cathryn Chudy and the Oregon Conservancy Foundation

March 09, 2016

My name is Cathryn Chudy. I live in Vancouver, Washington and I am testifying on behalf of myself and the Oregon Conservancy Foundation.

While the Department of Ecology notes on its web site that "a thorough investigation and cleanup of this site is a high priority for Ecology," it contradicts its own assertion by selecting Alternative #4 as its Cleanup Action Plan. This plan removes very little of the hazardous waste offsite, leaving the onsite property containing contaminants that will pose a long term risk to the health and safety of the citizens living in the area.

In 2014, I was one of many citizens who packed the public hearing on the six alternative plans that were proposed for this cleanup. Everyone who spoke urged no less than a level #6 cleanup - to have the contaminants excavated and removed, given that none of the proposed caps will withstand the inevitable test of time. Here we are again urging you to do the right thing for the protection of not just Longview citizens but for all of us affected by pollution impacts along the Columbia River.

Having a vested economic interest in a less costly partial cleanup, Northwest Alloys and Millenium Bulk Terminals support alternative #4 which is insufficient for full environmental protection. It is disturbing that the Department of Ecology ignored the overwhelming majority of public input and settled on a cleanup plan that is <sup>the</sup> not adequate or sustainable.  
*may*

We urge you to do the following:

- (1) Implement a stronger cleanup process that includes long term independent monitoring.
- (2) Establish financial provisions so that current and long term clean up costs do not fall on citizen taxpayers. Northwest Alloys and Millenium must be held accountable by the Department of Ecology for the safety of the site. The clean up fund must be sufficient to cover the costs of monitoring groundwater and soils, as well as maintaining, and eventually replacing, the caps as they age and wear out.

Please use your authority to protect the public interest by implementing a cleanup process that is fully sustainable.

Cathryn Chudy  
1506 E 29<sup>th</sup> St. VANCOUVER WA 98663

## Reynolds Aluminum clean-up

As citizens of this country, we are fortunate to have agencies designed to protect our health by over seeing the quality of the air we breathe and the water that we drink. Lately, it seems, these agencies have time and again betrayed us.

In Michigan, the EPA knew as early as last April that Flint's residents were at risk for lead contamination and that their health was in jeopardy, especially the health of the children. They did not publicize their concern. Instead, they tried to get the DEQ to act. Both the Feds and the State let the people down.

Some of the residents of SE Portland are now facing a public health emergency due to cancer-causing, toxic air pollution. Senators Wyden, Merkley and Blumenauer asked the EPA to intervene. The DEQ knew about the problem of high levels of lead, cadmium and arsenic, but kept the information secret for 8 months.

The soil and ground water at the former Reynolds Aluminum site are heavily contaminated and now need to be cleaned up. Surely, we can count on the Department of Ecology to do the right thing to protect the community of Longview by recommending a thorough cleanup.

But wait, they only are asking for minimal treatment, insuring that this land will forever be contaminated. No clean industry will ever want to locate here. Our air, water and precious Earth are being poisoned, seemingly with the complicity of the very agencies designed to protect. It has been said that these agencies "become captured by the industries they regulate."

Now that the decision has been made, we are asking that Ecology will guarantee that funding will be available to cover the cost of monitoring the ground water and soils and maintaining the caps in perpetuity. Ensure that the remaining site units will have a leak detection system, and require an additional reactive barrier to prevent the flow of groundwater through toxic wastes which could end up in the Columbia River.

This is the least you can do.

*Alona Steinke*  
*Van Couver, WA*

## LONGVIEW HEARING - Reynolds Cleanup, March 9, 2016

I was very disappointed to hear that Alternative 4 was chosen for the cleanup of the old Reynolds Aluminum Plant in Longview. I do not feel that it is adequate for a toxic clean up of this magnitude on the shores of a major waterway like the Columbia. The Port of Longview had the foresight to refuse a new oil refinery and propane facility, and I feel they deserve the best clean up available to this contaminated site.

We know that with continuing climate change, the sea level is sure to rise in the future. Predictions I have heard call for 2', or possibly 3', on the coast by 2100; Tides will carry that water up the river and flood marshes and wetlands near the Port. That water will, in turn, return to the river carrying cyanide, petroleum hydrocarbons, and so on, with it. Climate change also brings with it more catastrophic storm events like major floods with a similar result. Municipal water supplies are at stake as well as prime habitat in wetlands along the Columbia River and in the Columbia River Estuary.

Further, bedrock at the Reynolds' site is about 400' down and that area is covered with alluvial soils. Alluvial soils are especially vulnerable to liquefaction in the case of an earthquake, thus spreading the contamination even further.

This area should be a Superfund Site because we know that climate change and earthquakes are going to happen, but at least there are a few steps that can be taken to protect the huge resources of the Columbia and preserve for the Port of Longview the greatest potential for the future use of this site and jobs for the community.

There must be a source of revenue, a trust, that will cover the cost of replacing soil caps in the event that groundwater or soils are found to contain contaminants. This can never end. If the contaminated soils are not hauled away, as in Alternative 6, this area must be monitored forever.

There must also be a leak detection system in the site unit covers, and special precautions for Site Unit 7 which has the problem of the horizontal flow of groundwater through toxic wastes.

Alternative 4 lets down the community and the Port of Longview - they deserve better. However, I hope that we will do what we can to maximize the possibilities for a clean future for this site.

Diana Gordon  
642 I Street  
Washougal, WA 98671-1129  
360-835-7748  
tndgardens@comcast.net

# Cleanup Reynolds for Good!

Guy Barrett  
Department of Ecology - Industrial Section  
P.O. Box 47600  
Olympia, WA 98504  
[Reynoldscleanup.comments@ecy.wa.gov](mailto:Reynoldscleanup.comments@ecy.wa.gov)

Dear Mr. Barrett:

Cleaning up industrial pollution at the former Reynolds site is a top priority for our community. People rely on groundwater located near the site and value Columbia River fish and wildlife. We expect corporations to clean up their mess. The aluminum industry is in a tailspin and Alcoa recently announced plans to shutter its Wenatchee aluminum smelter. Ecology must ensure that Alcoa provides comprehensive, court-enforceable financial assurances to follow-through on decades of cleanup and post-cleanup monitoring. This includes funds to address pollution discovered during the cleanup process or by future site owners.

I support a full cleanup of the old Reynolds industrial site because:

THE REYNOLDS SITE IS AN IMPORTANT COLUMBIA RIVER  
PORT THAT COULD BE OF GREAT ECONOMIC + ENVIRONMENTAL  
VALUE TO LONGVIEW + THE SOUTHWEST WASHINGTON. IF IT  
WERE CLEANED UP + USED FOR ENVIRONMENTALLY FRIENDLY  
INDUSTRY

Sincerely,

Name: Gary M. Buss  
Address: 3008 FIELD  
Phone: 360-525-3946  
Email: gmbuss1@gmail.com

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The comment period closes **March 18, 2016**.

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**I support a full cleanup of the old Reynolds industrial site because:**

Danger to the environment could  
occur otherwise and it's the  
responsibility of the corporations responsible  
for the mess to clean it up!

Sincerely,

Name: Aimee Rios

Address: 447 231d AVE Longview, WA 98632

Phone: ~~425~~ 360 747-4050

Email: \_\_\_\_\_

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I support a full cleanup of the old Reynolds industrial site because:

I BELIEVE IN A CLEAN ENVIRONMENT!  
OUR COUNTY HAS "POTENTIAL".  
"POLLUTION" WILL ONLY MAKE MATTERS WORSE!

Sincerely,

Name: TADDEUS SUNDRVIST  
Address: 3028 HEMLOCK STREET  
Phone: 360-353-5005 (Home) 360-261-9496 (Cell)  
Email: taddi1886@hotmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

When a mess is made, someone needs to clean it up. Beyond that, anything short of a full clean-up will leave toxic chemicals in the earth near where I live.

