



PUBLIC PARTICIPATION PLAN

Georgia Pacific West Cleanup Site Bellingham, WA

Washington State Department of Ecology

Northwest Regional Office

Toxics Cleanup Program

3190 160th Avenue SE

Bellevue, Washington 98008

November 2014

Introduction

The Washington Department of Ecology (Ecology) has developed this public participation plan in accordance with the state's toxics cleanup law, the Model Toxics Control Act (MTCA), to promote meaningful community involvement during the cleanup of the Georgia Pacific (GP) West site in Bellingham, Washington.

Public participation is an integral part of Ecology's responsibilities under MTCA. Ecology's goal is to provide the public with timely information and meaningful opportunities for participation. This public participation plan describes the tools that Ecology plans to use to inform the public about the site and identifies opportunities for the community to become involved.



Site background

Location and ownership

The GP West Site is about 74 acres on the downtown Bellingham waterfront, 300 W. Laurel St. It is bordered by the Whatcom Waterway, Cornwall Avenue, East Chestnut Street and the Bellingham Shipping Terminal. Portions of the former Georgia-Pacific LLC property are contaminated at levels that exceed standards under MTCA. These contaminated areas make up the GP West site. The Port of Bellingham (port) owns most of the site. The site also includes a portion of property owned by the state of Washington, City of Bellingham, and BNSF Railway Company.

Site history:

A pulp and tissue mill operated at the site from 1926 through 2007. The Port of Bellingham acquired property within the site from Georgia Pacific Corporation in January 2005, and plans to use the property for commercial, retail, and residential purposes.

Environmental investigation of the site showed contamination in two separate and distinct areas. As a result the port and Ecology agreed to divide the site into two separate cleanup remedial action units, or areas, to expedite cleanup and support redevelopment. The two areas are known as the pulp and tissue mill area and the chlor-alkali area.

The GP West site is ranked a 5 on Ecology's Hazardous Sites List, indicating the lowest risk of human and environmental exposure to hazardous substances. GP and the port already have

studied and cleaned up some portions of the site, however further work is required.

Interim cleanup work

In 2011, the port removed soil with high levels of petroleum from the pulp and tissue mill area of the site. The soil was treated and disposed at a permitted landfill. In 2013, the port initiated the removal of soil with high levels of mercury from the chlor-alkali area of the site, and the removal of mercury-contaminated building materials.

Pulp & Tissue Mill Area

The former mill manufactured pulp to make tissue and toweling products, and for sale as market pulp. Other operations included an alcohol plant, lignin plant, acid plant, and steam plant with fuel oil storage. As a result the 31-acre area contains metals, low pH, petroleum hydrocarbons, volatile organic compounds, and dioxins/furans at levels that exceed state cleanup standards.

Chlor-alkali Area

The former chlor-alkali plant operated from 1965-1999. It used mercury to produce chlorine and sodium hydroxide for use at the pulp & tissue mill. Petroleum was also stored there. As a result this 43-acre area contains mercury, high pH, polycyclic aromatic hydrocarbons, and petroleum hydrocarbons that exceed state cleanup standards.

Cleanup alternatives and proposed plan

The Port of Bellingham produced a report called a Feasibility Study in early 2014, which listed alternatives for cleanup up the pulp and tissue mill area. Based on that report, Ecology developed a cleanup action plan, as part of a legal agreement with the port (called a consent decree). These documents, along with this draft public participation plan and a Determination of Non-Significance under SEPA, are currently available for public review. Ecology is accepting public comment on them from July 14 – August 27, 2014.

A second feasibility study and cleanup action plan will be developed for the chlor-alkali area in the future.

Bellingham Bay Demonstration Pilot

The GP West site is one of 12 cleanup sites identified through the Bellingham Bay Demonstration Pilot project, a coordinated effort by 15 federal, tribal, state and local organizations to clean up contaminated sites around Bellingham Bay.

