



Response to Comments

**Draft Cleanup Action Plan, Agreed Order
Amendment, and State Environmental
Policy Act (SEPA) Determination**

**Chlor-Alkali Area of the
Georgia-Pacific West Cleanup Site
Bellingham, WA**

Toxics Cleanup Program

Washington State Department of Ecology

Northwest Regional Office

Shoreline, Washington

August 2021



Publication Information

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<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=2279>

Cover photo credit

- Chlor-Alkali Area of the Georgia-Pacific West site facing southwest, May 2021 (Ecology)

Related Information

- Clean-up site ID: 2279
- Facility site ID: 14

Contact Information

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¹ www.ecology.wa.gov/contact

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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DEPARTMENT OF
ECOLOGY
State of Washington

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Public Outreach Summary

The Chlor-Alkali Area of the Georgia-Pacific West cleanup site (Site) located on the Bellingham waterfront is continuing Washington State's [formal cleanup process](#)² as directed under the Model Toxics Control Act ([MTCA](#)³). The Port of Bellingham (Port) is addressing contamination at the Site under a legal agreement with Ecology.

The Department of Ecology's public involvement activities related to this Site's 30-day comment period (July 6 – August 4, 2021) included:

- **Postcard and Fact Sheet:**
 - US mail distribution of a postcard providing information about the cleanup documents, the public comment period, public meeting, and virtual tour to approximately 4,800 addresses including neighboring businesses and other interested parties.
 - Email distribution of the postcard and a fact sheet to 230 people, including interested individuals, local/county/state/federal agencies, neighborhood associations, and interested community groups.
 - The postcard and fact sheet were available digitally through Ecology's [cleanup site webpage](#)⁴.
- **Legal Notices:**
 - Publication of one paid display ad in *The Bellingham Herald*, dated Friday, July 2, 2021.
- **Site Register:**
 - Publication of 4 notices in Ecology's Toxics Cleanup Site Register:
 - Comment Period Notice:
 - July 1, 2021
 - July 15, 2021
 - July 29, 2021
 - Response Summary Notice:
 - September 9, 2021
 - Visit [Ecology's Site Register website](#)⁵ to download PDFs.
- **Media Notification:**
 - Ecology sent a media notice on Thursday, July 1, to *The Bellingham Herald*, *Cascadia Weekly*, Western Washington University's *The Planet*, [Northwest Citizen news website](#)⁶, [Whatcom News website](#)⁷, and KGMI 790 AM radio station.

² <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

³ <https://ecology.wa.gov/mtca>

⁴ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=2279>

⁵ <https://fortress.wa.gov/ecy/publications/UIPages/PublicationList.aspx?IndexTypeName=Program&NameValue=Toxics+Cleanup&DocumentTypeName=Newsletter>

⁶ <https://nwcitizen.com/>

⁷ <https://whatcom-news.com/>

- **Media Coverage:**
 - KGMI 790 AM radio [interviewed Ian Fawley](#)⁸, Outreach Specialist, about the Georgia-Pacific West cleanup and public comment period on July 7, 2021.
- **Social Media:**
 - **Twitter:** Ecology – Northwest Region @ecyseattle posted a [tweet](#)⁹ on Thursday, July 1, 2021 connecting readers to the comment period including the cleanup site webpage, the online public meeting, a virtual tour, and how to submit comments.
 - **Blog:** On Friday, July 2, 2021, Ecology’s Northwest Regional Office posted a Chlor-Alkali Area cleanup plan story on [Ecology’s blog](#)¹⁰, which has approximately 1,200 email subscribers.
- **Online Public Meeting**
 - Ecology hosted an online meeting Wednesday, July 14, 2021 at 6:30 p.m. Ecology and Port staff presented details on the draft Cleanup Action Plan and answered questions about the Site.
- **Virtual Tour**
 - Ecology collaborated with RE Sources, an Ecology Public Participation Grant recipient, on a [virtual tour](#)¹¹ hosted on RE Sources’ website. The virtual tour featured seven informational YouTube videos linked to a Google Map centered on the cleanup site.
- **Websites:**
 - Ecology announced the public comment period and public meeting, posted the fact sheet and postcard, and made the review documents available on [Ecology’s Georgia-Pacific West webpage](#)¹² and Ecology’s [Public Inputs & Events webpage](#)¹³.
- **Document Repositories:**
 - In consideration of public health and safety, Ecology could offer only coordinated in-person review options during the 30-day comment period. Outreach materials and websites directed the public to contact Ian Fawley, Outreach Specialist, for document review assistance.