Sincerely,

Name: Geof Richie  
Address: 5609 Fircrest Dr #120  
Phone: 253-282-1337  
Email: akpresto@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

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Sincerely,

Name: Jane M. Salas  
Address: 2943 Laurel Rd, W. LAKEWAAS WA  
Phone: 360-365-3321  
Email: jane@winet.com

*Attend Washington Department of Ecology's open house & public meeting on the Reynolds cleanup on Wednesday, March 9, 2016, at the Red Lion (510 Kelso Drive). Open house from 4:30 pm to 6:30 pm. Public hearing begins at 6:30 pm.*

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**I support a full cleanup of the old Reynolds industrial site because:**

Any toxicity in the environment has to be avoided if it is already there as in this case it must be cleaned up. The short term and long-term impact is obvious and far reaching on (a) fresh water both human + wild life (b) for growing plant life all of this affects the air quality.

Sincerely,

Name:

Ann Bradley

Address:

2442 Park Hill Dr, Longview

Phone:

360-636-1472

Email:

jivaneeasha@gmail.com

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I support a full cleanup of the old Reynolds industrial site because:

anything less will leave the site unsuitable for many industries and reduce the property taxes that the county will reap. Remaining toxic pollution will also threaten the Columbia River and ground water.

Sincerely,

Name: Christopher Hill  
Address: 4363 Poplar Way Longview, WA 98632  
Phone: 360-577-3558  
Email: weatherquilt@aol.com

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I support a full cleanup of the old Reynolds industrial site because:

Fish and wild life are at stake,  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sincerely,

Name: Dave Hopkins

Address: 3273 Little Kalamia River Road, Woodland, WA, 98674

Phone: 360 - 225 - 5073

Email: steelhead462@hughes.net

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I support a full cleanup of the old Reynolds industrial site because:

They made the mess, they must clean it up!  
Not just 1/2 way! No toxic left-lakes, puddles  
whatever. It wasn't here naturally so the aluminum  
company should make it the way it was before  
Sincerely, they polluted it. The cost must be  
paid by them!

Name: Susi Hulbert

Address: 530 Hillcrest Longview WA

Phone: \_\_\_\_\_

Email: susih1313@yahoo.com

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**I support a full cleanup of the old Reynolds industrial site because:**

Danger of toxic materials penetrating into the soil and possibly into source of drinking water.  
Longview port needs to attract cleaner business.  
A toxic site is preventing this.

Sincerely,

Name: Josie Wells  
Address: 136 Cedar Falls Dr. Kelso  
Phone: 360-353-3135  
Email: josiemwells@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

*Something has to change! Washington needs to STEP UP and turn this country in more positive economically healthy industries*

Sincerely,

Name: Mary L. Lyons  
Address: 3528 SUNSET WAY  
Phone: 360-560-5272  
Email: marylyonsnow@comcast.net

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I support a full cleanup of the old Reynolds industrial site because:

Contaminated Ground water harms fish, people,  
and communities. Clean it up like it never  
happened

Sincerely,

Name: Miles Johnson  
Address: 111 Third St. Hood River  
Phone: 541-490-0487  
Email: miles.b.johnson@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

First, Reynolds should never have been allowed to make such a mess, but once they did, they shouldn't have been able to leave the mess they did - this is their mess to clean up before we end up drinking it and eating it and breathe more of it AT OUR EXPENSE / I'm on a fixed income I have no plans to exploit others for my benefit. I can't afford this financially, nor can my health.

Name: CAPT. KIMBERLY HIGGINS

Address: POB 2173, LONGVIEW, WA 98632

Phone: \_\_\_\_\_

Email: KIMNSPIKE@EARTH.LINK.NET

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# Cleanup Reynolds for Good!

Guy Barrett  
Department of Ecology - Industrial Section  
P.O. Box 47600  
Olympia, WA 98504  
[Reynoldscleanup.comments@ecy.wa.gov](mailto:Reynoldscleanup.comments@ecy.wa.gov)

3/2/2016

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I support a full cleanup of the old Reynolds industrial site because:

We, as the communities of the Lower Columbia River, no longer will accept being involved with an environmentally deadly commodity that is: (1) a proven poison, individually and at a planetary level, (2) old technology, (3) BAD BUSINESS DEALING WITH BANKRUPT ENTITIES, (4) NOT WORTH ENTANGLING OUR LAND/DEEPWATER PORT FACILITIES IN A LONG-TERM RELATIONSHIP WITH ANOTHER ENVIRONMENTAL DISASTER LOOMING Sincerely, DUE TO THE STATISTICALLY PROVEN RR/shipping accident/mile ratios, (5) WE DESERVE MORE JOBS THAT ARE HEALTHY & SUSTAINABLE W/O KILLING THE LIFE ON THIS PLANET (our only one!)

Name:

GARY WALLACE

Address:

179 LODGEPOLE RD KALAMA WA 98625

Phone:

360 673 4408

Email:

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**I support a full cleanup of the old Reynolds industrial site because:**

*The current level of cleanup chosen by DOE is inadequate AND DOES NOT GUARANTEE PROTECTION! DOE must provide monitoring of the areas identified on the site. Alcoa/Reynolds must provide financial resources for it.*

Sincerely,

Name: Roy Staples  
Address: 52409 Bloyd St Kelso WA 98626  
Phone: (360) 560-2708  
Email: roy.staples@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

*Longview is home to more than the residents. We have a huge environment of wildlife that migrate through this area. I want to be able to raise my children without fear that their health may be in danger because of the pollution in our area. Please help ensure that our environment is clean + safe for generations to come.*

Sincerely,

Name: Megan Richté  
Address: 5609 Finch Drive #120, Longview  
Phone: 253-205-4444  
Email: Missmeganrichte@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

I am concerned about leachate escaping into river ~~and~~ and groundwater. Note what is ~~was~~ happening at the Cowlitz dump!!!

Sincerely,

Name: Lisa Waldvogel  
Address: 1536 25th Ave - Longview WA 98632  
Phone: 360 442 1464  
Email: lisa.waldvogel@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

*I want this community to be given a chance to turn the corner economically. A higher level clean up will give us a better opportunity to attract vital, modern health conscious industries.*

Sincerely,

Name: MARY LYONS  
Address: 3528 sunset Way  
Phone: 360-423-8382  
Email: marylyonsnow@comcast.net.

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I support a full cleanup of the old Reynolds industrial site because:

I'm greatly concerned groundwater will become contaminated as sea levels rise. How about when rain comes in - there will be leachate... where will it go? Unlike Cowitz landfill, this is on the Columbia. Their leachate is diverted. Are we living a fantasy ~~the~~ Reynolds will not have this problem? I want to see a sustainable reserve for long term cleanup (my definition of long-term is 100 or more years) + ~~reserves~~ for newly-contaminated sites.

Sincerely,  
Name: Lisa Waldvogel  
Address: 1536 25th Ave NW WA 98632 unit 7. Also a leak  
Phone: 360 442 1464  
Email: Lisa.Waldvogel@gmail.com  
I want to see a 3rd reactive barrier by site  
detectable cover on  
SU# 1, 2, 6 & 7 not the  
low permeable cap.

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I support a full cleanup of the old Reynolds industrial site because:

*There aren't enough protections against  
leaching toxic chemicals out of the Columbia  
River into*

Sincerely,

Name: Gloria Sanders

Address: 1153 16th Ave #109

Phone: 360 423-0226

Email: glorius5400@centurylink.net

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**I support a full cleanup of the old Reynolds industrial site because:**

*I want to see the Waite taken off site.  
Number 6 Clean-up. Leak detectable covers.  
A strong financial hold so the tax payers are not  
paying for clean-up.*

Sincerely,

Name: Susan Lee Schwartz  
Address: 1240 Sycamore Place Longview WA 98632  
Phone: 360-425-7553  
Email: sschwartz1970@hotmail.com

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I support a full cleanup of the old Reynolds industrial site because:

we deserve protection and the best clean up  
possible for our community. Lead detectable covers  
now.

Sincerely,

Name: Brian Manning  
Address: 1520 Commerce Ave Longview, WA  
Phone: 253-209-4181  
Email: brianmanning81@gmail.com

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I support a full cleanup of the old Reynolds industrial site because:

Anything less is such a threat of pollution to the water & soil. Since that has been refused, I demand constant monitoring from an independent source of the presently known sites as well as all future sites discovered in the future.

