

Site Cleanup:

SCOTT PAPER MILL SITE

Between 17th and 20th Streets, east of Q Avenue, on Fidalgo Bay
Anacortes, Washington

**PUBLIC PARTICIPATION PLAN -
UPDATED**

Prepared by:

Washington State Department of Ecology



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

February 2009

This plan is for you!

This public participation plan is prepared for the Scott Paper Mill 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 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 Scott Paper Mill Site.

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If you need this publication in an alternate format, please call the 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 (TTY).

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1.0: Introduction and Overview of the Public Participation Plan

This Public Participation 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 the Scott Paper Mill Site. The Site is located between 17th and 20th Streets, east of Q Avenue, on Fidalgo Bay in Anacortes, 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 for providing 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, 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.
- 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.

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.

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

The Scott Paper Mill Site is one of several sites in the Anacortes 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. Some of these sites are grouped in several bays around the Sound for “baywide” cleanup efforts. As sites in the Anacortes 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 and maintain overall responsibility and approval authority for the activities outlined in this plan. Potentially liable parties (PLPs) are working with Ecology to clean up the Scott Paper Mill Site. The PLPs are the Port of Anacortes, Kimberly-Clark Corporation (which purchased remaining Scott Paper Company assets in 1995), and MJB Properties. 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 Scott Paper Mill Site.
- Section 3: An overview of the local community that this plan is intended to engage.
- Section 4: Detailed 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 urges the public to become involved in the cleanup process.

2.0: Site Background

Site Description and Location

The Scott Paper Mill Site is located between 17th and 20th Streets, east of Q Avenue on Fidalgo Bay, in Anacortes, Skagit County, Washington (see Figure 1). It is currently divided into three main portions: north (sometimes called the “Port Uplands Area”), south (sometimes called the “MJB North Area”), and the marine area. The north portion currently includes Seafarers’ Memorial Park, office buildings, parking, paved roads, and landscaped areas. The south portion is mostly undeveloped, vacant land, but includes four buildings. The marine area extends along both the northern and southern upland portions of the Site. The shoreline area includes riprap, sheet pile walls, concrete bulkheads, docks and piers; and the shallow, subtidal area includes eelgrass habitat.



Figure 1: The Scott Paper Mill Site is located between 17th and 20th Streets, east of Q Avenue, on Fidalgo Bay, in Anacortes, WA.

General Site History and Contaminants

A lumber mill operated on the Scott Paper Mill Site beginning in the late 1800s. A pulp mill also operated at the Site from approximately 1925 until 1978. No structures remain of either mill. Historical information and contaminants on the northern and southern portions of the Site are summarized in this section.

North Portion. Historic features on the northern portion of the Site included numerous buildings, sheds, piers, tailings ponds, boilers, fuel storage tanks, a smokestack, and burners. The Scott Paper Company operated this portion of the Site from 1940 until

1955. The Port of Anacortes purchased this portion in 1979 and used part of the property as a log yard from 1990 to 1993. It was divided into three parcels in 1998, and Sun Healthcare Systems, Inc. purchased one of these parcels.

In 1999, the Port of Anacortes and Sun Healthcare Systems, Inc. conducted an independent cleanup action on their parcel to remove a portion of the petroleum-contaminated soil and wood debris (see Ecology Fact Sheet #05-09-057). A 2-foot-thick soil cover and a soil containment wall along the shoreline were also installed.

Contaminants found during the investigation in the northern portion of the Site include:

- Metals (including arsenic, antimony, chromium, copper, lead, mercury, nickel, and zinc), diesel- and motor oil-range petroleum hydrocarbons, carcinogenic polynuclear aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), and dioxins/furans were found in soil at concentrations above preliminary cleanup levels.
- Petroleum hydrocarbons, arsenic, sulfide, bis(2-ethylhexyl)phthalate, ammonia, and nickel sporadic slight exceedances were found in groundwater.