Comment Summary

From July 6 – August 4, 2021, Ecology solicited public comments on a draft Cleanup Action Plan, Agreed Order Amendment (legal agreement), and a State Environmental Policy Act (SEPA) Determination for the Chlor-Alkali Area of the Georgia-Pacific West cleanup site.

⁸ <https://kgmi.com/podcasts/ian-fawley-waterfront-clean-up-plan/>

⁹ <https://twitter.com/ecyseattle/status/1410628359181066242>

¹⁰ <https://ecology.wa.gov/Blog/Posts/July-2021/Cleaning-up-On-Bellingham%E2%80%99s-waterfront,-a-cleanup>

¹¹ <https://www.re-sources.org/2021/07/gp-west/>

¹² <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=2279>

¹³ <https://10ecology.wa.gov/Events/Search/Listing>

Ecology received three comment during the 30-day comment period.

Table 1: List of Commenters

	First Name	Last Name	Agency/Organization/Business	Submitted By
1	Anthony	Keys		Individual
2	Eleanor	Hines	RE Sources	Organization
3	Shane	DeGross	BNSF Railway Co.	Business

Next Steps

Ecology has reviewed and considered the public comments received on the draft Cleanup Action Plan, Agreed Order Amendment, and SEPA Determination. Based on Ecology’s evaluation of the comments, no changes were necessary in the documents, and they are being finalized.

Work will begin on the engineering design of the cleanup action (construction). See graphic below and visit Ecology’s [cleanup process webpage](#)¹⁴ to learn more about Washington’s formal cleanup process.

Implementation of the cleanup action will occur under a future separate legal agreement, which will be issued for public review and comment.

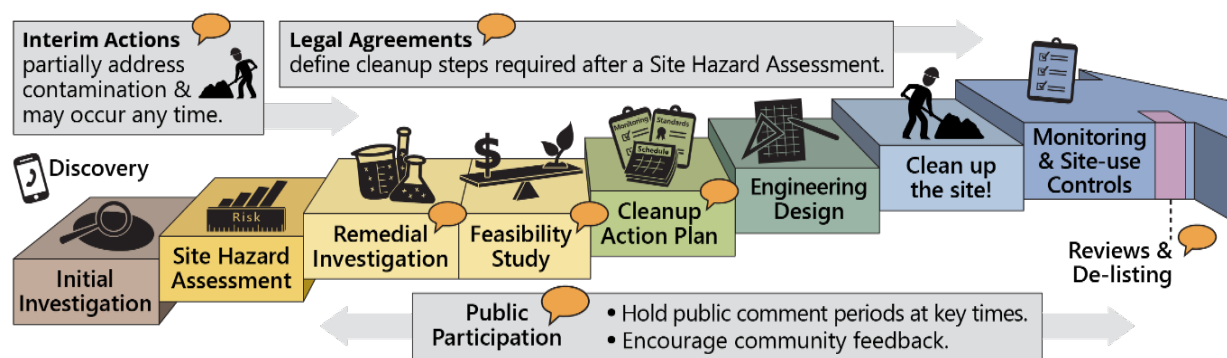


Figure 1: Washington's formal cleanup process ([download a text explanation](#)¹⁵)

¹⁴ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

¹⁵ <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

Comments and Responses

The public comments are presented below, along with Ecology's responses. Appendix A, page 14, contains the comments in their original format.

Comment from: Anthony Keys

I purchased a condo on railroad ave 15 years ago and I was told that the GP area was to be cleaned up. Why has it taken so long?

