

# RG Haley Site



RG Haley Site on Bellingham waterfront, October 2017

## Comments accepted

January 31 – March 1, 2022

## Submit comments

### Online at:

[www.bit.ly/Ecology-RGHaley-Comments](http://www.bit.ly/Ecology-RGHaley-Comments)

### Or by mail to:

Lucy McInerney, Site Manager  
 WA Department of Ecology  
 PO Box 330316  
 Shoreline, WA 98133-9716  
 206-594-0123  
[Lucy.McInerney@ecy.wa.gov](mailto:Lucy.McInerney@ecy.wa.gov)

## Document review locations

[www.bit.ly/Ecology-RGHaley](http://www.bit.ly/Ecology-RGHaley)

For document review assistance, please contact:

### Ian Fawley

Outreach Specialist  
[Ian.Fawley@ecy.wa.gov](mailto:Ian.Fawley@ecy.wa.gov)  
 425-324-5901

## Site info

Facility Site ID: 2870  
 Site Cleanup ID: 3928

## Engineering design report ready for public review

The Department of Ecology (Ecology) invites you to review the engineering design report for the RG Haley cleanup site (Site) on the Bellingham waterfront. The report represents 30% completion of design work and provides details, refining the cleanup action selected by Ecology in 2018.

Through a legal agreement with Ecology, the City of Bellingham (City) completed a pre-design investigation then prepared the engineering design report. Following public review, the City will use the report to develop construction plans and specifications.

A future legal agreement will require the City to implement the construction plans and specifications.

## On-site walking tour

RE Sources will host a walking tour of the Site. Ecology and City staff will join to share about the cleanup action design details and answer questions.



**Tuesday, February 8, 2022**

**Noon – 1:30 p.m.**

Meet at the end of Cornwall Ave by the pocket beach (Bellingham, WA)

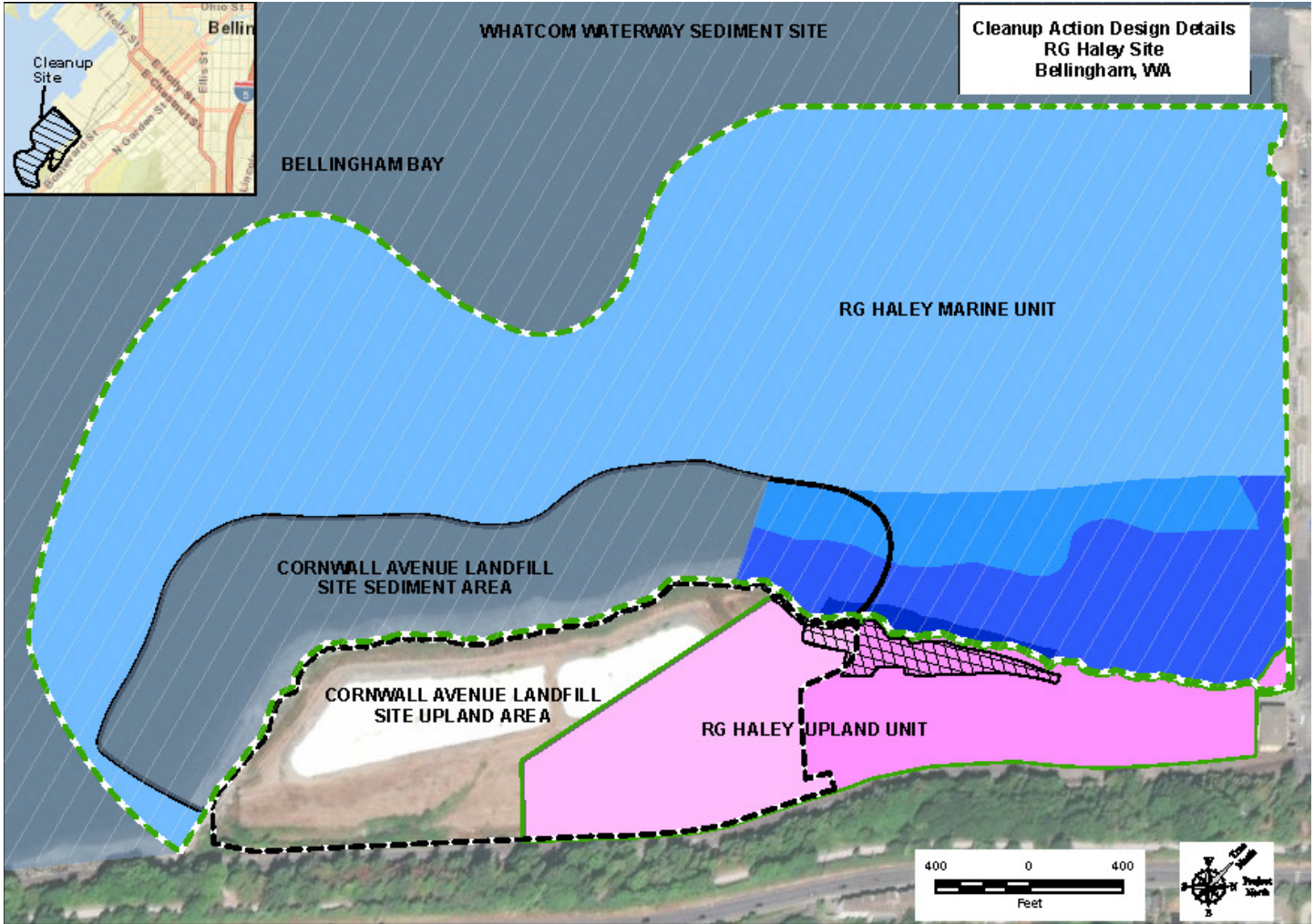
[www.re-sources.org/RGHaley](http://www.re-sources.org/RGHaley)

