

RESPONSE TO COMMENTS

Draft Agreed Order No. 23839 with Weyerhaeuser NR Company Agreed Order No. 23840 with Cosmo Specialty Fibers Associated Public Participation Plan

Public comment period: August 5 – Sept 16, 2025

This document addresses questions and comments received by the Washington State Department of Ecology (Ecology) during the public comment period for Agreed Orders (AOs) No. 23839 and 23840 and the accompanying Public Participation Plan (PPP) with respect to the Cosmo Specialty Fibers site.

We published notice of an opportunity to comment in the Daily World and distributed the notice to people living or owning property within a 1-mile radius of the main mill site and additional interested parties. In the notice, we invited public review of the documents and provided a 42-day public comment period. We also held an in-person hearing on September 9, 2025.

During the comment period, we received comments from 17 parties/persons. This document includes all of the comments Ecology received and the agency's response. Changes were made to the PPP, where necessary. The changes are described in Ecology's responses to the respective comments. A copy of the final Agreed Orders No. 23839 and 23740 and the PPP, including this Response to Comments will be sent to all interested parties upon issuance and posted on the Ecology's website at <https://apps.ecology.wa.gov/cleanupsearch/site/2375>.

Comment #1 from Tricia Sorensen

I live on Huntley Street in Aberdeen, a couple of years ago I noticed a puddle of water at the end of my driveway, after contacting the City of Aberdeen, it was determined that the leak was coming from the Wood Stave Pipe that runs down Huntley Street, Cosmo was notified of the leak, they had a contractor come out to repair the pipe, it was a long process and was an inconvenience to me being able to access my driveway. Since then, there has been another leak identified just two houses down, they still have 2 large holding tanks sitting out in front of the neighbors house and this leak has not been addressed. Prior to this, maybe 5-8 years ago there was a leak in the same vicinity on my street. I was told there was no concern for the liquid that was leaking on to the street and into my driveway. I am concerned there will be more leaks in these Wood Stave Pipes that run along my street and I agree that Weyerhaeuser, Cosmo and the current owner should be cleaning up all of these site to mitigate the potential hazards to human and animal life. Please let me know if you have any questions regarding my comments. Thank you, Tricia Sorensen.

Reponse to Comment #1

In addition to starting the cleanup process with Cosmo and Weyerhaeuser, Ecology also issued Administrative Order No. 21150 on May 5, 2022 to Cosmo. The goal of this order is for Cosmo to assess the overall condition of the wood stove pipe and minimize future leaks.

Administrative Order No. 21150 requires Cosmo to submit a long-term plan for the wood stove pipe. The plan covers the assessment of the pipe conditions as well as future maintenance and repair work. Cosmo submitted the most recent update of the plan in December 2022. Because the mill is currently down, the implementation of this plan is on hold until the mill resumes operation.

With respect to the cleanup process, the first required submittal is a Remedial Investigation Work Plan (Work Plan). As described in Exhibit B of the agreed order, the Work Plan will describe general facility information; site history and conditions; including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; hazardous substances and their sources, etc. The leaks mentioned in your comment will be required to be included in the Work Plan and investigated.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view a draft and final versions as they are posted by clicking "Subscribe to this site" button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #2 from Wendy Chatham

I am relieved to see Weyerhaeuser is also culpable for clean up. This toxic waste dump has been inflicting cancer and illness throughout that community for decades. I grew up in Cosmopolis, the relentless "steam" always caused me to wonder as a kid. Weyerhaeuser created the problem, they should have to participate in the solution.

Reponse to Comment #2

Comment noted.

Comment #3 from Margaret Annette Berry

I first contacted the Department of Ecology in February 2021 concerning the pollutants being spewed into our air by Cosmo Specialty Fibers. The reply, via email, that I received from Ha Tran said that Washington state had no jurisdiction and that federal laws dictate

the levels of pollutants emitted. While I understand this cleanup does not deal with air pollutants from current manufacturing, I am still concerned that Ecology does not have a law that can prevent such air pollutants.

As concerns the current cleanup, I sincerely hope that the Washington Department of Ecology holds Specialty Fibers, the Gore Group and Weyerhaeuser to the strictest standards of cleanup possible. It is a travesty to see the lack of concern and care by those entities. They all knew what a threat these chemicals were to our environment and our health but chose to do nothing; that would shrink their profits and be of no benefit to their companies.

They should be given only the shortest time period allowed to "investigate" before the clean up. That clean up should also proceed with all haste. There is no reason they should ever be granted "extensions" that would delay any portion of the cleanup. They have had years to resolve this issue.

Reponse to Comment #3

Ecology has named Weyerhaeuser and Cosmo as PLPs, which means that they are responsible for the cleanup. Please see response to [Comment #50](#) regarding Gores' status as a PLP.

The cleanup will be conducted under the state environmental law, Model Toxic Control Act (MTCA). MTCA has a process for establishing cleanup standards (i.e. cleanup levels). Cleanup levels are set on a case-by-case basis for each site, taking into consideration multiple factors. These factors include risks associated with the contaminants found, cross-media contamination, background concentrations, land use, state and federal laws, and other pertinent information. At this time, Ecology does not have all the information needed to determine the nature and extent of contamination at the site. Once the nature and extent of contamination is established, the actions needed to ensure that the site is cleaned up appropriately, including the establishment of cleanup levels, will be determined.

The next step in the cleanup process is the Remedial Investigation (RI), which will gather information needed to identify the nature and extent of the contamination for each contaminant found. The schedule for completion of the RI and other phases of the cleanup are in Exhibit D of each Agreed Order. We understand the push for conducting the cleanup as quickly as possible. We also need to ensure that the cleanup actions are thorough for the site. Because of the size and complexity of the site, the cleanup process from beginning to end may take many years. If Ecology is made aware of information that contamination at the site poses an immediate threat to human health or the environment, we will work with Cosmo and/or Weyerhaeuser to conduct cleanup under an interim action, as described in the Exhibit B, Task 3 of each Agreed Order.

Comment #4 from Bonnie Blessing

Who can time travel? But, I wish the people who left contaminants could have been encouraged to be more careful. Chehalis seems like one of the last refuges that still oddly hosts so many unique fish and wildlife. Just driving by you can what was a river, wetlands, ponds, ditches that must host an amazing array of fish and wildlife. Estuaries are one of the most important habitats for the salmon. We even have summer and fall chinook. Bull trout I love to learn that there is still salmon in this river. Even wild salmon that still somehow survive.

From air imagery one can see wetlands and ditches and flooded areas that must be important to ducks, rearing salmon and possibly unique rare odd little fish. Given how it looks, there's probably a gradient of water quality from the river to the ditches and wetlands nearby. A natural gradient.

From high do in the river and riverine areas that supports salmon to lower dissolved oxygen that may support the Olympic mudminnow. I saw this little midge-eater in the upper Chehalis in marshes and ditches. I learned that the unusual spirit fish, *Novumbra hubbsi*, live in places that resemble the back-40 of Cosmo. It can survive in places that are somewhat difficult for other organisms because somehow it tolerates some level of lower dO and possibly other water quality problems.

However, relatives of the *novumbra* are, I believe, used for toxin studies. The mudminnow would foreseeably accumulate dioxins in its tissues passing it up the food chain as other fishes and ducks consume it. Protecting this little fish may protect food resources and water levels for other fish and wildlife. The unusual spirit/shadow lives in other areas of the basin and out in coastal areas. (where I've seen it). Maybe it occurs near Cosmo. So, when it comes to the reports on fish and water quality and all, please consider that there very well could be fish near the plant or outfalls or ditches adapted to a gradient of water quality.

Thank you.

