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January 31, 2012

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Department of Ecology  
Southwest Regional Director  
P.O. Box 47600  
Olympia, WA 98504-7600  
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Department of Ecology  
Industrial Section  
P.O. Box 47600  
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*Submitted Via Email*

**RE: Model Toxics Control Act (MTCA) Agreed Order No. DE 8940 for Cleanup at Former Reynolds Aluminum Plant, Longview, WA.**

Dear Ms. Toteff, Ms. Wigfield, and Mr. Skyllingstad,

Columbia Riverkeeper (Riverkeeper) submits the following comments on the Department of Ecology's (Ecology) draft Agreed Order No. DE 8940 (Order) between Northwest Alloys, Inc., Millennium Bulk Terminals Longview, LLC (Millennium) (referred to collectively as "the parties"), and Ecology. After years of cleanup delay at the former Reynolds Aluminum site ("the site"), as well as new contamination by former lessee Chinook Ventures, Riverkeeper appreciates Ecology's responsiveness to public calls to jumpstart the cleanup process. Ecology's recent actions are important steps toward implementing a new approach to this highly contaminated site located on the banks of the Columbia River. These actions include setting new deadlines for the parties to submit work plans, proposing a new Agreed Order adding the new site operator as a party, a new RI/FS timeline, and updating the website with the most current information on site developments.

Decades of aluminum smelting left a legacy of heavily contaminated groundwater and soil at the 416 acre site. Waste from the old aluminum smelter is buried in pits across the site, including a recently discovered dumping ground in a wetland. Levels of fluoride, cyanide, and polycyclic aromatic hydrocarbons (PAHs) in the soil and groundwater exceed state standards

designed to protect public health and the environment. Aluminum smelting ceased over a decade ago and today Alcoa's subsidiary, Northwest Alloys, owns the property.

Last year, Millennium—an Australian company owned by Ambre Energy—leased the site in hopes of operating the largest coal export terminal in the nation. Millennium's plans were quickly stymied by its untruthful representations to state officials and the public about the size of its highly controversial coal export terminal. Since that time, Millennium launched a public relations campaign to paint itself as the “white knight” of cleanup. In truth, Millennium has **no experience** cleaning up hazardous waste sites, let alone one of the most contaminated sites on the Lower Columbia River.

Riverkeeper urges Ecology to continue and expand its recent focus on the former Reynolds site. This requires moving forward with strict cleanup investigation deadlines and enhanced agency oversight to ensure that the culture of delay and deception that persisted during Chinook Ventures' tenure is not repeated with Millennium.

### **Ensuring an End to Historic Cleanup Delays**

Chinook Ventures—the company that notoriously mismanaged and polluted the site—promised to quickly and effectively remediate the site. Not surprisingly, Millennium makes the same promises. Experience counsels in favor of a new oversight approach with inexperienced companies who promise to deliver on a complex, long-term cleanup. Despite Ecology's efforts to regulate Chinook Ventures' operations, recent discoveries demonstrate that oversight from afar (*i.e.*, Lacey) by staff with heavy workloads was inadequate to protect the site from further contamination by an inexperienced “cleanup” company, Chinook Ventures.

We cannot afford the same setbacks under Millennium.

Over the years, Ecology staff has repeatedly informed Riverkeeper that other workload demands and responding to Chinook Ventures' business developments (*i.e.*, transloading petcoke) detracted from working on cleanup at the site. For example, Chinook Ventures submitted a draft Remedial Investigation (RI) Report and focused Feasibility Study (FS) in 2007. Ecology never reviewed the documents for completeness and, in turn, subsequent steps to implement a RI/FS never transpired.

The new Order, which includes revised deadlines and adds Millennium as a potentially liable person (PLP), is one step toward changing the culture of delay at this site. The Order, however, will not change Ecology's workload and ability to move cleanup forward. Riverkeeper therefore recommends a new approach.

Under the 2007 Agreed Order, Ecology had the option of hiring a contractor, with Northwest Alloys and Chinook Ventures footing the bill. The department never took advantage of this provision. The 2012 Agreed Order also allows for contractor reimbursements. Moving forward, Ecology should hire a contractor, based at the cleanup site, to ensure that Millennium—a recently formed Limited Liability Company with absolutely no cleanup experience—does not

become another Chinook Ventures. By hiring a contractor, Ecology can also ensure the timely review, revision, and approval of future sampling actions, the RI/FS, and cleanup action plan.

