Final Environmental Impact Statement

Headquarters Camp Solid Waste Disposal Facility

Cowlitz-Wahkiakum Health District

Volume 3

Comments and Responses

December 1992

Final Environmental Impact Statement

Headquarters Camp
Solid Waste Disposal Facility

Volume 3
Comments and Responses

Cowlitz-Wahkiakum Health District
1516 Hudson, P.O. Box 458
Longview, Washington 98632

December 1992

This document is printed on recycled paper

Preface

This volume of the Final EIS contains copies of comment letters on the Draft EIS and transcripts of the public hearings held on August 25 and 26, 1992. Responses to comments are keyed to numbers in the left margin of the letters and transcripts. Specific responses are given to all comments relevant to the purpose and content of the EIS. Other comments, including those expressing an opinion for or against the project, have been responded to with "Comment noted" or other similar phrase. This indicates that the comments have been noted and are part of the public record, but that no further response is required for purposes of the Final EIS. An index to responses is provided at the end of this volume.

Some of the responses to comments contain references to literature sources. Full citations are provided in Section IV, References, in Volume 1 of this EIS.

Responses to Comment Letters

Headquarters Camp
Solid Waste Disposal Facility

Introduction

Comment letters are numbered and responded to in order of the date received by the Cowlitz-Wahkiakum Health District, as follows:

	Letter Number and Name	Date Received
1.	Nelson A. Graham, Assistant City Manager City of Longview	8/7/92
2.	Kay Mosebar	8/13/92
3.	Chris Ness	8/20/92
4.	Victor L. Caldwell, Pastor Longview Free Methodist Church	8/20/92
5.	Samuel R. Noel, President Columbia National Bank	8/21/92
6.	Bob Robinson, President Pacific Property Services, Inc.	8/21/92
7.	Robert G. Guide, Vice President Manufacturing Services Longview Fibre Company	8/24/92
8.	Don Belding Friends of Silver Lake	8/25/92
9.	Martha Belding Friends of Silver Lake	8/25/92
10.	Pat Wilkins	8/25/92
11.	Clara Wilkins, Chairman North Cowlitz Environmental Council	8/25/92
12.	Don Belding, President Friends of Silver Lake	8/25/92
13.	Marvin L. Cole Cole General Contractor, Inc.	8/25/92
14.	John McKenzie Valley Rentals, Inc.	8/25/92

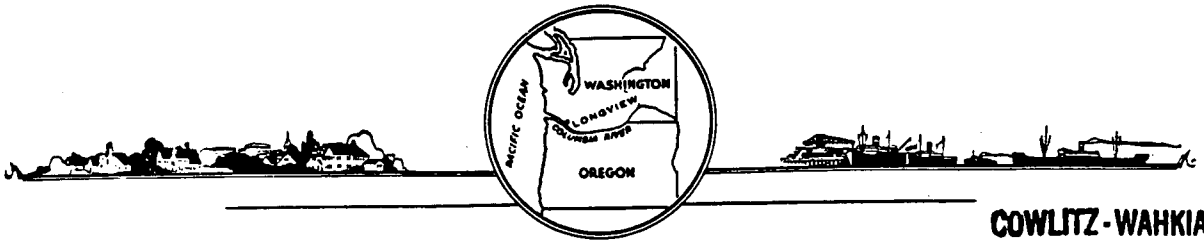
	Letter Number and Name	Date Received
15.	Steve Hanson Longview and Kelso Chambers of Commerce	8/25/92
16.	Martha Belding, Secretary Friends of Silver Lake	8/26/92
17.	Don Belding, President Friends of Silver Lake	8/26/92
18.	Chet Gardner, Master Silver Lake Grange	8/26/92
19.	Vernon R. Pickett, President Lower Columbia College	8/26/92
20.	Dan Evans, President and CEO J.H. Kelly, Inc.	8/26/92
21.	Pat Wilkins, Board Member North Cowlitz Environmental Council	8/26/92
22.	Clara Wilkins, Chairman North Cowlitz Environmental Council	8/26/92
23.	Douglas D. Orcutt, Vice President L.K. Comstock & Company, Inc.	8/28/92
24.	Jeff Wilson, President Cowlitz Clean Sweep, Inc.	8/28/92
25.	Gary Springer	8/28/92
26.	Ken Henderson	8/31/92
26A.	Jan D. Gano	8/31/92
26B.	Joseph D. and Kevin T. Willis Waste Control	8/31/92
27.	John Walkush, Vice President and Mill Manager NORPAC	9/2/92
27A.	Gary Healea, Vice President and Mill Manager Weyerhaeuser Paper Company	9/2/92

	Letter Number and Name	Date Received
28.	Verna M. Troxel	9/2/92
29.	James A. Repman, Executive Vice President Lone Star Northwest	9/3/92
30.	P.R. Worth	9/3/92
30A.	Don Belding	9/3/92
31.	Wolf Dammers, Fish Biologist Washington Department of Fisheries	9/3/92
32.	John E. McKenzie, Manager Valley Rentals, Inc.	9/3/92
33.	F.W. (Ted) Palin	9/4/92
34.	Douglas M. O'Connor, D.D.S.	9/8/92
35.	Don Lemmons Interstate Wood Products, Inc.	9/9/92
36.	Karen A. and Robert J. Elwood	9/9/92
37.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/9/92
38.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/9/92
39.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/9/92
40.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/9/92
41.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/10/92
42.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/10/92
43.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/10/92

	Letter Number and Name	Date Received
44.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/10/92
45.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/10/92
46.	Martha Belding	9/10/92
47.	Joli Sandoz	9/10/92
48.	Robert Schreiner	9/10/92
49.	Nina Bell, Executive Director Northwest Environmental Advocates	9/10/92
50.	Sharon Bergman, Executive Vice President Wayron	9/10/92
51.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
52.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
53.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
54.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
55.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
56.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
57.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
58.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
59.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92

