

Site Cleanup:

POPE & TALBOT, INC. SAWMILL SITE

Northeast View Drive
Port Gamble, Washington

PUBLIC PARTICIPATION PLAN

Prepared by:

Washington State Department of Ecology



DEPARTMENT OF
ECOLOGY
State of Washington

Revised February 2011

This plan is for you!

This Public Participation Plan is prepared for the Pope & Talbot, Inc. Sawmill Site cleanup as part of the requirement of the Model Toxics Control Act (MTCA). The Plan provides information about MTCA cleanup actions and requirements for public involvement, and identifies how Ecology, Pope Resources LP, and Olympic Property Group LLC, will support public involvement throughout the cleanup. The Plan is intended to encourage coordinated and effective public involvement tailored to the community's needs at the Pope & Talbot, Inc. Sawmill Site.

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If you need this document in a format for the visually impaired, call Toxics Cleanup Program at (360) 407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

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1.0: Introduction and Overview of the Public Participation Plan

This Public Participation Plan (Plan) explains how you can become involved in improving the health of your community. It describes public participation opportunities that will be conducted during cleanup of a site on the waterfront – the Pope & Talbot, Inc. Sawmill Site. These opportunities are part of a cooperative agreement between the Washington State Department of Ecology (Ecology) and the owners and operators of the Site, Pope Resources LP and Olympic Property Group LLC (the “companies”). The current agreement, called an Agreed Order, is a legal document in which the companies and Ecology agree to decide on cleanup actions for the Pope & Talbot, Inc. Sawmill Site. The Site is located at the east end of NE View Drive, at the mouth of Port Gamble Bay, Washington.

Cleanup actions and the public participation process that helps guide them are established in Washington’s Model Toxics Control Act (MTCA).¹ Under MTCA, Ecology is responsible to provide timely information and meaningful chances for the public to learn about and comment on important cleanup decisions before they are made. The goals of the public participation process are:

- To promote understanding of the cleanup process so that the public has the necessary information to participate.
- To encourage involvement through a variety of public participation opportunities.

This Public Participation Plan provides a framework for open dialogue about the cleanup among community members, Ecology, cleanup site owners, and other interested parties. It outlines basic MTCA requirements for community involvement activities that will help ensure that this exchange of information takes place during the investigation and cleanup, which include:

- Notifying the public about available reports and studies about the site.
- Notifying the public about review and comment opportunities during specific phases of the cleanup investigation.
- Providing appropriate public participation opportunities, such as fact sheets, to learn about cleanup documents, and if community interest exists, holding meetings to solicit input and identify community concerns.

¹ The Model Toxics Control Act (MTCA) is the hazardous waste cleanup law for the State of Washington. The full text of the law can be found in Revised Code of Washington (RCW), Chapter 70.105D. The legal requirements and criteria for public notice and participation during MTCA cleanup investigations can be found in Washington Administrative Code (WAC), Section 173-340-600.

- Considering public comments received during public comment periods.

In addition to these basic requirements, the Plan may include additional site-specific activities to meet the needs of your community. Based upon the type of the proposed cleanup action, the level of public concern, and the risks posed by the site, Ecology may decide that additional public involvement opportunities are appropriate.

These opportunities form the basis for the public participation process. The intent of this Plan is to:

- Provide complete and current information to all interested parties.
- Let you know when there are opportunities to provide input.
- Listen to concerns.
- Address those concerns.

Part of the Puget Sound Initiative

Pope & Talbot, Inc. Sawmill is one of two sites in the Port Gamble area, and is part of a larger cleanup effort called the Puget Sound Initiative (PSI). Governor Chris Gregoire and the Washington State Legislature authorized the PSI as a regional approach to protect and restore Puget Sound. The PSI includes cleaning up 50-60 contaminated sites within one-half mile of the Sound. These sites are grouped in several bays around the Sound for “baywide” cleanup efforts. As other sites in the Port Gamble area move forward into investigation and cleanup, information about them will be provided to the community as well as to interested people and groups.

