



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

International Paper and Port of Longview Longview, Washington 98632

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<https://fortress.wa.gov/ecy/publications/summarypages/1604004.html>

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Public Participation Plan

**International Paper Longview, MFA
Longview, Washington 98632**

Hazardous Waste and Toxics Reduction
Southwest Regional Office
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Olympia, Washington

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Public Involvement in Contamination Cleanup

Ecology developed this public participation plan (Plan) in cooperation with the International Paper Company (International Paper) and the Port of Longview (Port). This plan is for the Maintenance Facility Area, located on parcel 122215 at the Port of Longview, WA 98632.

The plan describes Ecology's actions to inform the public about contamination investigations and selection of cleanup activities throughout the corrective action process. Ecology encourages the public to learn about and get involved in decision-making opportunities at this site. The public is welcome to provide input during different stages of the investigation and cleanup of contamination at the site.

This plan is for corrective action, or cleanup, at the Maintenance Facility Area. Public participation activities are coordinated between Ecology, International Paper, and the Port of Longview (Port). Ecology maintains overall responsibility and approval authority in accordance with the requirements of the Dangerous Waste Regulations and the Model Toxics Control Act (MTCA). With participation from International Paper and the Port, Ecology will conduct formal public comment periods and other forms of public involvement throughout the cleanup process.

Site contacts

To be included in the record, comments about the site investigation, cleanup actions, or corrective actions must be submitted during formal comment periods. Questions are welcome anytime. If you have public participation questions, please contact Ecology's Public Involvement Coordinator, Bridgette Valdez-Kogle, at 360-407-7616 or brva461@ecy.wa.gov. If you have questions about the site cleanup, please contact Ecology's Corrective Action Project Manager for the Maintenance Facility Area:

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Hazardous Waste and Toxics Reduction Program
Southwest Regional Office
PO Box 47775
Olympia WA 98504-7775
Phone: 360-407-6359
Email: kaia.petersen@ecy.wa.gov

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information
- Conduct activities that enhance the public’s understanding of, and participation in, the cleanup process

For more information about public participation grants, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov. You may also visit the [Public Participation Grant website](#).¹

Regulatory framework

Ecology uses the federal Resource Conservation and Recovery Act (RCRA), Washington’s Hazardous Waste Management Act (HWMA), the Model Toxics Control Act (MTCA), and accompanying regulations for cleanup activities at the Maintenance Facility Area.

This Plan is required under MTCA, a “citizen-mandated” law that became effective in 1989. MTCA provides guidelines for the cleanup of contaminated sites in Washington State and sets standards to make sure the cleanup protects human health and the environment.

Cleanup at the site will be completed in accordance with MTCA regulations. Cleanup at the site must also satisfy federal and state “corrective action” requirements for facilities that manage, or have managed, hazardous wastes. The first step in the cleanup process is investigating the type and extent of contamination. This information will be presented in a report called a Remedial Investigation (RI). The second step is developing a Feasibility Study (FS), which outlines potential alternatives for cleanup at the site. MTCA allows us to combine these reports. Draft RI and FS reports will be available for public review when they are complete. Finally, a draft Cleanup Action Plan (CAP) will be written by International Paper and the Port. The draft CAP will be available for public review when it is complete.

Model Toxics Control Act (MTCA)

MTCA began as a grassroots citizen initiative in 1988, and started the process of cleaning up contaminated sites in Washington State. Under MTCA, a current or past site owner or operator may be held responsible for cleaning up contamination at their site to standards that are safe for

¹ ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

human health and the environment. Ecology was mandated with implementing MTCA and overseeing cleanups in the state and issued regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).² Ecology investigates reports of property contamination and if the contamination is seen as a significant threat to human health or the environment, the site is placed on the Hazardous Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

Hazardous Waste Regulations

There are federal and state regulations governing the management of hazardous wastes. The United States Congress enacted the Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act in 1976 to ensure safe management and disposal of municipal and industrial waste generated nationwide. RCRA has been amended several times, including in 1984 with the Hazardous and Solids Waste amendments that expanded the scope and requirements of RCRA.

The goals of RCRA are to:

- Protect human health and the environment.
- Reduce waste and conserve energy and natural resources.
- Reduce or eliminate generation of hazardous waste as quickly as possible.

Subtitle C of RCRA established a program to handle wastes from “cradle to grave.” Owners and operators of waste treatment, storage, and/or disposal (TSD) facilities are required to submit a permit application covering all aspects of design, operation, maintenance, and closure of the facility. RCRA requires owners and operators of these facilities to clean up contamination resulting from *past* and *present* practices, which includes practices of previous owners. These cleanup activities are known as corrective actions.




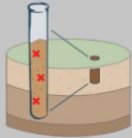





Federal law uses the term *hazardous waste*. Washington's [Dangerous Waste Regulations: Chapter 173-303](#)³ uses the term *dangerous waste*. Washington's definition of dangerous waste includes some wastes not included in the federal definition. State requirements for RCRA hazardous waste management must be at least as stringent as those established by federal law.