South Portion. The main feature on the southern portion of the Site was the pulp mill building, built in 1925. The pulp mill used waste from the lumber mill. The Scott Paper Company operated this portion from 1940 until 1978. This part of the Site was purchased in 1979, and was used for several years as a staging area for oil field equipment, boat manufacturing, and storage. MJB Properties, Inc. purchased it in 1990.

Contaminants found during the investigation in the southern portion of the Site include:

- Arsenic, copper, zinc, chromium, lead, and nickel were found at concentrations above preliminary cleanup levels in soil samples collected from less than two feet deep. Additional metals and cPAHs were found in soil samples collected from greater than two feet deep.
- Arsenic, sulfide, and 4-methylphenol sporadic slight exceedances were found in groundwater.

Marine Area. Contaminants found during the investigation in the marine sediments across both portions of the Site include:

- Metals (copper, lead, and mercury), PCBs, and wood debris were found in marine sediments above preliminary cleanup levels.

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.

At any time during the cleanup process, an interim action may be conducted. An interim action partially addresses cleanup at the site and usually is followed by site-wide cleanup.

Each of these steps will be 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.

Interim actions are not currently anticipated on the Scott Paper Mill Site.

Remedial Investigation/Feasibility Study Report

An RI/FS has been conducted on this Site. The RI determines which contaminants are on the site, where they are located, and whether there is a significant threat to human health or the environment. The draft RI report provides baseline data about environmental conditions that will be used to develop cleanup options. The FS and report then identify and evaluate cleanup options, in preparation for the next step in the process.

The RI and FS processes typically include several phases:

- Scoping.
- Site characterization.
- Development and screening of cleanup alternatives.
- Treatability investigations (if necessary to support decisions).
- Detailed analysis.

The RI and FS reports are combined into a draft Scott Paper Mill Site RI/FS report. The draft report was made available for public review and comment from August 29 through September 30, 2008, and can be found at the library and on the website listed in Section 4 of this document.

Cleanup Action Plan

The draft CAP is developed after public comment on the draft RI/FS report is completed. It 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. Ecology and the PLPs developed the draft CAP for the Site in December 2008 and January 2009.

Ecology and the PLPs are preparing to sign another legal document, called a Consent Decree. The Consent Decree is the legal agreement to perform specific cleanup actions and restoration for the Site. The draft CAP and an updated Public Participation Plan are attachments to the Consent Decree. All three documents will be available for public review and comment from February 25 through March 25, 2009, and can be found at the library and on the website listed in Section 4 of this document. 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

Anacortes is Skagit County's second largest city and its only seaport. It is the only city on Fidalgo Island. The current population is approximately 16,300 (about 7,200 households) situated within about 12 square miles. Located on Fidalgo Bay, Anacortes has 12.5 miles of saltwater shoreline, giving rise to three Port of Anacortes piers/wharves, a shipyard, several yacht- and mid-size boat building and sales operations, and several marinas. Four freshwater lakes and 3,300 acres of city-owned forestland and parks create a rural feeling, but the City also has modern educational and health care facilities. The City's 2006 labor workforce was more than 7,000, employed predominantly in manufacturing, accommodations/food service, retail, and health care.²

Key Community Concerns

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site. The Scott Paper Mill Site is located near a residential area. The proximity of the community to the Site is likely to raise concerns about how daily life and the future of the community may be affected during and after cleanup.

Many factors are likely to contribute to 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 Scott Paper Mill Site through public comments and other opportunities as detailed in Section 4.

² Anacortes Chamber of Commerce web Site, *available at* <http://www.anacortes.org/pdf/AnacortesCommunityProfileMarch2007.pdf> ; Accessed 11/12/07.

