



DATE: March 13, 2003
TO: Waterfront Futures Group
FROM: Lucille T. McInerney, P.E.,^{ATM} Toxics Cleanup Program
SUBJECT: Scoping for Visioning Project

The Department of Ecology appreciates this opportunity to provide input into your important visioning project for Bellingham's waterfront. We have been involved in bay-wide planning activities since 1996 through the Bellingham Bay Demonstration Pilot Work Group. This memo provides information on the main deliverable of the Work Group as well as the status of cleanup activities at the Whatcom Waterway site. We hope this information will help in your scoping work.

The Bellingham Bay Demonstration Pilot Work Group is a partnership of 15 federal, tribal, state and local organizations working to develop a streamlined, coordinated approach to cleanup, habitat restoration, controlling sources of pollution, land use, and disposal of contaminated sediments. The culmination of the Work Group effort is represented by the Bellingham Bay Comprehensive Strategy; a bay-wide guidance document for decision-makers that integrates these multiple elements. The Work Group is currently focused on facilitating/coordinating implementation of the Comprehensive Strategy.

In terms of cleanup, the Comprehensive Strategy identifies twelve sites around Bellingham Bay requiring remediation, including the Whatcom Waterway site. This site has been extensively studied by Georgia-Pacific (G-P) with Ecology oversight through a legal agreement.

The Whatcom Waterway contaminated sediment site is the result of historic (1965 – 1975) pulping activities at the G-P mill, with the main contaminants of concern being mercury and phenolic compounds (associated with wood products). The Work Group identified the Whatcom Waterway site as a high priority and developed a range of potential cleanup alternatives as part of the Comprehensive Strategy. In 2000, Ecology, with input from the Work Group and the public, analyzed the Comprehensive Strategy in the Bellingham Bay Comprehensive Strategy Final Environmental Impact Statement and identified a preferred cleanup alternative for the Whatcom Waterway site. Among the key elements of the preferred alternative were:

- ❖ Removal of contaminated subsurface sediments from the Whatcom Waterway, a federally authorized navigation channel. The waterway requires regular dredging in order to maintain required depths for navigation but regular dredging has not occurred due to sediment contamination. Dredging of these sediments would remove them from an area where

contaminated sediments could be disturbed and would also allow for a wider range of uses for the channel, integrating environmental remediation with economic development.

- ❖ Capping of sediments outside the navigation channel with clean material.
- ❖ Integration of habitat restoration and protection.
- ❖ Disposal of sediments from the Whatcom Waterway, and potentially other sites around Bellingham Bay, in a confined aquatic disposal facility near the Cornwall Avenue Landfill. (A confined aquatic disposal facility involves building an under water containment structure, filling it with contaminated sediments and then placing a thick layer of clean material on top)

In 2001, following closure of its pulp mill and associated operations, G-P determined that 21 acres of their 29-acre wastewater treatment lagoon, or Aerated Stabilization Basin (ASB), could potentially be used as a disposal facility for contaminated sediments dredged from the Whatcom Waterway site and other sites in Bellingham Bay. This new alternative was evaluated in a Supplemental Feasibility Study and Environmental Impact Statement released for public review and comment in March 2002.

The ASB alternative showed significant advantages over a confined aquatic disposal facility, most notably, it allowed for the use of hydraulic cutterhead dredging, a type of hydraulic suction pipeline. Hydraulic cutterhead dredges have sediment resuspension rates at the point of dredging typically three-times lower than mechanical dredges, providing additional water quality protection. Because the ASB is an upland facility, it also provides a greater level of certainty that contaminated material will be effectively contained. It is also located on Georgia-Pacific's property and removes the contaminants from state-owned aquatic lands. Preliminary technical evaluations such as structural stability, water quality protection and capacity indicate that the ASB could effectively be used as a contaminated sediment disposal facility.

Due to the demonstrated superiority of the ASB alternative when compared against environmental regulatory criteria, Ecology has preliminarily selected this alternative for implementation. Our selection will be articulated for public review in a draft Cleanup Action Plan that is currently being developed. While this alternative is based upon existing land use designations (for example, the Whatcom Waterway is a congressionally authorized navigation channel with required water depths), future land use decisions can and will be integrated into the final cleanup. For instance, in order to engineer the final cap that will be placed on the ASB after sediment disposal is completed, it will be necessary to determine the type of land use that will take place on top of the cap (i.e. buildings, ball fields, etc.).

I look forward to providing you with more detailed information as soon as we can schedule a presentation. In the meantime, please feel free to contact me or Jessica Paige with any questions. I can be reached at 425-649-7272 or lpeb461@ecy.wa.gov and Jessica can be reached at 360-738-6280 or jpai461@ecy.wa.gov

cc: Mike Stoner, Port of Bellingham
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