What are the large mounds of dirt in the center of the area, and why haven't they been disposed of in a timely fashion.

Why has the Harcourt condo complex been delayed or halted? Shouldn't they be held to a timeline?

Some areas are to be sealed. Won't the arsenic or cyanide eventually leak out of those areas to be sealed.

To reiterate. Why is everything taking so long?

Response:

The Chlor-Alkali cleanup unit is a complex cleanup site. It took years to plan for, collect, and analyze environmental data (the Remedial Investigation) in order to adequately characterize the nature and extent of contamination at the site. All of that information and data were then evaluated as part of the Feasibility Study in which eight different cleanup options were developed and then evaluated. Our cleanups are required to be permanent to the maximum extent practicable and this process, unfortunately, takes a long time.

The large piles of dirt that are visible to the south of W. Laurel Street are associated with Harcourt's condominium development project. This project is located on the Pulp & Tissue Mill unit. The Pulp & Tissue Mill cleanup was completed in 2016. This is a private development and not related to the Chlor-Alkali cleanup. The City of Bellingham issues permits for private development projects and should be contacted for information about the project's schedule.

The cap will be designed and constructed to meet the required performance standards. The cap will isolate contamination and prevent exposure to humans and the environment. Long-term monitoring and built-in contingencies will ensure that the cap is protective of human health and the environment.

Comment from: RE Sources (Eleanor Hines)

August 4, 2021

RE: GP West Chlor Alkali Draft Cleanup Action Plan and Associated Documents

Dear John Guenther,

Thank you for taking the time to consider our comment on the Georgia Pacific Chlor Alkali Area draft Cleanup Action Plan (dCAP), Agreed Order (AO) Amendment, and SEPA Determination and Checklist.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

We appreciate the work that has gone into designing this dCAP for a very complex site. We are very excited to see this area of the waterfront move along in the cleanup process so that one day it can be used by the public as well as commercial and industrial uses. The phased cleanup approach to this complex site makes a lot of sense.

We are pleased to see the neutralization of groundwater in the caustic core being addressed and hope that there is some flexibility if the plan does not neutralize the groundwater pH as intended. If the cleanup plan needs to be substantially changed because the neutralization treatment does not work as intended, please consider another public comment period or otherwise keeping the public informed of any changes. Keeping mercury less mobile is important for human and environmental health and safety.

We also have general concerns about sea level rise and the high seismic hazard of the area. We understand that these factors are taken into account, but with recent events like the extreme heatwave in June 2021 and the 8.2 magnitude earthquake off the coast of Alaska on July 28, 2021, we are reminded of how vulnerable we are to seismic activity and the impacts of climate change that may mean things like sea level rise are higher than the current estimated projections used for this cleanup. We would like to ensure that the most up to date data is being used to ensure a truly lasting protective cleanup despite what environmental hazards may come.

This plan sets the expectation that it will take 34 years for the monitored natural attenuation (MNA) for groundwater to reach safe levels. This is a very long time. We would like to see a plan

in place to ensure that the groundwater MNA can continue to occur and receive the necessary resources to see this cleanup action through to the end.

Our other concerns pertain to institutional controls, cleanup activities, and ensuring that this cleanup is well integrated into the plans for the Whatcom Waterway cleanup. These are addressed in the documents for review, but we would like to emphasize the importance of institutional controls ensuring that the cleanup is permanent and will not become an issue again in the future. During cleanup activities, we also feel it is very important to ensure that workers, the surrounding environment and biota, and public are ensured their health and safety from contaminants. We also want to emphasize the importance of ensuring that Whatcom Waterway is protected from potential recontamination from this site and the plans for the cleanup of the Whatcom Waterway is compatible with this cleanup action.

Thank-you for reading our letter and giving our concerns consideration. We value this public comment process and believe that it strengthens community engagement and involvement in the cleanup of Bellingham Bay.

Sincerely,

Eleanor Hines
Northsound Baykeeper, Lead Scientist
RE Sources

Response:

If the current cleanup plan needs to substantively change for any reason, a new or amended cleanup plan will be issued for public review.

