STATE ENVIRONMENTAL POLICY ACT (SEPA)
ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project: Mercury Contaminated Soil Removal Interim Remedial Action

2. Name of applicant: Port of Bellingham Telephone: (360) 676-2500

   Name of Contact: Brian D. Gouran Telephone: Same as above.

3. Address: P.O. Box 1677
   Bellingham, WA
   98227-1677

4. Date checklist prepared: September 14, 2016

5. Agency requesting checklist: Port of Bellingham

6. Proposed timing or schedule (including phasing, if applicable):

   The project is anticipated to occur in early 2017.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

   Yes. Final site remediation is anticipated to be completed in 2018/2019.

8. List any environmental information (studies, reports, etc.) you know about that has been prepared, or will be prepared, directly related to this proposal.

   - Public Review Draft Interim Action Work Plan, prepared by Aspect Consulting, September 8, 2016;
   - Final Environmental Impact Statement - The Waterfront District Redevelopment Project (Formerly Known as New Whatcom), dated December 2012 (including all supplemental and addenda);
   - GP West Final Remedial Investigation, prepared by Aspect Consulting, August 5, 2013

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

   No.

10. List any governmental approvals or permits that will be needed for your proposal, if known. Include Federal, State, City, County, and local districts or regional offices.

    The proposed action will be conducted as an interim action under Agreed Order No. 6834 (as amended) between the Port of Bellingham and the Washington State Department of Ecology within the authority of the state Model Toxics Control Act (MTCA). The proposed action is exempt from the procedural requirements of state and local permits that would otherwise be required, per RCW 70.105D.090. However, the proposed action is required to demonstrate substantive compliance with appropriate state and local permits. These include: City of Bellingham clearing, grading, and/or stormwater permits.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (You may attach a page if this space is not adequate.)

    The project site, located at 300 West Laurel Street in Bellingham, Washington, on the south side of the Whatcom Waterway (Figure 1). A Chlor-Alkali Plant, producing chlorine gas and sodium hydroxide (caustic) using a mercury cell technology, operated between 1965 and 1999. Contamination from historical industrial activities has impacted Site upland soils and groundwater with a variety of contaminants which are required to be addressed through the Model Toxics Control Act.

    The project will include the removal and off-site disposal of approximately 600 cubic yards of mercury impacted soil that is currently stored on site under a heavy-gage, impervious polyethylene cover (Figure 2). The 600 cubic yards of mercury-contaminated soil will be treated at the site to meet applicable regulations and be transported to a Subtitle C landfill for disposal. Once the soil is removed, the project area will be graded and paved. No additional structures, utilities, or infrastructure is associated with the project.

12. Location of the Proposal:

    The approximately 64 acre GP West site is located within the City of Bellingham with a street address of 300 Laurel on the south side of the Whatcom Waterway (Figure 1). The property is situated within portions of Sections 25 and 36, Township 38N, Range 02E and Section 30, Township 38N, Range 02E of the Willamette Meridian.

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site:

- ☒ Flat
- ☐ Rolling
- ☐ Hilly
- ☐ Steep Slopes
- ☐ Mountainous
- ☐ Other

b. What is the steepest slope on the site (approximate percent slope)?

<5%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

The surface of the project area consists primarily of pavement and gravel. Site soil generally consists of approximately 10-20 feet of silty sand and sandy silt mixed with miscellaneous debris. The fill material is underlain by 10-40 feet of native beach and inner-tidal deposits that consist of medium sand.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

The interim action will include the excavation and off- site disposal of approximately 600 cubic yards of mercury impacted soil from the southern portion of the site. Following the removal of this material the disturbed area will be graded as needed to restore the area with pavement.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Due to the flat topography of the site and the stormwater management components associated with the project design, erosion is not expected to result from the completed project. Appropriate best management practices (BMPs) will be implemented to address the potential for erosion during construction activities.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The current site conditions consist of approximately 99% impervious surfaces. There will be no change in impervious surfaces as a result of this project.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Contractors will be required to implement BMPs for erosion control during construction consistent with the Washington State Department of Ecology Stormwater Management Manual for Western Washington. These may include covering stockpiles, use of fabric filter fencing, straw bales, interceptor swales and/or similar measures.

