

## 8 RI Conclusions and Recommendations for FS

The RI has been completed in accordance with the Statement of Work for Agreed Order No. 6834, the RI/FS Work Plan (Aspect, 2009a), and its Addendum (Aspect, 2010a). The RI synthesizes data from more than approximately 490 explorations, 1,200 samples and approximately 2,100 chemical analyses of Site soil, 340 samples and 940 chemical analyses of Site groundwater, 43 samples and chemical analysis of Site soil vapor and ambient air, a detailed mineralogic evaluation of the Fill Unit aquifer matrix, bench-scale treatability testing for mercury-contaminated soil and groundwater, as well as extensive characterization of Site hydrogeology. Figure 8-1 depicts locations of the collective pre-RI and RI explorations that provided data to support this RI.

Based on the comprehensive Site characterization program, the nature and extent of contamination has been defined sufficiently to proceed with development of the FS for the Site. Figure 8-2 depicts areas of soil and groundwater exceeding screening levels applied in the RI, and these represent subareas to be addressed in the FS. However, because soil outside of the subareas contains contaminant concentrations above unrestricted soil screening levels, Site-wide soils will also be addressed in the FS.

After completion of the RI/FS and Cleanup Action Plan, the final Site cleanup will address areas of remaining upland contamination, and will protect human health and ecological receptors by terminating remaining exposure pathways, including recontamination of the Whatcom Waterway.

During the RI/FS process, the Port is also conducting early interim remedial actions to remediate known areas of contamination that can be addressed readily, in accordance with MTCA (WAC 173-340-430) and the provisions of Agreed Order No. 6834. The interim action is permanently removing petroleum-contaminated soil from the Bunker C Tank subarea and mercury-contaminated materials from the source area of the Caustic Plume subarea, with the two areas completed as separate phases of cleanup construction. As stated in Section 1.1, the results of the interim action will be presented in the subsequent FS, not in this RI. However, reports presenting the methods and results from the Bunker C Tank interim action and Caustic Plume interim action will be available on Ecology's web site:

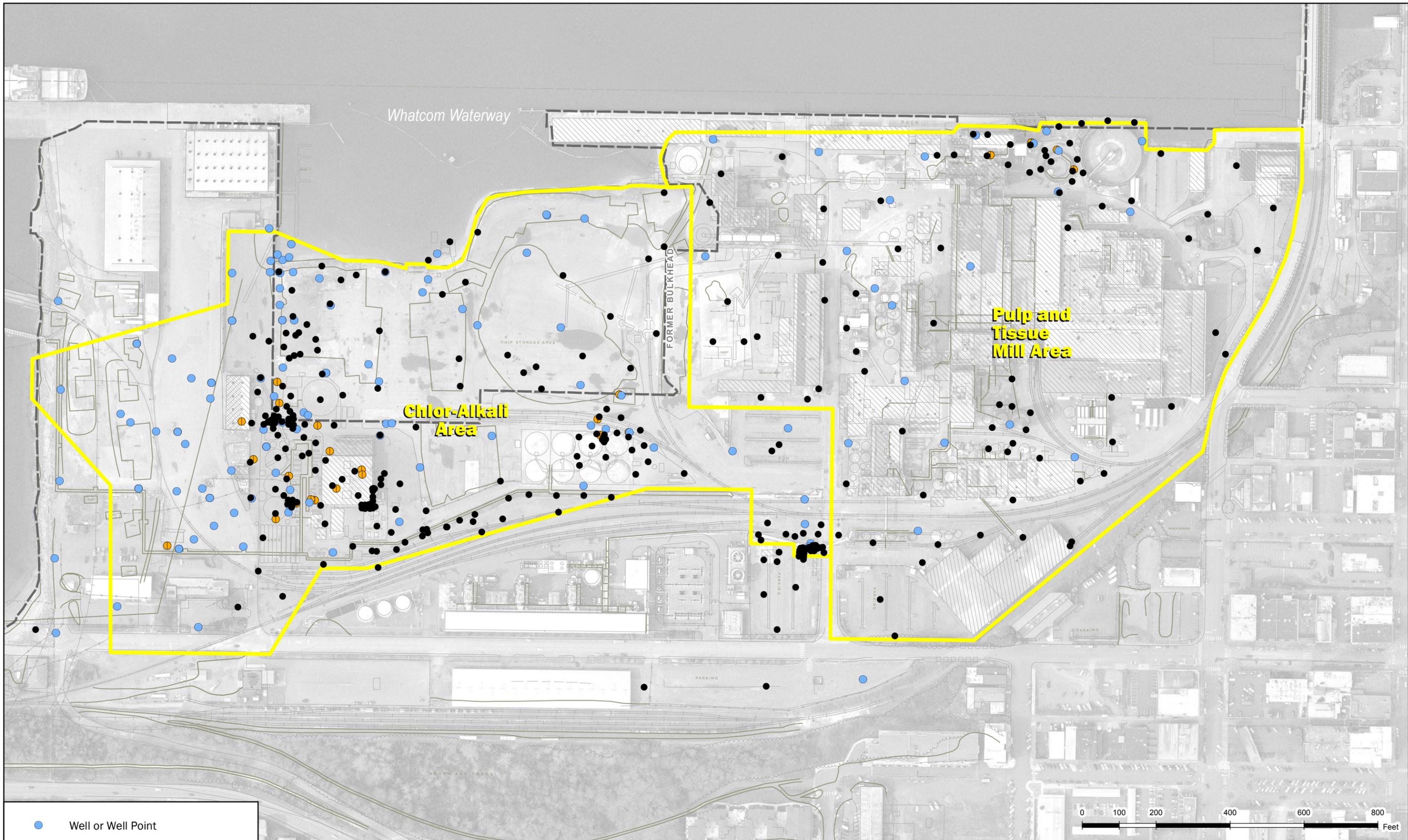
<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=2279> .