Reponse to Comment #4

At this time, we do not know if any contaminants from Cosmo have reached the river, wetland, or sensitive habitats. Potential impacts to these sensitive environments are a part of MTCA process and will be investigated as Cosmo and Weyerhaeuser proceed to the next steps under the AOs.

One of the first steps under the AOs is the Remedial Investigation (RI), which will identify the type of contaminants and their location as well as soil and groundwater characteristics. Data from the RI will also be used to form a Conceptual Site Model, which examines all exposure pathways, including pathways to sensitive environments (e.g. fish and wildlife).

If the RI finds that sensitive environments are impacted or have the potential of being impacted, the cleanup will be designed to protect these receptors.

Ecology will post key documents, such as the Work Plan for the RI, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view a draft and final versions as they are posted by clicking “Subscribe to this site” button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #5 from Bonnie Blessing

I live in headwaters of the Chehalis river but enjoy watching wildlife and knowing that fish that swim past Aberdeen are going to be ok. I try to save on fuel. Could you try 'zooming' or using zoom for info sessions. And many thanks to whoever is trying to clean this area up a bit. I appreciate jobs but also appreciate clean water. My grandparents taught school in Aberdeen/Hoquiam back when these places were probably making paper. Who can forget that smell? I hope those who managed the wood waste were careful.

Reponse to Comment #5

Ecology held a virtual hearing on Zoom for the February 11, 2026 for the Interim Action Amendment to Agreed Order no. 23840 with Cosmo. Ecology’s approach for keeping the public informed of the cleanup is described in the Public Participation Plan (PPP). Ecology has updated page 4 of the PPP regarding virtual and in-person hearings. Virtual hearings will be considered on a case-by-case basis.

Comment #6 from Bonnie Blessing

Please take care of the fish and wildlife.

Reponse to Comment #6

Cleanup under the MTCA will take into consideration the potential for exposure of contaminants to fish and wildlife. Please see response to [Comment #4](#) for additional information about the remedial investigation required by the agreed orders.

Comment #7 from Friends of Grays Harbor

Thank you for this opportunity to comment on the draft Public Participation Plan and Agreed Orders for the Cosmos Specialty Fibers Model Toxics Control Act (MTCA) site.

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington’s estuaries and ocean coastal environments. The goal of FOGH is to protect

the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

We incorporate by reference those comments made by Twin Harbors Waterkeeper.

We noted a typo on page 8 of the Cosmo Site Public Participation Plan, July 2025, under Tribal engagement, Quinault Island Nation, should read Quinault Indian Nation.

Reponse to Comment #7

Ecology has corrected the typo to Quinault Indian Nation in the Public Participation Plan (PPP).

Comment #8 from Friends of Grays Harbor

Section 7 Work to be Performed, outlines some remedial actions that Cosmo must take, however the notification of such actions which has a potential or cause of hazardous threat is too limited. Outfalls, wood stave pipelines, and settlement ponds all affect the water quality of the Chehalis River and Grays Harbor Estuary. These water-bodies are public and commercial shared assets that can dramatically affect the livelihoods and enjoyment of 1000s of visitors and residents.

Reponse to Comment #8

As mentioned in Response to Comment #3 above, if Ecology is made aware of information that contamination at the site poses an immediate threat to human health or the environment, we will work with Cosmo and/or Weyerhaeuser to conduct cleanup under an interim action, as described in the Exhibit B, Task 3 of each Agreed Order.

Ecology also notes that Cosmo's NPDES permit no. WA00000809 also requires notification of certain releases, including spills associated with the wood stave pipe and the Westport ponds (referred in the comment as the settling ponds). Regarding the outfalls to the Chehalis and Grays Harbor, the permit allows the discharge of pollutants provided that the Cosmo meets certain limits and conditions determined to be protective of water quality.

Comment #9 from Friends of Grays Harbor

The oyster and shellfish industry provides a significant economic benefit to the Grays Harbor area and State of Washington. The industry is regulated on a very stringent fecal colony limit. Exceeding that limit has been detrimental to the Oyster growers and has resulted in the closure of the Bay to shellfish harvesting. Specifically, the Oyster growers should be alerted of any water hazard potential or excursion so that they could plan for a closure. An example of a shellfish protective action would be to take the product out of wet storage before a shutdown occurred. This would allow the growers to continue to serve their markets. These warnings of real or potential problems should be made immediately so that growers can act proactively. The proposed 7 day delay of 7.2 would cause significant economic harm. In reviewing some comments that we have provided over the

years, I note that we've shown concern about this plant's deleterious contribution to water and air quality since 2015 and before. Now that the site is considering a cleanup plan we petition for extra care and consideration to the citizens and the environment to make sure that no adverse outcomes are created in the process.

Thank you for your consideration of this important public health, welfare and safety issue.

Reponse to Comment #9

As noted in the comment, high fecal coliform (FC) in the mill's effluent has historically resulted in intermittent closures of shellfish harvesting. Since the mill startup in 2010, Cosmo has taken measures to mitigate impacts on the shellfish beds, including getting lab accreditation needed for early detection of high FC levels and installing a disinfection system.

Because the mill is currently not in operation, the main source of FC is no longer present. FC counts have dropped significantly and do not pose a risk to shellfish harvesting at this time. When the mill is in operation, Cosmo must do daily monitoring of FC at its outfall in Grays Harbor. If the FC level exceeds the threshold set in the permit, Cosmo must notify the Department of Health to close the shellfish beds.

Ecology notes FOGH's concerns about the cleanup process itself posing a risk. Section 8.12 of the Agreed Orders contains an Endangerment provision to address this issue. This provision requires Cosmo and Weyerhaeuser to stop cleanup activities if Ecology or the PLPs find that the activities are creating a hazard to human health and environment. They may resume cleanup activity, under Ecology's approval, after the danger has been addressed.

Comment #10 from Twin Harbors Water Keeper

Thank you for this opportunity to comment on the draft Public Participation Plan and Agreed Orders for the Cosmos Specialty Fibers Model Toxics Control Act (MTCA) site. Twin Harbors Waterkeeper (THW) has had many concerns about the environmental impacts of this site and are pleased to see this legacy contaminated site begin the MTCA formal cleanup process. This site is very important to our community, as is this plan for public participation. The mission of THW is to protect and improve water quality and marine and freshwater habitats on the Washington Coast including Westport and the watersheds of the Hoh, Quillayute, Queets and Quinault and Chehalis Rivers and the Chehalis River Estuary and Willapa Bay Watershed. Twin Harbors Waterkeeper works to address environmental health disparities that are driven by legacy and current pollution and systemic inequities that disadvantage communities of color and lower income populations on the Washington Coast. When we prioritize clean water, we are also prioritizing the health and well-being of our community, especially our youth and elders. We submit these comments on behalf of our members.

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Page 4 “Signs around the Cleanup Site”: The section about public signage is not adequate. There is a public boat launch (owned by Cosmo) adjacent to the Main Mill area. To adequately inform our community and visitors, please post signs along the shoreline where the public launches boats and fishes. Please take steps to inform the Latinx community in the Grays Harbor area. Please provide the informational flyer, and future flyers, in English and Spanish. If you’d like help reaching out to the Latinx community, I’m willing to help. There is a popular 3-mile walking trail, the Chehalis Riverfront Walkway, adjacent to Westport Ponds. Please also post signs along the trail and at Bishop Athletic Center, where people park to walk on the trail.

There are at least two creeks, and several small drainages that drain to the Harbor that are in close proximity to the Westport Ponds. I have seen people fishing in two of these creeks over the years. Please post signs along the bridges (along the trail) in the vicinity of the drainages.