	Letter Number and Name	Date Received
59A.	Clara Wilkins, Chairman North Cowlitz Environmental Council	9/11/92
60.	Judy O'Neill, Chairman Job Service Employer's Committee	9/11/92
61.	Cheri Cameron, Secretary Friends of the Cowlitz	9/11/92
62.	Clark and Marya Evans	9/11/92
62A.	Stephen Willing	9/11/92
62B.	Stephen Willing	9/11/92
63.	John S. Karpinski	9/11/92
64.	Harry M. Browne, President PAMSCO Cleaning Supplies and Equipment	9/11/92
65.	Don Belding	9/11/92
66.	Ted Hutchinson, General Manager Lone Star Northwest	9/11/92
67.	Randy E. Dec, Sales Manager Lakeside Industries	9/11/92
68.	Dan Evans, President and CEO J.H. Kelly, Inc.	9/14/92
69.	Bryan Cowan, Regional Habitat Program Manager Washington Department of Wildlife	9/14/92
70.	John C. Thompson, President Cowlitz Economic Development Council	9/14/92
71.	M.F. Palko, Section Supervisor Environmental Review Section Washington Department of Ecology	9/15/92

LETTER NO. 1



THE CITY OF LONGVIEW
FOUNDED 1923
LONGVIEW, WASHINGTON 98632

COWLITZ-WAHKIAKUM COUNTIES

AUG 7 1992

HEALTH DISTRICT

July 31, 1992

Mr. David E. Riggs, Director of Environmental Health
P. O. Box 458
Longview, WA 98632

Subject: **Draft Environmental Impact Statement**
Headquarters Camp - Solid Waste Disposal Facility

Dear Mr. Riggs:

Thank you for providing us with a copy of the subject document. City staff have reviewed this information and have three areas to comment on:

(1) 1. The impact on the Cowlitz River, and subsequently, our water intake from any spill of solid waste or leachate;

(2) 2. The impact on traffic at the nine at-grade street crossings within the City limits, and

(3) 3. Possible odor problems from waste material or leachate being carried on the train as it passes near residential areas within the City.

We have reviewed II-23 and Appendix H, and do not find enough information to satisfy our questions on the first issue. The analysis as presented in the Environmental Impact Statement is not, in our opinion, the worst case from the standpoint of our water intake. We would request that further analysis be done to assure that our water intake and the public water supply of Longview would not be adversely affected by a worst-case spill at the nearest point upstream of our water intake. We believe the worst-case analysis should assume that there will not be complete mixing of the spill with the Cowlitz River, but rather, that it would stay concentrated with some minimal mixing as it flowed immediately downstream to our intake.

In regard to the second issue, the information contained in II-81 through II-87, does adequately address our concerns regarding traffic impact of the at-grade street crossing of the railroad. We agree with the conclusion that no mitigating actions are required.

On the third item, we wonder if there will be an odor problem as the trains pass near the residential areas in our city. The Environmental Statement document does not address that question. We would request further information to assure that our citizens will not be subjected to a nuisance odor problem as these trains pass through the city limits of Longview. We've enclosed a map showing the location of our water intake relative to the railroad.

Thank you for this opportunity to comment.