² <https://fortress.wa.gov/ecy/publications/SummaryPages/9406>

³ <https://fortress.wa.gov/ecy/publications/SummaryPages/9291>

RCRA and Washington’s Dangerous Waste Regulations, Chapter 173-303 WAC, require public participation throughout all stages of the permitting and cleanup of waste management facilities. The stages include periods before the permit application is submitted, through the permitting process, during the life of the permit, and during the cleanup process. Ecology, International Paper, and Port of Longview will meet the public participation requirements during the RI, FS, and CAP process at the site by complying with this Plan and MTCA public participation requirements.

Steps in Washington’s Cleanup Process

 <p>Interim Action</p>		<p>If contaminants pose an immediate risk to people or the environment, action can be taken at any point in the cleanup process to reduce the risk. Interim actions may also be used to progress cleanup when only a brief opportunity is available.</p>
 <p>Remedial Investigation (RI)</p>		<p>Environmental investigation to identify the nature, extent, and magnitude of pollution at a site, and how people, plants, and animals may be exposed to the pollution.</p>
 <p>Feasibility Study (FS)</p>		<p>Uses information gathered during the Remedial Investigation to develop cleanup alternatives, and then evaluates them through an environmental benefit vs. cost analysis. This process determines a preferred alternative.</p>
 <p>Cleanup Action Plan (CAP)</p>		<p>Ecology identifies a cleanup plan based on information in the RI/FS and public input. The CAP includes cleanup standards, a schedule for design and construction work, and requirements for monitoring, operation, and maintenance.</p>
<p>Cleanup & Monitoring</p>		<p>The CAP is used to clean up the site. After construction is complete, monitoring occurs. Environmental covenants prohibit or restrict activities that would expose any remaining contamination or adversely affect the cleanup.</p>

 Opportunities for public comment

Figure 1. Steps in Washington's Cleanup Process

State Environmental Policy Act

Compliance with the State Environmental Policy Act (SEPA) will occur during review and development of the Cleanup Action Plan (CAP) for the Maintenance Facility Area.

Site History

International Paper treated wood at the site from 1937 to 1982 in the Treated Wood Products (TWP) Area, adjacent to the Maintenance Facility Area. The wood treatment operations contaminated soils and groundwater with:

- Diesel
- Pentachlorophenol (PCP)
- Polycyclic aromatic hydrocarbons (PAHs) from creosote

In May 1991, the U.S. Environmental Protection Agency (EPA) identified several solid waste management units (SWMUs) for a RCRA facility assessment dated May 1991 (1991 RFA).⁴ There have been cleanup activities in the TWP Area to deal with much of the contamination related to the facility. In 1985, International Paper excavated contaminated soils from two surface impoundments and process areas in the TWP Area and capped remaining contaminated soils with a low-permeable cover. In 1997, Ecology requested additional cleanup in the TWP Area to ensure long-term protection of human health and the environment.

In 1997 and 1998, International Paper:

- Constructed a subsurface barrier wall around the TWP Area to contain contaminated soil and groundwater.
- Capped the area with an additional low permeable cover.
- Installed systems to remove groundwater contamination within the contained area.
- Installed wells that treat contaminants within the contained area.
- Installed groundwater monitoring wells inside and outside the subsurface barrier wall.

During the construction of the subsurface barrier wall, contaminated soils were found outside the wall alignment. Discharges of wood treatment wastewaters into an unlined ditch between 1947 and 1953 contaminated surrounding soils and groundwater. The ditch went through the area now called the Maintenance Facility Area. The Maintenance Facility Area is located on property now owned by the Port. The Maintenance Facility Area measures approximately five acres and

⁴ *RCRA Facility Assessment, Preliminary Review, International Paper Company, Longview, Washington, EPA I.D. No. WAD919745917* (1991 RFA Report), dated May 1991, prepared by the United States Environmental Protection Agency (EPA).

contains the Port of Longview's Mechanics Shop and a paved storage yard. The Port purchased the land in the Maintenance Facility Area from International Paper in 1965.

International Paper conducted additional investigations to determine the extent of contamination in the Maintenance Facility Area and installed a biosparging/bioventing treatment system that operated until 2008. International Paper also conducted studies in 2012 to evaluate the effectiveness of soil treatment technologies.

International Paper has drafted a RI/FS report for the Maintenance Facility Area that summarizes the extent of contamination and evaluates cleanup technologies. The draft final RI/FS report will be released for public review.

A Remedial Investigation (RI) is an in-depth study to:

- Determine site features such as groundwater flow, sediment type, and other factors.
- Define the type and extent of contamination.
- Assess potential effects on human health and the environment.
- Establish cleanup criteria.

