

# **Public Participation Plan Former Grays Harbor Pulp and Paper Mill**

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**801 23<sup>rd</sup> Street Hoquiam, WA 98550**

Washington State Department of Ecology  
Lacey, Washington

May 2024

## Publication Information

This document is available on the Department of Ecology's [Former Grays Harbor Pulp and Paper Mill cleanup site page](#).<sup>1</sup>

### Related Information

- Cleanup site ID: 2262
- Facility site ID: 44124741

## Contact Information

### Solid Waste Management Program

#### Industrial Section

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300 Desmond Dr SE  
Lacey, WA 98503

**Website<sup>2</sup>:** [Washington State Department of Ecology](#)

## ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov). For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/2262>

<sup>2</sup> [www.ecology.wa.gov/contact](http://www.ecology.wa.gov/contact)

# Public Participation Plan

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Industrial Section  
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DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan). The purpose of the plan is to promote meaningful community involvement during cleanup.

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

This plan has been drafted in conjunction with the comment period for the draft Agreed Order No. 17992 for the Former Grays Harbor Pulp and Paper Mill (site).

## Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime.

### Ecology

Solid Waste Management Program  
Industrial Section  
300 Desmond Drive SE  
Lacey, WA 98504  
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360-790-8363

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### Rayonier A.M. Properties LLC

1301 Riverplace Blvd., Suite 2300  
Jacksonville, FL 32207  
Warren Snyder, Director, Legacy Sites  
warren.snyder@ryam.com  
904-357-3768

## Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information<sup>3</sup>
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

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<sup>3</sup> Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

For more information about public participation grants, please visit the [Public Participation Grant website](#).<sup>4</sup>

## Washington's Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities.

This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

### Model Toxics Control Act

MTCA began as a grassroots citizen's initiative in 1988 and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).<sup>5</sup> Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.

### State Environmental Policy Act

The State Environmental Policy Act (SEPA) is followed during review and development of cleanup plans.

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<sup>4</sup> [ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants](https://ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants)

<sup>5</sup> <https://apps.ecology.wa.gov/publications/publications/9406.pdf>

# Site Information

## Land use

The site includes:

- The former dissolving sulfite pulp mill area that produced pulp from the 1920s to 1992. The sulfite process pulps wood chips using chemical solutions of sulfite and bisulfite. Demolition of the pulp mill's aboveground structures was completed in 1992.
- The paper mill area that produced paper using pulp from the on-site pulp mill (while it was in operation) and/or purchased recycled pulp from the 1920s to 2013. Demolition of the paper mill's aboveground structures was completed in 2016. While the site historically purchased bleached recycled pulp, there was no on-site bleaching at the site.
- The wastewater treatment plant area, where the facility treated wastewater treatment plant effluent on-site, and basins adjacent to the wastewater treatment plant where liquids from pulping processes were stored.
- Sediments contiguous with the upland portions of the site that may have become contaminated due to industrial practices or the discharge of treated wastewater.
- Rennie Island, where the pulp mill occasionally stored spent pulping chemicals in an unlined lagoon during upset conditions.

## How the site became contaminated

Industrial practices and historical land use by the mill owners and operators has resulted in soil and groundwater contamination at the site.

## Contamination

Previous independent investigations conducted by previous site owners and operators have detected the following contaminants in soil or groundwater at the site.

- Total petroleum hydrocarbons (TPH) from diesel, gasoline, and oil
- Polycyclic aromatic hydrocarbons (PAHs)
- Polychlorinated biphenyls (PCBs)
- Metals including lead, chromium, and mercury
- Benzene, Toluene, Ethylbenzene, Xylene (BTEX)
- Volatile Organic Carbons (VOCs)

## Cleanup plans

Since the 1992 pulp mill shutdown, site owners have voluntarily investigated and performed cleanup actions at some locations at the site. Some of the voluntary cleanup actions received a "No Further Action" status from Ecology. No further action letters do not constitute a settlement between parties potentially liable for cleanup and the Department of Ecology.

At this point of the cleanup process, Ecology is providing a draft agreed order for public review and comment. When in place, the agreed order initiates the cleanup process under Ecology supervision. The public will have multiple opportunities to comment throughout the cleanup process, as indicated by the orange comment bubbles in Appendix A of this document.

## Area community

The site is located in Grays Harbor County adjacent to the mouth of the Hoquiam River. Zoning for the site is currently designated as industrial. Areas directly north of the site are zoned as commercial and high-density residential. Rennie Island zoning designates it as a natural resource.

Hoquiam has its roots as a lumber and mill town. Economically, the community of Hoquiam has high unemployment rates (15 percent) and 47 percent of its population is considered low income. Its population is mostly white with the next largest ethnic groups being Hispanic (six percent) and Native American (three percent). Nearly all households (96 percent) speak English proficiently.

Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal guidance.<sup>6</sup> The non-English language(s) most widely spoken in the Hoquiam area are Chinese, including both Mandarin and Cantonese; Spanish; and other Asian-Pacific Islander languages. Ecology will reach out to community groups to verify which translations are most needed and where appropriate, Ecology will provide outreach in those translations. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community.