In 2000, Ecology, in cooperation with the pilot work group, produced the Bellingham Bay Comprehensive Strategy. The Comprehensive Strategy is a guidance document providing information about sediment cleanup and disposal, pollution prevention, habitat restoration and land use from a bay-wide perspective.

Georgia-Pacific West Site

Bellingham, WA

Key community concerns

Through comments received on the nearby Whatcom Waterway site's 2006 supplemental RI/FS and draft consent decree, Ecology identified concerns and interests that may apply to cleanup of the GP West site. Concerns and interests include:

- Protecting human health and the environment.
- Avoiding harm to important fisheries and habitats.
- Coordinating cleanup actions with other Bellingham Bay cleanup projects.
- Understanding the relationship between land use decisions and cleanup decisions.
- Providing opportunities for public involvement.
- Complying with regulatory requirements.
- Monitoring conditions after cleanup work is complete.

Additional public concerns may be identified over the course of site study and cleanup actions through public comment periods, hearings, meetings and other communication.

Public participation activities and responsibilities

Ecology is responsible for carrying out this public participation plan for the GP West site. Under the terms of a legal agreement, called an agreed order, the Port of Bellingham will cooperate and, when requested by Ecology, will help with the various public participation activities.

Ecology uses a variety of activities to promote public participation in the planning and cleanup of MTCA sites. Following is a list of the public involvement activities that Ecology will use during cleanup activities.

Public comment period – Several public comment periods have been conducted during the cleanup process for this site. Future comment periods will be conducted as required in order to keep the public informed at each step as the process moves forward.

Ecology will post these documents at information repositories, on Ecology's Georgia Pacific West web site at www.ecy.wa.gov/programs/tcp/sites - search site name Georgia Pacific West, and on CD by request.

Comments will be accepted at any time during the public comment period by letter or e-mail to:

Brian Sato, P.E.
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Washington Department of Ecology
Northwest Regional Office
3190 160th Ave. SE
Bellevue, WA 98008-5452
425-649-7265
brian.sato@ecy.wa.gov

Ecology will consider the need for changes or revisions to the draft documents based on the public comments received. If significant changes are made, then a second comment period may be opened. If no significant changes are made, then Ecology will finalize the draft documents.

Responsiveness summary - A responsiveness summary is a summary of written public comments received by Ecology during a comment period, and Ecology's responses to those comments.

Ecology will prepare a responsiveness summary to address comments received on the draft FS, consent decree and draft Cleanup Action Plan. Ecology will place the responsiveness summary in site information repositories.

When the responsiveness summary is available, Ecology will notify those who commented, and a notice will be placed in the site register.

Information repositories - Ecology maintains repositories of information regarding the site for the convenience of interested people, where site documents will be available for public review during the comment period. Ecology also can make copies of documents for a fee.

For this site, the information repositories are:

Bellingham Public Library
210 Central Ave., Bellingham
Phone: 360-676-6860

Department of Ecology
Bellingham Field Office
1440 10th St., Suite 102, Bellingham
Phone: 360-715-5200

Department of Ecology
Northwest Regional Office
3190 160th Avenue SE, Bellevue
Phone: 425-649-7190

Site register - The site register is published by Ecology twice a month to inform the public of:

- Activities related to the study and cleanup of contaminated sites.
- Public meetings, hearings and comment periods.
- Discussion or negotiations of legal agreements.
- Availability of cleanup reports.
- Hazard rankings of sites.

If you would like to regularly receive the site register, please contact:

Site Register
Department of Ecology-Toxics Cleanup Program
PO Box 47600
Olympia WA 98504-7600
360-407-7170

If you would like to be on the site register e-mail list, complete the electronic form at www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html.

Mailing list - Ecology has compiled a mailing list for the site. The list includes individuals, groups, public agencies, elected officials, private businesses, potentially affected parties, and other known interested parties. The list is updated as needed.

Fact sheets - Ecology will mail fact sheets to those entities on the site mailing list to inform them of public hearings, meetings, comment opportunities, and important site activities. Ecology also may mail fact sheets about the progress of site activities.

