



“Addendum” to Responsiveness Summary

Black Sand Beach Project

January 4 - February 5, 2010 Public Comment Period

**Draft Work Plan, 60 Percent Engineering Design,
State Environmental Policy Act (SEPA) Checklist, and
Determination of Non-Significance (DNS)**

**Prepared by
Washington State Department of Ecology
Eastern Regional Office
Toxics Cleanup Program
Spokane, WA**

July 2010

Two items were added to the Black Sand Beach Responsiveness Summary. First, Matt Wolohan's comments were received after the public comment period. We accepted his comments after the end of the formal comment period because he used an e-mail address from the public meeting agenda which contained a typographical error.

Second, an attachment was left out of the Responsiveness Summary which is being included in this Addendum. The attachment photo provides a comparison of what current beach sediments look like in comparison to potential replacement sediment.

Both of these items are included in the following text.

1. Matt Wolohan's Comment Letter and Ecology's Responses

----- Forwarded message -----
From: Matt Wolohan <webeeples@gmail.com>
Date: Thu, 28 Jan 2010 13:23:02 -0800
Subject: comments on Black Sand Beach
To: chgu461@ecy.wa.gov

As you stated at your meeting in Northport that only written comments would be considered, here is a list of comments that I would like to add as part of that.

1. In your presentation you mentioned cooperation and community involvement. This is a long standing problem that I have both as an affected party and a member of Citizens for a Clean Columbia with ECY. Notification is the key here. You kinda lucked out at the meeting as I was quite surprised at the civility of the locals to your proposals. You will be judged by the job you do and lack of transparency will likely be met with stiff resistance.

RESPONSE TO COMMENT 1

Thank you for your comment. Public participation in the Black Sand Beach project is an essential part of the Model Toxics Control Act (MTCA) process. Project updates and information are available from the Ecology website:

http://www.ecy.wa.gov/programs/tcp/sites/blackSandBeach/blackSandBeach_hp.html

2. I've been involved with Teck over this issue for at least the last 15 years and haven't gained a lot of confidence that they're just going to do the "right thing". My point on this is if you don't provide constant oversight, they're going to screw it up. Leaving them in charge of monitoring their work is a mistake and will leave the community holding the bag.

RESPONSE TO COMMENT 2

Ecology personnel will be present to observe the work at Black Sand Beach. Ecology will be there to review the work at key check points and determine whether removal action objectives have been met before allowing the work to proceed. Additionally, a cultural resource specialist or archaeologist will be present at the site whenever excavation is taking place to make sure any cultural finds, if encountered, are treated properly.

3. As someone who lives adjacent to BSB, the results of the project will be felt on a daily basis. Changing the makeup of the material will potentially effect the way the beach can be used. The size of the cover material has the potential to negatively impact lounging on the beach, the slope of the shoreline will keep a larger portion of it under water and create obstacles to fishermen, the proposed cobble on the shoreline will eliminate the ability of boats to access the beach, the condition the road is left in has the potential to greatly increase the access by people and the trash that they regretfully bring and leave.

RESPONSE TO COMMENT 3

Please see page 12 of Ecology's June 2010 Responsiveness Summary document, specifically response No. 1 and responses No. 2 through 7 to comment letter No. 2 (Chris Christian).

4. I would also like to see an adequate fire plan instituted as this is directly downhill from my home and the time of year for this project is high fire season. Fire likes to go uphill, sometimes very rapidly with disastrous consequences. We have been given 30 minute notice to evacuate once and another close call with a fire started by the railroad crew doing welding on the tracks. Quick response was the only thing that contained it as it was rapidly moving up the bank.

RESPONSE TO COMMENT 4

Please see page 42 of Ecology's June 2010 responsiveness summary document, specifically response No. 10 to comment letter No. 10 (Joe Wichmann on behalf of community members).

Teck will require its contractor to keep at least 500 feet of fire hose and a pump capable of delivering at least 50 gallons per minute at the most distant point of the fire hose. Additionally, Teck will notify the Washington State Department of Natural Resources North Columbia Wildland Fire District and Fire District 11 of the work, and will keep them informed of the schedule. The Work Plan will include specific information regarding notification and other emergency procedures that will be implemented in the event of a fire during the performance of the work.

5. The Waneta Road stretch from the access point to the turnaround is called the "Narrows". It's difficult to imagine 2 trucks passing each other in this stretch and not hard to imagine one of them in the ditch. We bring semis in from time to time and get a permit from the county to do this. The truck cannot travel on the road during school bus hours for safety reasons and I hope this condition will be followed.