Ecology has developed a Tribal Engagement Plan to work with the federally recognized tribes who own land or rely on resources near this site that could be affected by the contamination.

## Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

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<sup>6</sup> Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 69 Fed. Reg. § 35602 (June 15, 2004).



## How we share information with the community

During specific stages of the cleanup, Ecology will provide notice that documents are available for review and comment. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories (see "places to see print documents"). Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

We will add additional individuals, organizations, and other interested parties to our interested parties list as requested. If you would like to be added to the interested parties list for this site, please contact Tara Roberts at 360-280-4325 or [tara.roberts@ecy.wa.gov](mailto:tara.roberts@ecy.wa.gov).

The different ways we will communicate are further detailed below.

### Postal mailing list

Ecology maintains a mailing list that includes addresses within a one-mile radius of the site and relevant local, state, and federal government contacts. These people receive public comment notices when draft documents are available.

### Email lists

Ecology maintains an email list to update interested persons about this site. These people receive public comment notices when draft documents are available.

### Ecology's website and social media platforms

We maintain a [website](https://apps.ecology.wa.gov/cleanupsearch/site/2262) for the Former Grays Harbor Pulp and Paper Mill site.<sup>7</sup> The website will provide notice of public comment periods, provides site information, and cleanup documents available for download.

We may also share information about cleanup sites through [news releases, blogs, and social media](#).<sup>8</sup>

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<sup>7</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/2262>

<sup>8</sup> [ecology.wa.gov/About-us/Get-to-know-us/News](https://ecology.wa.gov/About-us/Get-to-know-us/News)

## Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).<sup>9</sup> To receive the *Site Register* by email, please [subscribe online](#),<sup>10</sup> or contact Sarah Kellington at [sarah.kellington@ecy.wa.gov](mailto:sarah.kellington@ecy.wa.gov) or 360-280-3167.

## Places to see print documents

During public comment periods, you can find print documents at the following locations:

Hoquiam Timberland Library  
420 7<sup>th</sup> Street  
Hoquiam, WA 98550

Washington Department of Ecology  
Headquarters  
300 Desmond Dr SE  
Lacey, WA 98503

To schedule an appointment to review documents at the Department of Ecology, please contact Connie Naotsuka at 564-669-4474 or [connie.naotsuka@ecy.wa.gov](mailto:connie.naotsuka@ecy.wa.gov).

## Newspaper display ads or legal notices

We will announce public comment periods and events in ads or notices published in the Daily World. We will also publish notice on our [Public Input & Events Listing](#).<sup>11</sup>

## Signs around the cleanup site

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

## How to share information with us

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime, or during public events.

## Public comment periods

Formal comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. At minimum, MTCA requires 30-day public comment periods for draft cleanup documents and 14-day comment periods for SEPA documents. SEPA documents are often made available for public review with other

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<sup>9</sup> [ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data)

<sup>10</sup> [https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic\\_id=WAECY\\_118](https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_118)

<sup>11</sup> [ecology.wa.gov/Events/Search/Listing](https://ecology.wa.gov/Events/Search/Listing)

cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days if there is significant interest.

Members of the public can submit comments during public comment periods in one of two ways: in writing by following instructions Ecology will provide when public comment periods are announced, or orally during a public hearing held as part of a public comment period.

If a public hearing is not scheduled during the public comment period, a hearing can be requested. We will schedule a public hearing if at least 10 people request the hearing. This may cause us to extend the public comment period to meet the public hearing notice requirements. Public hearings are held at locations close to the site that meet Americans with Disabilities Act standards. Public hearings are always announced in advance using a variety of methods.

Following a comment period, we publish all the input we received in writing during the public comment period and all comments we received orally during a public hearing and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final.

## **Public events**

We may also hold public meetings, workshops, and open houses based on community interest outside of the public comment period. If Ecology is holding a public event that is not associated with a public comment period, the public event is an informal way for the public to provide information to Ecology. Ecology will not publish input received during these informal events or respond in writing. Public events are held at locations close to the site that meet Americans with Disabilities Act standards and are announced in advance using a variety of methods.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Tara Roberts at 360-280-4325 or [tara.roberts@ecy.wa.gov](mailto:tara.roberts@ecy.wa.gov).

## **Americans with Disabilities Act**

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov), or visit our [ADA website](#).<sup>12</sup> People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

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<sup>12</sup> <https://ecology.wa.gov/About-us/Accessibility-equity/Accessibility>

## Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Tara Roberts at 360-280-4325 or [tara.roberts@ecy.wa.gov](mailto:tara.roberts@ecy.wa.gov).

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.

# Appendix A

# Washington's Cleanup Process



Public participation plans and comment periods are only required for cleanups under a legal agreement with Ecology. Otherwise, all cleanups follow the same steps. The steps are defined by Washington's cleanup law, the Model Toxics Control Act.