2. **AIR**

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial, wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

Short-term emissions to the air would result from diesel and gasoline automobile/equipment exhaust during construction. A minor amount of dust may be generated from soil handling activities depending on the seasonal conditions. However, the majority the excavations will occur at depth below the existing groundwater table which will reduce dust generation. The contractor will be prepared to implement dust suppression BMPs including, but not limited to covering and/or wetting any soil if necessary.

The excavation and removal of elemental mercury impacted soil may result in the temporary emission of volatile mercury in the immediate vicinity of the caustic plume excavation and cell building demolition. The emission of volatile mercury would be temporary and would be limited to the immediate vicinity of the excavation area during excavation/demolition activities.

b. Are there any off-site sources of emissions or odors that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Standard construction equipment will be utilized. During site preparation, demolition and construction, contractors will take reasonable precautions to minimize dust emissions. Temporary stockpiles staged at the site will be covered and secured. Contractors will be required to cover loads during transport.

To limit air emissions the volume of contaminated soil that is exposed at any one time can be minimized by only uncovering the soil while it is being excavated and moved into an on-Site soil treatment enclosure.

To control air emissions during the on-Site treatment process, a tent-like cover will be set up over the treatment system equipment. A large-capacity blower will draw air from beneath the cover through treatment canister(s) filled with sulfur-impregnated activated carbon designed to remove mercury vapors. The cover will provide containment and facilitate capture and treatment of mercury vapors generated during the soil treatment process. The blower will be sized to capture and exchange at least three times per hour the total volume of air from beneath the cover.

Throughout the soil treatment process, air monitoring for mercury will be conducted within the breathing zone for the purpose of worker health and safety, and around the project site perimeter to assess fugitive emissions.

3. **WATER**

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The interim action project location is adjacent to Bellingham Bay.

2) Will the project require any work over, in, or adjacent to (within 200 feet) of the described waters? If yes, please describe and attach available plans.

No.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No material will be placed in surface water or wetlands.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

No.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A

c. Water Runoff (including storm water):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Storm water will be treated on site through various BMP's during construction and until the site is stabilized. All storm water will be collected and managed through existing facilities. No additional volume is anticipated or re-routed by this project.

A Temporary Erosion and Sediment Control (TESC) plan will be developed and implemented throughout construction to minimize potential impacts associated with sediment and erosion. Temporary construction BMPs will include both source-control BMPs and treatment BMPs.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

Potential construction-related stormwater runoff associated with the proposed project during construction will be addressed through implementation of a TESC plan and associated best management practices.

4. **PLANTS**

a. Check or circle types of vegetation found on the site:

- ☐ Deciduous tree: alder, maple, aspen, other:
- ☐ Evergreen tree: fir, cedar, pine, other:
- ☐ Shrubs
- ☐ Grass
- ☐ Pasture
- ☐ Crop or grain
- ☐ Wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other:
- ☐ Water plants: water lily, eelgrass, millfoil, other:
- ☐ Other types of vegetation: Blackberry

b. What kind and amount of vegetation will be removed or altered?

None.

c. List threatened or endangered species known to be on or near the site.

None are known.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None.

5. **ANIMALS**

a. Check any birds and animals which have been observed on or near the site or are known to be on or near the site:

Birds:
☒ Hawk, ☒ Great Blue Heron,
☒ Eagle, ☒ Songbirds;
☒ Other: Ducks, Geese, Cormorant, Gulls, Terns

Mammals:
☒ Deer, ☐ Bear,
☐ Elk, ☐ Beaver;
☐ Other:

Fish:
☐ Bass, ☒ Salmon,
☐ Trout, ☐ Herring,
☒ Shellfish; ☒ Other: Forage Fish

b. List any threatened or endangered species known to be on or near the site.