### **Site Development Cannot Compromise Cleanup**

The former Reynolds Aluminum site is prime river-access industrial real estate. Riverkeeper supports responsible redevelopment of brownfield sites along the Columbia River. Development, however, cannot come at the cost of protective, thorough hazardous waste cleanup. At other former aluminum smelter sites along the Columbia, including the former Reynolds smelter in Vancouver, the former Martin Marietta smelter in The Dalles, and the former Aloca smelter in Troutdale, state and federal regulators moved forward with cleanup before new, large-scale industrial operations began.

At the former Reynolds smelter in Longview, Chinook Ventures began operating a major multi-commodity import/export terminal while it undertook “cleanup” activities. Experience shows that this model does not work. While Chinook Ventures was allegedly cleaning up the site, it was also creating new contamination with its petcoke operations and handling of site cleanup. Ecology should therefore take a new approach with Millennium: require investigations and site cleanup *before* sanctioning any expansion of industrial operations.

### **Proposed Supplemental Study Activities**

The Order calls for ten (10) Supplemental Study Activities (SSAs). Riverkeeper supports Ecology’s decision to expand sampling at the site, particularly sampling to understand the impact of Chinook Ventures’ operations and recently discovered historic contamination.

### **Adding Responsible Corporate Parties**

Riverkeeper supports Ecology’s decision to execute a new Order adding Millennium as a PLP. This decision, however, in no way reduces Northwest Alloys’ duties under MTCA to clean up its property.

### **Reassessing Hazard Site Ranking**

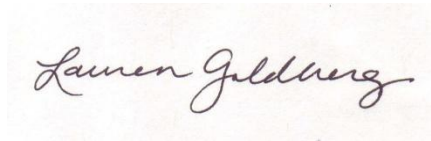
Ecology ranked the former Reynolds Aluminum site on the state’s Hazardous Sites List in 1999. Since that time, the department has significantly expanded its understanding of historic hazardous waste contamination at the site. Chinook Ventures operations also added to the historic contamination. Together, new information about historic contamination and new contamination by Chinook Ventures warrant revisiting the site’s ranking. WAC 173-340-330(6) states: “The hazardous sites list shall reflect the *current status* of remedial action at each site. The department may change a site’s status to reflect *current conditions*.” (emphasis added). Given new information and recent actions, Riverkeeper urges Ecology to reassess and change the site’s status “to reflect current conditions.”

## **Public Participation Plan**

Riverkeeper supports the revised Public Participation Plan, which calls for regular communication regarding the status of cleanup, formal and informal public comment periods, and presentations at community group meetings. As Ecology is aware, there is tremendous local interest in effectively and timely cleaning up this site. The Public Participation Plan reflects this high level of interest. The Plan would also benefit from an addition to the “website” section: Ecology should post all public comments on the website to increase the public dialogue on the future of this important cleanup process.

Riverkeeper appreciates the opportunity to comment on the draft Agreed Order and looks forward to continued opportunities for public understanding and input about one of the most important and complex Lower Columbia River cleanups of the decade.

Sincerely,

A handwritten signature in cursive script that reads "Lauren Goldberg". The signature is written in black ink on a light-colored, slightly textured background.

Lauren Goldberg  
Staff Attorney  
Columbia Riverkeeper

**From:** Niis Bue [<mailto:bueniis@yahoo.com>]  
**Sent:** Wednesday, February 01, 2012 10:41 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Longview site cleanup

Mr. Skyllingstad, I cannot attend the upcoming public hearing about the cleanup process on the former Alcoa site in Longview but would like to make my views known.

I know that workloads in all kinds of agencies are heavy, and I think we all know the deplorable reasons. While the Agreed Order is going in the right direction, more is needed. Isn't it our turn for this site's cleanup to become of the highest priority?

When that happens, I feel that Ecology should charge Alcoa for the cost of monitoring samples, overseeing cleanup, and reviewing cleanup plans. We taxpayers should not have to foot the bill for yet another corporate boondoggle.

My understanding is that both Millennium and Chinook lack the experience, if not the desire, to clean up the site, one of the most contaminated on the lower Columbia.

Please make cleaning up this site the highest priority and find a cleanup company with real expertise and the willingness to do a good job.

Thank you,

Niis Bue  
1516 - 24th Avenue  
Longview 98632

**From:** Carol Boudreau [<mailto:carolsb@mac.com>]  
**Sent:** Wednesday, February 01, 2012 10:47 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Cleanup at the Former Reynolds Aluminum Site

Mr. Skyllingstad,

I encourage the WA Dept of Ecology to require cleanup to get back on track at the old Reynold's Aluminum site in Longview. Ecology needs to charge Alcoa for services to monitor sampling results, oversee cleanup operations, and review cleanup plans. The polluter, not the taxpayer should foot the bill. The time for clean-up is now.