Roles and Responsibilities

Ecology will lead public involvement activities, with support from the companies. Ecology maintains overall responsibility and approval authority for the activities outlined in this plan. Pope Resources LP and Olympic Property Group LLC are responsible for cleanup at this Site. Another company, Pope and Talbot, Inc., is also responsible for cleanup of this Site; however, this company filed for bankruptcy and will not be participating in the Agreed Order. Ecology will ultimately oversee all cleanup activities, and ensure that contamination on this Site is cleaned up to concentrations that are established in state regulations and that protect human health and the environment.

Organization of this Public Participation Plan

The sections that follow in this Plan provide:

- Section 2: Background information about the Pope & Talbot, Inc. Sawmill Site.

- Section 3: An overview of the local community that this Plan is intended to engage.
- Section 4: Public involvement opportunities in this cleanup.

This Public Participation Plan addresses current conditions at the Site, but it is intended to be a dynamic working document that will be reviewed at each phase of the cleanup, and updated as needed. Ecology and the companies urge the public to become involved in the cleanup process.

2.0: Site Background

Site Description and Location

The Pope & Talbot, Inc. Sawmill Site is generally located at the east end of NE View Drive, at the mouth of Port Gamble Bay, in Port Gamble, Kitsap County, Washington (see Figure 1). The Site is bounded to the north by Hood Canal, to the east by Port Gamble Bay, and to the west and south by the Kitsap Peninsula. It includes the upland area, adjacent tidelands, and portions of Port Gamble Bay. The area was initially a relatively small sand spit, but underwent several changes during its operations, including filling activities to expand the upland area.

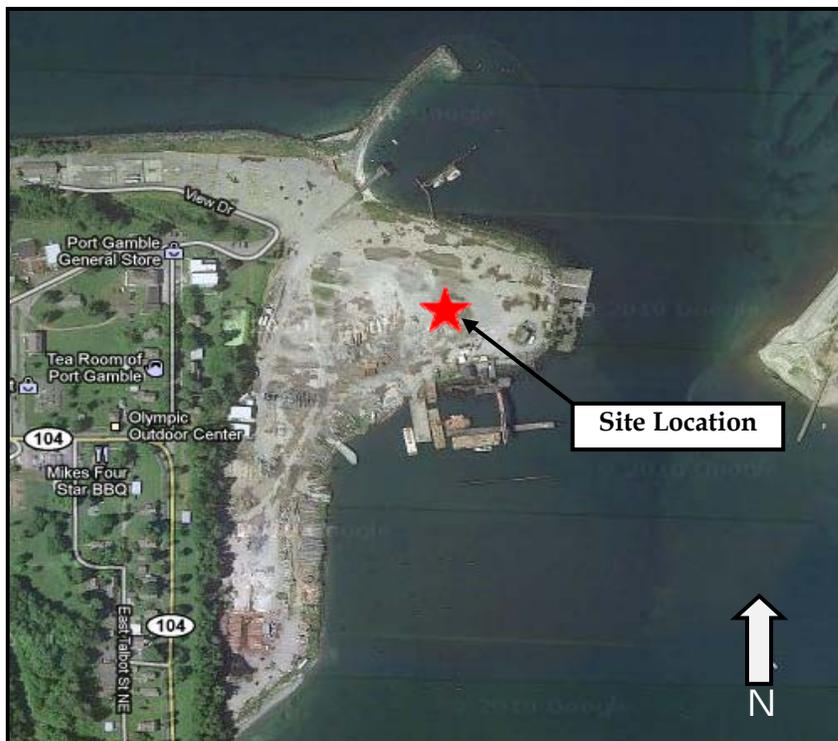


Figure 1: The Pope & Talbot, Inc. Sawmill Site is located at the mouth of Port Gamble Bay, at the east end of NW View Drive in Port Gamble, WA.

General Site History and Contaminants

The Pope & Talbot Sawmill manufactured forest products for over 142 years (1853 to 1995). During this time, the Site consisted of sawmill buildings, two woodchip loading facilities, a log transfer facility, and log rafting and storage areas. A separate log storage area for Pope & Talbot was located at the southwest end of Port Gamble Bay (Facility Site ID #1567413).

