



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 1, 2018

Mr. Phil Slowiak, Senior Project Manager, Remediation
International Paper
Corporate Environment
6400 Poplar Avenue
Memphis, TN 38197

Subject: Conditional approval of the Public Review Draft Remedial Investigation/Feasibility Study Report, Port of Longview Maintenance Facility Area, former International Paper Facility, Longview, Washington, dated July 12, 2016
EPA ID Number WAD 010745917

Dear Mr. Slowiak:

The purpose of this letter is to transmit the Department of Ecology's (Ecology) conditional approval of the draft 2016 Remedial Investigation/Feasibility Study (RI/FS) Report for the International Paper Longview Site's Maintenance Facility Area (MFA) and addendum to the RI/FS Report.

Overview

After a review of the requirements in Chapter 173-340 WAC (MTCA Cleanup Regulation), Ecology has placed conditions on the approval of the draft 2016 RI/FS Report and addendum to the RI/FS Report. Conditions on approval were also placed in response to:

- Comments received from stakeholders and the public during the public comment period from August 17 to October 2, 2017.
- A memo reviewing the draft 2016 RI/FS Report from Ridolfi Environmental, dated April 13, 2018.

Ecology's conditional approval is reflected in revisions on the draft 2016 RI/FS Report and addendum in text boxes.

Enclosed with this letter is Ecology's Responsiveness Summary (Publication 18-04-014, June 2018) prepared in response to the public comments received by Ecology on the draft RI/FS and addendum. The April 2018 memo from Ridolfi Environmental addressing the public review of the draft RI/FS is an attachment to the Responsiveness Summary.

Electronic versions of the Responsiveness Summary, the revised draft 2016 RI/FS Report, the revised addendum to the RI/FS Report, and comments received during the public comment period and public hearing are found at: <https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=3685>.

Background and basis for decision

Before public comment on the draft 2016 RI/FS Report, Ecology compiled an addendum to International Paper's RI/FS Report that included the Port of Longview's proposed remedial alternative for the MFA and related documents. Ecology made revisions to the addendum and the RI/FS Report before the public comment period.

Through a public notice and public hearing process Ecology sought comments on the Ecology-revised draft of International Paper's 2016 RI/FS Report for the MFA and Ecology's addendum to the RI/FS Report. Public comments were received throughout the comment period. Details about this process are provided in the enclosed Responsiveness Summary.

Public comments received by Ecology on the draft 2016 RI/FS Report and the addendum to the RI/FS Report fall into the following categories:

1. Descriptions and evaluations of the Port of Longview's preferred remedial alternatives for soil and groundwater in the MFA
2. Revisions to cost estimates for proposed remedial action alternatives for soil and groundwater.
3. Demonstrations that all practicable methods of treatment will be used to remediate this site in order to support Method C cleanup levels for groundwater and a conditional point of compliance for groundwater.

The inclusion of the Port's alternative as part of the RI/FS provided for a broader range of viable cleanup options for Ecology's consideration and public review. However, by expanding the scope of cleanup alternatives, the disproportionate cost analysis (DCA) in the draft 2016 RI/FS Report was rendered incomplete. Cost estimates in the both the RI/FS Report and addendum require further examination. The RI/FS Report and addendum must also demonstrate that all practicable methods of treatment are being used.

Ecology and International Paper are working on the issue of demonstrating that all practicable methods of treatment will be used in the cleanup of the MFA, setting Method C cleanup levels for groundwater, and setting a conditional point of compliance for groundwater.

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Scope of approval

Ecology conditionally approves the Ecology-revised versions of the draft 2016 RI/FS Report and the addendum to the draft 2016 RI/FS Report as meeting the requirements of WAC 173-340-350. Table 1 on pages 6-10 in the Responsiveness Summary outlines the scope of Ecology's conditional approval.

Next steps

Ecology's comments to the draft 2016 RI/FS Report and Ecology's revisions to the FS included in the addendum will be addressed during remedy selection evaluation of cleanup action alternatives along with a revised DCA. This additional evaluation and revised DCA will eventually be included in a draft cleanup action plan (CAP) for the MFA.

This letter and attachments will be posted on Ecology's website and shared with members of the public and with stakeholder groups to formally close out review of the draft 2016 RI/FS Report. Ecology will also place these documents and the revised RI/FS Report in the administrative record for the International Paper Longview Site.

Please contact me if you have any questions.

Sincerely,



Kaia Petersen
Corrective Action Site Manager
Department of Ecology
(360) 407-6359

Enclosure: International Paper Facility, Longview – Ecology's Responsiveness Summary
(Publication 18-04-014, June 2018)

<https://fortress.wa.gov/ecy/publications/SummaryPages/1804014.html>

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