Also, I am totally opposed to allowing Millennium to establish their coal export terminal on the Columbia River. It is already way too polluted! Millennium's coal export plans would compromise cleanup. They have already shown that can't "come clean" with the public and obviously have only their exploitative and mercenary gains in mind with their plans.

Please represent the Cowlitz County public who deserves a clean environment and healthy air.

Carol Boudreau  
565 Diebert Rd.  
Longview, WA 98632

**From:** Carol and Terry [<mailto:c1ricket@yahoo.com>]  
**Sent:** Wednesday, February 01, 2012 11:21 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:**

Clean up that site!!! And make Aloa pay for it. They polluted it, not us!!! Dr. Harold Kriesel,  
Cathlamet, WA.

**From:** Gayle Kiser [<mailto:kiser@cni.net>]  
**Sent:** Wednesday, February 01, 2012 11:32 AM  
**To:** Skyllingstad, Paul (ECY)  
**Cc:** Daniel Serres; Beth Doglio; [misnerj@co.cowlitz.wa.us](mailto:misnerj@co.cowlitz.wa.us); 'Lauren Goldberg'  
**Subject:** Comments on Agreed Order No. DE8940

February 1, 2012

Paul Skyllingstad

Department of Ecology, Industrial Section

PO Box 47600

Olympia, WA 98504

Mr. Skyllingstad,

Having read through the Agreed Order between Ecology, Millennium Bulk Terminals and Northwest Alloys, I urge Ecology to hold these companies to the highest standard. This project is long overdue and the people of the lower Columbia area deserve to be treated equally with other citizens living near contaminated former aluminum smelters.

As contained in their business name, Millennium is NOT an environmental clean-up company; they are a bulk commodities transporter. This project should not be entrusted to this newly formed corporation; we've seen what happened when Chinook Ventures promised to clean up the site.

This is a site with much potential, being a deep water port and located near the rail line. IF it is properly cleaned up it should attract clean industries. To allow it to be used as a coal export facility would merely compound the existing problems.

One of the urgencies in cleaning up the site is the locating of water wells for the City of Longview on the nearby Mint Farm property. With the contamination on the old Reynolds site, we can only put our trust in the engineers who have urged this development and hope they got it right. If not, a whole city is at risk.

Alcoa, aka Northwest Alloys, is one of the largest corporations in the world. It is their responsibility to see that this clean-up is completed. It is incumbent upon them to pay the expenses for this project. Do not make the taxpayers of the State of Washington pay one thin dime for this. Let he who profits pick up the tab for this.

If at all possible, I would ask that Ecology hold public hearings on this Agreed Order.



Gayle Kiser

President, Landowners and Citizens for a Safe Community

From: Mary Duvall [<mailto:rover@clatskanie.com>]  
Sent: Wednesday, February 01, 2012 11:35 AM  
To: Skyllingstad, Paul (ECY)  
Subject: Alcoa clean up

Dear Mr. Skyllingstad:

What happens at the Reynolds Aluminum site in Longview Washington impacts us in Oregon as well as the entire lower Columbia River. Any intelligent person realizes that by continuing to despoil the river we continue to poison people, fish, plants and all life forms in or around the river. The responsibility remains not only to stop misusing our resources with dirty energy projects, but to clean up the messes that have been made in the past and continue to threaten life far into the future. The following information has been shared with me by other concerned citizens in the Longview area.

"Cleanup at the highly contaminated Reynolds Aluminum site in Longview is years behind schedule. While other aluminum smelters along the Columbia were cleaned up and converted to new industrial operations, Alcoa—owner of the Reynolds site—hasn't finished investigating the site to understand the extent of pollution or proposed a cleanup plan for the Longview site. The agency is now accepting public comments on its new agreement, called an "Agreed Order," with Alcoa (aka Northwest Alloys) to get cleanup back on track"

I urge you to get this site cleaned up with Alcoa footing the bill as they made the mess. If you have to sue them, do so.

Those companies that have promised clean up in the pass in order to use the site have lied, failed and in so doing compromised the public good for private gain. The next company to come in Millenium has no clean up experience and plans to pollute the area further with coal dust, selling more coal to China to increase mercury in the environment, as well as acid rain, and increase carbon emissions. Please do not support this travesty.

Thank you for your hard work in behalf of life on the planet.

Sincerely,

Mary Duvall

73151 Lost Creek Road  
Clatskanie, Oregon 97016

**From:** d smith [<mailto:daoldman@cni.net>]  
**Sent:** Wednesday, February 01, 2012 11:41 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** coal

Tax payers should not have to pay for clean up of industrial garbage.