After the mill was taken down and removed in 1997, the upper portion of the Site was leased for log sorting, wood chipping, materials handling, and marine research.

Manufacturing activities released pollutants, including petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and metals. Some of these contaminants have been found in soil, groundwater and sediments surrounding the Site. In addition to the chemicals released, wood waste impacts to the marine sediments have been found. Log rafting and chip loading operations deposited wood waste on the bed of Port Gamble Bay.

Between 2002 and 2007, interim cleanup actions removed approximately 26,000 tons of soil and 31,000 cubic yards of wood debris from the Site.

The Cleanup Process

Washington State's cleanup process and key opportunities for you to provide input are outlined in Figure 2. The general cleanup process includes the following steps:

- Remedial Investigation (RI) - investigates the site for types, locations, and amounts of contaminants.
- Feasibility Study (FS) - identifies cleanup options for those contaminants.
- Cleanup Action Plan (CAP) - selects the preferred cleanup option and explains how cleanup will be conducted.

Each of these steps is generally documented in reports and plans that will be available for public review. Public comment periods of at least 30 calendar days are usually conducted for the following documents:

- Draft RI report
- Draft FS report
- Draft CAP

These cleanup steps and documents are described in greater detail in the following subsections.

Interim Actions

Interim actions may be conducted during the cleanup if required by Ecology. An interim action partially addresses the cleanup of a site, and may be required if:

- It is technically necessary to reduce a significant threat to human health or the environment.
- It corrects a problem that may become substantially worse or cost substantially more to fix if delayed.
- It is needed to complete another cleanup activity, such as design of a cleanup plan.

As described above, several interim actions have already taken place at the Site. Additional interim actions are not currently anticipated on the Pope & Talbot, Inc. Sawmill Site.

Remedial Investigation

The site owner prepared the Draft RI under an Agreed Order (legal agreement) with Ecology. The RI describes the contamination in upland soil, groundwater, and sediments in and surrounding the Site.

Soils remaining on the Site are below cleanup levels. Previous interim actions successfully removed contaminated soils and reduced groundwater concentrations of total petroleum hydrocarbons, mercury, and other hazardous substances to levels that are now protective of human health and the environment.

Wood waste exists in the north and south in-water portions of the Site. When wood waste breaks down, it releases sulfide and ammonia, which are harmful to animals in the mud. Other chemicals that may bioaccumulate in shellfish are present in low concentrations at the Mill Site, and include arsenic, cadmium, carcinogenic PAHs, and dioxins/furans.

Feasibility Study Report

In the FS, Ecology evaluates potential cleanup action alternatives and recommends a preferred cleanup action. This Draft FS addresses cleanup options for both upland and in-water portions of the Site. Information from the RI about the amount and location of contaminants is used to understand potential risks and identify cleanup alternatives. Alternatives may include contaminant removal, capping and/or institutional controls to reduce exposure, and they may be used in different combinations. Long-term monitoring will be part of the remedy to ensure cleanup achieves its goals.

The in-water portion of the Site is divided into four sediment management areas (SMAs) based on the depth of water and concentration of wood waste deposits. The FS separately evaluates cleanup alternatives for the upland portion of the Site and each in-water SMA.

Information from a bay-wide Cultural Resources Overview, which identifies and maps areas of historical, archaeological, and cultural resources within the project area, was considered in the evaluation of alternatives. A Preliminary Habitat Resource Analysis is also included in this FS to summarize the importance of eelgrass and shellfish as resources and help inform cleanup in Port Gamble Bay.

The preferred alternatives are protective of human health and the environment, make up a permanent solution that can be completed in a reasonable timeframe, addresses public concerns identified to date, and are compatible with future land uses at the Site.

The preferred alternatives identified by Ecology include the following:

Upland Areas: Since interim actions from 2002 to 2007 were successful at removing contaminated soils, the preferred alternative for remaining contamination is to use institutional controls. These controls will prevent the future use of groundwater as a drinking water supply, and ensure adequate soil cover to minimize future wildlife impacts.