The Interim Action will occur exclusively on the upland portion of the site; however, federally listed or threatened species that could occur in the vicinity of the site include Chinook salmon, marbled murrelet, steelhead, bull trout, and Southern Resident orca.

c. Is the site part of a migration route? If so, explain.

Yes, all lands within the Whatcom County lowlands are within the Pacific Migratory Flyway. Birds that inhabit the area vary seasonally due to migration.

d. Proposed measures to preserve or enhance wildlife, if any:

The Interim Action is being conducted as a remedial action to partially address site contamination. Removal of site contaminants contribute to long-term improvements.

6. ENERGY AND NATURAL RESOURCES

a. What kind of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

No long-term energy needs required for completed project, however fossil fuels and electric power will be required for the construction phase of the Interim Action.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

There are no energy needs for this project once construction is complete, therefore, none are proposed.

7. ENVIRONMENTAL HEALTH

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

During the cleanup project there could be small scale accidental spills or leakage of petroleum products from construction equipment. Excavation and handling of the contaminated soil may result in short-term worker exposure to constituents present in the excavated material.

1) Describe special emergency services that might be required?

None are anticipated.

2) Proposed measures to reduce or control environmental health hazards, if any:

Standard handling procedures and Best Management Practices (BMP's) will be in place and conducted in accordance with MTCA site requirements. Contractors will be required to develop and comply with site specific Health and Safety Plan, including appropriate Hazardous Waste Operations and Emergency Response (HAZWOPER) training. Air monitoring will be conducted throughout the project area during construction activities. Following completion of the Interim Action, site access will continue to be restricted until completion of the final cleanup action, or until additional institutional controls are put in place to ensure public safety.

b. **Noise**

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Existing noise will not affect the project.

2) What types and levels of noise would be created by or associated with the project on a short-term or long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Typical construction noise from vehicles and equipment would be expected on a short-term basis during daytime hours. No long-term noise is anticipated from this project.

3) Proposed measures to reduce or control noise impacts, if any:

Equipment will be appropriately sized for operations needed and running only when necessary.

8. **LAND AND SHORELINE USE**

a. What is the current use of the site and adjacent properties?

The site and adjacent properties are vacant industrial properties. The BNSF Railway mainline bounds the eastern and southern portion of the site. The Bellingham Shipping Terminal bounds the site to the south.

b. Has the site been used for agriculture? If so, describe.

No.

c. Describe any structures on the site.

There are no structures within the Chlor-Alkali Remedial Action Unit where the Interim Action will occur.

d. Will any structures be demolished? If so, what?

N/A

e. What is the current zoning classification of the site?

Industrial Mixed-Use.

f. What is the current comprehensive plan designation of the site?

Industrial/Waterfront Mixed-Use.

g. If applicable, what is the current shoreline master program designation of the site?

N/A

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

No.

i. Approximately how many people would reside or work in the completed project?

N/A

j. Approximately how many people would the completed project displace?

N/A

k. Proposed measures to avoid or reduce displacement impacts, if any:

N/A

l. Proposed measures to ensure that the proposal is compatible with existing and projected land uses and plans, if any:

The project will remove existing contaminated soil from the site for off-site disposal. The project is consistent with the Port and City land use and although there will be no changes to existing site uses as a direct result of the Interim Action, the project will facilitate the initial phases of infrastructure and redevelopment to occur on the anticipated timeframe.

9. **HOUSING**

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

N/A.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

N/A.

c. Proposed measures to reduce or control housing impacts, if any:

N/A.

10. **AESTHETICS**

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No permanent structures are proposed as part of the Interim Action.

b. What views in the immediate vicinity would be altered or obstructed?

None.

c. Proposed measures to reduce or control aesthetic impacts, if any:

N/A.

11. LIGHT AND GLARE

a. What types of light or glare will the proposal produce? What time of day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

N/A.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

N/A.

12. RECREATION

a. What designated and informal recreational opportunities are in the immediate vicinity?