**From:** Bob Vella [<mailto:bvella@live.com>]  
**Sent:** Wednesday, February 01, 2012 12:27 PM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Millennium site in Longview

To: Paul Skyllingstad - Department of Ecology, Industrial Section

I urge your department to give the highest priority to the proper clean-up of the Millennium site in Longview. We the citizens have had enough of disingenuous promises, and cozy relationships between industry and government that dump long-term business costs on the public. Please do the right thing and consider making a morally just decision rather than a politically convenient one.

Thank you,  
Bob Vella

From: Bill Nelson [<mailto:bill.nelson@cni.net>]  
Sent: Wednesday, February 01, 2012 4:43 PM  
To: Skyllingstad, Paul (ECY)  
Subject: Reynolds Aluminum site cleanup

I support the complete cleanup of the Reynolds site, before any new use of the site can be considered. I do not trust Millennium to do it on its own, and request that the Department of Ecology carefully oversee and manage the cleanup.

Thank you.  
Bill Nelson  
Kelso, WA

**From:** tierra busby [<mailto:tierra@tbusbylaw.com>]  
**Sent:** Thursday, February 02, 2012 9:50 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Millenium Coal

Dear Mr. Skyllingstad,  
Please take into account the following comments regarding the contaminated waste site left by the former Reynolds Aluminum plant on the Columbia River in Longview, WA. As you're aware, the site was supposed to be cleaned up by Chinook Ventures, a company which did not comply, and is now owned by Millenium Coal. My family and my community are asking you to assist with requiring proper clean up of this site. This community and its children don't need further compromise of our already polluted living environment.

- Millennium's Coal Export Plans Would Compromise Cleanup. Millennium wants to build the largest coal export terminal on the west coast—long before cleanup is complete. With groundwater already contaminated by cyanide and fluoride, Ecology cannot let Millennium's short-sighted coal export plans compromise the long-term health of the community.
- The time for clean-up is now. In the past Ecology's workload and decision not to prioritize this site led to major delays in the cleanup process. The new Agreed Order is a step in the right direction, but Ecology must prioritize this site and get the clean up finished.
- **The polluter, not the taxpayer should foot the bill.** Ecology can charge Alcoa for services to monitor sampling results, oversee cleanup operations, and review cleanup plans.
- Millennium has NO Experience Cleaning up a Hazardous Waste Site. Chinook Ventures—the company that leased the property before Millennium—promised to clean up the site and produce jobs. Instead, Chinook made matters worse by polluting the site further and covering up contamination it discovered. Like Chinook, Millennium is promising the moon for cleanup. In reality, Millennium is focused on coal exports and has no experience cleaning up hazardous waste sites, let alone one of the most contaminated sites on the Lower Columbia River. This calls for a new approach to agency oversight moving forward.

Thank you for your attention to this critical matter.

**Tierra A. Busby, Esq.**  
Frey & Busby, PLLC  
600 Royal Street, Ste B  
Kelso, WA 98626  
PH: (360) 577-8700  
FAX: (360) 577-8702

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**From:** Sandra Davis [<mailto:abernathyfarm@q.com>]  
**Sent:** Thursday, February 02, 2012 3:36 PM  
**To:** Skyllingstad, Paul (ECY)  
**Cc:** dennis weber; ken botero; maryjane melink; mike wallin; [wojtowicz@co.cowlitz.wa.us](mailto:wojtowicz@co.cowlitz.wa.us)  
**Subject:** Comments on draft Agreed Order No. DE 8940 for former Reynolds facility

February 3, 2012

*Sent via email*

Mr. Paul Skyllingstad  
Department of Ecology  
P. O. Box 47600  
Olympia, WA 98504

Re: Agreed Order No. DE 8940 for Cleanup of former Reynolds Aluminum facility in Longview, Washington

Dear Mr. Skyllingstad:

Below are my public comments on the draft Agreed Order between Northwest Alloys, Millennium Bulk Terminals and the Department of Ecology.

In August of 2011, the Department of Ecology stated that Millennium was actively seeking to remove the petcoke pile on the subject property. To date, the petcoke pile has not been removed.

In reviewing the draft Agreed Order, no reference of sampling is made to the acreage on the northern portion of the site - north of Industrial Way - which is located within the city limits of Longview. Has this acreage been reviewed for past waste burial practices or contamination from other means? I believe during Reynolds' operation there was a history of hazardous material located in this area.