SMA-1: Dredging is selected as the preferred alternative for this area. This would include removing pilings and overwater structures to allow excavation, and removing approximately 8,000 cubic yards of wood waste and associated sediment deposits located in this relatively shallow embayment.

SMA-2: A combination of dredging and containment is selected as the preferred alternative for this area and would include the following:

- Remove pilings and overwater structures to allow excavation
- Excavate and dredge wood waste and associated sediment deposits located in relatively shallow areas
- Place engineered caps on non-dredged areas to confine remaining wood waste
- Conduct long-term sediment monitoring

SMA-3 and -4: The preferred alternative selected for SMAs 3 and 4 is monitored natural recovery, which uses ongoing, naturally occurring processes to reduce sediment impacts over time. This alternative would also include long-term monitoring to ensure that cleanup achieves its goals.

Cleanup Action Plan

The companies have agreed to develop a draft CAP on the Site. After public comment on the draft RI and FS reports, all comments are compiled and evaluated, and a preferred cleanup alternative will be selected. The draft CAP explains the cleanup standards that will be applied at the Site, selects the preferred cleanup alternative(s), and outlines the work to be performed during the actual Site remediation. The CAP may also evaluate the completeness and effectiveness of any interim actions that were performed on the Site. The draft CAP will be available for public review and comment. Once public comments are reviewed and any changes are made, Ecology provides final approval and Site cleanup can begin.

3.0: Community Profile

Community Profile

Port Gamble was founded in 1853 by Maine businessmen Andrew Pope and William Talbot. It was the longest continuously operating mill town in North America, and is the only remaining company-owned mill town on Puget Sound². Port Gamble is an unincorporated town located in northern Kitsap County. Kitsap is the third most densely populated county in Washington, experiencing a 22% increase in population between 1990 and 2000³. Its total population, as reported in 2006, is 240,604, with 160,371 residents over age 25, and 124,604 residents in the workforce⁴. In the next 20 years, its population is expected to exceed 330,000⁵. The county's median household income is approximately \$55,000. Over 92% of available housing units are occupied.

Key Community Concerns

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site.

Many factors are likely to raise community questions, such as the amount of contamination, how the contamination will be cleaned up, or future use of the Site. Community concerns often change over time, as new information is learned and questions are answered. Identifying site-specific community concerns at each stage of the cleanup process is helpful to ensure that they are adequately addressed. On-going key community concerns will be identified for the Pope & Talbot, Inc. Sawmill Site through public comments and other opportunities as detailed in Section 4.

² <http://www.portgamble.com/> (Accessed November 5, 2007)

³ Kitsap County Comprehensive Plan, 2006.

http://www.kitsapgov.com/dcd/10year/final/vol_1/01_intro.pdf (Accessed November 5, 2007)

⁴ U.S. Census Bureau, 2006.

http://factfinder.census.gov/servlet/ACSSAFFacts?_event=&geo_id=05000US53035&geoContext=01000US%7C04000US53%7C05000US53035&street=&county=kitsap&cityTown=kitsap&state=04000US53&zip=&lang=en&sse=on&ActiveGeoDiv=&useEV=&pctxt=fph&pgsl=050&submenuId=factsheet_1&ds_name=null&ci_nbr=null&qtr_name=null®=null%3Anull&keyword=&industry= (Accessed November 5, 2007)

⁵ Kitsap County Community Development website

<http://www.kitsapgov.com/dcd/10year/default.htm#overview> (Accessed November 5, 2007)

4.0: Public Participation Opportunities

Ecology and the companies invite you to share your comments and participate in the cleanup in your community. As we work to meet our goals, we will evaluate whether this public participation process is successful. This section describes the public participation opportunities for this Site.

Measuring Success

We want this public participation process to succeed. Success can be measured, at least in part, in the following ways:

- Number of written comments submitted that reflect understanding of the cleanup process and the site.
- Direct “in-person” feedback about the site cleanup or public participation processes, if public meetings are held.
- Periodic updates to this Plan to reflect community concerns and responses.