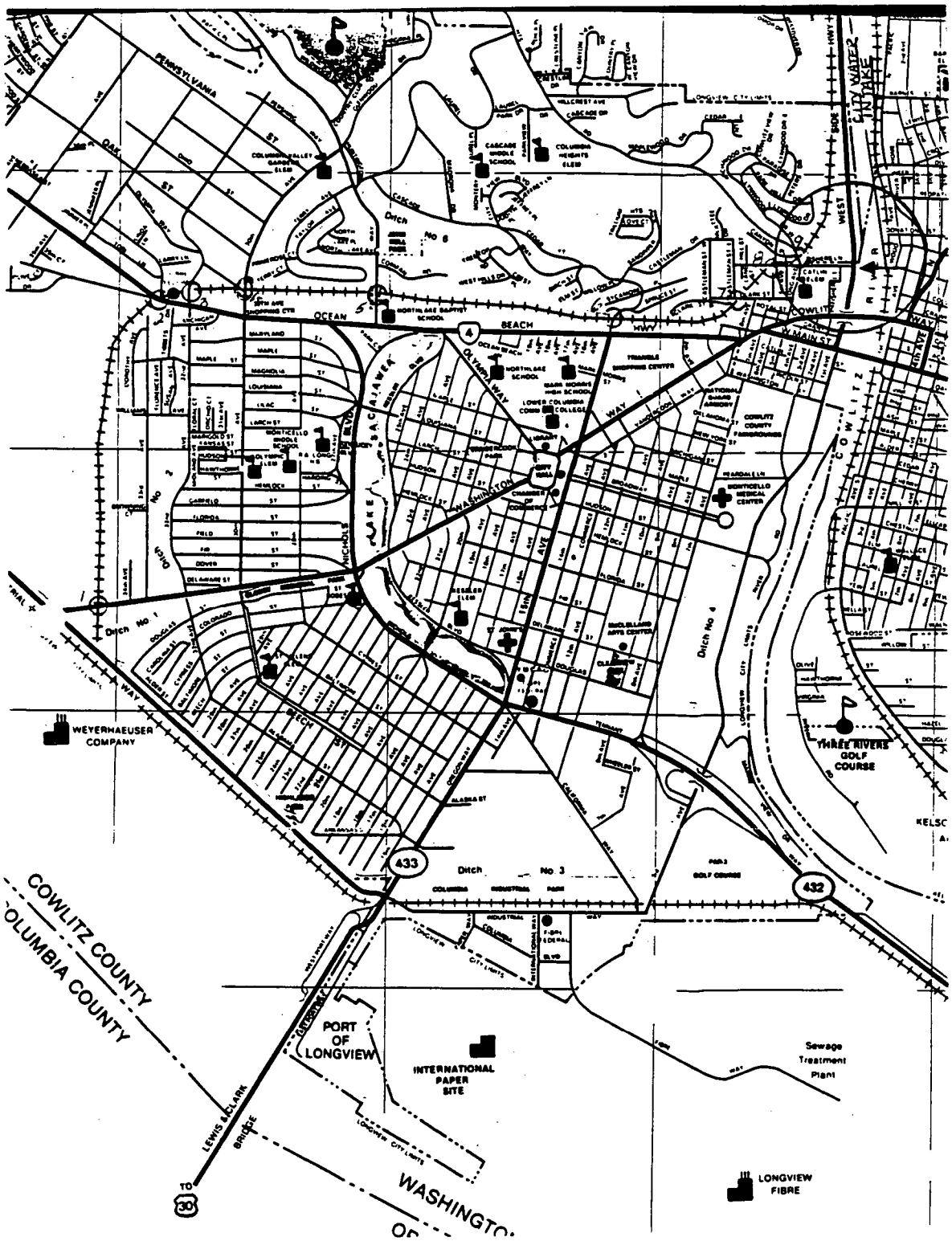
Sincerely yours,

CITY OF LONGVIEW

Nelson A. Graham

Nelson A. Graham
Asst. City Manager

NG:smm


COWLITZ COUNTY
COLUMBIA COUNTY
WASHINGTON
PORT OF LONGVIEW
INTERNATIONAL PAPER SITE
WEYERHAEUSER COMPANY
LONGVIEW FIBRE
Sewage Treatment Plant
THREE RIVERS GOLF COURSE
LEWIS & CLARK BRIDGE
TO (30)
OCEAN BEACH HWY
MAIN ST
WASHINGTON WAY
OLYMPIA WAY
PACIFIC HWY
Ditch No 1
Ditch No 2
Ditch No 3
Ditch No 4
Ditch No 6
433
432
LONGVIEW CITY LIMITS

RESPONSE TO LETTER NO. 1

Nelson A. Graham, Assistant City Manager
City of Longview

1. The consultants responsible for analyzing the impacts of a spill of solid waste or leachate in the Cowlitz River met with you and your staff in October 1992. It was agreed at that meeting that, rather than conducting additional modeling to evaluate potential spills closer to the City of Longview's water supply intake, a spill response plan would be developed, implemented, and periodically updated. Section I.B.1.f(4), Spill Response, has been added to the EIS to describe the proposed spill response plan. A detailed spill response plan would be included in the Plan of Operation submitted with Part 2 of the solid waste permit application, and would have to be approved by Ecology before the permit is issued. At your suggestion, the proposed spill response plan includes a "call-down" list specifying the order of notification for spills at different locations. For a spill in or near the Cowlitz River, the City of Longview and Kelso water plants would be notified first.

2. Your agreement with the conclusions of the EIS regarding traffic impacts at the at-grade rail crossings is noted.

3. Section I.B.1.c, Waste Transportation and Rail Loading/Unloading Facilities has been revised to describe the types of containers used for rail transport of solid waste and leachate. Section II.A.4, Air Quality, has been revised to evaluate the potential for odors in residential areas during rail transport of these materials.

   Containers used to transport solid waste would be covered with a tied-down canvas tarp, and would have a rubber gasket on the rear door to reduce the potential for leakage. The containers would be similar to those currently used for rail transport of Snohomish County mixed municipal waste and King County construction, demolition, and landclearing waste to the Roosevelt Regional Landfill in Klickitat County. Odor has not proved to be a problem in these long-haul transport operations. Weyerhaeuser is also currently using this type of container to transport a portion of its industrial solid waste, including deinking sludge, to the Roosevelt Regional Landfill. This train passes through the City of Longview, and City staff indicate there have been no odor complaints. Therefore, no significant odors would be expected from transport of the types of solid waste that would be received at the proposed facility.

   Leachate from the proposed landfill would be transported by rail in fully enclosed, steel-jacketed tank cars with a plate steel housing over the manway (see further discussion in the response to Letter No. 69, Comment 13). It is unlikely that leachate odors would be detectable even within short range of full tank cars.

LETTER NO. 2

COWLITZ-WAHKIAKUM
COUNTIES

AUG 1 - 1992

HEALTH DISTRICT

August 12, 1992

David Riggs
Director of Environmental Health
Cowlitz Wahkiakum Health District
1516 Hudson
Longview, Wash. 98632

Dear Mr. Riggs;

This letter expresses my positive opinion of the Weyerhaeuser solid waste disposal. The public hearing sponsored by the Corp of Engineers and now the Draft Environmental Impact Statement appear to support the facility in every respect. Clearly a few residents of the area are opposed but I believe the concerns they have raised have been answered in a positive manner.

In concluding this letter, I want to extend my support in the strongest way for the facility.

Sincerely,

Kay Mosebar
577 3209

1452 Hudson
Longview, Wa. 98632

RESPONSE TO LETTER NO. 2

Kay Mosebar

Your support for the proposed landfill is noted.

LETTER NO. 3

COWLITZ-WAHKIAKUM
COUNTIES

AUG 3 1992

HEALTH DISTRICT

Chris Ness
1139 Tower Road
Castle Rock, WA 98611

August 18, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

I want to support the proposed Weyerhaeuser landfill at Headquarters. I have lived in the Toutle-Castle Rock area for close to 40 years, and I believe there is not a better alternative for a landfill site that is as environmentally sound. this landfill is necessary to produce jobs and economic growth to Cowlitz County.

Sincerely,

Chris Ness

CHRIS NESS

RESPONSE TO LETTER NO. 3

Chris Ness

Your support for the proposed landfill is noted.

LONGVIEW FREE METHODIST CHURCH

Victor L. Caldwell
Pastor

COWLITZ-WAHKIAKUM
COUNTIES

AUG 20 1992

HEALTH DISTRICT

August 19, 1992

Mr. David Riggs, Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, Washington 98632

Dear Director Riggs:

After carefully listening to Mr. Thom Scanlon's presentation at the Early Edition Rotary Club on August 18, 1992, I am convinced that the Weyerhaeuser Company has made a thorough study of the environmental impact and have proposed more than adequate safeguards for the new Silver Lake Landfill. Mr. Scanlon did an excellent job of answering numerous questions from the club and, in my opinion, have done their homework well.

The Weyerhaeuser Report on the proposed Silver Lake Landfill is extensive and reflects adequate concern for the surrounding communities. I am in favor of Weyco being granted approval for this state-of-the-art landfill. It appears to me that they have listened well to the environmental concerns and that they have worked hard to overcome them.