This tour is funded through a Public Participation Grant from Ecology.




## En español

El Departamento de Ecología le invita a comentar sobre un reporte ambiental para el sitio que está contaminado RG Haley en Bellingham.





Si le gustaría recibir este documento en español, por favor llame a 425-324-5901 y espere a que un intérprete se una a la llamada o envíe un correo electrónico a [preguntas@ecy.wa.gov](mailto:preguntas@ecy.wa.gov). Traducciones de avisos públicos para los sitios de limpieza de la Bahía de Bellingham se preparan bajo solicitud.








**UPLAND UNIT**

-  RG Haley Low-Permeability Capping System - Soil, Plastic liner, and drainage/gas collection layers; 2-foot thick
-  Combined RG Haley/Cornwall Low-Permeability Capping System - Soil, Plastic liner, and drainage/gas collection layers; 4-foot thick
-  Soil Solidification

**MARINE UNIT**

-  Sediment Relocation and Amended Cap - Amended sand and rock armoring; 5-feet thick
-  Amended Cap - Amended sand and rock armoring; 2 to 5-feet thick
-  Thin Layer Cap - Sand; 1-foot thick
-  Monitor Naturally Recovering Sediment

**OVERLAPPING CLEANUP SITES**

-  RG Haley Upland Unit Boundary
-  RG Haley Marine Unit Boundary
-  Cornwall Landfill Site Upland Area Boundary
-  Cornwall Landfill Site Sediment Area Boundary
-  Whatcom Waterway Sediment Site





Kayakers on Bellingham Bay cleanup sites tour with the RG Haley site upland unit in background and marine unit in foreground, June 2019

### Cleanup action design details

Based on a pre-design investigation, the engineering design report (representing 30% completion of the design work) provides details that refine the cleanup action selected by Ecology in 2018. The cleanup action design details include the following (see also figure on page 2):

#### Upland Unit (on land)

- **Soil solidification:** An area of approximately 0.75 acres of contaminated soil along the shoreline will be treated by solidification resulting in approximately 13,400 cubic yards of solidified soil.
- **Low-permeability capping system:** An area of approximately 9 acres of contaminated soil will be capped with clean soil and a plastic liner, including areas that overlap with the adjacent Cornwall Avenue Landfill site. The cap also includes a drainage layer to manage stormwater runoff and a gas collection layer to capture and safely vent subsurface vapors.

Solidification and capping will isolate the contaminated soil and reduce the amount of rainwater flowing through the contaminated soil.

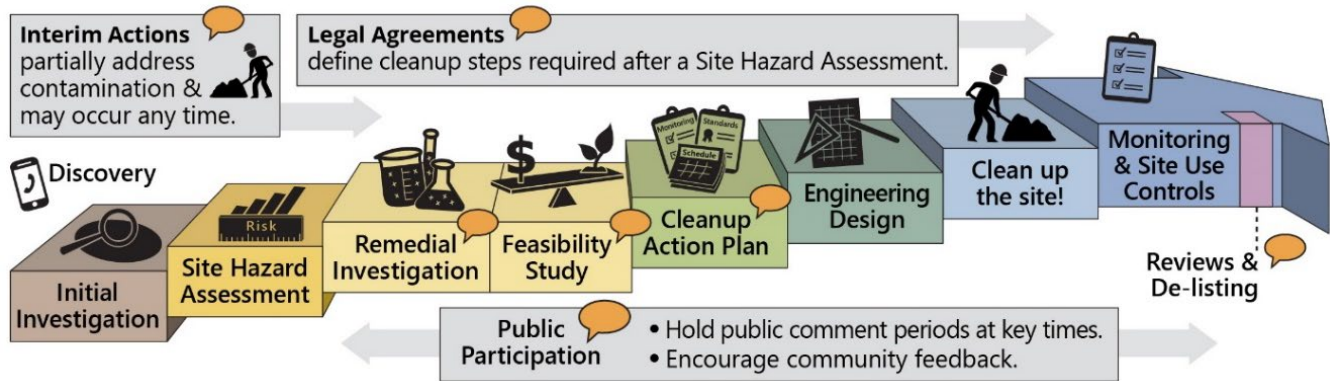
#### Marine Unit (in-water sediment)

