

Responsiveness Summary

Periodic Review Report Public Comment Period

February 6-March 9, 2015

Fort Vancouver Plywood

Vancouver, Washington

Site Manager: Panjini Balaraju

Public Involvement Coordinator: Audrey Kuklok

We received one comment on the draft Periodic Review Report. The comment is in the site file at the Washington Department of Ecology's Southwest Regional Office. The Periodic Review Report is now final.

Comments

Comments were received in an e-mail dated March 5, 2015.

Dear Mr. Balaraju:

The Port of Vancouver, USA (port) is providing comments on the "Periodic Review Report Draft, Fort Vancouver Plywood, Facility ID#: 1029" that was released for public comment on February 5th, 2015. The port owns the real property where the former Fort Vancouver Plywood was located. The port takes environmental stewardship seriously and it is our commitment to strive for programs and policies that allow nature and industry to successfully coexist. Thank you for the opportunity to review and comment on the periodic review report and we look forward to the response to comments for further clarification.

- Section 2.1, first paragraph: change "Blazier" to "Brazier"
- Section 2.1, second paragraph: the port demolished the remaining office building in the summer of 2013.
- Section 2.1 and 2.2: The way these section are written, it sounds as though the plywood facility may still operate in some fashion on the property; the plywood mill stopped operation in 1997. Also, the property has been used for industrial purposes for over 100 years. The port suggests referencing the property's "continued" industrial use instead "proposed" or "future" industrial use.
- Section 2.4.3, third paragraph: The most recent groundwater monitoring was conducted in September of 2014 not 2013 (report attached).
- Section 2.5.2: This quotes section 1b of the Environmental Covenant, indicating that "No groundwater may be taken from the property for domestic, agricultural, or any other use." However, the, last paragraph

of Section 2.2 mentions that the port uses the groundwater from the deeper saturated zone as a source of potable water. The port's use of the deeper aquifer is not affected by the restrictive covenants. Please clarify the statement in section 2.5.2 so it is not implied that the port's use of the deeper aquifer for potable water contradicts the covenant.

- Section 3.1, last paragraph: This states that the "ECs restrict the groundwater use at the property." Please clarify that the shallow groundwater zone is specifically subject to this restriction: as noted above, the port operates potable supply wells in the deeper saturated zone adjacent to Cell2 that are not subject to the restriction.
- Section 3.4, first paragraph: This states the whole site is currently occupied by a metal recycling facility. Only Cell1 and portions of Cell2 are occupied by the metal recycling facility, the remaining portion of Cell2 is occupied by the malting facility.
- Section 3.4: The section does not discuss the new rail trench installed through the cleanup area as part of the port's West Vancouver Freight Access (WVFA) project. This new concrete rail trench structure began construction in 2013 and will be completed by April 2015. The construction of this project and the impacts to the cell1 and cell 2 caps were approved by Ecology prior to the commencement of construction. The trench structure runs the entire length (east-west) of the former Fort Vancouver Plywood site along the river (-1100 feet, see attached figure). A retaining wall comprised of soldier and sheet pile was installed along the land side of the trench to a total depth averaging approximately 34 feet below ground surface (See attached photo). This project has indirectly created a barrier that likely prevents residual site contamination in shallow soil and groundwater from migrating to the river.
- Overall, there are a number of typos that we noted in the report that could be corrected (e.g., "caped" vs. "capped" in Section 2.4.1).

Thank you for your time.

Sincerely,

Matt Graves
Environmental Manager
Port of Vancouver, USA

Ecology Response

Good morning Matt,

Thanks for your comments. I read your comments and they look fine to me. I will revise the draft periodic review report based on your comments. Also I will check for the typos one more time.

In the future, I will send you a draft for your comments before we send it out for the 30-day public comment.

Thanks.

Panjini Balaraju