The sloughs surrounding the 416-acre site are designated as direct tributaries to the Columbia River. With the possibility of water contamination from the Reynolds Aluminum plant and also from Chinook Ventures, these sloughs could flow back into areas near residential housing as well as sending pollutants into the Columbia River. The sloughs in this area need extra attention and continuous sampling for the possibility of contamination.

There has been much discussion regarding the large black mud pond in the northwestern site area. As stated by the Department of Ecology to the Longview City Council, this mud pond has been capped and the hazardous wastes will not be removed. There is always the potential of contaminants leaching into the ground or the groundwater. Leaving these dangerous materials in the ground with only a partial liner under the pond will eventually prove a health hazard to Longview residents and workers



on the site. Because of this threat, many residents in Longview feel it would be important to completely remove this mud pond.

Millennium's plans to build a coal export terminal will compromise the cleanup of this property. This land is zoned heavy industrial, but that must not prevent the thorough cleanup of all contaminants. To the detriment of our community, Millennium will speed through the cleanup process for their ultimate goal of operating a coal terminal.

There are no references in the draft Agreed Order of permitted construction or operation of an export coal terminal while cleanup is being performed. What requirements will there be to Millennium while they continue building and operating this site for other purposes besides the implementation of this Agreed Order?

Thank you for affording me and the general public the opportunity to comment on this important cleanup in Cowlitz County. It would also be beneficial to hold a public hearing for everyone to hear concerns before this Agreed Order is finalized.

Yours truly,

Sandra Davis  
1002 Abernathy Creek Road  
Longview, WA 98632

email to: Dennis Weber, Major of Longview  
Ken Botero, Longview City Council  
Mary Jane Melink, Longview City Council  
Mike Wallin, Longview City Council  
Mike Wojtowicz, Cowlitz County Dept. of Building and Planning

**From:** Art Birkmeyer [<mailto:art.birkm@gmail.com>]  
**Sent:** Thursday, February 02, 2012 5:06 PM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Longview - Reynold Metals Plantsite Cleanup

Mr.  
Skyllingstad,  
02/02/2012

I live, work and worship in Longview, WA..

I am very upset with the progress that has been made in getting the old Reynolds Metal Plant in Longview environmentally cleaned up. Other aluminum Plant sites have been cleaned up where Longview has been ignored. This needs to be done now and your organization are the ones legally responsible to see that it happens.

The original owner (Reynolds Metals) needs to be held totally responsible for the cleanup an NOT any other company like Millennium. If you can't handle it maybe the federal government can and we can eliminate your state agency as being non productive?

Arthur R. Birkmeyer  
2802 Northlake Ave.  
Longview, WA 98632

**From:** [calicojordan@aol.com](mailto:calicojordan@aol.com) [<mailto:calicojordan@aol.com>]

**Sent:** Thursday, February 02, 2012 7:45 PM

**To:** Skyllingstad, Paul (ECY)

**Subject:** Millennium's Coal Export and Longview, WA

Dear Mr. Skyllingstad,

Millennium's Coal Export will not be creating a substantial number of jobs. Nor are they experts at cleaning up hazardous waste sites. Millennium will simply be making more money at the expense of Longview, WA.

Please keep them from hurting our area!

Sincerely,

Cynthia Davis

**From:** [rabiaah@juno.com](mailto:rabiaah@juno.com) [<mailto:rabiaah@juno.com>]

**Sent:** Saturday, February 04, 2012 1:50 PM

**To:** Skyllingstad, Paul (ECY)

**Subject:** Clean up at Millennium in Longview

Dear Sir, Mr. Paul Skyllingstad,

As a resident of Wahkiakum County, just downriver from Longview, Washington, I would like to review some statements that I agree with regarding cleaning up the old Alcoa Aluminum plant:

"Millennium is focused on coal exports and has no experience cleaning up hazardous waste sites, let alone one of the most contaminated sites on the Lower Columbia River. This calls for a new approach

to agency oversight moving forward.

Millennium's Coal Export Plans Would Compromise Cleanup. Millennium wants to build the largest coal export terminal on the west coast long before cleanup is complete. With groundwater already contaminated by cyanide and fluoride, Ecology cannot let Millennium's short-sighted coal export plans compromise the long-term health of the community.

The time for clean-up is now. In the past Ecology's workload and decision not to prioritize this site led to major delays in the cleanup process. The new Agreed Order is a step in the right direction, but Ecology must prioritize this site and get the clean up finished.

The polluter, not the taxpayer should foot the bill. Ecology can charge Alcoa for services to monitor sampling results, oversee cleanup operations, and review cleanup plans."

Thank you for your time in this matter.