Feasibility studies (FS):

- Establish cleanup criteria.
- Evaluate cleanup alternatives.
- Evaluate cost estimates of cleanup alternatives.

The Cleanup Action Plan (CAP) describes the selected cleanup method(s). It also states cleanup standards and other requirements. The CAP is based on information and technical analyses from the RI/FS and public comments and community concerns. A draft of the CAP will be available for public review and comment before it becomes final.

Site community

The site is located at the Port of Longview in a predominately industrial and commercial area. The city of Longview has a large population of Spanish speakers.⁵ According to the federal Environmental Protection Agency's (EPA) EJScreen Tool, there are pockets of linguistically isolated people in Longview. It is important for Ecology to incorporate cultural and linguistic needs of this community when we conduct our public outreach and participation activities.

⁵ *Estimates of Population with Limited English Proficiency (LEP) for the State and Counties*, Washington State Office of Financial Management, Forecasting and Research Division.

Ecology will provide information in Spanish in our public comment notices and other places when appropriate. We strive to make our public participation efforts as inclusive as possible. Ecology will try to ensure that all community members have access to important documents.

Non-English speakers can call Ecology and ask for an interpreter so they can learn more about this site. Ecology will use Language Link, a phone-based interpretation service when needed. This service can be used for over 200 languages.

Public Participation Activities

The public may ask questions at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology. However, to be included in the record, comments about the site investigation, cleanup actions, or corrective actions must be submitted during formal comment periods. In addition, the public may review site documents. This is the most direct way to learn more about the site and be involved in the cleanup's decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will send public comment notices to addresses inside the site's "affected area," generally within a ½-mile radius of the facility and to interested organizations and individuals. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings. Basic information about the site will be in Spanish. This information will include how to request materials in Spanish or to speak with Ecology staff through an interpreter.

Ecology may also develop fact sheets explaining what is happening at the site, the site background, and next steps in the process. These fact sheets will be available online and at document repositories.

Public comment periods

Formal 30-day comment periods allow interested members of the public an opportunity to comment on draft site documents, amended orders, or newly proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period to 60 days.

Public meetings

We will hold public meetings, workshops, open houses, and public hearings based on community interest. These meetings are held at locations close to the site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).⁶ To receive the *Site Register* by email:

- [Subscribe online](#)⁷, or
- Contact Cheryl Ann Bishop at 360-407-6848 or cherylann.bishop@ecy.wa.gov.

Newspaper display ads or legal notices

These will announce public comment periods, public meetings, workshops, open houses, and public hearings. We will publish these ads or notices in *The Daily News*. We will also place notice on [Ecology's Public Events Calendar](#).⁸

Email lists

We maintain an [email list](#) to update interested persons about dangerous waste facilities and corrective action.

Mailing list

Ecology maintains a mailing list that includes individuals interested in site activities. The list also includes addresses within a half mile radius of the site and local, state, and federal governments. These persons will receive formal public comment notices at different stages of the cleanup. We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, contact Bridgette Valdez-Kogle, the site's Public Involvement Coordinator at 360-407-7616 or bridgette.valdez-kogle@ecy.wa.gov.

Ecology's website and social media platforms.

We maintain an [International Paper Longview cleanup website](#).⁹ The website will be kept up to date and has information about the site and important documents.

We may also share information about cleanup sites through news releases, our ECOconnect blog, and social media, all posted to [Ecology's News webpage](#).¹⁰

⁶ ecology.wa.gov/contamination-cleanup/site-register

⁷ <http://listserv.ecology.wa.gov/scripts/wa-ECOLOGY.exe?SUBED1=SITEREGISTER&A=1>

⁸ <http://apps.ecy.wa.gov/pubcalendar/calendar.asp>

⁹ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3685>

¹⁰ ecology.wa.gov/About-us/Get-to-know-us/News

Other Outreach Tools

In addition to public comment notices and fact sheets, other flyers announcing public comment periods, meetings, and workshops may also be posted in various locations throughout the community (e.g., local businesses, schools, libraries) and on Ecology's website.

Document repositories

During public comment periods, you can find important documents at the following locations:

Longview Public Library

1600 Louisiana Street
Longview, WA 98632
360-402-5300

Department of Ecology

Southwest Regional Office
300 Desmond Drive SW
Lacey, WA 98503
360-407-6300

Future opportunities to comment

The revised draft RI and FS reports will be available for review and comment when they are complete. Ecology will hold a 45-day public comment period once the draft RI and FS reports are ready. Once Ecology reviews the comments, the reports will be finalized. The Port and International Paper will then develop a draft Cleanup Action Plan (CAP) under an agreed order.

Plan Amendments

This plan was developed by Ecology, and complies with MTCA regulations (WAC 173-340-600). It will be reviewed as the cleanup progresses, and amended if necessary. Ecology provides final approval of the Plan and amendments.

This Plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us. If you feel the planned outreach activities and mechanisms described in this Plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amendment of the Plan.