My residential property is located at 525 Allen Avenue S.E., Castle Rock, WA 98611 and my home mailing address is P. O. Box 660, Castle Rock, WA 98611. I firmly believe that Weyerhaeuser wants to be a good neighbor and have not fear that the proposed new landfill will do any harm to our area whatsoever.

Thank you very kindly for considering these remarks.

Sincerely,

Victor L. Caldwell

Victor L. Caldwell

RESPONSE TO LETTER NO. 4

Victor L. Caldwell, Pastor
Longview Free Methodist Church

Your support for the proposed landfill is noted.

LETTER NO. 5

COWLITZ-WAHKIAKUM
COUNTIES
AUG 21 1992
HEALTH DISTRICT

COLUMBIA NATIONAL BANK

August 19, 1992

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

We have read the Draft Environmental Impact Statement (DEIS). We are not experts in environmental laws but we are assuming they have complied with the Cowlitz-Wahkiakum Health District rules and regulations as well as the State of Washington and the U.S. Federal Government.

As a member of the business community, we feel that Weyerhaeuser's existing presence is extremely important to us. We all know that the company will not remain in this area if this solid waste disposal facility is denied since at that point there would be no reason to remodel their 1948 vintage pulp mill and related facilities because there would be no place to dispose of the future waste product. We are of the opinion that we should be as positive as legally possible to encourage Weyerhaeuser to remain here. That does not mean that we should ignore any aspects of the impact of this solid waste disposal facility. We should acknowledge that this facility is on property that Weyerhaeuser owns and that they have gone to significant expense as well as incurring future expense to have this facility out of the view of our citizens and as far away from the community as possible so that related noise, dust, and any other effects of the facility are minimal. The cost of transporting the solid waste to this site is certainly more than if the site had been located closer to their Longview facilities. We believe Weyerhaeuser should be commended for this site selection.

Since it is our belief that current environmental rules and regulations are in some cases "regulatory over-kill" we should be as positive as legally possible to encourage the approval of this proposed facility, as long as the company has complied.

P. O. Box 2159 • 1315 14th Avenue • Longview, Washington 98632 • (206) 425-7100

Our bank feels that Weyerhaeuser is a good corporate citizen and we feel that this facility being approved will be a significant positive factor in Weyerhaeuser's decision as to whether or not to modernize its Longview operations and remain in this community. We recommend approval of this facility.

Sincerely,

Samuel R. Noel

Samuel R. Noel
President and
Chief Executive Officer

SRN:pj
CC: Thom Scanlon, Environmental Projects
Weyerhaeuser Company
Campus Center II-102
Tacoma, WA 98477
Gary Healea, Vice President and Mill Manger
Weyerhaeuser Company
P. O. Box 188
Longview, WA 98632

RESPONSE TO LETTER NO. 5

Samuel R. Noel, President and Chief Executive Officer
Columbia National Bank

Your support for the proposed landfill is noted.

LETTER NO. 6

PACIFIC
PROPERTY
SERVICES
INC.

1159 - 14th Ave.
P.O. Box 1814
Longview, WA 98632
(206) 423-5759

COWLITZ-WAHKIAKUM
COUNTIES
AUG 2 1992
HEALTH DISTRICT

August 19, 1992

Mr. Daniel Riggs
Director of
Environmental Health
Cowlitz-Wakiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

Although I do not wish to attend a shouting match, and therefore do not plan to attend the public hearings, I do wish to make my feelings known on the proposed Weyerhaeuser Solid Waste Dump.

After reviewing the Environmentat Impact Statement and other sources of reliable information, I have come to the conclusion that the Silver Lake site is the best practical solution to a very critical problem.

Yours very truly,

Bob Robinson, President
Pacific Property Services, Inc.

BR/ml

RESPONSE TO LETTER NO. 6

Bob Robinson, President
Pacific Property Services, Inc.

Your support for the proposed landfill is noted.

LONGVIEW FIBRE COMPANY
MAIN OFFICE AND MILLS, LONGVIEW, WASHINGTON 98632
1-206-425-1550

August 21, 1992

David Riggs
Director of Environmental Health
COWLITZ-WAHKIAKUM HEALTH DISTRICT
1516 Hudson
Longview WA 98632

Dear Mr. Riggs:

In behalf of the Longview Fibre Company and also as an individual who is very much interested in the management of solid waste, I would like to comment on the draft EIS for the Weyerhaeuser Headquarters Camp disposal facility. I have reviewed the four page summary and am very satisfied that all environmental impacts have been satisfactorily addressed. Any risks are minute and certainly outweighed by the advantages of such a facility.

As a member of the Cowlitz County Solid Waste Advisory Committee, I have followed the development of this project and am satisfied that Weyerhaeuser Company has been responsive to the community's environmental concerns and has done everything possible to mitigate them. I am also convinced that this area needs an industrial solid waste disposal site, because non-hazardous solid waste is an inevitable by-product in the Forest Products industry. We also need to do everything possible to extend the life of our municipal solid waste site.

I urge you to approve the Weyerhaeuser Headquarters Camp solid waste site application and to issue the Solid Waste Permit.

Yours truly,

Robert G. Guide

R. G. Guide
Vice President-Manufacturing Services
and Assistant Mill Manager

cm

cc: Chris Haynes
Integrated Solid Waste Management
Weyerhaeuser Corporate Headquarters
Tacoma WA 98477

RESPONSE TO LETTER NO. 7

Robert G. Guide, Vice President Manufacturing Services
Longview Fibre Company

Your support for the proposed landfill is noted.

LETTER NO. 8

FRIENDS of SILVER LAKE

2258 LAKEVIEW DRIVE
SILVER LAKE, WA 98645
(206) 274-7866

August 24, 1992

(1) We are here to address an Environmental Impact statement written for Weyerheauser in order for it to obtain a permit for a regional industrial waste dump at the Headquarters site above Silver Lake. We are told to address our comments to the Cowlitz Wahkiakum Health Department.

But CWHD has no say in the permitting of this dump. It gave that authority to Washington Department of Ecology. This action was initiated in a letter from DOE to CWHD April 15. One reason given was;
"Wyerhaeuser has raised concerns regarding the objectiveness employed by the Health District in reviewing the project thus far."
Other reasons also indicated WEYCO had dictated the change of permitting authority.