Regards,

Cynthia Caster  
115 Cross Dike Road  
Cathlamet, WA. 98612

**From:** Susan Schwartz [<mailto:slschwartz2651@hotmail.com>]  
**Sent:** Monday, February 06, 2012 10:34 AM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Coal Export in Longview

**Susan Schwartz 3858 Pennsylvania Street Apt 71 Longview WA 98632**  
**[SLSchwartz2651@hotmail.com](mailto:SLSchwartz2651@hotmail.com) 360-425-7553**

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February 6, 2012

Paul Skyllingstad  
Department of Ecology, Industrial Section  
P O Box 47600  
Olympia WA 98604-7600

Dear Mr. Paul Skyllingstad:

Please get Alcoa to follow the Agreed Order to get the cleanup of the site in Longview, Washington back on track. The Alcoa site needs to be cleaned up before any one decide if Millennium's Coal Export can come to Longview. There have been major delays in the cleanup process because of the Department of Ecology's workload and decision not to prioritize the Alcoa site. You to get someone who is experienced Millennium is an coal export company not a hazardous waste site cleanup company.

This is one the most contaminated sites on the Lower Columbia River.

I believe the taxpayers should pay for the cleanup. You should have Alcoa pay for the cleanup.

Sincerely,  
Susan Lee Schwartz

**From:** [kay\\_beck@comcast.net](mailto:kay_beck@comcast.net) [mailto:[kay\\_beck@comcast.net](mailto:kay_beck@comcast.net)]

**Sent:** Monday, February 06, 2012 9:01 PM

**To:** Skyllingstad, Paul (ECY)

**Subject:** Comments on Millenium's coal export plans

4019 Oak St.  
Longview, WA 98632

Dept. of Ecology, Industrial Section

P.O. Box 47600

Olympia, WA 98504-7600

2/6/2012

Dear Mr. Skyllingstad,

I am a citizen of Longview, WA who is deeply concerned about Millenium's plans to build a coal export terminal.

The site needs to be cleaned up. I have no knowledge or understanding of why or how Alcoa (aka Northwest Alloy) and then Chinook escaped:

1. completing an investigation of the site to understand the extent of pollution
2. proposing a cleanup plan
3. actually cleaning it up

Enough is enough!

I suffer from an asthma related respiratory condition that is easily aggravated by particulates.

I want the Department of Ecology to insist on a thorough and complete cleanup by a well-experienced company with a proven track record BEFORE anyone new moves in. My hope is that it will not be a company that will further compromise my health.

Sincerely,

Kayrene Beck

4019 Oak St.

Longview, WA. 98632

360-636-5461

**From:** [jgreen2317@aol.com](mailto:jgreen2317@aol.com) [<mailto:jgreen2317@aol.com>]  
**Sent:** Wednesday, February 08, 2012 1:53 PM  
**To:** Skyllingstad, Paul (ECY)  
**Cc:** [don.jensen@ci.longview.wa.us](mailto:don.jensen@ci.longview.wa.us); [dennis.weber@ci.longview.wa.us](mailto:dennis.weber@ci.longview.wa.us);  
[maryjane.melink@ci.longview.wa.us](mailto:maryjane.melink@ci.longview.wa.us); [kbotero@comcast.net](mailto:kbotero@comcast.net); [chet.makinster@ci.longview.wa.us](mailto:chet.makinster@ci.longview.wa.us);  
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[RaiterG@co.cowlitz.wa.us](mailto:RaiterG@co.cowlitz.wa.us); [wojtowicz@co.cowlitz.wa.us](mailto:wojtowicz@co.cowlitz.wa.us)  
**Subject:** Fwd: Former Reynolds Site Cleanup - Agreed Order No. DE8940 - Comment

Resent due to delivery failure reported.

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From: [jgreen2317@aol.com](mailto:jgreen2317@aol.com)  
To: [paul.skyllingstad@ecy.wa.gov](mailto:paul.skyllingstad@ecy.wa.gov)  
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[RaiterG@co.cowlitz.wa.us](mailto:RaiterG@co.cowlitz.wa.us), [wojtowicz@co.cowlitz.wa.us](mailto:wojtowicz@co.cowlitz.wa.us)  
Sent: 2/8/2012 1:49:09 P.M. Pacific Standard Time  
Subj: Former Reynolds Site Cleanup - Agreed Order No. DE8940 - Comment

February 8, 2012

Sent via email  
Hard copy sent USPS  
Mr. Paul Skyllingstad  
Department of Ecology, Industrial Section  
PO Box 47600  
Olympia, WA 98504-7600

Re. Agreed Order No. DE 8940, former Reynolds Aluminum Site, Longview, WA  
Northwest Alloys, Inc./Millennium Bulk Terminals Longview