Sincerely,

Name: JoAnne Baker  
Address: 3545 Fairway Lane, Longview, WA 98632  
Phone: 360-636-5968  
Email: jblainebaker@gmail.com

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I support a full cleanup of the old Reynolds industrial site because:

Because aluminum causes Alzheimers disease and 'cuZ  
Chief Seattle said "We did not just inherit this land from our  
ancestors, we are borrowing it from future generations."  
WA State needs nickel deposit on beverage containers. This  
could (more than) fund clean-up process.

Sincerely,

*John F. Doyle*

Name:

John F. Doyle

Address:

630 16<sup>th</sup> Av, Longview WA

Phone:

(360) 703-4949

Email:

NONE

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I support a full cleanup of the old Reynolds industrial site because:

I LIVE HERE AND THE PRIORITIES IN MY LIFE RIGHT NOW ARE MY HEALTH, PERSONAL AND FINANCIAL AND OF THE ENVIRONMENT. I SHOULD NOT HAVE TO SUFFER THE CONSEQUENCES OF THE EXPLOITATION OF MY SURROUNDINGS BY AN ENTITY THAT ISN'T EVEN FROM HERE. ALSO, I HOPE THE SAID (KONY) ISN'T →

Sincerely,

Name: CAPT. KIMBERLY HIGGINS  
Address: POB 2173, LONGVIEW, WA 98632  
Phone: \_\_\_\_\_  
Email: KIMNSPIKE@EARTHLINK.NET

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LOST ON DOE, THAT THE POSSIBILITY  
OF MILLENIUM STAYING AT THE REYNOLDS  
PROPERTY COULD RESULT IN ANOTHER  
FAILED VENTURE - A HAZARDOUS VENTURE  
THAT THE TAXPAYERS ARE GOING TO HAVE  
TO FOOT THE BILL FOR.

# Cleanup Reynolds for Good!

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**I support a full cleanup of the old Reynolds industrial site because:**

We want 1) Leak detectible cover on SU#1 #2 #6 & #7  
2) Third leach cover by site #7  
3) Funds in reserve to monitor clean up long term  
Full clean up will attract cleaner business. ✓

Sincerely,

Name: Josie Wells  
Address: 136 Cedar Falls - Kelso, WA 98626  
Phone: 360.353.3135  
Email: josiemwells@gmail.com

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I support a full cleanup of the old Reynolds industrial site because:

*I have serious concerns re: long-term issues concerning the containment.  
For the next business looking at the site I would like to see:*

- 1. \$\$\$ set aside for future sustainable funding needs.*
- 2. Third reactive barrier by site Unit 7  
(to protect from C010 Ditch (fluoride migration))*
- 3. Leak detection cover on SU #1, SU #2, SU #6, SU #7  
(instead of low permeable cap)*

Sincerely,

Name: Patricia Kelley

Address: 1816 Hazel Dell Rd Castle Rock, WA 98611

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

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**I support a full cleanup of the old Reynolds industrial site because:**

anything less will preclude some businesses from locating at the site when the coal export terminal fails to materialize. Anything below a level of cleanup will cause a loss of property tax dollars

Sincerely,

Name: Christopher D. Hill  
Address: 4363 Poplar Way, Longview, WA 98632  
Phone: 360-577-3558  
Email: weathergulf@aol.com

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**I support a full cleanup of the old Reynolds industrial site because:**

We need to know that our community is safe for living, breathing, and working. This is a new concept for this area. When I moved here in 1970, all the problems, stench etc. was explained, "well, it's the smell etc of money" i.e. it's o.k. Not any more!! We want our great Columbia ~~to~~ be clean + safe for us and our fish, waterfowl - our city + citizens

Sincerely,

Name: Susi Hulbert  
Address: Longview, WA  
Phone: \_\_\_\_\_  
Email: susih1313@yahoo.com

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**I support a full cleanup of the old Reynolds industrial site because:**

As a community, we deserve environmental due diligence; clean up the mess that was made because we ALL live here. There is NO Planet B!

Sincerely,

Name: Allyson F. Sosa

Address: 8904 N Portsmouth Ave, Portland, OR 97203

Phone: 971-227-7730

Email: AFSosa08@yahoo.com

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# Cleanup Reynolds for Good!

Guy Barrett  
Department of Ecology - Industrial Section  
P.O. Box 47600  
Olympia, WA 98504  
[Reynoldscleanup.comments@ecy.wa.gov](mailto:Reynoldscleanup.comments@ecy.wa.gov)

Dear Mr. Barrett:

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I support a full cleanup of the old Reynolds industrial site because:

"FULL CLEANUP" IS NOT REFLECTED IN THE  
CURRENT ECOLOGY PLAN. ENOUGH OF A FUND  
TO COVER COSTS OF DISCOVERED CONTAMINATED  
AREA'S, ENOUGH \$ FOR THE FUTURE

Sincerely,

Name: ALLAN RUBBERG  
Address: 1540 COMMERCE #403  
Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

Attend Washington Department of Ecology's open house & public meeting on the Reynolds cleanup on Wednesday, March 9, 2016, at the Red Lion (510 Kelso Drive). Open house from 4:30 pm to 6:30 pm. Public hearing begins at 6:30 pm.

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**I support a full cleanup of the old Reynolds industrial site because:**

I Believe in a safe community and leaders that stand up  
for our environments and healthy constituents. Our  
Community has the highest rates of cancer + Asthma, let's  
fix that.

Sincerely,

Name: Megan Richie  
Address: 5609 Finch Drive #120, Longview WA 98632  
Phone: 253-205-4444  
Email: missmeganrichie@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

Our health should always be more important  
than \*profits\*. We have the highest breast cancer  
rate in the state. Why?

Sincerely,

Name: Sherry Davis  
Address: 2325 52nd Ave.  
Phone: 360-423-5212  
Email: davisholidays@g.com

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I support a full cleanup of the old Reynolds industrial site because:

THE QUESTION IS COMPLETE  
REMOVAL OF ALL DAMAGED SOIL

Sincerely,

Name: ALVAN G. RUDBERG

Address: 1510 COMMERCE # 403

Phone: ~~20~~ 360-261-2978

Email:

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**I support a full cleanup of the old Reynolds industrial site because:**

*The proposed low permeability cap areas may fail over time and the idea that Reynolds/Alcoa or Millonium will step up and solve problems involving leaching or transport of toxics into the River or ground water is overly optimistic*

Sincerely,

Name: DAVE HALE  
Address: P.O. BOX 412  
Phone: (360) 520-1753  
Email: ndhale.33@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

Southwest WA. citizens deserve the right to a quality of life that does not bring lower quality of air and water back to our region; NOR develop anymore negative health impacts - cancers; WE WANT MORE HEALTHY FAMILY-WAGE JOBS - NOT A DUMP!! COAL or OIL!

Sincerely,

Name: GARY B. WALLACE  
Address: 179 Lodgepole Rd KALAMA WA 98625  
Phone: 360 673 4408  
Email: gbwallace179@live.com

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I support a full cleanup of the old Reynolds industrial site because:

*It would eliminate dead restrictions  
which would reduce property values  
and tax revenue and limit future  
gain at the site*

Sincerely,

Name: JOHN GREEN  
Address: 1318 25<sup>th</sup> AVE  
Phone: 360 575 9738  
Email: Jgreen2317@AOL.com

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I support a full cleanup of the old Reynolds industrial site because:

*no clean business should have to buy the site for business — so they won't cleanup is necessary.  
1] Monitoring on all sites; 2] Financial Fund from Alcoa/Reynolds; 3] leak detectable cover on S.U.#1,2,6,7. to deal with toxic migration at more sites.*

Sincerely,

Name: Roy Staples  
Address: 2409 Bloyd St Kelso, WA 98626  
Phone: 360-560-2708  
Email: Roy.staples@gmail.com

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**I support a full cleanup of the old Reynolds industrial site because:**

I don't want the tax payers to have to pay for more cleanup down the road, total cleanup will attract good and better businesses to that site, not dirty businesses.