We found no bias on the part of the Health Department toward WEYCO. We did find in a letter of May 22 ,1992 from DOE Director, Chuck Clark, to Col. Cunningham, Corps of Engineers, a statement that indicates DOE is not an unbiased entity, Clark says "We (DOE) have participated in the siting studies leading to the selection of the Headquarters Camp site, which we believe to be the best practicable alternative.

We asked Director Clark to furnish times and names of those involved with this siting study and he could furnish none. We area certain DOE was not involved with this siting study which lead to the selection of Headquarters Camp. and to say "we" believe it to be the best practicable alternative, shows a decision by DOE to influence the Corps, and shows prejudicial treatment for WEYCO. DOE cannot be considered unbiased.

This was not always so. January 28, 1992, Curt Cook wrote 7 pages of comments to CWHD from DOE of things wrong with this site. WE understand he is no longer on the project.

February 7, 1992 Roland Ugochuku, Regional Engineer Solid and Hazardous Waste Section of DOE wrote 8 pages of concerns to CWHD.

Chuck Clark became the new Director DOE. April 8, 1992 Roland Ugochuku wrote CWHD that WEYCO consultants had met with Doe February 27, 1992 and WEYCO wrote a letter March 13, 1992. and Does concerns of their letter of February 7, have been addressed by that letter and that meeting. We wrote DOE asking for copies of that letters and minutes of that meeting, which solved all the problems listed by DOE earlier, including the need for more data on the deeper aquifer wells etc but received

none.

May 22, Chuck Clark wrote the Corps of the DOE involvement --which no one can seem to confirm--and his approval of the Headquarters site.

Thus, since local authority has been delegated to DOE and Doe has already approved this site, this meeting to consider the EIS with the object of giving a permit is wasting your time and mine. Its a done deal.

But, for the sake of the record and so the generations which will live with this industrial dump will know that we spoke for them, we would like to offer the following.

(2) THREATS. Threats are not appropriate for an environmental impact statement and I-10 of the EIS says Weyerhaeuser has indicated that this delay (of approving Headquarters site) could affect the company's consideration of facility expansion or commitments to new facilities in the region."

June 24, front page Wall street Journal says WEYCO plans to have profit of 700 million in 1995, made for the most part in pulp and paper and lumber. The same article lauds the production and profit of the Green Mountain Mill. That same week workers at the mill took a $1 and hour drop in pay and lost the bonus for production. If the EIS is to mention financial considerations, .it should mention them all.

(3) SCOPE the EIS addresses only two-county waste when WEYCO, DOE, and CWHD know the comprehensive plan is being written by SWAC, a vested interest group, to allow out of county waste, though no one has authority to monitor it.

(4) Recently at a meeting with CWHD and DOE , John Robinson said. "You two are charged with protecting us. Your departments were created for that. You get paid for that. You are supposed to protect us from the bad things in the environment. That trust can't be bought."

I only hope all of you remember that.

RESPONSE TO LETTER NO. 8

Don Belding
Friends of Silver Lake

1. Weyerhaeuser had no part in the mutual decision of the Health District and Department of Ecology to transfer permitting authority to Ecology. Both agencies believe that Ecology is better able to provide a thorough review of the detailed design information to be submitted by Weyerhaeuser in Part 2 of its solid waste permit application, due to the greater depth of technical expertise available among Ecology staff members. The Health District will remain SEPA lead agency, and will be responsible for monitoring landfill operations and issuing annual operating permits in accordance with the MFS.

   Ecology's initial review comments on the site characterization portion of the solid waste permit are contained in a February 7, 1992 letter to Mr. David Riggs of the Environmental Health Division from Roland Ugochuku. The concerns raised in the February 7, 1992 letter were addressed by EMCON Northwest in a letter dated March 13, 1992. Ecology stated in its subsequent April 8, 1992 letter to David Riggs: "Ecology's concerns over background information regarding the site characterization have been addressed."

   As a point of clarification, Kirk Cook's comments of January 28, 1992, were included in the February 7, 1992 letter. The two letters do not represent separate sets of comments. The February 7, 1992 letter and the response by EMCON Northwest are included in Appendix O of this EIS.

2. Section I.A.5, Timing of Possible Approval, has been revised to focus on environmental benefits/disadvantages. A cost-benefit analysis is not required under SEPA (WAC 197-11-450).

3. The Draft EIS did not consider the import of industrial solid waste from outside Cowlitz and Wahkiakum counties, because the state Pollution Control Hearings Board ruled that waste import is not consistent with the existing Cowlitz-Wahkiakum Regional Solid Waste Management Plan (see Section I.A.4 of the EIS). However, a new Comprehensive Solid Waste Management Plan for Cowlitz County alone is currently being prepared, and a Preliminary Draft Plan has been issued for public and agency review. The Preliminary Draft Plan recommends that waste import to private solid waste disposal facilities be allowed. Based on a recent U.S. Supreme Court decision on the waste import issue, the Cowlitz County prosecuting attorney has advised the County Solid Waste Superintendent that "in drafting our solid waste management plan, we must be careful to not subject private waste facilities to restrictions based solely on the point of origin of the wastes." (Koss, 1992. See Appendix P.)

In light of these recent developments, the EIS has been revised to evaluate the import of industrial solid waste from Weyerhaeuser operations outside Cowlitz and Wahkiakum counties. Weyerhaeuser estimates that the volume of imported waste would be approximately 150,000 cubic yards per year, or about 15 percent of the total waste volume of 1,000,000 cubic yards per year. Only minor changes were needed in the impact analyses in the Draft EIS (Section II.B.1, Noise, and Section II.B.6, Transportation) to evaluate the impacts of acceptance of this additional waste volume.

The EIS Fact Sheet has been revised to indicate that approval of the 1992 Cowlitz County Comprehensive Solid Waste Management Plan as written would be needed before waste import could begin. Waste to be imported would be subject to the same waste screening procedures as non-imported solid waste. Further information on waste screening has been added to Section I.B.1.f(3), Waste Inspection and Acceptance Program.

