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SUBMITTED ELECTRONICALLY VIA EMAIL AND ONLINE PORTAL

October 2, 2017

Ms. Kaia Petersen
Washington State Department of Ecology
Southwest Regional Office
Hazardous Waste & Toxics Reduction
PO Box 47775
Olympia, WA 98504-7775

**RE: International Paper Response to Additional Public Comments
Public Review Draft Remedial Investigation / Feasibility Study Report
Port of Longview Maintenance Facility Area, Longview, Washington**

Dear Ms. Petersen,

International Paper Company (International Paper) has been working diligently with the Washington Department of Ecology (Ecology) for over 10 years to develop a public review draft remedial investigation/feasibility study (RI/FS) report for the Maintenance Facility Area (MFA) at the Port of Longview (Port). Throughout the RI/FS development process, International Paper has met with the Port on multiple occasions to discuss cleanup action alternatives and incorporate alternative modifications suggested by the Port to accommodate potential economic development opportunities. In May 2015, the Port stated that it was prepared to support the modified preferred cleanup action alternative identified in the public review draft RI/FS report (Alternative S5B). This culminated in the subsequent approval by the Washington Department of Ecology (Ecology) in late 2015 of the public review draft RI/FS report that was submitted to Ecology on December 21, 2015. The Port subsequently proposed additional modifications regarding site grades and potential future site uses, and those modifications were also incorporated by International Paper into the public review draft RI/FS report that was submitted to Ecology on July 12, 2016. Multiple modifications have been suggested by the Port and incorporated by International Paper to allow for both continued existing site uses and potential additional future site uses that have been proposed by the Port. Alternative S5B is most protective of human health and the environment (MTCA's primary objectives), and it also

incorporates the Port's requested modifications related to supporting current and future economic development objectives.

ADDITIONAL PUBLIC COMMENTS

Additional public comments regarding the public review draft RI/FS report have been submitted by the Port and others during the public comment period that ends October 2, 2017, and International Paper responds below to those comments that generally fall into the following categories:

1. International Paper's alternative will create a "mound" that could not only impact future site uses, but also current site uses.
2. Economic development is not given adequate consideration by International Paper's alternative.
3. The Port has offered to pay the \$1.5 million difference in costs between their alternative and International Paper's alternative.
4. International Paper will look for the easiest way out, and an opportunity to walk away.

Alternative S5B Will Not Create a Recognizable "Mound"

Alternative S5B will not create a recognizable "mound," but will rather smooth existing site grades to fill valleys and connect existing grade breaks that are currently controlled by site features such as retaining walls. Post-remediation site grades will not exceed current site grades, and therefore will not negatively impact either current or future site uses. The Port has provided International Paper with maximum allowable site grade metrics, and those specific grade metrics have been incorporated into the July 12, 2016 public review draft RI/FS report (page 7-25).

The Port's Economic Development Objectives Have Been Addressed on Multiple Occasions

Although economic development needs are not explicitly identified as a consideration in MTCA's remedy selection process, International Paper has discussed those needs with the Port on multiple occasions since the submittal of the public review draft RI/FS report in 2011, and has incorporated multiple modifications to accommodate requests by the Port related to minimizing impacts on Port operations and allowing for potential future development. The revised cleanup action alternative identified as Alternative S5B in the July 12, 2016 public review draft RI/FS report incorporates modifications to accommodate current Port uses as well as potential future Port uses. The incorporation of three zones, including 'Zone 1' near the existing rail spur from which all impacted soil will be moved to allow for a potential future 'dump pit,' is one example of a significant accommodation suggested by the Port and incorporated by International Paper. Alternative S5B is most protective of human health and the environment (MTCA's primary objectives), and it also incorporates the Port's requested modifications related to supporting current and future economic development objectives.

The Port Has Made No Formal Commitment to Fund the Additional \$1.5 Million Cleanup Cost

The Port's preferred alternative has been identified as having an additional cost of \$1.5 million without significant additional benefit related to protection of human health and the environment, but potential future benefits related to economic development. The additional excavation and offsite disposal related to this additional \$1.5 million cost also has potentially detrimental environmental impacts related to transport of hazardous materials and additional exposures, as well as continued monitoring of those materials at an offsite location. International Paper understands through public comments presented at the public hearing, publicly available correspondence between the Port and Ecology, and various media outlets that the Port of Longview proposes to pay the \$1.5 million difference between their alternative and Alternative S5B. For the record, International Paper is not aware of any formal offer from the Port to pay for these additional costs nor has International Paper had any formal discussions with the Port regarding the matter.

International Paper Has Acted as a Good Steward

International Paper has consistently acted as a good steward and in the process has never indicated a potential to 'walk away' by word or deed. International Paper has worked cooperatively with the Department of Ecology and the Port to meet obligations under the 1997 Consent Decree, No. 97-2-01088-9. International Paper continues to perform quarterly groundwater monitoring and reporting; has completed and submitted the July 12, 2016 public review draft RI/FS report, and has posted and maintains financial assurance to secure its obligation and demonstrate its commitment to implement the cleanup action at the Port of Longview.

CONCLUSION

International Paper has diligently worked with Ecology and the Port to produce and revise the public review draft RI/FS report for the MFA. This has included a process extending over ten years during which International Paper has sought to accommodate the Port's evolving development objectives for the MFA. Those accommodations are further described in Tables 1 and 2 of the Technical Memorandum submitted to Ecology previously on July 21, 2017. The public review draft RI/FS report submitted to Ecology on July 12, 2016, has been prepared consistent with the Model Toxics Control Act (MCTA) requirements and supports *Alternative S5B - Solidification Outside and Inside Building Footprint with Relocation of Soil near Railroad Tracks* as the preferred soil remedy and *Alternative GW4 – Monitored Natural Attenuation* as the preferred groundwater remedy.

International Paper has evaluated cleanup action alternatives for the MFA in accordance with MTCA methodology, including developing a comparison of benefits to costs. *In situ* solidification of MFA soils was identified as providing the highest degree of protection of human health and the environment in relation to associated costs.

Moreover, International Paper has met with the Port on multiple occasions since the submittal of the public review draft RI/FS report in 2011, and International Paper has incorporated multiple modifications to accommodate requests by the Port related to potential future development. The revised cleanup action alternative identified as Alternative S5B in the July 12, 2016 public review draft RI/FS report incorporates modifications to accommodate current Port equipment and uses as well as potential future Port equipment and uses. The Port has proposed adding excavation and offsite disposal to Alternative S5B to create an additional alternative. A comparison of the Port's alternative to Alternative S5B indicates that the Port's alternative has an associated additional cost of \$1.5 million with no significant additional benefits related to protection of human health and the environment. The request to incorporate additional excavation and offsite disposal at an additional cost of \$1.5 million is not justified, and Alternative S5B is the appropriate cleanup action alternative for the MFA. Alternative S5B is most protective of human health and the environment (MTCA's primary objectives), and it also incorporates the Port's requested modifications related to supporting current and future economic development objectives.

Very truly yours,

INTERNATIONAL PAPER COMPANY

A handwritten signature in blue ink, appearing to read 'P. Slowiak', is written over the company name.

Philip J. Slowiak, Sr., CSP
Senior Program Manager
Environmental Remediation

cc: S. Ginski, IP
P. Kalina, AECOM