We will use best available science when considering sea level rise and seismic hazards during engineering design of the cleanup.

The estimated 34 year restoration time-frame for groundwater monitored natural attenuation (MNA) is a long time. It is worth noting that that estimate is for attenuation of the petroleum hydrocarbon naphthalene reaching its cleanup level everywhere within the unit (i.e., a standard point of compliance under MTCA), and the cleanup level is based on contaminated vapors potentially entering future structures if built over the plume. The naphthalene plume remains a few hundred feet from the Whatcom Waterway Log Pond shoreline and it is contracting over time (attenuating naturally); as such, it is not expected to pose any risk to the marine environment while the attenuation is occurring. Long-term groundwater monitoring will be conducted as part of compliance monitoring to ensure ongoing compliance with groundwater cleanup standards.

All the Bellingham Bay cleanup sites are closely coordinated to ensure comprehensive protection of human health and the environment. Compliance monitoring and institutional

controls must be site-specific from Ecology's perspective. However, they can be coordinated between the PLPs for efficiency.

The implementation of BMPs, and compliance with state and federal worker safety laws, will ensure the health and safety of workers, the surrounding environment and biota, and the public during cleanup construction. The Port successfully implemented such BMPs—including rigorous control of air emissions—during the prior two interim actions involving removal of soils heavily contaminated with mercury, and the lessons learned from those activities can be applied in the future cleanup.

Preventing the recontamination of a cleaned up site is a high priority for Ecology and the PLPs. Therefore, long-term compliance monitoring will be a key component for cleanup of the Chlor-Alkali unit.

Comment from: BNSF Railway Co. (Shane DeGross)

Shane C. DeGross
Manager Environmental
Remediation

BNSF Railway Company
605 Puyallup Avenue
Tacoma, WA 98421

Phone: (253) 591-2567
E-mail: Shane.DeGross@bnsf.com

August 4, 2021

Mr. John Guenther, Site Manager
Washington Department of Ecology
913 Squalicum Way, unit 101
Bellingham, Washington 98225

Re: BNSF Railway Company Comments on Georgia Pacific West Chlor-Alkali Area: Draft Cleanup Action Plan and Associated Documents

Mr. Guenther,

BNSF Railway Company (BNSF) has reviewed the Draft Cleanup Action Plan (dCAP) for the Georgia Pacific West Chlor-Alkali Area. BNSF, an adjacent landowner, is concerned about the lack of information in the plan for the management of stormwater. Recent work on the Georgia Pacific site have resulted in increased stormwater pooling and ponding at the facility impacting the adjacent BNSF right-of-way. Without additional information regarding management of stormwater, the proposed hard cap option for the Lignin Warehouse B area (to prevent

stormwater infiltration) may exacerbate this problem. From the available documents, BNSF is not able to determine the impact the proposed dCAP will have on stormwater from the facility.

We appreciate the opportunity to comment here and hope to see additional information about how stormwater from this facility is being managed.

Sincerely,

Shane C. DeGross
Manager of Environmental Remediation

cc:

Calvin Nutt, BNSF Railway co.
Brooke Kuhl, BNSF Railway Co.

Response:

As part of the cleanup next steps the Port will prepare an Engineering Design Report which will include a more detailed project design including capping materials, grades and general stormwater management. During the cleanup, stormwater will be managed in accordance with the cleanup project's construction stormwater permit. Post-cleanup stormwater infrastructure will be constructed to City of Bellingham and Ecology stormwater management standards.

Appendices

Appendix A. Public comments in original format

anthony keys

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RE Sources

August 4, 2021

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Eleanor Hines
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Shane C. DeGross
Manager Environmental
Remediation

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Sincerely,

A handwritten signature in blue ink that reads "Shane C. DeGross".

Shane C. DeGross
Manager of Environmental Remediation

cc:

Calvin Nutt, BNSF Railway Co.
Brooke Kuhl, BNSF Railway Co.