4. Comment noted.

LETTER NO. 9

FRIENDS of SILVER LAKE

2250 LAKEVIEW DRIVE
SILVER LAKE, WA 98645
(206) 274-7866

COMMENTS TO WEYCO EIS

August 1992

(1) I read this EIS and felt like I was getting a snow job by a used car salesman who said this car will last forever, no accidents for 200 years, . It will never have a radiator leak. It is a state of the art car. Common sense made me have concerns. Need volume 2 , which is referred to, but not given.

(2) 2. DATA Entire EIS Lacks data to back up suppositions on testing methods, life of liner, amount of rain, figures for a derailment of more than one car, etc.

(3) 3. TESTING All testing is proposed to be done by WEYCO at 3 month intervals, with reports to Health Dept . This is the same process used at Radakovich dump, and no problems were discovered until citizens protested. Page I-29 says detection systems would be tested as "deemed appropriate" deemed by whom?

(4) 4. SUPPOSITIONS. Many suppositions are made, example; Though a variance is required to allow a dump in the wetlands, this variance has not been given. In this EIS it is implied that it will be. Correspondence from Federal and State agencies to the Corps of Engineers does not indicate such a permit will be forthcoming. Thus this EIS is premature.

(5) 5. SCOPE OF EIS This EIS addresses only Wahkiakum and Cowlitz wastes. WEYCO has added that the Cowlitz County Solid Waste Management Plan -(chapter 9) allow waste from other counties. This has been approved by Cowlitz County Solid Waste Advisory Committee,(which is top heavy with vested interests, In addressing this chapter, Nelson Graham, Chairman, said, " Not to allow incoming waste might 'hurt' local industries".) This EIS should address the fact that WEYCO expects importation of waste from other areas to be placed at the Headquarters site.

Sludge, which is up to 40% water is not solid waste, but planned for this dump.

(6) 6. HAZARDOUS WASTE page-I4 c says "If a derailed tank car fell into Sucker Creek or Ostrander Creek at low flow and ruptured a valve, it would significantly impair water quality and kill all fish and most other aquatic organisms downstream to Silver Lake and the Cowlitz River, respectively." With that in mind, how can this material be deemed non hazardous? The chemicals from De-inking of newsprint is not addressed. Will newsprint be brought in from other countries or states, as has been suggested previously? Do we know the content of that newsprint? How is that tested?

DOE, in a letter, November 28, 1990, to Congresswoman Unsoeld, says, regarding the WEYCO waste at the Radcovich dump, "FURTHER TESTING OF THE UNTREATED CLARIFIER SOLIDS, BOILER ASH, LIME DREDGES AND GRITS WAS CONDUCTED BY THE DEPARTMENT OF ECOLOGY AND WEYERHAEUSER. RESULTS OF THE ANALYSIS INDICATED SOME TOXIC ORGANIC COMPOUNDS IN THE CLARIFIER SOLIDS AND INCREASED LEVELS OF

BIOLOGICAL ACTIVITY OCCURRING WITHIN THE MATERIAL. MORE OF THESE MATERIALS WERE DESIGNATED DANGEROUS OR HAZARDOUS WASTE AND THEREFORE NOT APPROPRIATE FOR DISPOSAL AT A SOLID WASTE FACILITY.' This same waste is proposed for Headquarters. Will WEYCO be allowed to burn all waste brought in, as well as its own waste?. How will this waste be rendered non hazardous?

Waste from like mills, ITT Rayonier, Port Angeles and Boise Cascade, St. Helens, is called by those companies in their employees handbooks, hazardous. How is WEYCO waste less hazardous?

(7) 7. GROUND WATER AT 5'? S-8, Does Liner at 5 feet above groundwater comply with the MFS? None of the concerns of DOE regarding groundwater, as per DOE letter of Feb 7, 1992 to CWHD have been addressed. Deeper aquifer not addressed.
Copy of letter attached.

(8) 8. SEDIMENTATION S 9-4 all data is based on the supposition that all but 5 acres will be covered, except for 3 summer months. Is borrow area, source of much sediment, always covered except in summer?'

(9) 8 a, SILT Where is the silt deposited after it fills up the retention ponds. Is it placed out of watershed of Silver Lake? Are the ponds likely to wash out in heavy rainfall? How prevented?

(10) 9. AMOUNT OF LEACHATE. All estimates are on an "average" rainfall. Can leachate be retained in winter at site if accident on rail delays removal? Where? How much rainfall on 5 acres at 2"? How much is uncovered in spring and summer when could have, and have had 2" rain? How much leachate produced?

(11) 10. GAS s-9-6 What is "sufficient gas". More details on 'enclosed flair' are needed. What chemicals are produced? The prevailing wind is directly over Silver Lake. This is not mentioned.

(12) 11, MITIGATION WITH AGENCIES Letters of May 22, 1992, from WDW, EPA, and Dept of Interior, Fish and Wildlife, to the Corps of Engineers, shows WEYCO and those agencies are not even close to agreement on mitigation. This EIS implies they are in agreement.

(13) 12. DERAILMENTS s-14 Derailment data is based on nationwide figures on mainlines, resulting in a 200 year occurrence of a possible derailment. Derailments on this line are frequent, EIS should be based on data from the rail line which will be used. Results, we suspect, will be considerably oftener than 200 years.

(14) 13, TRANSFER STATION LOCATION- s-17 Transfer station is placed in the most vulnerable spot, the area most apt to have an accident, and directly above a steep drop to Sucker Creek Safeguards not adequately addressed. EIS says 20,000 gal of leachate would be deleted by Sucker Creek when got to Silver Lake. Summer flow or winter Flow? Flow not checked below transfer station. How many cars considered? One?

(15) 14. WASTE AMT I1 repeats 2 counties waste only, which we know not expected. I-7 page one says waste 742,000 I-8 says 892,000 What is the real amount of waste from all sources expected next 30 years.

(16) 15 THREATS; I-10 EIS says, "Weyerehaeuser has indicated that this delay (of approving Headquarters site) could affect the company's consideration of facility expansions or commitments to new facilies in the region."

THIS THREAT IS NOT APPROPRIATE FOR AN ENVIRONMENTAL IMPACT STATEMENT.. and should be disregarded by all respondents and removed from final EIS.

