



July 9, 2018

Jennifer Dart, Community Development Deputy Director
City of Arcata
[736 F Street, Arcata, CA 95521](http://www.cityofarcata.org/736-F-Street-Arcata-CA-95521)

Re: Proposed Work Plan for Little Lake Industries Arcata Mill Site, 46 South I Street

Dear Ms. Dart,

Thank you for holding the informative June 26 discussion and inviting further comments on the Site Conditions Report and Data Gaps Investigation Work Plan for the Little Lake Industries Arcata mill site proposed by SHN.

Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance. Dioxin contamination from former mill sites related to the use of the wood preservative pentachlorophenol has been one of our top priorities for protecting human health and the environment since our organization's inception in 2004. In 2006, we successfully advocated for formal listing of Humboldt Bay as Impaired by dioxins and furans under Section 303(d) of the Clean Water Act.

We strongly support the City of Arcata's work toward characterizing dioxin and pentachlorophenol (PCP) contamination at the Little Lake Industries site, and we appreciate the opportunity to review and comment on the proposed investigation. Contamination at this site has been a concern for many years due to its proximity to Humboldt Bay and Butchers Slough/Jolly Giant Creek, which was re-aligned through the former mill site in 1988. In 2009, several mill buildings were demolished and removed without a Coastal Development Permit, so we did not have the opportunity to review and comment on the project at that time. We only recently became aware of the dioxins and PCP that were detected in the site's soil and groundwater in 2004.

The proposed Data Gaps Investigation Work Plan is an important step toward identifying the extent of contamination at the site, but we have several recommendations based on our review of historical documents in the City's files.

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Recommendation #1: At least three sediment samples from Butchers Slough should be sampled for dioxins and furans to determine whether these contaminants documented downstream are likely to have originated from the subject property or from another former mill site. Sediment samples should be collected adjacent to the parcel near one of the discharge ditches on the east side of the property, as well as immediately downstream and upstream of the property.

In 2015, a major dioxin hotspot was identified in Humboldt Bay sediments near the mouth of Butchers Slough, also known as Jolly Giant Creek, just downstream from Little Lake Industries.ⁱ Subsequent review of relevant documents implicate historic mill operations at the site, but also suggest another potential source of contamination. In 2002, sediments were dredged from the slough channel and stockpiled on the site. Historic lumber mills both upstream and downstream are likely to have used PCP, so sampling the slough sediments may help identify the sources of contamination in Humboldt Bay near the mouth of Butchers Slough.

Recommendation #2: Groundwater at WP-04 should be analyzed for pentachlorophenol and dioxins due to the proximity to the condensate ditch associated with the kiln and boiler buildings. The 2002 Phase I Assessmentⁱⁱ for the site describes the collection of condensate and other liquids from the kiln, which was then pumped into the boiler. The boiler was reportedly drained of blowdown water three times a day according to operating instructions for the equipment (pages 32-33).ⁱⁱ The water was drained to Jolly Giant Creek in the early days of operation, and later was reportedly drained to the sanitary sewer, although no records indicate that a sanitary sewer hookup ever existed at the site (page 33).ⁱⁱ

According to a City of Arcata document summarizing past work on the site,ⁱⁱⁱ the kiln bricks, interior framing lumber, and interior metal roof framing were coated with Texas Refinery Corporation vapor barrier kiln sealant (TRC 3185). When this material was analyzed for PCP and dioxins in 2007, the levels were found to be extremely high (PCP at 33 mg/kg, and 2,3,7,8-TCDD at TEQ 1,500 to 172,000 pg/g).^{iv} Since the condensate from the kiln was used in the boiler, the areas around the boiler building and condensate ditch have the potential for pentachlorophenol and dioxin contamination of groundwater (see photos 15 and 21 in Figure A-1).

Recommendation #3: The 2002 Phase I Assessmentⁱⁱ recommends PCB sampling in the vicinity of the remanufacturing complex, which was destroyed by fire in 1973, and near the drying kiln building, both of which are thought to have contained transformers (pages 5-6). It is unclear from our review of the numerous documents related to the site whether PCB testing was ever done.

Please do not hesitate to contact me if you have any questions or need more information about our recommendations. We appreciate the opportunity to comment and we look forward to working with you in the future.

Sincerely,

____s/_____
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Cc: Keith Baldanza, North Coast Regional Water Quality Control Board
Erik Nielson and Anna Gower, SHN Consulting Engineers and Geologists

ⁱ Beneficial Reuse of Dredged Materials for Tidal Marsh Restoration and Sea Level Rise Adaptation in Humboldt Bay, California Feasibility Study. 2015. Prepared for the Humboldt Bay Harbor, Recreation, and Conservation District by SHN Consulting Engineers and Geologists, Inc. Eureka, CA.

ⁱⁱ Phase I Targeted Brownfields Assessment, South I Street Mill Reuse Project, Arcata, California. 2002. Prepared for the U.S. EPA by Innovative Technical Solutions, Inc. Walnut Creek, CA.

ⁱⁱⁱ Little Lakes Industrial Kiln Demolition Project. 2009. City of Arcata Redevelopment Agency. Arcata, CA.

^{iv} Lab report, July 30, 2007. Prepared for the City of Arcata by STL Sacramento. West Sacramento, CA.