4.0: Public Participation Opportunities

Ecology invites 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 identified in this section are familiar with the cleanup process and activities at the Site. For more information about public involvement or about technical aspects of the cleanup, please contact:

For technical questions
or comments:
Panjini Balaraju
Ecology Project Coordinator
WA State Dept. of Ecology
Toxics Cleanup Program

For public involvement
questions or comments:
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Ecology's Webpage

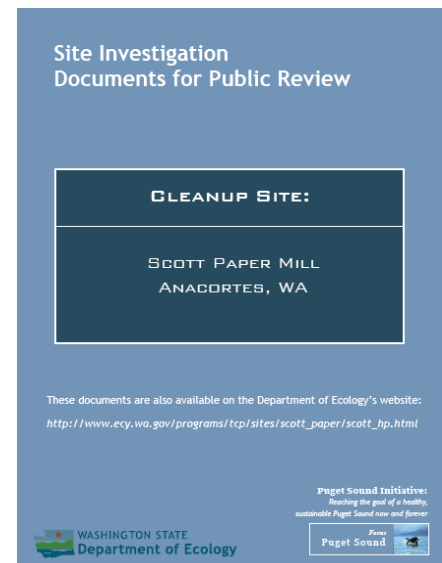
Ecology has created a webpage to provide convenient access to information. Documents such as the draft RI/FS report and draft CAP are posted as they are issued during the investigation and cleanup process. Visitors to the webpage can find out about public comment periods and meetings; download, print, and read information; and submit comments via e-mail. The webpage also provides links to detailed information about the MTCA cleanup process. The Scott Paper Mill Site webpage is available at the following address: http://www.ecy.wa.gov/programs/tcp/sites/scott_paper/scott_hp.html

Information Centers/Document Repositories

The most comprehensive source of information about the Scott Paper Mill Site is the information center, or document repository. Two repositories provide access to the complete list of site-related documents. All Scott Paper Mill investigation and cleanup activity reports will be kept in print at those two locations and will be available for your review. They can also be requested on compact disk (CD). 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:

- **Anacortes Public Library**
1220 10th Street
Phone: (360) 293-1910
Hours: Mon.-Thurs. 11 a.m.-8 p.m., Fri. 11 a.m.-5 p.m., Sat.-Sun. 12-5 p.m.
- **WA Department of Ecology Headquarters**
300 Desmond Drive SE
Lacey, WA 98503
By appointment. Please contact Carol Dorn at (360) 407-7224 or cesg461@ecy.wa.gov.

Look for the document cover illustrated here.



Public Comment Periods

Public comment periods provide opportunities for you to review and comment on major documents, such as the 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 Scott Paper Mill Site, newspaper notices will be posted in the Anacortes American, the Skagit Valley Herald, and the Clamdigger.

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. Fact sheets have been prepared for the Scott Paper Mill Site explaining the RI/FS Report and this Public Participation Plan (See Appendix A) and also for the Consent Decree and draft Cleanup Action Plan (See Appendix B). Future fact sheets may be prepared 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 an e-mail and regular mail distribution list throughout the cleanup process. The list is 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 the mailing list by contacting Ecology's public involvement staff person listed earlier in this section.

Optional Public Meetings

A public meeting will be held during a comment period if requested by ten or more people, or if Ecology decides it would be useful. Public meetings provide additional opportunities to learn about the investigation or cleanup, and to enhance informed comment. If you are interested in a public meeting about the Scott Paper Mill Site, please contact the Ecology staff listed earlier in this section.

Open houses were held on September 16 and September 17, 2008, at City Council Chambers for the RI/FS report.

An open house and two public meeting/hearings have been scheduled on March 3 and March 17, 2009, for the draft CAP. The meetings are as follows:

- An open house has been scheduled on March 3, from 4:00-7:00 p.m. This is a chance to talk one-on-one with project staff about site documents, and hear an informal presentation that will begin at 6:00 p.m. This meeting will be held at the Cannery, 715 Seafarers Way, Suite 101, Anacortes.
- Two public meeting/formal hearings have been scheduled on March 17 at 2:00 p.m. and again at 6:30 p.m. This is a chance to see a presentation about the cleanup, ask questions, and voice your comments to Ecology. This is a formal comment opportunity that will be recorded. These meetings will be held at Anacortes City Council Chambers, at the corner of 6th and Q Avenues, Anacortes.

Submitting Comments

You may submit comments by regular mail or e-mail during public comment periods to the Ecology 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 a general explanation about how the comments were addressed.