(17) 6. DISTANCES I-13 Silver lake is 1 1/2 miles not 2 1/2 from facility. Sucker Creek has direct access to Silver Lake. Steep terrain, a drop of 800 feet in that distance, plays a part, but not mentioned in EIS.

(18) 17. LANGUAGE. EIS often says WEYCO "Could" -- when" WIll" is implied--- Would as in I-14. I-14 c. Also, the word 'intended' 1-16-2 is used instead of"will" EIS Implying the action will be done, but no committment.

(19) 16. BOTTOM GRADING I-16 2 grading is 'intended' to be more than 5-10 feet above groundwater level. How does dozer operator know, since groundwater level varies in dump site. He will excavate 35 feet deep--where?

(20) 17,. RECOMPACTED SOIL I-17 This was depicted as clay in earlier news releases and after our insistance on seeing the clay changed to recompacted soil. (soil on site). When is this tested for impermeability?, by whom? results ?

(21) 18. CONSTRUCTION INSPECTIONS. I-21 EIS says an engineer is always on site -- during construction? only? When?--WEYCO or agency monitoring this? Written reports required? What arethe penaltiesfornon compliance?

(22) 19, SPILLED LEACHATE AT SITE I-23. What is the "impermeable ground cover" which catches spilled leachate at this most venerable area of the transfer? More data needed.

(23) 20. TANK CARS. How loaded? Will always have 10 cars on hand? Enough for 2" Rain in one day on five a acres?.

(24) 21. CONTAMINATION OF SILVER LAKE II-23 G. EIS says 20,000 gallons of leachate would impact Sucker Creek, but Silver Lake would not be affected except at the mouth of Sucker Creek. The chemical, ammonia, only addressed. Will this spill involve only ammonia? What other chemicals released in a spill? No allowance is made for the fact that Silver Lake is behind a dam with no overflow out of the lake 6 months of the year. Leachate will remain in the lake. More than one car of 20,000 gallons could be spilled. In the last derailment on this line last week, seven cars were overturned. The one before that, six months ago, five were overturned. Amounts should be figured for more than one car accident.

(25) 22. KELSO AND LONGVIEW WATER SUPPLY. EIS says spilled leachate would not hurt Kelso water supply, for leachate would have 7,100 and 10,100 feet to be diluted by the Cowlitz river if spilled onthe bridge. What if a derailment happened closer to the water supply, as it did last week?, (the rail goes closer to the water supply than the bridge.) What happens if seven cars (as happened last week near this area) are overturned? How many cars is this based on, one?

(26) 23. LINER AND SEALS No mention is made of the manufactures' guarantee of the liner or method of sealing, monitoring of sealing, conditions required and how met.

.....

(27) Note; there is much repetition in the information given in the EIS. Repetition, as every salesman and writer knows, is a tool to make audience and reader remember (and believe what the writer or salesman says is true?).

(28) Though this EIS calls for one site--Headquarters or no action. Site selection activities, though not made a part of this EIS, is used for propaganda (pg S-2), This is not appropriate for this EIS. The site selection study shows that no site other than the Headquarters site was every truly considered by WEYCO. The site selection study will show that other sites were eliminated for flaws which existed, but were ignored at the Headquarters site. Also, other less environmentally damaging sites are available, but not mentiooned in the EIS. If you are going to mention site selection activites, all information should be given.

RESPONSE TO LETTER NO. 9

Martha Belding
Friends of Silver Lake

1. Comment noted. SEPA provides that "technical reports and supporting documents need not be circulated with an EIS...but shall be readily available to agencies and the public during the comment period." [WAC 197-11-440(7)]. As indicated in the Draft EIS Fact Sheet, Volume 2 of the EIS (Appendices B-I) was available for review or purchase during the comment period at the Health District office in Longview. It was also available for review at the Longview, Kelso, Castle Rock, Kalama, and Woodland public libraries. Volume 2, including the new appendices developed as part of this Final EIS, is still available for review or purchase at these locations. The Health District has sent you a copy of all three volumes of the Final EIS for review by members of Friends of Silver Lake.

2. See responses to Letter No. 63, Comments 2 and 5. With regard to the amount of rain, data from on-site measurements of precipitation were used, and standard sources such as the National Oceanographic and Atmospheric Administration (NOAA), Washington State Department of Transportation (WSDOT), and U.S. Soil Conservation Service (SCS) were consulted, to arrive at conservatively high estimates of rainfall and storm events.

   With regard to the life of the liner, there are two parts to the proposed composite liner system: the 60-mil polyethylene flexible membrane liner (FML) and the 2-foot layer of low permeability soil underlying the FML. Like other geologic materials, the soil liner would last indefinitely. Polyethylene is the most inert and stable FML material available, and is the material of choice for most hazardous waste landfills, as well as for municipal and industrial waste landfills.

   Polyethylene has been used in landfill liners only since the 1980's, so there is no data available on its long-term performance in landfill applications. The material was first developed by Bell Laboratories in 1939 as a coating for telephone wires in the trans-Atlantic cable, and to date it has proven resistant to underocean conditions. Laboratory testing also indicates that the material is resistant to a wide range of chemical conditions that may occur in hazardous waste landfills (Tisinger and Peggs, 1991). With the relatively mild chemical conditions that would exist in the proposed landfill, as well as the absence of sunlight, the polyethylene liner would be expected to last well beyond the time when final cover is installed, the waste degrades, and leachate production essentially ceases.

   The liner leak analyses discussed in Sections II.A.2, Groundwater, and II.A.3, Surface Water are based on actual field studies of liners (see response to Letter No. 63, Comment 19), and take into consideration the potential for imperfections in the liner

material or small holes that may occur even with a rigorous construction quality assurance (CQA) program such as that proposed (see response to Comment 20 below).

With regard to the derailment of more than one car, see response to Letter No. 69, Comment 13.

3. Landfill operations staff or consultants retained by Weyerhaeuser would be responsible for conducting monitoring programs. Monitoring frequencies and parameters, and inspection schedules for the various landfill systems, would be incorporated in the Plan of Operation submitted to Ecology with Part 2 of the solid waste permit application. This Plan would be approved by Ecology prior to issuance of the permit, and all landfill operations would be conducted in accordance with the Plan. Results of monitoring and testing would be submitted to Ecology and the Health District, at which time they would also be available for review by the public. The response to Letter No. 69, Comment 9 is also relevant.