No recreational opportunities are currently available at the site. Access to the site is currently restricted due to historic contamination and public safety concerns. The adjacent waters of Bellingham Bay are used by recreational boaters and small personal watercraft such as kayaks etc.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

The project site currently does not support recreation. However, portions of the site are planned for completion as public access and park under the Waterfront District sub-area plan. The proposed project will ultimately enhance public access to the site by completing cleanup within areas anticipated to include public access or parks. Details for public access and park components will be developed separately.

13. HISTORIC AND CULTURAL PRESERVATION

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

Although no archaeological resources have been recorded on the Site, it is located within an archaeologically sensitive area of former tidal flats adjacent to the mouth of Whatcom Creek and to the bluffs to the south. The ancestors of the Lummi Nation inhabited and utilized the area, and appear to have established seasonal fishing encampments near the creek mouth. The FEIS presents the expected probabilities (high, medium, low) for the presence of Native American archaeological materials beneath the Site and surrounding areas. Based on the FEIS, there is a low to moderate probability in the vicinity of the Interim Action.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

No landmarks or evidence of historic, archaeological, scientific, or cultural importance are known to exist on or immediately next to the site.

c. Proposed measures to reduce or control impacts, if any:

The proposed IA soil removal will primarily occur above the current surrounding site grades and will not disturb site soils. If any minor grading is required for site restoration, this will occur in Fill Unit soils overlaying the Tidal Flat Aquitard, within medium or low probability zones for archaeological artifacts. However, there is a possibility that buried cultural artifacts, such as chipped or ground stone, historic refuse, building foundations, or human bone, could be discovered at the top of the Tidal Flat Aquitard if an excavation extends to that depth. If apparent archaeological artifacts are encountered, the Port will be notified immediately. The Port will notify Ecology, DAHP, the Lummi Nation, and Nooksack Tribe, and will invite the parties to attend an on-Site inspection with a professional archaeologist contracted by the Port. The archaeologist will document the discovery in a report submitted to DAHP so that they may control access to information regarding potential sensitive-site locations, in accordance with Chapter 27.53 RCW; the report will be referenced, but not included, in reports for the IA and RI/FS; and
In the event of an inadvertent discovery of potential human remains, work will be immediately halted in the discovery area and the apparent remains will be covered and secured against further disturbance. The City of Bellingham Police Department and Whatcom County Medical Examiner would be immediately contacted, along with DAHP and authorized Tribal representatives. A treatment plan would be developed by a professional archaeologist in accordance with applicable state law.

14. TRANSPORTATION

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on-site plans, if any.

The site is accessible by Cornwall Avenue.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

No. The site is located within one mile of a public transit stop.

c. How many parking spaces would the completed project have? How many would the project eliminate?

None.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

Excavated soil will be transported from the Site to a permitted and licensed off-site disposal facility to be selected by the project contractor. Based on the anticipated volume of soil to be removed it is expected that during construction, up to 15 truck trips per day will be generated. In addition, construction workers would likely generate up to 15 trips per day and up to 10 peak hour trips.

Following completion of the Interim Action, vehicular traffic is not anticipated to change as a result of the project.

g. Proposed measures to reduce or control transportation impacts, if any:

Truck traffic will be routed from Cornwall Avenue to the designated truck route along Roeder Avenue.

15. PUBLIC SERVICES

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

No.

b. Proposed measures to reduce or control direct impacts on public services, if any.

N/A

16. **UTILITIES**

a. Check utilities currently available at the site:

☒ Electricity,	☐ Natural gas,
☒ Water,	☐ Refuse service,
☐ Telephone,	☐ Sanitary sewer,
☐ Septic system,	☐ Other: Internet