Reponse to Comment #10

With respect to engaging with the Latinx community, Ecology has received the contact information you provided for RISE and have reached out Jessica Molina at RISE. We also added RISE to our mailing list. Ecology has updated the PPP to include coordination with RISE.

Cosmo had danger signs posted at the gated entrances on HWY 105. The signs warn the public to stay out of the area. At this stage, we do not know the health risks posed by the Westport ponds, or other areas on the mill properties. As we receive more data from the site investigation, additional signage may be required as needed. As discussed in response to [Comment #53](#), Ecology has added the following language on page 4 of the PPP regarding signage: “Appropriate signage for health risks will be required based on the results of site remedial investigation.”

Ecology observed that sections of the fences between the ponds and the walking trails were down and have cited this in the inspection reports to Cosmo to correct.

Comment #11 from Twin Harbors River Keeper

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Page 6: Please add a new figure to the document that shows the location of the 2.5 mile wood stave wastewater pipe, as well as the location of all known leaks that occurred in the past.

Reponse to Comment #11

Ecology required Cosmo to conduct a survey and assessment of the wood stave pipe. The report is publicly available here:

<https://apps.ecology.wa.gov/paris/DownloadDocument.aspx?Id=431780>.

As discussed in the response to [Comment #53](#), the PPP was updated by adding Appendix B to show the location of the Wood Stave pipe and recent leaks.

Please note that the figure only includes the recent known leaks. There may be historical leaks or unknown leaks that could be discovered as Cosmo and Weyerhaeuser conduct their investigation of the site under the AOs. These discoveries will be documented in the RI report, which will be made available for formal review and comment. Ecology will post key documents, such as the Work Plan for the RI and the RI, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>.

While there is no formal public comment period for the Work Plan, you will be able to view draft and final versions as they are posted by clicking “Subscribe to this site” button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #12 from Twin Harbors River Keeper

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Page 7: Please post signs in the residential areas where there were “about 16 leaks in the 2.5 miles wood stave wastewater pipe.” Please expand the radius of addresses to receive written notices of the cleanup (currently ¼ mile radius) to at least ¼ mile radius of all known locations of leaks of the wood stave wastewater pipe.

Reponse to Comment #12

The leaks were of effluent that had been treated at the mill. At this time, we do not have information on whether or not the leaks pose any risks. Please see response to [Comment #10](#) and [#53](#) regarding future signage.

Ecology has expanded the notification to addresses along the wood stave pipe line. We may expand the notification list in the future, based on data collected at the site.

Comment #13 From Twin Harbors Riverkeeper

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Page 7: The last bullet point under “How the site became contaminated” states: “The pipe is made of wood stave and runs about 2.5 from the mill...” which likely should read something like “...2.5 miles from the mill...”

Reponse to Comment #13

Ecology corrected the error to page 7.

Comment #14 from Twin Harbors Riverkeeper

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Page 8: The section about Tribal engagement states that the Quinault Island Nation relies on resources that could be affected by the contamination. Please correct this to read “Quinault Indian Nation.”

Reponse to Comment #14

Ecology corrected the error on page 8.

Comment #15 from Twins Harbor Riverkeeper

Comments on Draft Public Participation Plan, Cosmo Specialty Fibers

Please add a figure to the Public Participation Plan that shows the location of the tanks where chemicals are currently stored. Please include what chemicals are stored in each tank, and the approximate amount stored in each tank.

Reponse to Comment #15

The PPP is intended to document how Ecology will communicate with the public throughout the cleanup process. Specific information about the site is more appropriate to be included in the submittals required by the agreed orders.

The first submittal required by the agreed orders is a Remedial Investigation Work Plan (Work Plan). As described in Exhibit B of the agreed order, the Work Plan will describe the following: general facility information; site history and conditions, including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; and hazardous substances and their sources, etc.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view draft and final versions as they are posted by clicking “Subscribe to this site” button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #16 from Twin Harbors Riverkeeper

Comments to Cosmo Draft Agreed Order , No. DE 23840

Please consider these comments to all of the Draft Agreed Orders for this project.

Page 16, section 8.7, Access to Information. Please require that all sampling data be available to the public, including maps and data collected in proximity to the 16 leaks in the wood stave wastewater pipe.

Reponse to Comment #16

All sampling data must be included in the Remedial Investigation (RI) Report. Ecology will post a copy of the RI Report here: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. See the updated PPP for information on how to subscribe to the site to receive updates.

The public will have the opportunity to review and comment on the RI report, including the sampling data, before Ecology approves the report as final (as specified in each AO Exhibit B: Scope of Work).

Comment #17 from Twin Harbors Riverkeeper

Comments to Cosmo Draft Agreed Order , No. DE 23840

Please consider these comments to all of the Draft Agreed Orders for this project.

Please add a new figure to show the location of the wood stave pipe, and location of the 16 leaks.

Reponse to Comment #17

Ecology added the figure of the wood stave pipe location and recent leaks to the PPP. For the AOs, the leaks are a part of the site history to be included in the Remedial Investigation Work Plan (see Exhibits B of the AOs).

Comment #18 From Twin Harbors Riverkeeper

Page 32, Scope of Interim Actions. Please add this to the list of possible interim actions:

- Removal, and proper disposal, of wastewater from the Westport Ponds, and/or repair of aeration systems and fences.
- Survey of wastewater ponds to determine if they are leaking.

Reponse to Comment #18

As the cleanup process is still in the early stages, we do not have data on leaks from the Westport ponds or if present, their impacts on the environment. The next phase of the cleanup, under the AOs, is to investigate the nature and extent of contamination at the site.

The result of the investigation will be shared with the public as noted in the response to [Comment #16](#). The result of the investigation will be used to determine if interim actions are needed in the future.

Comment #19 From Jon Harwood

Public participation plan should recruit local citizens to observe and inspect the site and surrounding area. It could include persons on the harbor looking at the ponds during high flow. The ponds is monitored - the data from the monitoring should be published on a regular basis. The public will be more able to participate if they have information - detailed information.

Reponse to Comment #19

MTCA, which is the underlying authority for cleanup activities, does not have provisions for citizens to monitor cleanup sites as it only provides the framework for PLPs or Ecology to clean up a site. Ecology also notes that there would be health and safety concerns associated with such observations/inspections. Ecology's Spill Program staff are familiar with the site and are trained and equipped to respond to offsite releases. If you observe signs of spills, leaks, or releases, you can report these to Ecology's 24-hour number at (360) 407-6300 or online at: <https://ecology.wa.gov/footer-pages/report-an-environmental-issue/statewide-reporting-form-erts>. Other concerns can be provided directly to the Ecology Site Manager. This contact information is added to page 4 of the PPP ("How you can share information with us").

The discharge from the ponds is monitored under their wastewater discharge permit (NPDES Permit WA0000809). That wastewater monitoring data is publicly available through Ecology's PARIS database, here: <https://apps.ecology.wa.gov/paris/DischargeMonitoringData.aspx>. To view Cosmo's data, you can enter Cosmo's name or permit no. WA0000809 in the search box. More detailed information regarding the wood stave pipe are noted in Ecology's response to [Comment #11](#).

Because we are in the early stage of the cleanup, Ecology does not know the nature or extent of contamination at the site. Under the AOs, Cosmo and Weyerhaeuser will collect more data during future site investigations. Prior to starting the investigation, Ecology will post the Remedial Investigation Work Plan on the Cosmo's cleanup website here: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. The Work Plan is a document outlining how the investigation will be carried out and how the data will be collected. While there is no formal public notice of the Work Plan, you will be able to view draft and final versions as they are posted by clicking "Subscribe to this site" button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Once the investigation is complete, the results will be put into a report and posted on Cosmo's cleanup website. There will be a formal public notice period, during which the public will have an opportunity to review and comment on the report. The public review process is described in the table in Exhibit D of each AO.