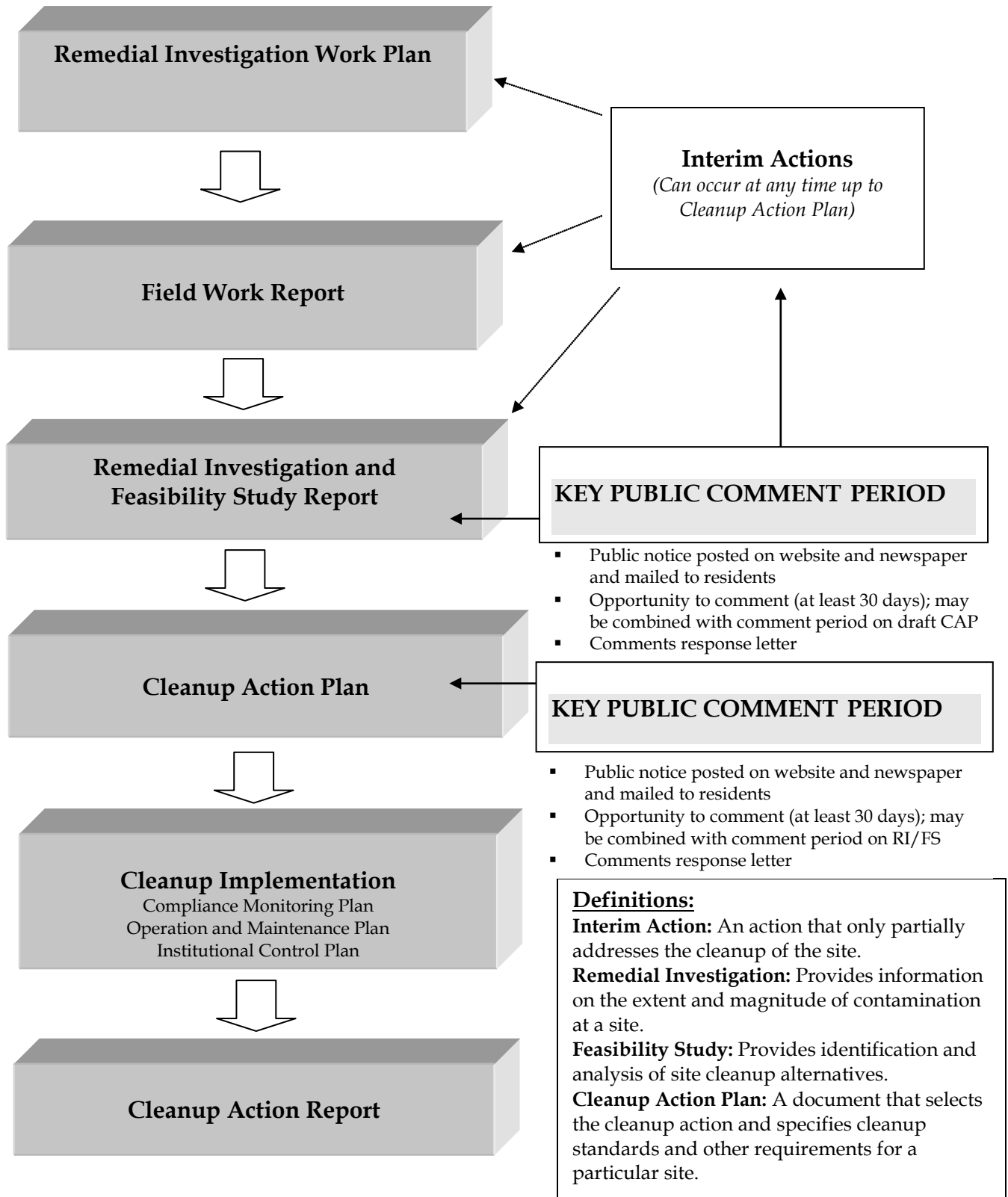
Other

Ecology is 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.