RESPONSE TO COMMENT 5

Please see page 41 of Ecology's June 2010 Responsiveness Summary document, specifically response No. 6 to comment letter No. 10 (Joe Wichmann on behalf of community members).

6. We have a legal easement to the BSB access road. On your 30% plan it was stated that easement issues would be resolved by Jan.15th. Despite contact at the meeting and a call from me to Mr. Godlewski, I have yet to hear from Teck engineers on this. I did talk to a lawyer who was in attendance at the meeting and he has offered assistance, but I hope to not go that way. The ball is in their court.

RESPONSE TO COMMENT 6

Ecology understands outstanding easement and access issues have been discussed and resolved with Teck since this original comment was generated. For safety reasons, property owners that use the BSB access road to access their property should coordinate with the Contractor's site specific safety officer or his/her designee to use the unpaved road during construction work. Mr. Wolohan will be contacted by Teck or its Contractor before the start of construction to facilitate coordination and communication.

7. My wife and I are commercial beekeepers and are active in our harvest and bee moving at this time. Running into a dump truck with a load of bees is not a pleasant thought, but I can tell you as someone who has been involved in picking up wrecked bee trucks, it's a big mess! two trucks simultaneously is a recipe for disaster.

RESPONSE TO COMMENT 7

Please see page 41 of Ecology's June 2010 Responsiveness Summary document, specifically response No. 6 to comment letter No. 10 (Joe Wichmann on behalf of community members).

Teck and/or its technical representatives will coordinate with the truck hauling contractor to ensure awareness of local truck hauling and transport activities that may warrant specific attention and consideration. Communication between local residents and the construction supervisor regarding specific road hauling concerns will be addressed in the Truck Haul Plan.

8. In your 30% plan, you show the river at 70,000 cfs when the cleanup will occur. Since we've lived here we've seen it at 300,000cfs and it looks a little different when this occurs. The rocks are completely covered and the water line is up where the road forks, [just below the worst part of the road]. I've seen Epa documents that show the river at 500,000cfs and at that point, the water was across Waneta Rd. in the area between our warehouse and the access point. This was pre-upriver dams and this scenario probably won't occur, but it probably will surpass the 300k cfs at some point in time. My main point on this is that once the river reaches this level there will be little to stop the reintroduction of slag on this beach. The river is flowing upstream and the downstream section will fill in first and depending on the intensity of the runoff, the upstream section will do the same.

RESPONSE TO COMMENT 8

The Work Plan for the Black Sand Beach project includes provisions for monitoring of the replacement beach by Teck (section 7.1) following construction completion. The monitoring will be conducted annually over a 5-year period to document replacement beach conditions. The monitoring will document potential changes to the beach caused by natural erosion and/or redeposition of sediment materials, including granular slag. We agree that deposition of any new

sediment material (including granular slag) on to the replacement beach is most likely to occur during a high flow river condition. These same high flow conditions also could result in localized erosion of some portions of the replacement beach.

9. As with most projects the government is involved in, I feel there is little I can do to stop it. I hope the comments will be used in as constructive a way as possible and that any information that can be gleaned from it will be used in such a way that future attempts at cleanup will meet with greater success. Coordinating with all concerned parties is essential to these ends.

RESPONSE TO COMMENT 9

Please see our response to your comment No. 1 above. Please also see page 41 of Ecology's June 2010 Responsiveness Summary document, specifically response No. 5 to comment letter No. 10 (Joe Wichmann on behalf of community members).

In addition, please see page 51 of the Responsiveness Summary document, specifically response No. 1 to comment letter No. 11 (Joe Wichmann as CCC Technical Advisory Lead).

If there's anything we can do to help this proceed smoothly, please feel free to call or e-mail. We are certainly apprehensive looking forward to next September and want this to be as least disruptive as possible.

Sincerely, Matt Wolohan & Diane Hall -Rainbow Honey Co.

2. Attachment 1 - Photo of current beach sediments and potential replacement sediments for Black Sand Beach.

36310019_17.cdr



Typical replacement sand is shown above, existing granulated slag is shown in bottom section of top photograph.



Typical beach replacement sand provided courtesy of Colville County Concrete, actual fill replacement sand may vary.

**Attachment 1
Photos of Granulated Slag and Typical Replacement Fill
(Top Layer)**

Job No. 36310019

Black Sand Beach
Northport, Washington