Comment #20 from Jon Harwood

Are the PLPs allowed to hire third parties for the cleanup? Are there restrictions to the agreements they can make with third-party clean-up? The agreements should be sure the PLPs cannot transfer the liability for the cleanup by selling the property or hiring a third party to be responsible for the clean up.

Reponse to Comment #20

Yes, PLPs often hire consultants and other third parties to assist them with the activities required to be completed by the agreed orders. However, liability is determined based on the standards described in [RCW 70A.305.040](#). The standards describe whether or not a person or party would be liable for cleanup based on their ownership or operation of the site and other circumstances. Once Ecology names a PLP, they remain a PLP until the state releases them from liability which typically occurs when the site is cleaned up.

In the case of selling the property, the purchaser may be liable for the cleanup, depending on a number of factors. For liability associated with real estate transactions, please see Ecology's publication here:

<https://apps.ecology.wa.gov/publications/documents/2209021.pdf>.

Comment #21 from Jon Harwood

Monthly progress reports from Cosmo and Weyerhaeuser should be provided to local press outlets by default.

Reponse to Comment #21

With respect to providing cleanup records to the public in general, Ecology follows the procedures under MTCA and the Washington State Public Records Act [Chapter 42.56 RCW](#). Ecology typically does not share monthly reports unless requested through a public records request.

Local news outlets are welcome to reach out to Ecology for these records as well as any questions regarding the site.

Comment #22 from Jon Harwood

The monitoring at the outflow from the Westport Ponds should be done by a third-party that was no conflict of interest. Cosmo and Weyerhaeuser cannot be trusted to monitor and report accurately the data from the outflow from the ponds.

Reponse to Comment #22

There are two different types of "outflows" from Westport Ponds. These are:

- 1) *Flow to surface water (i.e. Chehalis River and Grays Harbor)*: This flow is identified in Cosmo's wastewater discharge permit. The wastewater discharge permit is issued under a program called the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program is a self-monitor monitoring program.
- 2) *Potential leaks to soil and groundwater*: This is currently unknown and will be investigated under the AOs. Cosmo and Weyerhaeuser may hire an environmental consultant to conduct this investigation on their behalf. However,

Ecology still has oversight of the procedures for data collection and quality assurance, as outlined in Exhibit B of each of the AOs. These procedures are to ensure the quality and accuracy of the data collected.

For (1), the data was used for evaluating compliance and permitting; permit renewal must go through a public notice period for the public to review and comment. As discussed in Response to Comment #19 above, Cosmo's wastewater monitoring data is publicly available through Ecology's PARIS database, here:

<https://apps.ecology.wa.gov/paris/DischargeMonitoringData.aspx>. To view Cosmo's data, you can enter Cosmo's name or permit no. WA0000809 in the search box.

For (2) above, the public will have the opportunity to review and comment on the data before it is approved by Ecology and finalized (see response to [Comment #19](#)).

Comment #23 from Jon Harwood

The public participation plan needs to include reaching out to oyster growers and crab fisherman.

Reponse to Comment #23

The oyster growers are on Ecology's e-mail list described in the PPP (page 3). Ecology updated page 3 to clarify as follows: "The e-mail list also includes oyster growers downstream of the site." Outreach to the growers is based on historic interest from them on other permitting actions at the site.

Currently we have no data indicating impacts on crab fishing. If site investigation shows a potential for impacts, Ecology will update the PPP to include this industry as appropriate. Ecology notes that anyone may request to be added to our interested parties list for actions at the site. Please email Tara Roberts at tara.roberts@ecy.wa.gov to request to be added to our interested parties list.

Comment #24 from Jon Harwood

Who is the Industrial Section Management. Is it spelled out? The person is responsible for dispute resolution - they will be working on this one.

Reponse to Comment #24

The Industrial Section Manager at the Department of Ecology is currently James DeMay. He is the one who has signed both of the agreed orders for Ecology. The Industrial Section currently has oversight of the cleanup at Cosmo.

Comment #25 from Jon Harwood

If at all possible, PLPs should be found criminally liable for polluting the surrounding ground and water. That should nullify their water, treatment, and air permits and disallow them from operating again unless it is completely cleaned up first.

The pipeline should appear on maps of the site, along with where historic leaks have happened. Then maps and literature should be distributed by hand, in Spanish also, in the entire south Aberdeen area. Local residents should be approached in person, and offered a chance to be on an email or mailing list for updates and future notifications. Landowners should also be contacted, since the area may have a high percentage of rental properties.

Reponse to Comment #25

Under the environmental cleanup law, MTCA, PLPs are expected to clean up the contamination that comes from the operation of the Cosmopolis mill. This cleanup work can be done at the same time as the facility is operating, provided that the facility follows the AOs and MTCA requirements. The AOs provide the framework for the PLPs to work under Ecology's oversight to achieve cleanup. The water and air permits are issued under different authorities and Ecology must follow the procedures under those authorities for issuing, enforcing, and, if needed, revoking those permits.

Based on the comment, Ecology updated the PPP as follow:

- Added Appendix B to show the location of the Wood Stave pipe and recent leaks. Historical leaks are unknown at this time and will be investigated as part of the work under the AOs.
- Added language on page 2 ("How we share information with the community") to include future outreach to addresses along the wood stave pipe via e-mail (if known) and our mailing list.
- Added language on page 8 ("Area Community") for Ecology's coordination with RISE on future outreach for Spanish translation. RISE is a network for communication with the Spanish-speaking community of Grays Harbor (see response to [Comment #10](#)).

Comment #26 from Jon Harwood

Every effort should be made to keep liable parties from blaming each other, and tying it all up in court.

Reponse to Comment #26

Each of the AOs contains a schedule to keep the cleanup process moving forward. Any request for extension in the schedule is first subject to Ecology's review and approval.

Comment #27 from Jon Harwood

The data from the monitoring of outflow from the Westport ponds needs to be passed on to the media by default so it can be published. The public is more likely to be involved if they are given real information. The outflow pond monitoring should not be done by the liable parties. Even with the safeguards in place, they cannot be trusted. There is too much at stake. If they see bad news coming from the outflow data, they are likely going to just stop collecting it. The penalty from not collecting the data may be much easier to deal with than what shows up in the data.

Reponse to Comment #27

Ecology agrees that having accurate data is a critical step to the cleanup of the site, considering the potential risks to human health and the environment. Please see Ecology response to [Comment #22](#) regarding the different types of flows from the Westport ponds and the measures in place for checking the quality of the data.

Note that if Cosmo or Weyerhaeuser chooses to not collect data as agreed upon in the AOs, Ecology will make a good faith effort to resolve any issues and follow the Resolution of Dispute procedures in Section 8.9 in the respective AO. If the issues cannot be resolved, Ecology also has the option of conducting this work per Section 8.9.4 and recover the cost from Weyerhaeuser, Cosmo, and other PLP(s).

Comment #28 from Jon Harwood

Where are the oyster growers? They need to be written into the public participation plan. They are likely to suffer shut down if pollutants are discovered in Grays Harbor. It happened when Weyerhaeuser operated the facility. Oyster growers were very unhappy.

Reponse to Comment #28

While the oyster growers are not specifically called out in the PPP, they are currently on Ecology's email list to receive notification about the site. Please see response to [Comment #23](#).

Comment #29 from Jon Harwood

Lee First from Waterkeeper Alliance had good concrete suggestions regarding notices posted, and fences repaired, at the Westport ponds. Please heed in the name of public participation.

The public participation plan may need amending as discoveries at the site progress. For example, if more leaks are discovered in neighborhoods, or more toxic chemicals, the Dept. of Ecology may need a reporting hotline for local residents to call in observations or emergencies.