Dear Mr. Skyllingstad,

I appreciate the opportunity for public comment on this first step in the cleanup process of the former Reynolds Aluminum Site in Longview. I depend on your agency's diligence and expertise for ensuring the health of our citizens amid the potential impacts of the ongoing exposure to toxins from this industrial site over the last 70 years and into the future. It is understandable that environmental protections were not in place through the mid 20<sup>th</sup> century but as we enter the second decade of the 21<sup>st</sup> century, I expect to see exponential progress in this area. I also hope to have the promises of cleanup made to the Longview City Council on October 6, 2011, fulfilled. It is time to meet the challenge of cleanup with no further delays and I request an uncompromising schedule and high level of Ecology oversight for this long overdue cleanup.

That said, my specific concerns regarding the Agreed Order are listed below:

1. It is documented that further contamination of the site took place during Chinook Venture's tenancy. Consequently, there should be additional sampling and testing of sections previously tested under the 2007 Order DE 4263.

2. Past Reynolds' employees have given anecdotal accounts of toxic dumping toward the NE section of the property (Weyerhaeuser property line). Therefore, additional sampling of soils around and under the white & black mud ponds in the NE section of the property and toward the property line should be required.
3. The sections identified for additional soil sampling (SSA-1 – SSA-7) have a varied chemistry list for the testing criteria. It is unclear to me why each site is not tested for a full list of contaminants, considering the known history of contamination and more recently of unpermitted activities and even possible contamination from unknown activities.
4. Mercury (Hg) is a possible errant by-product of industrial activities and its presence is of grave concern. Testing for this chemical in soils and water should be required.
5. Due to the great public interest regarding the cleanup of this site and the need for full transparency, I ask that the test results be posted to the Ecology website in the project file in a timely manner as well as at the Longview Public Library. To facilitate layman comprehension, the reports should indicate test results as compared to the maximum acceptable contaminant level of each chemical.
6. Testing of all stormwater discharge should be required.
7. The CDID ditches are currently considered waters of the state connected to the Columbia River. It is likely that highly contaminated stormwater has washed a cocktail of toxins into the ditches. Accumulation of these chemicals in the ditch soils could possibly leach into the ditch waters. Testing the soils of the ditches for contaminants should be required. Responsibility for remedial action to the CDID ditches should remain with the parties of this Order.
8. On page 11 of the Order, it is suggested that the schedule can be delayed by project permitting requirements. At the Longview City Council workshop of 10/06/11, we were assured by Alcoa and the Department of Ecology that the cleanup plan for this site was unrelated to the permitting of a coal export project planned for this property, and it would proceed independently with all due haste. Delays should not be allowed.
9. Though it may be an unfair assumption to judge the capabilities of Anchor QEA through association to the environmentally damaging behavior of Chinook Venture, Anchor QEA prepared the 2007 Feasibility Study Work Order report, a report, which indicated Option 2 as the most “feasible” cleanup because of moderate cost but with only moderate benefit to the environment, merely capping and monitoring rather than removal of toxins. (Ironically, the estimated cost for Option 2 cleanup was \$11.7 million and the various other options ranged upwards to \$147 million for complete excavation.) In contrast, an Alcoa document publicly distributed on August 25, 2011, with a subtitle: “We are committed to the site cleanup” states: “We will implement the work with qualified professionals and contractors.” and “Alcoa has a dedicated professional team that manages site clean-up and redevelopment. In April this team won the Phoenix Award Grand Prize for Excellence in brownfield redevelopment of the former Troutdale, Oregon smelter.” The referenced cleanup was accomplished by Tetra Tech of Pasadena, CA. If Tetra Tech does not lead the cleanup effort, we have all been misled. It is critical to the economic future of Longview and the health of the environment and our citizens, that this promise is kept. Priority should be given to cleanup work using a company that excels in this work.
10. There should be no further consideration of new project activities on this site until the cleanup process is complete. It is difficult to envision a focused and thorough cleanup of contaminated soils with ramped-up ongoing industrial activity.
11. Once again, transparency and full public discourse is of highest importance. I request that a public hearing be held in Cowlitz County as part of the public process, once the draft RI/FS report is issued. Our citizens are due a forum to voice their concerns for the level of cleanup chosen.

Thank you for this opportunity to comment. I eagerly await the issuance of the RI/FS for an opportunity to comment further.