- **Sediment relocation:** Approximately 2,300 cubic yards of contaminated sediment require excavation and relocation to beneath the upland low-permeability capping system.
- **Capping:** Approximately 9.5 acres will receive an engineered clean sand cap to isolate contaminated sediment. In areas where groundwater flows through subsurface contaminated sediment, the sand cap will be amended with clay or activated carbon to treat groundwater.
- **Natural recovery:** Approximately 50 acres of contaminated sediment is recovering due to natural deposition of sediment. This area will be monitored to ensure contaminant levels continue to decline.

### Cost and funding

Completion of the engineering design work is expected to cost about \$1.5 million. Future construction work is expected to cost about \$21 million.

The City is eligible for reimbursement of up to half of their costs from Ecology through the state’s remedial action grant program. This funding helps to pay to clean up publicly owned sites. The Legislature funds the grant program with revenues from a tax on hazardous substances.



Washington's formal cleanup process

### What process led to the engineering design report?

The Model Toxics Control Act ([MTCA](#)<sup>1</sup>) is Washington's environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect human health and the environment. Ecology enacts the MTCA and oversees cleanups. The [MTCA site cleanup process](#)<sup>2</sup> is completed in steps over a variable timeline and requires public participation (see graphic above).

The City and Ecology have completed several steps in this process:

- **2001:** The City completed early cleanup work (called an Interim Action) to address oil seepages. The Interim Action Work Plan was subject to public review prior to finalization.
- **2016:** The City completed an environmental investigation (called a Remedial Investigation/ Feasibility Study) of the Site. The remedial investigation found petroleum hydrocarbons, pentachlorophenol (PCP), polycyclic aromatic hydrocarbons (PAHs), and dioxins/furans at concentrations in the soil, groundwater, and sediment that must be addressed under the MTCA. The City evaluated a range of six cleanup options for both the Upland (on land) and Marine (in-water sediment) units in the feasibility study. The Remedial Investigation/Feasibility Study report was subject to public review prior to finalization.
- **2018:** Based on the Remedial Investigation/Feasibility Study report, Ecology selected a cleanup action for the site, which was described in a Cleanup Action Plan. The plan called for a variety of cleanup actions: solidifying and capping contaminated soil (on land), relocating and capping contaminated sediment (in-water), as well as monitoring post-construction conditions, and placing site use controls to ensure long term protection of the cleanup action. The Cleanup Action Plan was subject to public review prior to finalization.
- **2019:** The City completes a pre-design investigation.
- **January 2022:** Ecology issues the engineering design report (representing 30% completion of the design work) that refines Ecology's 2018 selected cleanup action for public review.

As shown on the graphic above, public participation is not required at the engineering design step of the MTCA process because this step provides design details that refine Ecology's previously selected cleanup action described in a Cleanup Action Plan. However, Ecology has elected to issue the RG Haley engineering design report for public review due to anticipated community interest.

<sup>1</sup> <https://ecology.wa.gov/mtca>

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

## What happens next?

- **January 31 – March 1, 2022:** Public comment period.
- **February 8, 2022:** On-site walking tour hosted by RE Sources through an Ecology Public Participation Grant.
- **2022:** Ecology finalizes the engineering design report (representing 30% complete design work) after addressing public comments received.
- **2022/2023:** City proceeds with permitting activities and additional investigation to develop 60, 90 and 100% complete construction plans and specifications.

Also in 2023, Ecology expects to issue a legal agreement requiring the City to implement the construction plans and specifications for public review. Construction is anticipated to begin in 2024.

## Background

From the mid-1800s to the mid-1900s, the Site was used for industries including lumber, coal and wharf operations. Various companies treated wood on the property. RG Haley International Corporation was the last company to treat wood there (1955 to 1985). The preservative used in the wood-treating operations was pentachlorophenol mixed with a diesel-like carrier oil. This mixture was released during operations, contaminating soil, groundwater, and sediment.