Reponse to Comment #29

Regarding signage, please see response to [Comment #10](#) from Lee First.

Ecology considers the PPP to be a living document that we will update as we progress through the cleanup. We also have a 24-hour number and online form for reporting spills (see response to [Comment #19](#)). Other concerns can be provided directly to the Ecology Site Manager. This contact information is added to page 4 of the PPP ("How you can share information with us").

Comment #30 From Teresa Boten

I just learned of all of this and my house is the closest house to the ponds I have had headaches since we purchased the home in 2013 not knowing anything about the mills chemicals or ponds I have had to deal with my home turning black I've had to deal with horrible smells and I want to know what is going to be done I want to know when this is going to be cleaned up and I want to know what this is doing to my health. I called and called down to cosmo and complained of this many times and nothing was ever done.

Reponse to Comment #30

Ecology staff cannot advise on personal health concerns. However, cleanup regulations does lay out a process for establishing cleanup levels that are protective of human health. The cleanup levels will be established in the next stages of the cleanup.

Comment #31 from Gordon Chaffee

Thank Tara and you for your efforts in convening the public meeting in Aberdeen on the Cosmo project.

While I fully support the cleanup effort and expect it to proceed, I believe the best way forward is to support Mr. Richard Bassett's proposal to create a biorefinery from the existing pulp mill structure. I have my own ideas of what this should look like, but Mr. Bassett's ideas will come before mine.

The restarted facility needs to be different than the previous rendition. There are BACT technologies that will reduce or eliminate polluting emissions from the plant. There are biological methods to break down most chemicals that have been spilled or released over the years both at the site and at its outfalls.

An ongoing business that is profitable will be able to do more towards a long-term cleanup that will just the Agreed Order. Expectations are different today for a business than they were fifty years ago. The goal is to have a clean and neat facility that one can be proud to showcase. That should be our goal for this site, to help Mr. Bassett achieve this goal.

The rehabilitated facility will provide direct employment in the mill and should be able to spawn other businesses. Potentially, biological cleanup methods can be perfected and a team assembled that will allow the creation of a cleanup business to remediate soil toxins. If lignin is recovered from the red liquor, it may be the raw material for other businesses that can be grown on the site. Transporting raw materials is expensive and local production "gets the weight off".

There is a tremendous amount of work and great expense to create a truly great viable business, it would be a valuable asset for our Grays Harbor community. This is an admirable goal to pursue.

Reponse to Comment #31

MTCA cleanup can proceed at the same time as the facility is operating, as has been done at other sites in Washington. As such, the mill's restart and operations will be considered as Ecology and the PLPs proceed with the next steps of the cleanup.

Comment #32 from Nicholas Rand

I would like to lift sanctions placed by the EPA, reduce fines towards Mr basset, and allow the mill to restart. Of course, mr basset would need to agree to a list of repairs to be made before restarting. This list can be created by the EPA and the DOE. I've seen Richard's plans and his list of repairs he plans to accomplish before starting and it's a fair amount of work at a price that cannot be afforded unless the sanctions are removed and he is allowed to take on investors.

Both sides get what they "say" they want. That being said, I believe the DOE and EPA have a deeper agenda and won't ever allow that mill to restart. That deeper agenda is to demolish the mill and clear the land. If this is your plan, please just say so and stop wasting everyone's time. If I'm wrong and you actually just want things cleaned up, then work with Mr basset and allow him to achieve this goal along with employing 200 people in a dying community.

Reponse to Comment #32

Ecology does not have authority to lift any sanctions or requirements placed by EPA or other regulatory agencies. Where the requirements between Ecology and other agencies overlap, Ecology typically works with Cosmo, Weyerhaeuser, and other agencies to coordinate the actions as needed. An example of this is Section 6.7 of the AOs.

Ecology also notes that MTCA cleanup can proceed at the same time as the facility is operating, as has been done at other sites in Washington. As such, the mill's restart and operations will be considered as Ecology and the PLPs proceed with the next steps of the cleanup process.

Comment #33 from Craig Zora

I am writing to provide my comments regarding the Weyerhaeuser Agreed Order No. 23839 and Cosmo Specialty Fibers, Inc. (Charlestown Investments) Agreed Order No. DE 23840. I appreciate the opportunity to review the Agreed Orders and to submit my feedback during the public comment period which I understand will close on September 16, 2025.

HAZARDOUS SUBSTANCES. What specific hazardous substances have been identified at the Site, including the Main Mill, Westport Ponds, and Wood Stave Pipe areas? What measures are being taken to secure property access for Weyerhaeuser, especially in residential areas along the Wood Stave Pipe? What is the current condition and maintenance status of critical infrastructure such as the Wood Stave Pipe and Westport Ponds aerators? What specific interim actions have been proposed or implemented to

address immediate risks, especially given recent leaks in the Wood Stave Pipe and hazardous waste violations?

Agreed Order 5.14: In the last 10 years, there were around 16 leaks detected along the Wood Stave Pipe, both at the Main Mill and the Westport Ponds, as well as in the residential neighborhoods along the pipe. The most recent leak was discovered on September 12, 2023 due to water puddling above the pipe in the residential area of south Aberdeen. Cosmo reported that the puddling had stopped on October 18, 2023. The cause of the leak has not been investigated. To address the series of leaks, Cosmo submitted the final Pipe Risk Assessment Repair and Maintenance Plan to Ecology on March 7, 2023 under the Ecology's Administrative Order No. 21150 issued on May 5, 2022. The plan has not yet been implemented.

Reponse to Comment #33

Hazardous Substances

The first submittal required by the agreed orders is a Remedial Investigation Work Plan (Work Plan), which will provide much of the information requested in the comment. As described in Exhibit B of the agreed order, the Work Plan will describe general facility information; site history and conditions; including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; hazardous substances and their sources, etc. The leaks from the wood stave pipe will be included as part of the remedial investigation.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view a draft and final versions as they are posted by clicking "Subscribe to this site" button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Access

Section 8.4 of the AOs outlines the procedures for Cosmo to provide access to both Ecology and other PLPs at reasonable times to conduct the cleanup work.

Current Status

Because the mill is not operating, there is no wastewater in the wood stave pipe, other than potential stormwater and groundwater seepage. For the current status of the pipe, please see Ecology's response to [Comment #11](#). As noted in the comment, Ecology issued an [Order](#) in May 2022 requiring Cosmo to implement a repair and maintenance plan for the pipe. Because the mill is not currently operating, we are not requiring Cosmo to implement the plan at this time.

Interim Actions

Ecology and Cosmo a signed an Interim Action Order, effective Dec 22, 2025. Ecology has the option to issue other interim actions in the future as described Task #3 in Exhibit B of each AO. Task #3 described the different circumstances in which interim actions would be initiated.

Comment #34 from Craig Zora

OUTFALL POLLUTION. How are the elevated dioxin and furan levels at the outfalls being addressed, and what implications do they have for sediment remediation and public health?

Agreed Order 5.15: The November 2017 Sediment Study results showed elevated concentrations of dioxin and furans at both outfall 001 and outfall 002 of the NPDES permit no. WA0000809.

The outfall and diffuser lease (20-009630 and 51-074503) with the Department of Natural Resources expired in 2011 and the replacement easement (51-087147) was never signed. Will the outfall sediment impact zones be sampled for contaminants?

Reponse to Comment #34

The elevated dioxin and furan levels in the sediment indicates the presence of these pollutants that requires additional investigation under the AOs. Ecology has not established a sediment impact zone at this time. If the site investigation described above finds sediments above cleanup levels, those areas will also be part of the cleanup.

