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RE: The Port of Longview's Comments on the Draft Clean-up Action Plan / International Paper Longview
Facility ID# 1080
Cleanup Site ID# 3685
10 International Way, Longview, WA 98632

Ms. Graber and Ms. Peterson:

The Port of Longview (Port) submits the following comments regarding the Draft Cleanup Action plan (dCAP) prepared by the Department of Ecology and the State Environmental Policy Act (SEPA) checklist prepared by AECOM and submitted by International Paper Company (IP). The Port appreciates Ecology's incorporation of public comments made by the public and the Port during the public review of the Remedial Investigation/Feasibility Study in 2017.

The Port generally concurs with the dCAP, but again comments that the remediation utilize in-situ soil stabilization (ISS) methods only for nonaqueous phase liquid (NAPL) impacted soils. The Port asserts that ISS is inappropriate for soils that exceed cleanup levels that are not impacted by NAPL. By using ISS method on all contaminated soil exceeding cleanup levels, there will be a greater volume of ISS materials and residual contamination in the Maintenance Facility Area (MFA) than necessary. This will result in a larger area and volume of ISS material covered under a restrictive environmental covenant, and will potentially impact future port operations and result in future costs for managing these extra ISS materials.

If the dCAP retains the unnecessary use of ISS for soils not impacted by NAPL, the Port will require an agreement to recover costs when development occurs outside of Zones 1 and 2 within the MFA to reimburse the Port, and Cowlitz

County citizens, for the future costs of managing extra ISS materials. The Port should not have to incur costs associated with contamination IP leaves behind in the form of ISS materials created unnecessarily.

The dCAP outlines generally the schedule of implementation for both soil and groundwater cleanup. IP will need an access agreement with the Port and Ecology to implement the cleanup on Port property. Access to Port property is regulated by federal law and governed by Port procedures. Port personnel must be directly involved in scheduling, security clearing, and escorting Ecology, IP and contractor personnel whenever they come onto Port property. Furthermore, any pilot test and soil and groundwater cleanup implementation will have significant impacts on Port operations. These impacts include, but are not limited to, the following:

- Temporarily relocating the Port's mechanic shop which services the Port's fleet of vehicles and equipment, the washbay for cleaning cargo equipment, our fuel truck and fuel transfer area, and an above ground propane tank;
- Impacts to an adjacent steel tenant's operation, which includes disruption of rail service, road access, and labor relations;
- Impacts to neighboring businesses that utilize the Port's rail system and roadway system adjacent to the cleanup area;
- Impacts to ingress and egress through Gate 4 which is utilized heavily in daily operations and for emergency egress;
- Revisions to the Port's Facility Security Plan (FSP) as the retaining wall, fencing, and Gate 4 are a portion of the northern boundary of our secured facility. The fence line will have to be relocated to accommodate the cleanup action. The FSP is a requirement of MARSEC (Maritime Security) administered by the US Coast Guard which must approve all revisions to the FSP.
- Impacts to the Port's rail infrastructure, track 590 and 593, which are integral to not only servicing our steel tenant neighbors, but for all Port operations. Blocking of these tracks will impact Port daily operations as well as Longview Switchings' ability to move and store rail assets at the Port.
- Impacts to the haul road, which provides circulation for Port employees, neighboring tenants, ability to move non-licensed equipment through the Port, and inspection of rail cars located on the adjoining trackage.
- Impacts to stormwater conveyance and sampling locations. The implementation will be conducted in an area that the Port samples stormwater for their Industrial Stormwater General Permit. This sample point will need to be relocated, which is a process that includes notification to and approval by the Department of Ecology.

Such costs incurred by the Port, as outlined above, should be IP project costs and not borne by the Port. Ecology and IP will have to work closely with the Port on implementation logistics to ensure all impacts are mitigated and that any costs are either paid by IP or reimbursed to the Port.

The Port understands that IP's implementation of the cleanup action will require a legal mechanism such as an Agreed Order or Consent Decree, and that the Port may be required to be a party to that agreement. The Port will need to evaluate what type of agreement will be the most protective of the Port. The Port encourages Ecology and IP to allow enough time in their process for all parties to come to a mutual agreement on the form of the implementation instrument. Further, this instrument will need full support and approval of the Port Commission.

Regards,



Dan Stahl
Chief Executive Officer