Sincerely,

Name: LINDA CURRY

Address: 253 CRESCENT DR. KELSO, WA 98626

Phone: 360-577-1515

Email: LSKCURRY@COMCAST.NET

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PUBLIC COMMENT SHEET

NAME Patricia Bellamy  
ADDRESS 3214 NE Cesar E Chavez Blvd.  
EMAIL Portland, Oregon 97212

COMMENTS (Please use as many sheets as needed)

This is not a "Clean up" as option #4.  
My understanding is: very small amt of contamination  
is removed but simply <sup>no lines</sup> capped and monitored  
and <sup>caps</sup> will need to be replaced in 50-100 years -  
that is a wide variation and not that long if  
you consider the 50 year date. With inflation  
and raising costs it may be much more expensive  
than doing the best containment far away  
from the river to begin with. Are levers safe?  
Monitoring by Ecology is not frequently done or  
enough and, what about earthquake risks and repair  
costs. Please consider using most: option #6  
and have the <sup>Reynolds</sup> polluters pay the costs.  
We need clean industry on clean, safe  
sites and not a dirty coal terminal.

Thank you for your service/and opportunity  
to comment on this important issue. Push  
for maximum not minimum to <sup>renew</sup> ~~keep~~ our  
beautiful river and region safe and healthy.

# Cleanup Reynolds for Good!

Guy Barrett  
Department of Ecology - Industrial Section  
P.O. Box 47600  
Olympia, WA 98504  
[Reynoldscleanup.comments@ecy.wa.gov](mailto:Reynoldscleanup.comments@ecy.wa.gov)

Dear Mr. Barrett:

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I support a full cleanup of the old Reynolds industrial site because:

The level of cleanup must be what is thorough & permanent for the public, not what is financially preferable for industry. I trust that as our guardians, the D.O.E. will do what is right and require level six option.

Sincerely,

Name: Linda Horst  
Address: 1020 Kool Rd, Kelso, WA, 98626  
Phone: 360-423-5061  
Email: \_\_\_\_\_

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PUBLIC COMMENT SHEET

NAME DAVE HALE

ADDRESS P.O. Box 412, SILVER CREEK, WA 98585

EMAIL ndhale33@gmail.com

COMMENTS (Please use as many sheets as needed)

I would like to see a thorough clean up Alternative 6. This alternative would allow the site to be used with far less restrictions as to land use resulting from restrictive covenants.

I understand the cost benefit analysis and the arrival at an alternative 4.

Therefore, I would request that the greatest possible financial assurances be applied to the clean up of the Reynolds Lonview Site.

Additional Reactive barriers should be required for contaminants in the north eastern part of the site.

Monitoring and maintenance of the semi-permeable caps should be overseen by DoE as well as all test wells. Concurrently, funding for sufficient staff to accomplish monitoring and maintenance needs to be guaranteed up front.

River sediments identified as heavily contaminated should have been already removed. All excuses should be set aside and this should be done as soon as river conditions permit.

PUBLIC COMMENT SHEET

NAME Susan Leeschwartz

ADDRESS 1240 Sycamore Place Longview WA 98632

EMAIL sschwartz219700@hotmail.com

COMMENTS (Please use as many sheets as needed)

You need to do a Number 6 Clean-up. The hazardous waste must be taken off site. I believe the hazardous waste is too dangerous to be kept on site. The tax payers will have to pay for the rest being cleaned-up. If you unfortunately decide to stay with doing a level 4 Clean-up, please use Leak Detectable Covers.

**TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY**  
**PUBLIC COMMENTS ON THE CLEANUP ACTION PLAN FOR REYNOLDS ALUMINUM IN LONGVIEW**

I strongly encourage the Department of Ecology to require the highest level of cleanup including off-site removal of contaminants to protect our water, air, community residents, on-site workers, fish and wildlife from the potential release of toxins. Leaving contaminated material on-site requires monitoring this site for years to come. Additionally, we now know sea level rise is inevitable. Should this occur, toxins migrating from this site will dangerously expose citizens to toxins that were merely covered and capped.

NAME <i>(please print)</i>	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
Kathleen Patten	1645 24th Longview	360 751 5849	mokpatten@sslv.org	
DANI MARON OLIVER	75 BLUE HORN	360-425-8230	monkeysRmonkeys@vadoo.com	✓
Celia Krosky	12848 NW Sunrise Blvd <sup>Pdx of</sup>	503-490-4251	Celia.Krosky@gmail.com	✓
Aimee Rio	4472 35th Ave Longview WA <sup>98632</sup>	360-747-4080	Tenacious Happygirl423@gmail.com	
Krista Mead	PO Box 402, Kelso WA	(360) 575-9451	kmead@longview.k12.wa.us	✓
KRISTINA L. MAYS	2804 CYPRESS ST LV 98632	360-501-6212	KURESHINA@AOL.COM	
Katie	82- 36th Place	360 425-2926	dankfrei@gmail.com	
Roy Staples	2409 Bloyd St Kelso 98626	360-560-2708	roy.staples@gmail.com	✓
GARY WALLACE	179 Lodgepole Rd <sup>Kelso 98625</sup>	360 673 4408	gwallace179@live.com	✓
John STEPPERT	2204 MAPLE ST LV	360/577-0612	STEPPERS@COMPAST.NET	✓
Lisa Waldvogel	1930 35th LV 98632	442 1464	lisa.waldvogel@gmail.com	✓

**TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY**  
**PUBLIC COMMENTS ON THE CLEANUP ACTION PLAN FOR REYNOLDS ALUMINUM IN LONGVIEW**

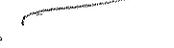
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NAME (please print)	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
Doris Disbrow	on file			
Sherry Davis	on file 2325 52nd AVE	360-423-5212	davisholidayseg.com	✓
Sarah McCoy	on file			✓
Joyce Riggin	on file			
Marilee Dea	4613 NE Killingsworth <sup>97218</sup> #2	503-771-6088	marileede@a.comcast.net	✓
Beverly Hilliard	3018 Pershing Way		ivlady52@comcast.net	
Rene Desautier	1138 20 <sup>th</sup> Ave	360-951-9290	UMCREv@hotmaile.com	
Susan Lee Schwartz	1240 Sycamore Place Longview WA 98632	360-425-7553	sschwartz1970A@Hotmail.com	✓
Margaret Green	1318 25 <sup>th</sup> Ave Longview, WA 98632	360-575-9238	jgreen2317@aol.com	✓
John Green	" " "	360-575-9238	jgreen2317@aol.com	✓
Laura Skelton	954 E. Union St., apt. 215 Seattle WA 98122		laura@wpsr.org	

## TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY

### PUBLIC COMMENTS ON THE CLEANUP ACTION PLAN FOR REYNOLDS ALUMINUM IN LONGVIEW

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NAME <i>(please print)</i>	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
Nicki Nabavizadeh	2829 SE Belmont St.	405-229-8730	nickinaba@gmail.com	
Steve Chase	2619 Florida St.	360-935-9895	schasekbc@comcast.net	
Sara	8964 n portsmouth <sup>Portland</sup> 97202	503 995 4035	Sollerto@greenpeace.org	
HARVEY WILLIAMS	8535 OR Hwy -	360-423-3860	harve.williams@ymail.com	
Lisa Waldvogel	1536 27th LV	441464	lisa.waldvogel@gmail.com	

**TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY**  
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NAME (please print)	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
DAVE HALE	P.O. Box 412, <sup>WA 98585</sup> SILVER CREEK	360-520-1753	ndhale33@gmail.com	✓
Rebecca Myhre	601 Heritage Blvd, Longview	360-749-5153	abeam28@gmail.com	✓
Debra Walker	179 Lodgepole Rd Kelowna	360-673-4408		
Elaine Sharp	1609 22nd Ave Longview, WA	360-909-5549	hesharpone@comcast.net	✓
Tony Schmitt	79 Blue Heron Dr Longview WA 98632			
Shawn Higgins	1237 Commerce AVE #8	(360) 636-2843	leave message at 2843#	✓
Diane Dick	13 St. Helens Ln, LV 98632	360 636 5276	dickdl50@gmail.com	✓
Jason Hammond	936 23rd	560-2298		✓
Alison McClelland	1439 23rd Ave	577-8171	alisonbooknut@outlook.com	✓
Pat Dick Frederickson	2205 Olympia Way	425-9112		
Jon Dessert	1307 NE 93rd	360-521-5145		✓