Comment #35 from Craig Zora

RI/FS STATUS. What is the current status of the remedial investigation (RI) and feasibility study (FS) under this Order? Have any interim actions been identified or implemented yet to address immediate risks?

Reponse to Comment #35

As the site is in the early stage of the cleanup, the RI and FS have not been initiated. The PLPs agreed to conduct these tasks as described in Exhibit B of each AOs. Exhibit D provides the schedule for the deliverables required by the orders. Cosmo and Ecology signed an Interim Action on Dec 22, 2025. This Interim Action is an amendment to Cosmo's AO, adding new tasks and schedules for Cosmo to prevent further site contamination. Additional interim actions can be considered in the future if there are further risks that must be addressed in a timely manner (see response to [Comment #33](#))

Comment #36 from Craig Zora

WEYCO COSMO RESPONSIBILITIES. How are the responsibilities divided between Weyerhaeuser and Cosmo Specialty Fibers, Inc. under their respective Agreed Orders?

Reponse to Comment #36

Both Cosmo and Weyerhaeuser are responsible for complying with the requirements in their respective agreed orders. At this point, it is up to them if they want to work together on the submittals required by each of the orders.

Comment #37 from Craig Zora

RISKS. What are the main risks of endangerment or emergency conditions currently present at the Site? Will warning signs be installed at the Westport ponds and the Cosmopolis boat launch?

Reponse to Comment #37

With respect to warning signs at the pond, please see response to [#Comment 10](#).

Because the mill has been down for almost three years, the physical and exposure risks are uncertain at this time. The AOs requires a Health and Safety plan (see Exhibit B, Task #1) prior to conducting work at the site.

Other risks are associated with the chemicals onsite in combination with the loss of electricity and water and Cosmo's limited ability to response to emergencies. Ecology Spills Program are trained to respond to emergency releases and are familiarized with the site. Ecology also has a 24-hour number for reporting emergencies (see response to [Comment #19](#)).

Comment #38 from Craig Zora

SECURITY. How is access to the Site, especially properties owned by Cosmo, being secured for Weyerhaeuser to conduct required work?

Reponse to Comment #38

Section 8.4 of the AOs outlines the procedures for Cosmo to provide access to both Ecology and other PLPs at reasonable times to conduct the cleanup work.

Comment #39 from Craig Zora

MILESTONES. What are the key milestones and deadlines in the schedule of deliverables, such as submission of the RI Work Plan, RI Report, FS, and Cleanup Action Plan?

Reponse to Comment #39

The key milestone are described under each task in Exhibit B of the AOs. The schedule and deliverables (e.g. RI Work Plan, RI report, FS) are in Exhibit D of each order.

The Cleanup Action Plan is not included in the AOs. Ecology plans to continue this phase under future AOs or Consent Decrees. Future AOs or Consent Decrees will also go through public notice.

Comment #40 from Craig Zora

SAMPLING. What types of sampling and analysis are planned in the RI (soil, groundwater, sediments, stormwater, etc.)?

Reponse to Comment #40

The first submittal required by the agreed orders is a Remedial Investigation Work Plan (Work Plan). As described in Exhibit B of the agreed order, the Work Plan will describe the following: general facility information; site history and conditions, including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; and hazardous substances and their sources, etc.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view draft and final versions as they are posted by clicking “Subscribe to this site” button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #41 from Craig Zora

COMPLIANCE. What measures are in place to ensure compliance with applicable laws and regulations, including MTCA, SEPA, and others listed in Exhibit C?

Reponse to Comment #41

Known applicable laws are identified in Exhibit C of the AOs. As the PLPs undertake more actions under the cleanup, other regulations may apply as well. The PLPs will identify and document compliance with the applicable regulations for Ecology’s review, per section 8.15 of the AOs.

Comment #42 from Craig Zora

COORDINATION. How will the coordination occur between Ecology, EPA, Weyerhaeuser, and Cosmo given the overlapping orders and responsibilities? How are disputes between Ecology and Weyerhaeuser resolved under the Order? What are the procedures if Weyerhaeuser or Ecology identifies a significant change in site conditions or an emergency?

Reponse to Comment #42

Ecology has oversight of the cleanup work being performed under the AOs, which includes coordination with multiple PLPs to resolve potential conflicts and avoid

redundancy in the work being conducted. Ecology generally encourages the PLPs to coordinate among themselves whenever possible.

The AOs help with coordination by laying out the obligations of each party and the work expected to be accomplished. The AOs also have procedures for resolving disputes in Section 8.9.

EPA is not currently involved in the cleanup conducted under the AOs, as MTCA is a state law. Should EPA take actions that could affect the cleanup, Ecology will work with EPA and the PLPs as needed.

Comment #43 from Craig Zora

FINANCIAL RESPONSIBILITIES. What financial responsibilities does Weyerhaeuser have in paying Ecology's remedial action costs, and how are these costs tracked and invoiced? What are the procedures and limitations related to transfer of interest or ownership of property within the Site? Are there existing use restrictions or institutional controls proposed or in place at the Site?

Response to Comment #43

Ecology has a process to recover their costs from Cosmo and Weyerhaeuser, as described in Section 8.1 of the AOs.

Ownership transfers are subject to Section 8.14 of the AOs. As the current owner, Cosmo is required to notify Ecology at least 30 days prior to the transfer. Prospective purchasers, lessees, assignees and other successors must also be notified of the cleanup. Please see Ecology's response to [Comment #20](#) for additional information for prospective purchasers.

The site use may be restricted by zoning. There are currently no institutional controls at the site. However, institutional controls may be considered in the future as part of the cleanup.

Comment #44 from Craig Zora

CONSEQUENCES. What are the consequences if Weyerhaeuser fails to meet the schedule or requirements outlined in the Agreed Order?

Response to Comment #44

Ecology will make a good faith effort to work with the PLPs to address issues as they come up. We can also use the dispute resolution procedures in Section 8.9 of the AOs.

As described in Subsection 8.9.4, Ecology may conduct the work and recover the cost from the PLPs. Ecology can also initiate enforcement action under Section 10 of each of the AOs.

Comment #45 from Craig Zora

AMENDING THE AGREED ORDER. What is the process for amending the Agreed Order if new information or conditions arise during the remedial action?

Reponse to Comment #45

Procedures for amendment are described in Section 8.11 of each AO. Substantial changes to the AO will go through a public notice to provide the public with the opportunity to review and comment, as was provided for the Interim Action Amendment to Cosmo's AO, effective Dec 22, 2025.

Comment #46 from Craig Zora

MONITORING. What are the long-term monitoring and maintenance plans post-remediation to prevent future releases or risks?

Thank you for considering my comments on the Weyerhaeuser Agreed Order. Please keep me informed of any future developments regarding this project.

Reponse to Comment #46

As the site is in the beginning stage of the cleanup, there are no long-term monitoring and maintenance plans proposed at this time. These measures are typically considered after completion of the FS as described in Exhibit B, Task 4 in each AO.

To receive updates outside of our typical notifications for public notice opportunities on the site cleanup, please see the cleanup website (<https://apps.ecology.wa.gov/cleanupsearch/site/2375>), click on the "Subscribe to this site" button to get notifications of new documents, comment periods, and status change at the site.

Comment #47 from Richard Vessey

Dear ECY,

The Mill has demonstrated their blatant disregard for the health and well-being of the people and environment in our community.

Now is the time to holistically, address the very serious current and future toxic waste hazards, for which we seem to have been left holding the bag.

ECY is very much appreciated but much more should be included in this project.

The elephant in the room is the short and long-term unknown risk of the hazardous toxic waste site a.k.a. Westport Holding Ponds. Simply blowing bubbles into it is laughably insufficient, if it weren't so serious.