Regards,

Margaret Green  
1318 25<sup>th</sup> Avenue  
Longview, WA

Email copy to:

Longview City Council, Mayor Dennis Weber, Ken Botero, Tom Hutchinson, Don, Jensen, Mary Jane Melink, Mike Wallin

Cowlitz County Commissioners, Mike Karnofsky, James Misner, George Raiter

Mike Wojtowicz, Cowlitz County Dept. of Building and Planning

**From:** [elaine-bud@q.com](mailto:elaine-bud@q.com) [elaine-bud@q.com]  
**Sent:** Wednesday, February 08, 2012 10:25 PM  
**To:** Skyllingstad, Paul (ECY)  
**Subject:** Comments on Agreed Order No. 8940

329 Bunker Hill Rd.  
Longview, WA 98632  
February 8, 2012

Paul Skyllingstad  
Department of Ecology  
Industrial Section  
P.O. Box 47600  
Olympia, WA 98504-7600  
[paul.skylkingstad@ecy.wa.gov](mailto:paul.skylkingstad@ecy.wa.gov)  
(360) 407-6102

RE: Agreed Order No. 8940 for Cleanup of Reynolds Metals Aluminum Smelter Site

Dear Mr. Skyllingstad:

I appreciate the opportunity to comment on Agreed Order No. 8940 as a citizen of Cowlitz County concerned about the economic viability of one the area's prime industrial properties. I am also a former employee of Longview Fibre Company, and have witnessed my employer make enormous strides in using technologies to make our community a cleaner, healthier place to live. I know that responsible companies can make a difference in promoting a cleaner environment for the entire community.

I have noted that Agreed Order No. 8940 replaces Agreed Order DE 4263 from 2007. While there have been many intervening events between 2007 and 2012, it would appear that failure to enforce the earlier order would imply that someone has been asleep at the switch. Although little is gained by castigating past sins, the absence of prior enforcement should be a motivation for strict compliance in carrying out the current Agreed Order.

After reading the text of Agreed Order 8940, the point that stands out most clearly to me is that two parties are named PLP's: Northwest Alloys, Inc. (NWA, a subsidiary of Alcoa) and Millennium Bulk Terminals (MBTL). While it is often advantageous to have two parties responsible for meeting an obligation rather than only one, the opportunity to shift the obligation from one party to the other becomes an obvious potential delaying tactic. And, in light of past history, it would appear that such skepticism is warranted.

Currently, we understand that MTBL has purchased certain surface assets at the former Reynolds site, but NWA retains the underlying property rights. While it is apparent that MTBL wishes to develop the site into an export coal facility, we urge that the enforcement of Agreed

Order 8940 in no way be tied to the approval process for such a facility. It should thus be obvious to the Department that surface tenants can come and go (as did the former tenants Chinook Ventures) but the land owner does not have that liberty. Thus, we urge the Department to be especially vigilant in the Order oversight and not allow the cleanup to be quid pro quo for coal export approval. And, if the MTBL/NWA consortium is not moving expeditiously to carry out the cleanup, we believe the Department should not be reluctant to carry out the cleanup itself, as provide in Article VIII (C) of the Order.

The cleanup process at the Reynolds site has been a significant failure to date; we urge the Department to (1) not let the PLP's delay an expeditious cleanup and (2) not allow the cleanup be considered a trade-off for the coal export facility approval.

Yours very truly,

Harold Cockrell

**From:** Gary Sayler [gsayler2000@yahoo.com]

**Sent:** Thursday, February 09, 2012 3:44 PM

**To:** Skyllingstad, Paul (ECY)

**Subject:** Cleanup of the Reynolds Aluminum site in Longview, WA

Dear Mr. Skyllingstad,

We urge you to prioritize the overdue cleanup at the Reynolds Aluminum site in Longview and to make sure that it is done carefully and correctly.

Alcoa(Northwest Alloys) should be responsible for this cleanup, under Ecology's watch. (Is Chinook Ventures being held to account for polluting the site further and covering up the contamination it discovered?)

Millenium Coal has its own agenda, that of building the largest coal terminal on the west coast, and wants to proceed with building their terminal before cleanup is completed. As they have no experience in cleaning up a hazardous waste site, we strongly urge Ecology to set strict guidelines for cleaning up the site which would include using a contractor with successful experience in site cleanup. We would also hope that Millenium Coal will be monitored closely to make sure that their operation will not add polutants to the site or Columbia River. We've already had the experience of Chinook Ventures promising the moon and leaving the site worse than when they came. It's hard to believe that Millenium's huge operation with trains and trains of dirty coal won't worsen the already-polluted air in the Longview area and harm our river.

Thank you for the work you do to try to protect our beautiful area.

Sincerely,

Gary and Dawn Sayler  
2525 Hickory Ave.  
Longview, WA 98632  
360-501-4358