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NAME <i>(please print)</i>	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
CAROLYN FOX	1428-19 <sup>th</sup> Avenue P.O. Box 1531 Lgr.	971-273-9878	currently disconnected from the web	✓
Marjorie Willenber	313 Nevada Drive Lr.	360-425-7959	N.A.	✓
Jason Hammond	936 23 <sup>rd</sup>	560-2298		✓
Allyson Sosa	Portland	971-227-7730		✓
Suzi Hulbert	530 Hillcrest Longview		susi1313@yahoo.com	-
Jack Thomas	2655 MAGNOLIA ST	423-2270		
Linda Curry	253 Crescent Rd. K	577-1575	LSCCurry@Comcast.net	✓
Arthur Birkmeyer	2802 N. Lake	636-5506	ART.BIRKMEYER@GMAIL.COM	
Josie Wells	Kelso	360-353-3135	josiemwells@gmail.com	
Anthony Wilson	Longview	360-757-1177		
Casal Brady	630 16 <sup>th</sup> ave.	703-4949		

**TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY  
SUBJECT: CLEANUP OF REYNOLDS ALUMINUM IN LONGVIEW**

ngly encourage you to require the highest level of cleanup to protect our water, air, workers at the site, community residents, :  
fe from the potential release of toxins from this historically contaminated site. We have only "one" chance to get this right to h  
ome for the future of our citizens.

NAME <i>(please print)</i>	ADDRESS	PHONE	EMAIL	YES, I am willing to submit written comments
Kathleen A. Robson <i>Kathleen</i>	306 Wynmar Rd. Woodland, WA 98674	360-225-6440	robson.katia@gmail.com	✓ ✓
Peggy A. Smith <i>Peggy</i>	1622 Minor Rd. Kelso, WA 98626	360-624-8964	spaggy50@yahoo.com	✓ No
Bernadette K. O'Brien <i>Bernadette</i>	3239 Pacific Way Longview WA 98632	360.270.1410	bernadette1410@hotmail.com	No →
Alice L. Richter <i>Alice L.</i>	328 Olegua Ave Rd Castle Rock WA 98611			No →
Sharon Harmon <i>Sharon</i>	1400 O.B. Hwy. #65 Longview	431-3325		No →

**OWNERS AND CITIZENS FOR A SAFE COMMUNITY**  
For more information, call 360-703-2200

From: Therese Livella [mailto:harvestofpeace@yahoo.com]  
Sent: Monday, March 14, 2016 8:37 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Reynolds Clean up

Dear Guy Barrett,

I know very little about the history of what has happened at the Reynolds plant as I have recently relocated to Washington. I attended the public hearing on March 9 and am so glad I did. The questions were awesome. The biggest thing I took away from that meeting is this: Why does the state of Washington continuously stop at half a job done rather than aiming for a job well done? Stopping clean up at a level 4 makes no sense to me. From what I gather, level 4 is not clean up, it is containment--we hope. It is time for the Department of Ecology will stop approving dirty projects and start cleaning up the ones we have.

As I mentioned earlier, I have recently moved to Washington and I am both appalled and proud of my new community. Appalled at what environmental disasters have happened to this beautiful area in the past, appalled at the continuous onslaught of new disastrous proposals and proud of the citizens who are becoming informed, educated and empowered to speak and act to make positive changes. Washington can do better than look the other way. It is time to do a full scale clean up at the Reynolds plant. Any monitoring of the site needs to happen not just by a third party but by an independent third party, with no conflict of interest. Any new projects must have clean up costs UP FRONT, IN PERPETUITY. It is time to hold polluters responsible.

Thanks for your time.

Therese Livella

From: Sandra Davis [mailto:abernathyfarm@q.com]  
Sent: Monday, March 14, 2016 9:01 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Reynolds Metals Cleanup Action Plan Comments

March 14, 2016

Sent via email to: Reynoldscleanup.comments@ecy.wa.gov

Guy Barrett

Dept of Ecology, Industrial Section

P.O. Box 47600

Olympia, WA 98504-7600

RE: REYNOLDS METALS ALUMINUM SMELTER CLEANUP ACTION PLAN

Dear Mr. Barrett:

With the Cleanup Action Plan in its final stages, I appreciate the opportunity to once again comment on this selected cleanup alternative. As you know, providing the highest degree of protection for public health and the environment in the future should be the number one priority of this Cleanup Action Plan. To add strength to the cleanup alternative #4, I propose the following additions.

1. Additional Reactive Barrier

Even though fluoride measured in the northeast corner was at acceptable levels in 2014, these contaminants could still travel offsite with the northerly flow of groundwater. Every option must be used to contain all toxins and prevent any migration off the property and possible entry into our CDID ditches and eventually into the Columbia River. The only solution would be an additional reactive barrier in the northeast corner above SU7. (It should be noted that the Highlands neighborhood's new walking trail runs along the length of the CDID ditch just east of the Reynolds site.)

## 2. Financial Assurances

Financial Assurances need to include enough funds to last indefinitely. A dedicated trust should be set up after the Cleanup Action Plan has been completed to be used for monitoring, maintenance, repairs, and replacements of soil caps, as well as the containment or removal of any additional contaminants found in the future.

## 3. Alternative Cap Designs

If alternative cap designs are being considered during this Cleanup Action Plan, such as to accommodate the use of site units for parking or storage, the designs should meet appropriate structural strength requirements. These alternative designs would also necessitate the need for additional funds to be secured for the eventual repair and replacement of these more costly designed caps.

## 4. River Sediment

Even though the U.S. Corps of Engineers is slow to issue permits for removal of the contaminated river sediment, Ecology does have some authority, surely, to demand this contaminated sediment be removed from the Columbia River during the 2016/2017 fish window. Delaying the removal for over two years is totally unacceptable.

High concentrations of contaminants (PAHs, PCB Aroclors, Dibenzofuran and Carbazole) found in soil tests at Outfall 002A showed these toxins were an immediate risk to human health and to fish. To this day, area fishermen continually fish off the Reynolds site waterfront area. As I also reported previously, the City of Rainier drinking water is drawn from the Columbia, slightly upriver from the Reynolds waterfront.

## 5. Leak Detection Systems

Leak detectable caps on landfills provide for true protection of the underlying wastes from future exposure to moisture for as long as the wastes represent a threat. There are dozens of commercial leak detectable capping systems that can be installed on the waste site units. The leak detection system would evaluate leakage rate and provide this information so corrective action can be taken immediately.

Thank you for your time and consideration.

Sincerely,

Sandra Davis

1002 Abernathy Creek Rd

Longview, WA 98632

360-577-1043

From: John Steppert [mailto:steppjs@comcast.net]  
Sent: Tuesday, March 15, 2016 11:22 AM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Reynolds cleanup

Dear Mr. Barrett, thanks so much for the time and effort you and your staff spent last week going over the Reynolds clean up details. I believe the Millennium Coal Export Facility will not be built at the Reynolds site. If the Millennium facility is not built, this piece of property could be a highly sought after site for other cleaner, more environmentally friendly industries who would be inclined to locate there if the hazardous materials were dug up and hauled off. Therefore, I think Option No. 4 is not sufficient. The hazardous material has got to go, so the community and other interested parties are convinced the site is clean and would indeed welcome industries that would be safe, environmentally compatible, and that we would be proud of.

Thanks again for all your diligence and hard work

Rev. John Steppert, Longview

From: Susi Hulbert [mailto:susih1313@yahoo.com]  
Sent: Tuesday, March 15, 2016 10:57 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Totally clean up the Reynolds site in Longview

Dear Mr Barrett,

The Reynolds site that was so irresponsibly left with a toxic mess, MUST be cleaned up. All the toxic poisons must be hauled away and put in a highly protected place, not just an area with a fence around it. We do NOT deserve to have our area ruined for a decent safe life. The people responsible for the degradation of the land should be held responsible to return it to what it was before they poisoned it. Whatever the cost is, is their responsibility. I see no reason to agree to a half- assed job because they waited and didn't do it, or that it cost too much. They made a lot of money and could have been moral in their dealings.