Newspaper advertisements - At a minimum, Ecology will place an ad in The Bellingham Herald to announce comment periods, public meetings and hearings for the site.

Plan update

This public participation plan may be updated as the project proceeds. If a substantive update is necessary, the revised plan will be submitted to the public for comment.

Public points of contact

If you have questions or need more information about this plan or this site, please contact:

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Glossary

cleanup: The implementation of a cleanup action or interim action. In other words, the term “cleanup” includes actions taken to address a release, or threatened release of hazardous substances that could affect public health and/or the environment.

cleanup action: Any remedial action, except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy or remove a hazardous substance.

cleanup action plan (CAP): The document prepared by Ecology that selects the cleanup action for the site, and specifies cleanup standards and other requirements for the cleanup action. The cleanup action plan is based on information and technical analysis generated during the remedial investigation/feasibility study. Ecology also considers public comments and community concerns.

comment period: A time period during which the public can review and comment on various documents and Ecology actions. For example, a comment period is provided to allow community members to review and comment on proposed cleanup action alternatives and proposed plans. Also, a comment period is held to allow community members to review and comment on draft feasibility studies.

consent decree: A legal document that is entered in court, which formalizes an agreement reached between the state (and the U.S. Environmental Protection Agency if involved) and the potentially liable person(s) to implement cleanup. A consent decree settles the liability for parties that implement the cleanup. Consent decrees are subject to public comment. If substantial change is proposed to a decree, an additional comment period is provided under the terms of the decree before the decree is formally entered in court.

feasibility study (FS): This study uses information obtained in a remedial investigation to develop and evaluate a range of cleanup options for a site, termed “cleanup alternatives.” The FS must include cleanup alternatives that protect human health and the environment (including, as appropriate, terrestrial and ecological receptors) by eliminating, reducing, or otherwise controlling risks posed through each exposure pathway and migration route.

information repository: A file containing current information, technical reports and reference documents available for public review. The information repository is usually located in a public building that is convenient for local residents such as a public school, city hall or library.

Model Toxics Control Act (MTCA): Legislation passed in the state of Washington by voter initiative in 1988, which became effective in 1989 and was codified as Chapter 70.105D RCW. Its purpose is to identify, investigate and clean up facilities where hazardous substances have been released. It defines the role of Ecology and encourages public involvement in the decision making process.

potentially liable person (PLP): Any person whom Ecology finds, based on credible evidence, to be liable under MTCA, RCW 70.105D.040. This includes, but is not limited to, individuals or companies, state agencies, and others, who are the owners or operators of a facility; who owned or operated the facility at the time of disposal or release of hazardous substances; who generated hazardous substances disposed of at the facility, or who otherwise owned the hazardous substances and arranged for disposal; or who transported hazardous substances for disposal. Whenever possible, Ecology requires these PLPs, through administrative and legal actions, to clean up sites.

public participation plan: A plan prepared to encourage coordinated and effective public involvement designed to meet the public's needs at a particular site.

remedial investigation: This study characterizes the site and defines the nature and extent of contamination.

remedial investigation/feasibility study (RI/FS): Two distinct but related studies. The FS is

usually performed immediately following the RI, and together they are referred to as the RI/FS. They

are intended to collect, develop, and evaluate sufficient information regarding a site to select a cleanup action, including:

- Gathering the data necessary to determine the type and extent of contamination.
- Establishing criteria for cleaning up the site.
- Identifying and screening cleanup alternatives for remedial action.
- Analyzing in detail the technology and costs of the alternatives.

responsiveness summary: A summary of oral and written public comments received by Ecology during a public comment period on key documents, and Ecology's responses to those comments.

The responsiveness summary is not required for MTCA documents. However, Ecology sometimes chooses to prepare them as part of site-specific public participation activities.

site or “facility”: Any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft; or any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited stored, disposed of, or placed, or otherwise come to be located.