Based on the data presented in the RI, the Port seeks to split the GP West Site into two remedial action units for the purposes of completing subsequent FS documents, Cleanup Action Plans, and related Consent Decrees for cleanup implementation. The two remedial action units will be:

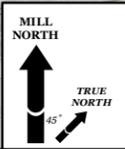
- (1) the Chlor-Alkali area, comprising the mercury-contaminated subareas of the Site - equivalent to the Site boundary prior to Agreed Order No. 6834 but expanded to encompass soil and groundwater exceeding screening levels applied in the RI; and
- (2) the Pulp and Tissue Mill area which contains no mercury subareas.

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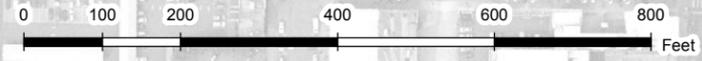
The boundaries of these two remedial action units are presented on Figures 8-1 and 8-2. While there is scattered soil contamination across the entire current Site, none of the defined contaminant subareas cross the boundary between the proposed two remedial action units. At the time of drafting the Draft Final RI, the Port is in discussion with Ecology regarding this administrative process related to the division of the current Site.



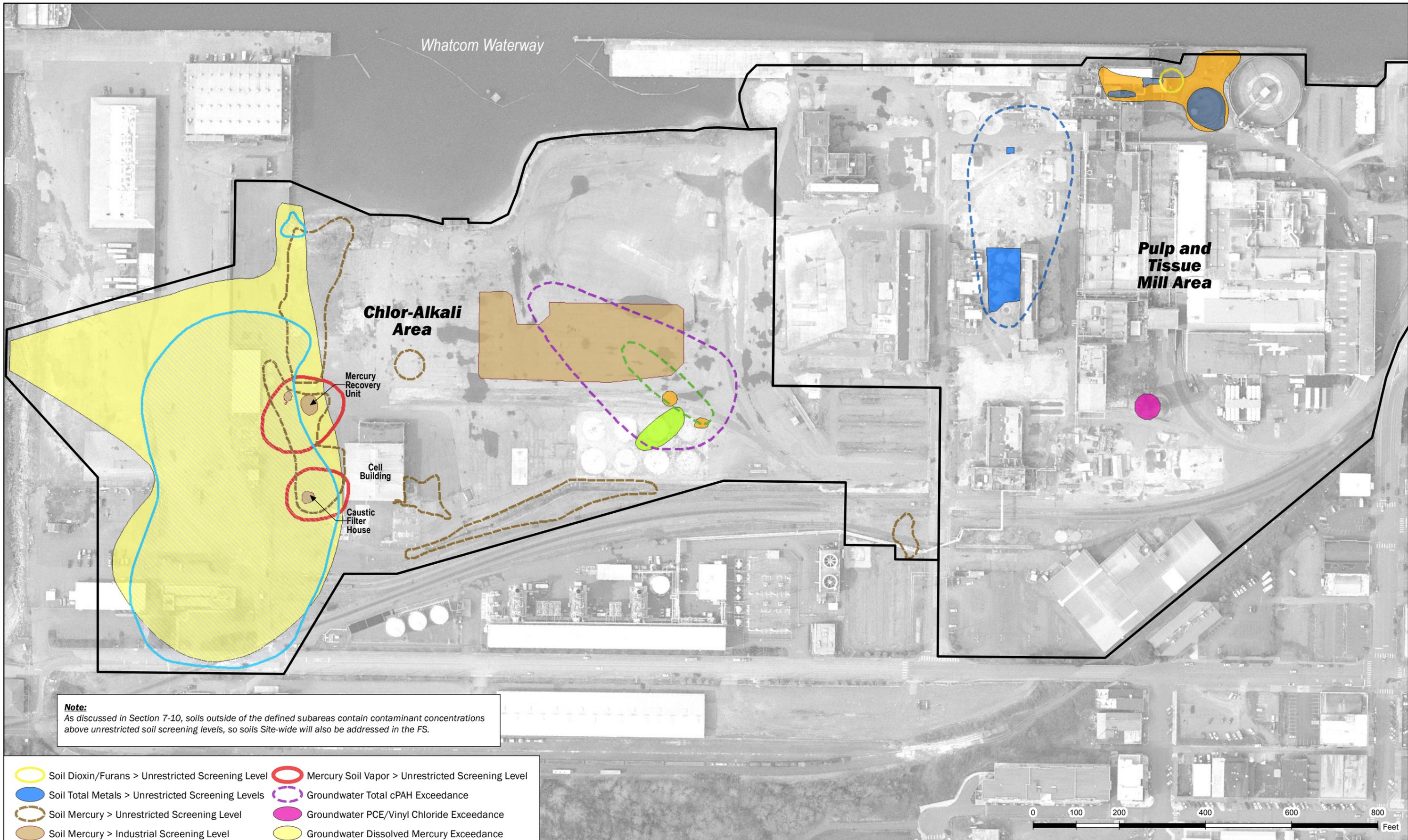
- Well or Well Point
- Vapor Probe or Ambient Air Sample
- All Other Explorations



**Exploration Locations**  
GP West Site RI/FS  
Bellingham, WA

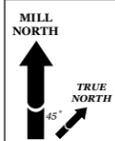


DATE: Apr 2013	PROJECT NO. <b>070188</b>
DESIGNED BY: SJG	
DRAWN BY: PPW	FIGURE NO. <b>8-1</b>
REVISED BY: PPW	