Very sincerely,  
Susi Hulbert

From: Dorethea Simone [mailto:light1lamp@gmail.com]  
Sent: Wednesday, March 16, 2016 8:47 AM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Clean up of site in Longveiw

To Guy Barrett:

I ask for a long term cleaning up of Longview. This place is to have an earthquake and there fore planning to go in after an earthquake is wrong and backward thinking. Remove the waste tanks to a site that is not having an earth quake!

Thank you for thinking of your GrandChildren and or Grand Nieces and Nephews and their children. Do a Level 6 clean-up, for Goodness sake!

Thank-you.

Dorethea Simone BSN  
2828 NE Everett St, 20  
Camas, WA 98607  
(541) 400-8935

From: COTHERN, SHAYNE (DNR)  
Sent: Wednesday, March 16, 2016 9:36 AM  
To: Barrett, Guy E. (ECY); ECY RE Reynolds Cleanup Comments  
Cc: O NEAL, ELIZABETH (DNR); Wilhelm, Denise (DNR)  
Subject: CAP DNR Comments

Guy,

Attached are DNR's comments regarding the CAP for the former Reynolds Aluminum Site. Should you have any questions please don't hesitate to call.

Shayne

**Shayne Cothorn**

Environmental Specialist-Sediment Quality Unit  
Washington State Department of Natural Resources (DNR)  
(360) 902-1064

[Shayne.Cothorn@dnr.wa.gov](mailto:Shayne.Cothorn@dnr.wa.gov)

[www.dnr.wa.gov](http://www.dnr.wa.gov)



March 14, 2016

Guy Barrett  
Washington Department of Ecology  
Industrial Section  
300 Desmond Dr. SE  
Lacey, WA 98504-7600

Subject: Longview Millennium/NW Alloys 2016 Cleanup Action Plan

Mr. Barrett,

Please accept this comment letter from the Washington Department of Natural Resources (DNR) regarding the Millennium/NW Alloys 2016 Cleanup Action Plan (CAP). Although DNR does not have management authority over the uplands portion of the site, DNR does manage the state-owned aquatic lands directly adjacent to the site used for the terminal and outfalls associated with the facility. These state-owned aquatic lands are managed under the terms found in aquatic lands lease 20-B09222 held by NW Alloys.

DNR understands the actions proposed in this CAP will help remediate the impacts resulting from past uses of these lands and are not related to proposals for future use of the site. The components of the CAP reflect a diligent effort on the Part of the Department of Ecology (Ecology) to ensure that contaminants on state-owned aquatic lands are remediated and that the sources of those contaminants will be addressed.

Just as DNR expressed support for the cleanup of state-owned aquatic lands under the proposed 2014 Interim Action, we support this CAP and are hopeful this project can be implemented quickly to ensure the impacts of this release are minimized. As a reminder, for the work that will be completed on state-owned aquatic lands, all permits and required DNR use authorizations must be in place prior to the commencement of work on state-owned aquatic lands.

Mr. Guy Barrett

March 14, 2016

Page 2 of 2

DNR would like to thank Ecology for its diligent efforts to remediate this site and to ensure the recovery of the state's resources. If you have any further questions regarding the use authorizations for the terminal or outfalls associated with the facility, please contact Denise Wilhelm at (360) 740-6824 or by email at [denise.wilhelm@dnr.wa.gov](mailto:denise.wilhelm@dnr.wa.gov). If you have questions regarding DNR review of sediment quality investigations, please contact me at (360) 902-1064 or by email at [shayne.cothorn@dnr.wa.gov](mailto:shayne.cothorn@dnr.wa.gov).

Sincerely,



Shayne Cothorn

Environmental Specialist, Sediment Quality Unit

Cc: Denise Placer, DNR Aquatics Land Manager

From: Dorethea Simone [mailto:light1lamp@gmail.com]  
Sent: Friday, March 18, 2016 9:33 AM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Industrial Reynold future and changing laws too later

Dear Guy Barrett:

Dept of Ecology- Industrial Section:  
Greetings.

It was mentioned, at the hearing, that if CLEAN products or job ideas come "later" for the Longview Reynolds toxic Aluminum site, your rules can be "changed later?!" That is shown to be silly, as courts are still tying your hands, right now, right?

That seems so nonsensical to me! Didn't this "later" ideas seem wrong to you, as it was said? You say yourself, that this site was never, ever, even yet cleaned-up by those whose corporation put filth and poison present there, now!

When Giant, death-bringing Corporations would rather spend their multimillions in court to allow pollution, how can you even SAY OUT LOUD that the site plans can change "Later?" Stand-up for what is right there on the Front lines!

Procrastination is too deadly today!

It is already too much later, so it clean, now, for clean jobs and products, now!!!

Shocked and intending to act, I am,

Sincerely,

Dorethea Simone BSN  
2828 NE Everett St, Unit 20  
Camas, WA 98607  
(541)-400-8935

From: McClure Tosch [mailto:tosm@yakamafish-nsn.gov]

Sent: Friday, March 18, 2016 4:01 PM

To: Barrett, Guy E. (ECY)

Cc: Schexnider, Cindy; Anderson, Ivy (ATG); mark.stiffler@alcoa.com; k.gaines@millenniumbulk.com;

Jeff Fisher - NOAA Federal; Rose Longoria; Laura Shira; Elena Ramirez; Callie Ridolfi; Paul Ward; Steve

Parker; Lee Carlson; Phil Rigdon

Subject: Yakama Nation Comments on the Draft Cleanup Action Plan for the Former Reynolds Aluminum Smelter Site

Hi Guy,

Attached are Yakama Nation's comments on the draft cleanup action plan for the former Reynolds aluminum smelter site.

Please let me know if you have any questions and we look forward to working with you on the site.

Thanks,

McClure Tosch

Remediation and Restoration Specialist

Yakama Nation Fisheries

P.O. Box 151, Toppenish, WA 98948

(509) 865-5121 x6413



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

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

March 18, 2016

**RE: Reynolds Metals Aluminum Smelter – Draft Cleanup Action Plan**

Dear Mr. Barrett:

The Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) is taking the opportunity, pursuant to the 2015 Memorandum of Understanding with the Department of Ecology (Ecology), to provide the attached comments on the Draft Cleanup Action Plan (CAP), Exhibit B of the proposed Consent Decree for the Reynolds Metals Aluminum Smelter in Longview (Site). Although the CAP appropriately states that its cleanup objectives include protection of surface water in the Columbia River, the Yakama Nation is concerned that Ecology is using the drinking water standard maximum contaminant level (MCL) for groundwater discharges of fluoride into surface water that do not protect aquatic receptors from exposure to fluoride, resulting in compensable injury to fish under § 107(f) of CERCLA and also potential prohibited take of listed species under § 9 of the Endangered Species Act (ESA).

Ecology is proposing that the groundwater cleanup level for total fluoride be set at 4 mg/L per the State Drinking Water MCL. Conditional POCs at points prior to Columbia River discharge have also been proposed for fluoride in groundwater based on an impracticability determination. See CAP at 38; WAC 173-340-720(c). However, studies have shown that certain anadromous fish species, many of which migrate and/or rear as juveniles in the Columbia adjacent to the Site, avoid surface water areas where discharges of fluoride occur at levels as low as 0.2 mg/L. Many of these fish are listed as threatened or endangered under the ESA, and are important stocks for exercise of Yakama fishing rights under the Treaty of 1855. Ecology's proposed remedy in its present configuration would not achieve final cleanup levels for fluoride in groundwater for hundreds of years, potentially leaving a zone in the Columbia inhospitable to sensitive fish for many generations. To address this problem, it will be necessary to conduct additional studies of fluoride pathways in the Site's groundwater, as well as to reevaluate the alternatives to determine how to achieve a more protective standard for aquatic receptors.

Although this may present additional challenges for Ecology at the final decision stage of this cleanup, the Yakama Nation is certainly willing to assist the agency in the process to achieve a cleanup that is protective of both human health and the environment. If you have any questions regarding this letter, please contact McClure Tosch at (509) 865-5121 ext. 6413.