If we are successful, this process will increase:

- Community awareness about plans for cleanup and opportunities for public involvement.
- Public participation throughout the cleanup.
- Community understanding regarding how their input will be considered in the decision-making process.

Activities and Information Sources

Ecology Contacts

Ecology is the lead contact for questions about the cleanup in your community. The Ecology staff person identified in this section is familiar with the cleanup process and activities at the Site. For more information about public involvement or the technical aspects of the cleanup, please contact:

Kevin MacLachlan
Ecology Site Manager
WA State Dept. of Ecology
Toxics Cleanup Program
PO Box 47600
Olympia, WA 98504-7600

Phone: (360) 407-6798

E-mail: Kevin.MacLachlan@ecy.wa.gov

Ecology's Webpage

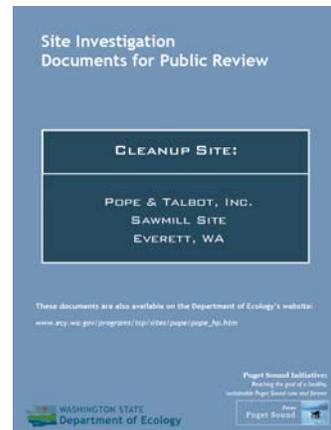
Ecology has created a webpage to provide convenient access to information. Documents such as the Agreed Order, draft reports, and cleanup plans, are posted as they are issued during the investigation and cleanup process. Visitors to the webpage can find out about public comment periods and meetings; download, print, and read information; and submit comments via e-mail. The webpage also provides links to detailed information about the MTCA cleanup process. The Pope & Talbot, Inc. Sawmill Site webpage is available at the following address: http://www.ecy.wa.gov/programs/tcp/sites/pope/pope_hp.html

Information Centers/Document Repositories

The most comprehensive source of information about the Pope & Talbot, Inc. Sawmill Site is the information center, or document repository. Two repositories provide access to the complete list of site-related documents. All Pope & Talbot, Inc. Sawmill investigation and cleanup activity reports will be kept in print at those two locations and will be available for your review. They can be requested on compact disk (CD) as well. Document repositories are updated before public comment periods to include the relevant documents for review. Documents remain at the repositories throughout the investigation and cleanup. For this Site, the document repositories and their hours are:

- **Kitsap Regional Library - Poulsbo Branch**
700 NE Lincoln Street
Phone: (360) 779-2915
Hours: Mon – Wed 10 am - 8 pm, Thurs 1 pm - 5 pm,
Fri 10 am - 6 pm, Sat – Sun 1-5 pm
- **WA Department of Ecology Headquarters**
300 Desmond Drive SE
Lacey, WA 98503
By appointment. Please contact Carol Dorn at
(360) 407-7224 or Carol.Dorn@ecy.wa.gov

Look for document covers such as the illustration on the right.



Public Comment Periods

Public comment periods provide opportunities for you to review and comment on major documents, such as the Agreed Order, draft Public Participation Plan, and the draft RI/FS report. The typical public comment period is 30 calendar days.

Notice of Public Comment Periods

Notices for each public comment period will be provided by local newspaper and by mail. These notices indicate the timeframe and subject of the comment period, and explain how you can submit your comments. For the Pope & Talbot, Inc. Sawmill Site, newspaper notices will be posted in The Kitsap Sun.

Notices are also sent by regular mail to the local community and interested parties. The community typically includes all residential and business addresses within one-quarter mile of the Site, as well as potentially interested parties such as public health entities, environmental groups, and business associations.

Fact Sheets

One common format for public comment notification is the fact sheet. Like the newspaper notice, fact sheets explain the timeframe and purpose of the comment period, but also provide background and a summary of the document under review. Two fact sheets have been prepared for the Pope & Talbot, Inc. Sawmill Site. The first fact sheet explains the Agreed Order and this Public Participation Plan (See Appendix A). The second fact sheet explains the Draft Remedial Investigation and the Draft Feasibility Study (Appendix B). Future fact sheets will be prepared at key milestones in the cleanup process.