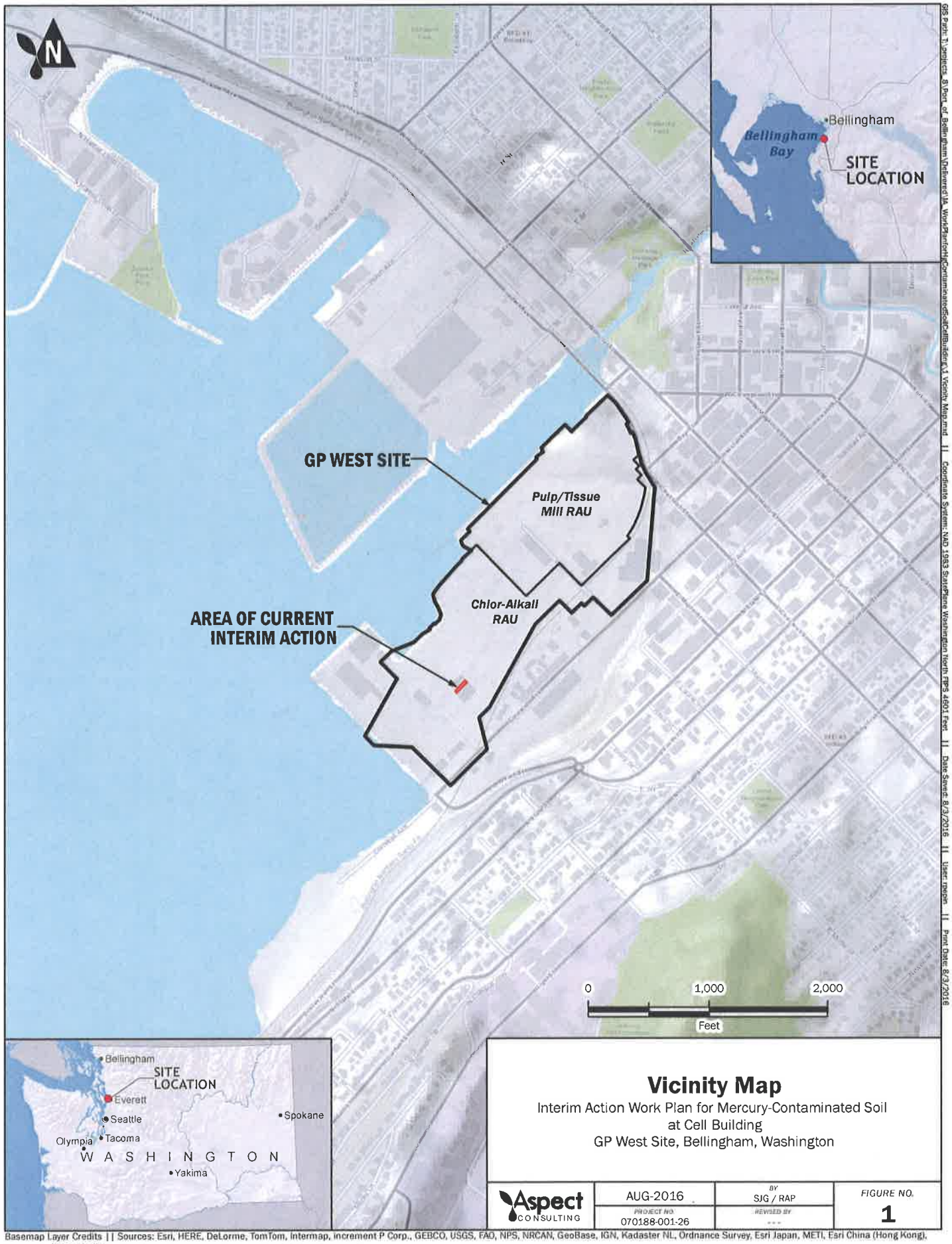
b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