Sincerely,

Paul Ward, Program Manager  
Yakama Nation Fisheries

Attachment: Technical Comments on the Reynolds Metals Aluminum Smelter Draft Cleanup  
Action Plan

cc: Ivy Anderson, Washington AAG (Transmitted Via Email)  
Mark Stiffler, Northwest Alloys, Inc. (Transmitted Via Email)  
Kristin Gaines, Millennium Bulk Terminals LLC (Transmitted Via Email)  
Jeff Fisher, National Marine Fisheries Service, (Transmitted Via Email)

## TECHNICAL COMMENTS

**DATE:** March 18, 2016

**SUBJECT:    **Technical Comments on Draft Cleanup Action Plan  
Former Reynolds Metals Aluminum Smelter Site, Longview, Washington****

This document provides Yakama Nation's comments on the Draft Cleanup Action Plan (Draft CAP) for the Former Reynolds Metals Reduction Plant (Former Reynolds Plant or Site) site in Longview, Washington prepared by the Washington State Department of Ecology (Ecology), dated January 2016. The former Reynolds Plant is a cleanup site regulated under the state of Washington Model Toxics Control Act Statute and Regulation (MTCA) by the Industrial Section of Ecology.

The Former Reynolds Plant is adjacent to the Columbia River, which has been designated critical habitat for several ESA listed species including salmon and smelt all utilize the river at this Site. Because of the important natural and cultural resources of this area, the Yakama Nation supports a thorough and complete assessment of the Site and the selection of a remedy alternative that is protective of both human and ecosystem health.

A major concern with the Draft CAP is the groundwater to surface water pathway, especially with respect to aquatic toxicity of fluoride. The Draft CAP specifies cleanup standards, conditional points of compliance (conditional POCs), and the cleanup action to be implemented at the Former Reynolds Plant. As a result of the unique hydrodynamics of this Site, groundwater movement is complex. Contaminated groundwater is interconnected with surface water through multiple pathways—groundwater diffusion and seeps released directly to the Columbia River and groundwater infiltration into the Consolidated Diking Improvement District (CDID) ditches that surround the property which are periodically discharged untreated to the Columbia River. In addition to groundwater, the CDID ditches also collected stormwater run-off and water from the onsite stormwater ditches located throughout the Former Reynolds Plant. The Conceptual Site Model (CSM) does not adequately delineate or predict the fate and transport of the contaminated groundwater plumes at the site. As a result, the remedy selection and preliminary Draft CAP design are based on an incomplete CSM that, do not:

- Identify pre-design information needs
- Provide a network of compliance and monitoring points adequate for surface water protection
- Select cleanup levels protective of aquatic life that comply with other state and federal regulations

We ask that Ecology re-evaluate the remedy selection and Draft CAP in light of the concerns presented below.

### **Fluoride Cleanup Level**

The proposed cleanup standards for fluoride in groundwater and surface water need to address the interconnected nature of water resources and the potential ecological receptors impacted at the Former Reynolds Plant. The chemical-specific Applicable or Relevant and Appropriate Requirements (ARARs) should identify water quality standards for both the protection of human health and for the protection of aquatic life (for both acute and chronic exposures) WAC-173-340-700(6)(a).

For the Draft CAP, Ecology has proposed a surface water standard based on the groundwater cleanup standard for fluoride of 4 milligrams per liter (mg/L) that is derived from the state of Washington maximum contaminant levels (MCLs) for the protection of a variety of beneficial uses of Washington's groundwater. The groundwater cleanup standards are established with drinking water in mind to be protective for human health which is frequently the beneficial use requiring the highest quality of protection. However, some of the state's groundwater support environmental systems with existing and future beneficial uses requiring more stringent protection than that provided by human health based criteria (WAC 173-200-040).

Currently, there are no state of Washington or federal surface water quality numeric criteria for fluoride. However, the WAC surface water guidelines, which are an ARAR, provide for narrative criteria for other parameters.

#### WAC-173-201A-260, Toxic substances

"(2) Toxics and aesthetics criteria. The following narrative criteria apply to all existing and designated uses for fresh and marine water: (a) Toxic, radioactive, or deleterious material concentrations must be below those which have the potential, either singularly or cumulatively, to adversely affect characteristic water uses, cause acute or chronic conditions to the most sensitive biota dependent upon these waters, or adversely affect public health (see WAC 173-201A-240, toxic substances..."

#### WAC 173-201A-240, Natural conditions

"(1) Toxic substance shall not be introduced above natural background levels in waters of the state which have the potential either singularly or cumulatively to adversely affect characteristic water uses, cause acute or chronic toxicity to the most sensitive biota dependent upon those waters..."

MTCA also includes similar language regarding toxic substances that can have an adverse effect on sensitive species in WAC 173-340-730(1)(e) and WAC 173-340-720(1)(d).

Although Ecology does not have a numeric criterion for fluoride, National Marine Fisheries Service have recommend threshold adverse effects criteria for salmon in Columba River at

concentrations as low as 0.2 mg/L in freshwater<sup>1</sup>. This threshold must be considered by Ecology when they are evaluating this CAPs compliance with the Endangered Species Act and Clean Water Act. Fluoride ions in the aquatic environment have been shown to interrupt metabolic processes, bioaccumulate, and impact reproductive processes in aquatic animals, among other symptoms of exposure. The Canadian province of British Columbia has ambient Water Quality Criteria (WQC) for total fluoride as a function of water hardness and ranges from 0.4 mg/L (hardness of 10 mg CaCO<sub>3</sub>/L) up to 1.5 mg/L as a not to exceed threshold for marine or estuarine waters used by aquatic life. This threshold was evaluated for the protection of organisms, including salmonids, specifically those species found in rivers, estuaries, and marine environments of the Pacific Northwest.

Elevated concentrations (2.64 mg/L) of fluoride in surface water were detected during the remedial investigation. This sample was collected within the CDID ditch (W4 adjacent to the Reynolds Pumping Station) and represents surface water with elevated fluoride concentrations to be discharged untreated to the Columbia River when the pump is turned on. An investigation of this pathway has not been completed and should be to understand its effects on aquatic life.

In addition to concerns about elevated concentrations of fluoride in surface water, fluoride-contaminated groundwater was identified in the Remedial Investigation and Feasibility Study (RI/FS) in both the East and West Groundwater Areas<sup>2</sup>. Within these two areas, there are locations identified in the RI/FS that are immediately adjacent to surface water (CDID ditches and the Columbia River) and are well above the proposed cleanup standard for fluoride (4 mg/L). For example, fluoride concentrations observed in nearshore or near-ditch and nearshore groundwater monitoring wells at ranges from 20 mg/L to more than 100 mg/L of fluoride.

The interconnected nature of shallow groundwater and surface water at the site should prompt a proposed groundwater cleanup level, points of compliance and compliance monitoring, and selected alternative that is based on the protection of surface water for its highest beneficial use—protection of sensitive ecological receptors, some of which are federally listed species.

### **Conceptual Site Model Concerns and Pre-Design Information Needs**

The Draft CAP should identify a cleanup action for the Former Reynolds Plant that meets appropriate cleanup levels within a reasonable time frame and it should select an alternative

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<sup>1</sup> As observed in studies of *Effects of Water-Borne Pollutants on Salmon-Passage at John Day Dam, Columbia River (1982-1984)* by David Damkaer and Douglas Dey in March of 1985 as part of a joint study supported by the U.S. Army Corps of Engineers and the National Oceanic and Atmospheric Administration.

<sup>2</sup> The Remedial Investigation and Feasibility Study, *Former Reynolds Metals Reduction Plant – Longview*, was prepared for the Washington State Department of Ecology in January 2015 and submitted by Anchor QEA.

that uses multiple remedial technologies to meet these identified needs. However, this cannot be done without a full understanding of the Site conditions.