MTCA Site Register

Ecology produces an electronic newsletter called the MTCA Site Register. This semi-monthly publication provides updates of the cleanup activities occurring throughout the state, including public meeting dates, public comment periods, and cleanup-related reports. Individuals who would like to receive the MTCA Site Register can sign up three ways:

- Call (360) 407-6069
- Send an email request to ltho461@ecy.wa.gov or
- Register on-line at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html

Mailing Lists

Ecology maintains both e-mail and regular mail distribution lists throughout the cleanup process. The lists are created from carrier route delineations for addresses within one-quarter mile of the Site; potentially interested parties; public meeting sign-in sheets; and requests made in person or by regular mail or e-mail. You may request to be on a mailing list by contacting the Ecology staff person listed earlier in this section.

Optional Public Meetings

Public meetings provide additional opportunities to learn about the investigation or cleanup, and to enhance informed comment. A public meeting for the Draft Remedial Investigation and Draft Feasibility Study will be held on **March 9, 2011** beginning with an open house at 4:30 pm and a presentation/Q&A at 5:30 pm. The location is the Hood Canal Vista Pavilion, located on NE View Drive in Port Gamble.

Submitting Comments

You may submit comments by regular mail or e-mail during public comment periods to the project manager listed earlier in this section.

Response to Comments

Ecology will review all comments submitted during public comment periods, and will modify documents as necessary. You will receive notice by regular mail or e-mail that Ecology has received your comments, along with an explanation about how the comments were addressed.