It is imperative we do a thorough analysis and incorporate a plan to detoxify the pond site. This means; multiple air, water, soil core samples, structural integrity review.

No one knows exactly, what is there. I suspect there will be a few nasty surprises.

The public has the right to know the risks and all data collected should be published. We need this data to mitigate and/or remove the danger.

The goal should and could be, complete decontamination and site restoration. I strongly believe with the new technology at our disposal, that this is quite feasible.

Once the data is collected, we can create a digital twin of the site and use AI to virtually test thousands of solutions, within the Nvidia "Omniverse". Some enzymes like eating toxic waste.

Notwithstanding a potential tsunami, which would/could empty the ponds down to bedrock and spread this toxicity onto the land and into the Harbor, making the area unlivable, it just makes good common sense to clean up the site and remove the risk.

Your attention to this very reasonable concern is greatly appreciated.

Thanks again ECY for all your current hard work and efforts to fix this problem.

Reponse to Comment #47

As noted in the comment, aeration at the Westport Ponds is not intended to address the question of contamination and pollution. The ponds have been a source of odor in the past. The purpose of the aerators is to add oxygen to the water as needed to mitigate the odors. For the status of the aerators, please see response to [Comment #33](#).

The Westport ponds are a potential source of contamination to be investigated under the AOs. The first submittal required by the agreed orders is a Remedial Investigation Work Plan (Work Plan). As described in Exhibit B of the agreed order, the Work Plan will describe the following: general facility information; site history and conditions, including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; and hazardous substances and their sources, etc.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view draft and final versions as they

are posted by clicking “Subscribe to this site” button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov.

Once this work is completed, the results will be documented in a RI report and posted on the site cleanup page: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. The public will have an opportunity to review and comment on the results.

If the data shows contamination associated with the ponds, cleanup actions will be required in accordance to the steps laid out in Exhibit B of each AO. This includes reviewing different methods to achieve cleanup of the site (per Task 4 of Exhibit B).

Comment #48 from Vanessa LaValle

I am very concerned about this site and its potential for leaking chemicals into the Chehalis river. There are so many former weyerhaeuser sites that we as a community are now on the hook for cleanup. I am worried about the stored chemicals since the Cosmopolis specialty fibers company took over the site. I am also disheartened to hear that there may be a pipe leaking into the wetland area. Can DOE pursue funding from the previous tenants for this multi-phased clean up? Can DOE have fish and animal monitors to ensure fish and wildlife don't end up in the areas of high toxicity? Can businesses such as these with high environmental impacts be forced to deposit a bond before opening so that when they close we have money to take on this high-priority sites? This area is very important for wildlife and should be strengthened as a corridor for aquatic, riparian and terrestrial species.

Reponse to Comment #48

Weyerhaeuser is one of the PLPs (potentially liable persons/parties) responsible for carrying out the cleanup work. Ecology has oversight of the cleanup and will recover the costs associated with our oversight from the PLPs per Section 8.1 of the AOs. Cosmo is also another PLP. Ecology is considering whether additional PLPs should also be named.

With respect to the protection of fish and wildlife, please see Ecology’s response to [Comment #4](#) on how the cleanup will address these ecological receptors.

Under MTCA regulations, PLPs are required to have financial assurance under specific scenarios (e.g. long-term maintenance, engineered controls). Financial assurance can be in the form of a trust fund, a surety bond, a letter of credit, financial test, or other mechanisms. Financial assurance is not applicable in some cases, as it depends on a number of site-specific factors, including the nature of the contamination, cleanup method chosen, etc. As the cleanup process moves forward, Ecology will review the data received and consider requiring financial assurance as appropriate.

Comment #49 From Phil Jurasin

Ones health and well being and enjoyment of ones property is of the MOST importance. The track record of this old (68 years old) run down Pulp mill exposes the neglect of maintenance. Regular breakdowns, and lack of repairs, cause excessive releases of toxic

chemicals. The unfit air engulfs the community and not a rarity, but the norm. If the mill ran with the BEST of Practice Mode using up to date technology-like a closed loop process it would still be a pulp mill, but not impacting the community at such a gross disregard. I say clean up this UPERFUND toxic mess and tear down this OLD DINOSAUR-68 years is enough- Move on to something good for all. 2 1/2 yrs. of no noise is like heaven. Work Hard and anything is possible. If you stall you will never reach the TOP.....

Reponse to Comment #49

Comment noted. Ecology does not have the authority to require a facility to be demolished. However, Ecology recognized the importance of initiating cleanup activities at this site at this time. As discussed above, this cleanup work can be done at the same time as the facility is operating, provided that the facility follows the AOs and MTCA requirements. If the facility re-starts, they will also be required to comply with their permits and applicable regulations.

Comment #50 From Mike Maki

I have uploaded two documents to the DOE record for public access and consideration: "From Liability to Bio-Economy Hub: A Comprehensive Redevelopment and Feasibility Analysis for the Cosmopolis mill" and "The Cosmopolis Mill Contamination: An Analysis of Corporate Ownership, Environmental Neglect, and the Pursuit of Liability for the Gores Group," in which we emphasize that this owner/operator of the Cosmo Specialty Fiber mill, directly responsible for some of the more egregious environmental issues, should not be allowed to escape through a legal loophole. Gores Group should bear their full share of fiscal and legal responsibility (ongoing) for necessary and mandated clean-up.

Reponse to Comment #50

Ecology has reviewed documentation related to Gores Group's (Gores') interest in the mill, including Gores' 9/20/23 response to our 8/1/23 preliminary PLP letter. Based on the information available, we sent another preliminary PLP letter to Gores on 12/22/25, providing the basis for Ecology's determination. Gores provided a response on 2/26/26.

Ecology has considered all information received. We determine that Gores meets the definition of a PLP per [RCW 70A.305.040](#) of MTCA and have issued a final PLP determination letter on May 11, 2026.

Comments #51 through #54 below are from the testimonies received during the in-person public hearing held on September 9, 2025.

Comment #51 from Mike Maki

Good evening. My name is Mike Maki. I'm a native of Cosmopolis, and I'm 75 years old, so I was 7 years old when the Cosi pulp mill opened, and um I remember it well. I went to school in Cosmopolis and graduated from Aberdeen Weatherwax High School. In those days, environmentalist wasn't a word, wasn't a term. We called ourselves conservationists,

and I have been one since the earliest age that, that I could think, because we watched Weyerhaeuser mowing down the forests and we smelled every day there was an east wind, the pulp mill. And yet, in 1960 we got a new school and that was a really good thing, so I'm a little bit biased here. I come from a place where jobs from the forest do mean something. And so I have followed this issue very intensively since it has become, um, you know, on the front page, so to speak. In the written testimony there will be a long report that we are submitting, so you will be able to get way more deeper into this, as I have. The love to hate Weyerhaeuser feeling goes deep and yet today we have, it's a new ball game, really. I want to say that I have looked into Richard Bassett, and he is perhaps a little flaky, as you suggest, but he has a vision for something that is very different than what's happened there in the past. He has, uh, ideas such as that the lignosulfonate that red liquor is a resource. It's not just something to throw away and burn. That we have an existing infrastructure in place that can create a new kind of job, not just a lunch bucket working at the pulp mill, but there's going to be, God willing and everybody agreeing, finally, that this is not a bad idea what's going to happen in our county. This is an opportunity to really do something different. The term bioinnovation is what the term we use and the term Mr. Bassett uses, and if you look into what his vision is, it's really quite remarkable and it could mean all the difference, and it could put us on a different front page. A front page of a county and a population that really sees the potential for using our forest resources wisely to create a new generation of technically savvy people who are able to do something that is minimally polluting and maximally useful for the greater good. What I.. another example, there's a way, because, I'm a mushroom guy, and we have a bioinnovation center of our own that we are starting up and you can take fungi and process wood chips to prepare them to make paper that reduces the energy by 30% and the chemicals by 50%. We can, we can streamline this process and bring it into the 21st century and really do it differently, and Mr. Bassett is all about trying to do that. We need the help of everyone. and um, I'm here to help and communicate further, so if you want to go deeper with me it will be submitted in the record and we will have a great report for you, so thank you so much.