A significant amount of information provided in the Draft CAP and RI/FS is only presented conceptually. Considering the complex site hydrodynamics, a conceptual description of groundwater flow relative to surface water, and a number of surface/subsurface features (Columbia River, several landfills, former impoundment ponds, onsite ditches/ponds, and regional levee/ditches) is not adequate to allow understanding of the fate and transport of contamination caused by the release of hazardous substances at the Site. It is not clear why the RI does not include detailed (to scale) geologic cross-sections across the entire area of investigation illustrating soil types observed at groundwater monitoring wells and piezometers; cross-sections illustrating fill versus native materials and other human constructed elements like and utility corridors, ditches, and landfills; vertical contaminant plume profiles; and other illustrations necessary to evaluate the extent, magnitude, sources, and migration pathways of contamination at the Site.

The RI/FS discusses a number of industrial landfills (Landfill #1, Landfill #2, Landfill #3, and the Black Mud Pond [BMP] Facility) that are present at the Site and that correspond with the areas identified as having groundwater contaminated with elevated levels of fluoride. These landfills are located close to or adjacent to both the Columbia River and the CDID ditches. Several have and have had wastes in contact with groundwater for decades. It is not clear why potential impacts have not been investigated off-site or closer to the river given that areas of elevated contamination are found immediately adjacent to property boundaries and downgradient of landfilled features that contain industrial wastes.

The RI/FS uses a monitoring network with limited coverage to delineate contamination and determine site hydrodynamics. We question the simplifying assumptions made about the western shoreline area with respect to groundwater – surface water interconnectedness. Based on information presented in the RI/FS, it does not appear that the groundwater plume has been adequately delineated south of the SU1 and SU2 source areas along the shoreline. The lack of well/piezometer coverage and no focused seep investigation across the site also raises concern about groundwater flow conclusions, especially in this area. The assumption that groundwater in the vicinity (RLSW-4 and G-6S) is perched and therefore disconnected from the Columbia River is questionable. There are limited RI/FS data provided on groundwater elevations over time; however, RI/FS Figure 4-2 does not support this assumption. The CSM presented in RI/FS Figure D-6-3 incorrectly depicts screen elevations. Lastly, there is not conclusive data (seep investigation, piezometer installations, and comprehensive well coverage) to confirm that groundwater and contamination from this area is not reaching Columbia River. It is essential that Ecology re-evaluate the groundwater surface water pathway with a more critical analysis.

### **Points of Compliance and Contingency Plan**

The Draft CAP identifies groundwater and surface water Points of Compliance (POC) for the proposed cleanup actions. For surface water, groundwater is the contaminated medium of concern and the Draft CAP identifies the CDID ditches and the Columbia River as the receiving surface waters of the state. The cleanup levels for fluoride in groundwater do not appear to meet compliance requirements before reaching surface water. If a conditional POC is used for surface water, that POC should be in upland wells or at the interface between groundwater and surface water, not off shore or at the end of a pier after dilution. That interface is the hyporheic zone and sediment porewater is typically the most representative sample medium before substantial mixing and attenuation of contamination has occurred. This is important for the protection of all aquatic life that rely on the hyporheic zone and appears to be required under WAC 173-340-700(6)(b). In addition, any discharges from the CDID ditches to the Columbia River should also meet the required surface water cleanup levels prior to discharge. Monitoring requirements should be structured to confirm that contaminants are not leaving the Site at levels that may cause injury to organisms in the adjacent Columbia River.

Furthermore, the Draft CAP monitoring plan only requires sampling of surface water as part of the Contingency Plan, and only in the unlikely event that groundwater concentrations increase at the conditional POCs. Therefore, the groundwater fluoride contaminant plume will likely continue to bleed into surface water for 100s to 1,000s of years, completely unchecked. If for some reason groundwater conditions worsen and exceed the "remediation level" conditions, then surface water samples will be required. These diluted surface water samples will mask effects of contaminated site groundwater inputs and do not provide for a meaningful surface water point of compliance or Contingency Plan. The Contingency Plan and Compliance Monitoring Plan should be re-evaluated to include additional nearshore upland or porewater sampling, regardless of contaminant trends, to ensure that groundwater to surface water contaminant contributions do not affect aquatic life. Monitoring should continue until such time that aquatic toxicity criteria are consistently met at nearshore upland groundwater conditional POCs.

Additionally, the Draft CAP proposes a conditional POC for groundwater located within the contaminant plumes and inside the property boundary. Additional POCs are needed along the shoreline to confirm that impacted groundwater is not affecting surface water and the aquatic life that rely on the hyporheic zone of the Columbia River.

### **Ambient Surface Water Contaminant Concentrations**

With respect to ambient or background surface water concentrations, these stations should represent surface water not affected by the site. Ambient sampling should not occur within ditches into which impacted site groundwater infiltrate or co-located with a site outfall, as selected in the Draft CAP (Table 6). These proposed locations and data sets should not be used to calculate ambient contaminant concentrations. Appropriate ambient station locations should

be re-evaluated and considered in the selection of cleanup levels (WAC 173-340-700(6)(d) & 173-340-709(2))

## **Summary**

The Former Reynolds Plant, adjacent to the Columbia River, needs additional evaluation of the extent of fluoride contamination and a more thorough evaluation of the site hydrodynamics to evaluate the potential for contaminants to migrate off-site and to susceptible receptors within surface water bodies adjacent to the Site. The primary habitat concern to the Yakama Nation is the Columbia River as this river is a major corridor for significant ecological resources. Yakama Nation supports a thorough and complete assessment of the Site conditions, and the selection and implementation of a cleanup remedy that is protective of both human and ecosystem health within a reasonable time frame.

There are a number of concerns for the proposed groundwater cleanup action that need to be addressed and re-evaluated in the Draft CAP:

- Current contaminant maps indicate that fluoride plumes are unbounded (aerial extent has not been determined).
- Vertical contaminant plume maps are inadequate; they do not show manmade features, the extent of groundwater contamination, fill versus native materials, or hydrogeological controls.
- The assumptions about perched, isolated nearshore groundwater contamination in the western property area are questionable.
- Permeable Reactive Barriers (PRBs) are placed in only two limited areas. There is no demonstration that this is adequate lateral/vertical "treatment" of groundwater.
- The lifespan of the PRBs may not be adequate for the restoration time frame.
- The restoration time frame is not reasonable; as presented in the Draft CAP it is hundreds (if not thousands) of years. The proposed groundwater cleanup action should clean up groundwater within a reasonable time frame.
- Groundwater and surface water cleanup levels for fluoride are not protective of aquatic receptors and do not appear to comply with ARARs like the Clean Water Act and Endangered Species Act.
- The current ambient or background data is within the vicinity of the site and is likely impacted by site contamination. New data should be collected outside of the potential influence of this site and be considered in the cleanup level selection process.
- The Compliance Monitoring Plan and Contingency Plan do not adequately evaluate groundwater to surface impacts. Additional investigation is needed along the Columbia River shoreline that will affect the selection of points of compliance.

- Surface Water cleanup levels that protect aquatic life should be met before groundwater has entered the Columbia River.
- Contaminated groundwater will continue to enter surface water even after the implementation of the proposed groundwater cleanup action.

The draft CAP will not meet the minimum requirements for a MTCA cleanup (WAC 173-340-360(2) and (173-240-260(3)). For example, the draft CAP does not: protect the environment; comply with state and federal ARARs; comply with monitoring requirements of MTCA; achieve groundwater cleanup in reasonable timeframe.

From: Marion Ward [mailto:mjward333@q.com]  
Sent: Friday, March 18, 2016 8:09 PM  
To: ECY RE Reynolds Cleanup Comments  
Subject: Comments on former Reynolds Aluminum Cleanup in Longview

Dear Mr. Barrett:

The property where Reynolds Aluminum was formerly located in Longview, WA is heavily contaminated and none of the contaminated land areas were ever lined. Alternative Plan #4 removes very little of the hazardous waste offsite. Once contaminated, always contaminated.

Please require a reactive barrier in the northeast corner of the property above Site Unit #7 to prevent flow of groundwater through toxic wastes that could eventually end up in the Columbia River. Financial guarantees need to be made in perpetuity, thereby requiring a dedicated trust be set up to monitor groundwater and soils. And, a leak detection system into the covers of remaining site units needs to be incorporated.

Thank you for your consideration of this request.

Marion Ward  
Portland, Oregon