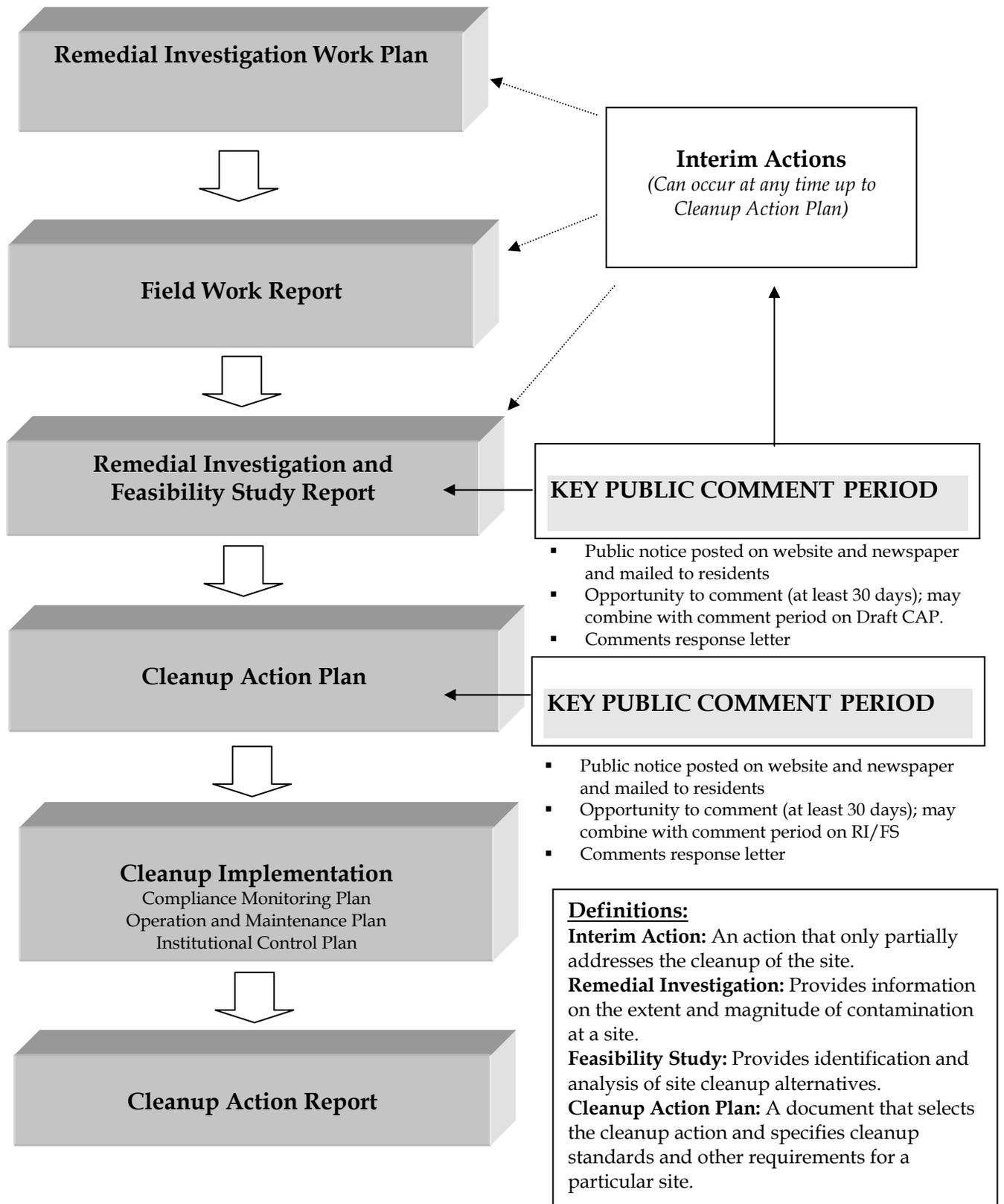
Other

Ecology and the companies are committed to the public participation process and will consider additional means for delivering information and receiving comments, including combining public comment periods for other actions (such as those associated with the State Environmental Policy Act).

Public Participation Grants

You may be eligible to apply for a Public Participation Grant from Ecology to provide additional public participation activities. Those additional activities will not reduce the scope of the activities defined by this Plan. Activities conducted under this Plan would coordinate with the additional activities defined under the grant.

Figure 2: Washington State Cleanup Process



Glossary

Cleanup: The implementation of a cleanup action or interim action.

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 that complies with MTCA cleanup requirements, including but not limited to: complying with cleanup standards, utilizing permanent solutions to the maximum extent practicable, and including adequate monitoring to ensure the effectiveness of the cleanup action.

Cleanup Action Plan: A document that selects the cleanup action and specifies cleanup standards and other requirements for a particular site. The cleanup action plan, which follows the remedial investigation/feasibility study report, is subject to a public comment period. After completion of a comment period on the cleanup action plan, Ecology finalizes the cleanup action plan.

Cleanup Level: The concentration (or amount) of a hazardous substance in soil, water, air, or sediment that protects human health and the environment under specified exposure conditions. Cleanup levels are part of a uniform standard established in state regulations, such as MTCA.

Cleanup Process: The process for identifying, investigating, and cleaning up hazardous waste sites.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels.

Feasibility Study: Provides identification and analysis of site cleanup alternatives and is usually completed within a year. Evaluates sufficient site information to enable the selection of a cleanup action. The entire Remedial Investigation/Feasibility Study (RI/FS) process takes about two years and is followed by the cleanup action plan.

Hazardous Site List: A list of ranked sites that require further remedial action. These sites are published in the Site Register.

Interim Action: Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

Model Toxics Control Act: Refers to Chapter 70.105D RCW. Voters approved it in November 1988. The implementing regulation is found in Chapter 173-340 WAC.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city or county) newspaper of largest circulation; and the opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Release: Any intentional or unintentional entry of any hazardous substance into the environment, including, but not limited to, the abandonment or disposal of containers of hazardous substances.

Remedial Action: Any action or expenditure consistent with MTCA to identify, eliminate, or minimize any threat posed by hazardous substances to human health or the environment, including any investigative and monitoring activities of any release or threatened release of a hazardous substance, and any health assessments or health effects studies conducted in order to determine the risk or potential risk to human health.

Remedial Investigation: Any remedial action that provides information on the extent and magnitude of contamination at a site. This usually takes 12 to 18 months and is followed by the feasibility study. The purpose of the Remedial Investigation/Feasibility Study is to collect and develop sufficient site information to enable the selection of a cleanup action.