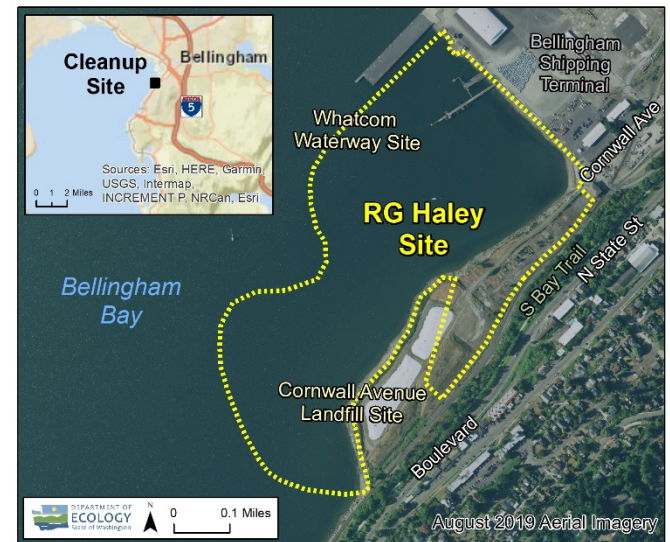


Aerial view of RG Haley site operations, 1953

## Location

The Site is located at the end of Cornwall Avenue on the Bellingham waterfront and consists of approximately 6 upland acres and approximately 60 acres of in-water area.

The City of Bellingham owns the majority of the upland portion of the Site and the State of Washington owns the majority of the in-water portion.



Aerial map of RG Haley site on Bellingham waterfront

## Bellingham Bay cleanup

Other contaminants from nearby overlapping sites are also present at the Site. They include mercury in sediment from the Whatcom Waterway site, and municipal refuse, phthalates, metals, and polychlorinated biphenyls (PCBs) from the Cornwall Avenue Landfill site. Ecology is overseeing cleanup activities at these sites as well.

The RG Haley site is one of 12 [Bellingham Bay cleanup](http://www.ecology.wa.gov/BellinghamBayCleanup)<sup>3</sup> sites coordinated through the Bellingham Bay Demonstration Pilot. The Pilot is a bay-wide multi-agency effort to clean up contamination, control pollution sources and restore habitat, with consideration for land and water uses.

<sup>3</sup> [www.ecology.wa.gov/BellinghamBayCleanup](http://www.ecology.wa.gov/BellinghamBayCleanup)



Toxics Cleanup Program  
913 Squalicum Way, Unit 101  
Bellingham, WA 98225

## RG Haley Site

Engineering design report ready for public review

*Información en español incluida (página 1)*

### Public comment period

January 31 – March 1, 2022

[www.bit.ly/Ecology-RGHaley](http://www.bit.ly/Ecology-RGHaley)

[www.bit.ly/Ecology-RGHaley-Comments](http://www.bit.ly/Ecology-RGHaley-Comments)

### On-site walking tour

February 8, 2022

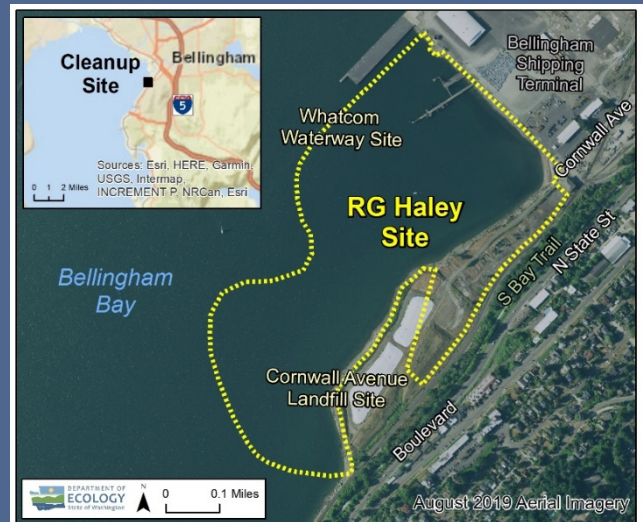
Noon – 1:30 p.m.

Meet at the end of Cornwall Avenue  
by the pocket beach (Bellingham, WA)

[www.re-sources.org/RGHaley](http://www.re-sources.org/RGHaley)

### ADA accessibility

To request an ADA accommodation, contact Ecology by phone at 425-324-5901 or email at [ian.fawley@ecy.wa.gov](mailto:ian.fawley@ecy.wa.gov), or visit [ecology.wa.gov/Accessibility](http://ecology.wa.gov/Accessibility). For Relay Service or TTY call 711 or 877-833-6341.



Aerial view of RG Haley cleanup site