Thank you.

Reponse to Comment #51

Comment noted. MTCA cleanup can proceed at the same time as the facility is operating, as has been done at other sites in Washington. As such, the mill's restart and operations will be considered as Ecology and the PLPs proceed with the next steps of the cleanup.

Comment #52 from Donna Albert

Thank you to the Department of Ecology and for this, for this opportunity. I ask that public comments be immediately posted for the public on the Ecology website as soon as they are submitted. I want to see those public comments and know what others know, now, not after this comment opportunity is over. I can answer Liz's very good question, "How can a facility like this be allowed to continue to operate with outdated polluting equipment and store deadly chemicals in unlined ponds and in an ancient wooden pipeline?" The answer there should be a law that requires updates to protect people, but there isn't. Our laws are

written to defer to industry. It is unacceptable that a facility like this one could possibly restart with unlined ponds and wooden pipelines. Where to look for contaminants in this study: Please use the period of time from the earliest possible spill under Weyerhaeuser to determine how far the contaminants may have spread. This applies to each of the following items: The pipeline between the main plant and the Westport ponds is very old and made of wood. Please look under the wooden pipeline and please investigate where contaminants have spread underground or in the water. Look around the main plant where large unreported spills may have happened. Look in soils and in the water underground and in nearby water and sediments. Look under the wooden pipe (Did I do this already? Mmm. Heh, okay). Look under the Westport ponds. Look where the contaminants have migrated in the soils and water underground. Look where the contaminants have spread in floods. It seems unlikely to me that those ponds didn't overflow in 2007 and there may have been other times. Look at the outfalls and places in the harbor where the sediment may hold contaminants. Thank you for this presentation and for taking our comments. Thank you.

Reponse to Comment #52

The Westport ponds and wood stave pipe will be part of the area to be investigated for contamination. The first submittal required by the agreed orders is a Remedial Investigation Work Plan (Work Plan). As described in Exhibit B of the agreed order, the Work Plan will describe the following: general facility information; site history and conditions, including previous operations; past field investigations, including any data collection and analysis of soils, air, groundwater, surface water, and sediments; a conceptual site model showing contaminants, migration pathways in all environmental media, and potential receptors; geology and groundwater system characteristics; past, current, and future land use; identification of natural resources and ecological receptors; and hazardous substances and their sources, etc.

Ecology will post key documents, such as the Work Plan, on the cleanup site for Cosmo: <https://apps.ecology.wa.gov/cleanupsearch/site/2375>. While there is no formal public comment period for the Work Plan, you will be able to view draft and final versions as they are posted by clicking "Subscribe to this site" button on the website. If you have any questions or comments on the draft Work Plan, please send them to ha.tran@ecy.wa.gov. Ecology updated to page 3 of the PPP to include instructions for subscribing.

Comment #53 from Lee First

So my first comments are on the draft public participation plan. On page 4, the section that says, that's about "Signs around the cleanup site". So today I rode my bike on the Chehalis waterfront walkway and that goes along the um, the four Westport ponds. And I think, you know, it's a public walkway. It's one of the only places where people have access to sort of near the river although the, the walkway goes along the ponds. And so, I noticed there were quite a few places where the fence was in disrepair. And so, I think that there needs to be signs along that walkway about the leaks and the contamination in the ponds. And then, also, in order to adequately inform our community and visitors, I think there should be

signs posted along the shoreline where the public launches boats and fishes. So Cosmo has a boat launch where I saw a few people launching today. And, you know, and just a little ways upstream I think is where the outfalls were where there is dioxin and furans. And so, people are fishing, and um and dioxins and furans are some of the most toxic chemicals known to humans. People have no idea. They are out there fishing now. So, please post signs along the Westport ponds trail and also at the Bishop athletic center where people park to walk on the trail and please post signs at the public boat launches about the cleanup and opportunities to participate in the cleanup process.

On page six of the draft public participation plan, please add a new figure to the document that shows the location of the 2.5-mile wood stave wastewater pipe as well as the location of all known leaks that occurred in the past.

On page 7 please post signs in the residential areas where there were about 16 leaks in the 2.5 mile wood stave wastewater pipe, and please expand the radius of addresses to receive written notices of the cleanup to at least ¼ mile radius of all known locations of leaks of the wood stave wastewater pipe.

On page 8, the section on Tribal Engagement, it says this, “the Quinault Island Nation relies on resources that could be affected by contamination” please correct this to read “Quinault Indian Nation”.

Let’s see, and here’s some comments on the Agreed Order on page 16, so I don’t remember which one this, I think it was the Weyerhaeuser one: page 16, section 8.7 Access to Information, please require that all sampling data, or please put this in the requirements for the remedial investigation, please require that all sampling data be available to the public including maps and data collected in proximity to the 16 leaks in the wood stave wastewater pipe (30 seconds) and make sure to add a figure to the draft agreed order that shows the location of that wastewater pipe and of the 16 leaks. Um, I hope that the remedial investigation requires a survey of the wastewater ponds to determine if they are leaking. Thanks for this opportunity.

Thank you. Are there any others who did not sign up to speak who would like to speak at this time.

Reponse to Comment #53

Please see response to [Comment #10](#), regarding signage and fencing at the site. Please see response to Comment #52 above for information about the first submittal required by the agreed order (Remedial Investigation Work Plan), which will describe the proposed areas of investigation and the contaminants that will be evaluated.

Ecology made the following changes to the PPP:

- Corrected the error on page 8 to the “Quinault Indian Nation.”
- Add the following language on page 4 regarding the signage: “Appropriate signage for health risks will be required based on the results of site remedial investigation.”

- Added Appendix B to show the location of the Wood Stave pipe and recent leaks.
- Added language on page 2 (“How we share information with the community”) to expand the mailing list to addresses along the wood stave pipe. Following site investigation, Ecology may further expand the list to addresses around radius of the pipe.

Comment #54 from Bonnie Blessing

This is the Chehalis River, like this is low down. I live in the headwaters or really close to the headwaters. Salmon that come up towards Waddell Creek and Stony Creek and the Black River, they go by this place, and so I really encourage you to assess whether there is any impact to them or bioaccumulation or whatever and then I believe it's near marshes that have special critters in them. I'm not sure, but I think there's some marshes out back and I really think there's some fascinating things in there that may use habitats that you wouldn't expect like ditches and things like that that might connect these ponds or leach out into these ponds and go sideways. I think there might be some real interesting opportunities to see what might have gone into the adjoining wildlife that may actually come on to, they, they don't, they don't always stay where they belong or where they should be, and if they do move onto the property or next door. And then secondly, please watch out for the health of everybody in the community, if the stuff leaches out and goes sideways, I really appreciate you're watching where the groundwater plume, if there is any, could go. And I used to come down to the this area a lot because my grandparents taught school here, Fred and Donna Turnbow at High Schools. I hope that they had taught well to make sure that everyone kept things really clean and appropriate and thank you to whoever is cleaning this up.

Response to Comment #54

The MTCA cleanup regulations take into account all potential exposure pathways to the different anticipated receptors, including humans, fish and wildlife. These considerations are built into the site investigation as well as the selection of the cleanup method. Please see Ecology's response to [Comment #52](#) for more details.