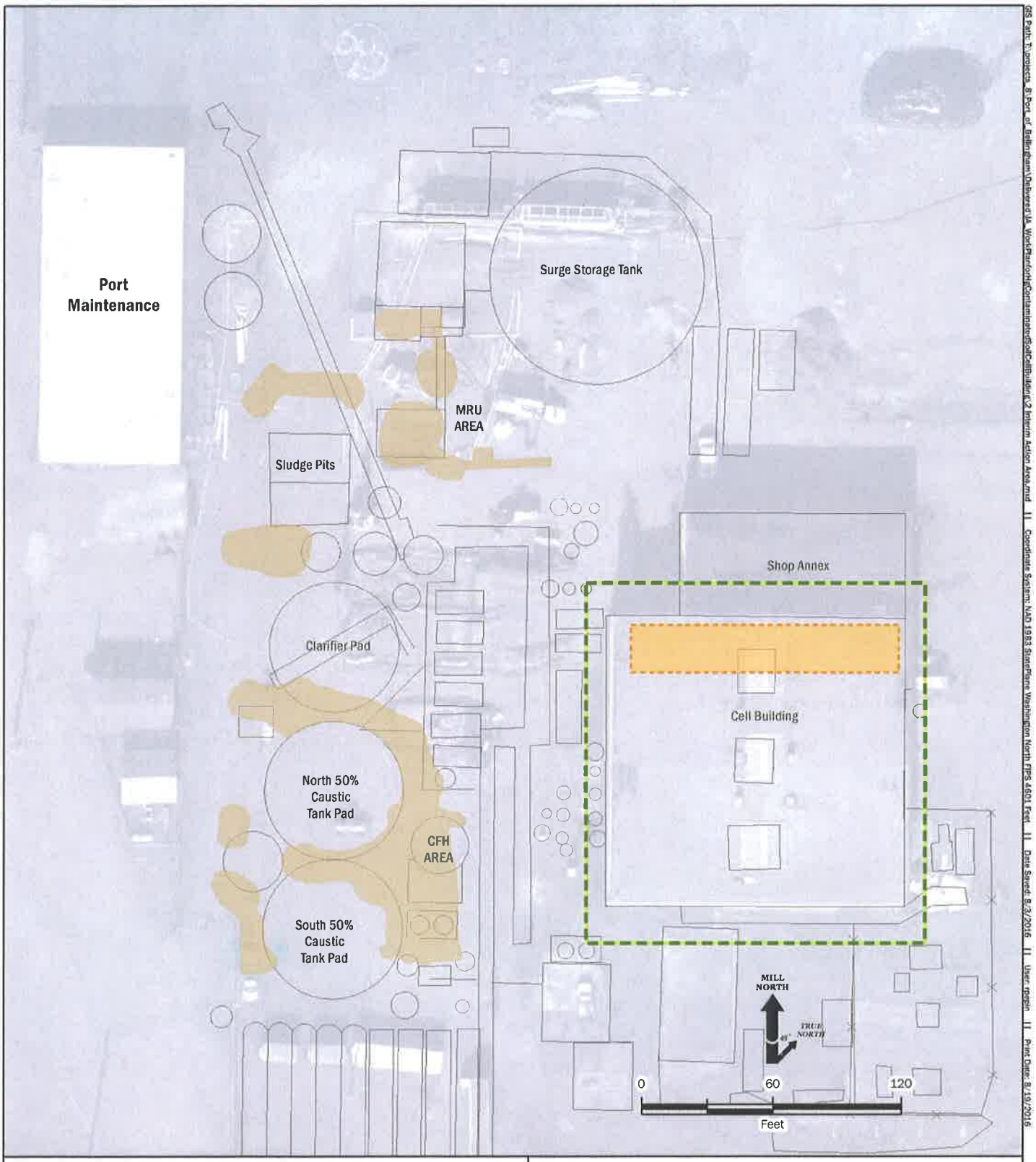
Signature: _____ 9/14/2016
Date Submitted



Vicinity Map

Interim Action Work Plan for Mercury-Contaminated Soil
at Cell Building
GP West Site, Bellingham, Washington

Aspect Consulting	AUG-2016	BY SJG / RAP	FIGURE NO. 1
	PROJECT NO. 070188-001-26	REVISED BY ---	



Covered Cell Building Excavation Area

Excavation Areas from 2013-2014 Interim Action

Approximate Area of Soil to be Removed during this Interim Action

Aerial Imagery Source: City of Bellingham, Photo Date 2013

Interim Action Area

Interim Action Work Plan for Mercury-Contaminated Soil
at Cell Building
GP West Site, Bellingham, Washington

Aspect Consulting	AUG-2016	BY SJG / RAP	FIGURE NO. 2
	PROJECT NO 070188-001-26	REVISED BY ---	