**Note:**  
As discussed in Section 7-10, soils outside of the defined subareas contain contaminant concentrations above unrestricted soil screening levels, so soils Site-wide will also be addressed in the FS.

- |   |   |
|---|---|
| Soil Dioxin/Furans > Unrestricted Screening Level | Mercury Soil Vapor > Unrestricted Screening Level |
| Soil Total Metals > Unrestricted Screening Levels | Groundwater Total cPAH Exceedance                 |
| Soil Mercury > Unrestricted Screening Level       | Groundwater PCE/Vinyl Chloride Exceedance         |
| Soil Mercury > Industrial Screening Level         | Groundwater Dissolved Mercury Exceedance          |
| Soil TPH > Unrestricted Screening Level           | Extent of Dissolved Metals Exceedances            |
| Soil TPH > 10,000 mg/kg                           | Groundwater pH Exceedance                         |
| Soil Naphthalene > Unrestricted Screening Level   | Groundwater Naphthalene Exceedance                |



**Subareas to Address in FS**  
GP West Site RI/FS  
Bellingham, WA

DATE: May 2013	PROJECT NO. 070188
DESIGNED BY: SJG	
DRAWN BY: PPW	FIGURE NO. 8-2
REVISED BY: PPW	

Path: T:\projects\_8\Port\_of\_Bellingham\Delivered\RI\Final\8-2 Subareas to Address in FS.mxd

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## Limitations

Work for this project was performed and this report prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. It is intended for the exclusive use of Port of Bellingham for specific application to the referenced property. This report does not represent a legal opinion. No other warranty, expressed or implied, is made.