4. The variance you refer to is a variance from the MFS locational standard that prohibits the location of a landfill's active area in a wetland (see Section I.B.1.a, Project Overview). The Washington Department of Ecology would make a decision on the variance prior to its decision on the solid waste permit (if the variance is not approved, the solid waste permit cannot be issued). The EIS does not imply that approval of the variance is a foregone conclusion. Rather, a variance is listed in Section G of the Fact Sheet along with all the other permits and approvals that would be required for the landfill. The decision on whether to approve the variance will be based on MFS requirements for variances (WAC 173-304-700), as well as information contained in the variance application and this EIS.

   The agency correspondence you refer to does not relate to the needed variance from the MFS, but rather to the Corps of Engineers Section 404 permit, which is required to place fill in wetlands. The variance process and Section 404 permit process are completely separate, conducted by different agencies pursuant to different sets of regulations. Ecology will not make its decision on the variance until after the Final SEPA EIS is issued. The Corps of Engineers must conduct environmental review under NEPA before making a decision on the Section 404 permit. The variance and Section 404 permit and all other applicable permits and approvals would be needed before landfill construction begins.

5. With regard to waste import, see response to Comment 15 below. With regard to your comment on sludge, the definition of solid waste in the state MFS includes sludges and other semisolid wastes. That definition reads:

   > "Solid waste" means all putrescible and nonputrescible solid and semisolid wastes, including but not limited to garbage, rubbish, ashes, industrial wastes, swill, demolition and construction wastes, abandoned vehicles or parts thereof, and discarded commodities. This includes all liquid, solid, and semisolid, materials which are not the primary products of public,

private, industrial, commercial, mining, and agricultural operations. Solid waste includes but is not limited to sludge from wastewater treatment plants and septage, from septic tanks, woodwaste, dangerous waste, and problem wastes." [WAC-173-304-100 (73)].

6. See response to Letter No. 17, Comment 1.

7. Placement of the composite liner within 5 feet above groundwater complies with the MFS when accompanied by a hydraulic gradient control system as is proposed at the Headquarters Site [WAC 173-304-130(2)(b)(i)].

   With regard to Ecology's February 7, 1992 letter, see response to Letter No. 8, Comment 1. With regard to potential impacts on the deeper aquifer, see response to Letter No. 41, Comment 1.

8. Borrow areas and soil stockpiles would be protected from erosion by temporary plastic cover or revegetation, and controlled runon and runoff. The acreage of exposed area would differ at different times of year (see Section II.A.3, Surface Water). Water quality monitoring of stormwater discharge would be conducted as required by the stormwater NPDES permit. Also, see responses to Letter No. 62A, Comment 3; Letter No. 63, Comments 15.64 and 15.68; and Letter No. 69, Comments 16 and 41.

9. Sediment removed from the sedimentation/detention basins would be removed during the summer and placed in the soil stockpiles to be used as part of landfill construction. With regard to the performance of the basins during heavy rainfall, see response to Letter No. 18, Comment 6.

10. Section I.B.1.d(4)(c), Leachate Storage and Transfer, discusses average and average peak daily leachate flows and the sizing of the leachate holding pond. Further detail is provided in Appendix D. The computer model used to estimate leachate production from an active waste cell (HELP2) is recognized as a conservative method for calculating maximum and average leachate generation. The leachate holding pond would have sufficient capacity to hold at least 10 days' supply of maximum anticipated leachate flow, and about 30 days' supply of normal peak winter flows. This is more than sufficient holding capacity to store leachate during temporary rail disruptions, or during a 100-year storm. If a rail delay extended beyond the storage capacity of the leachate pond, truck transport of leachate would be used as a backup measure. Also see responses to Comment 23 below and Letter No. 62A, Comment 4.

11. Section I.B.1.d(6), Landfill Gas and Odor Control, has been revised to reflect modifications in the landfill design since the Draft EIS, and to clarify the issues raised by your comment. As discussed in that section, landfill gas generation from the proposed landfill is expected to be lower than from a municipal waste landfill due to the characteristics of the waste, so Weyerhaeuser is not proposing a gas control system at this time. However, horizontal trenches with gas extraction pipes would be installed in the last lift of waste before the final cover is placed. If "sufficient" gas is generated, it would

be withdrawn from the landfill with a vacuum system and incinerated in high temperature flares (see further detail on the design of the active gas control system in the section referred to above). The definition of "sufficient" would be determined in coordination with the Southwest Washington Air Pollution Control Agency (SWAPCA). It is proposed that a gas system be installed if and when gas flows are high enough to support combustion, but additional or different criteria may be established by SWAPCA.

Flare design would depend on gas generation rates and other factors. Flares would be shrouded, so the flames would not be visible from the ground. Detailed design of the flares and other aspects of the gas and odor control system would be developed in coordination with SWAPCA as part of the process of obtaining the required approval from that agency (see Section G of Fact Sheet).

Section II.B.4, Air Quality, has been revised to provide further information on the composition of landfill gas. The high-temperature flares would destroy virtually all of the trace volatile organic compounds and reduced sulfur compounds that may be present in the gas. For greater detail, see Appendix L of this EIS.

With regard to prevailing winds, there are two dominant wind directions in the region: a westerly or northwesterly direction in the summer and a southwesterly direction in the winter. Data from on-site meteorological monitoring, as well as data reported by Ecology for the sewage treatment plant site in Longview, confirm the bimodal nature of the wind direction. When the wind is from the southwest (31 to 38 percent of the time), it will be from the proposed landfill site toward Silver Lake. This was not discussed in the EIS because it has no effect on the evaluation of air quality impacts. The air quality model used to predict concentrations of trace landfill gas constituents at the western site boundary assumed worst-case meteorological conditions (that is, low wind speed and high atmospheric stability).

Other than meteorological conditions, the primary factor determining atmospheric concentrations of landfill gas constituents is distance. The distance from the center of the proposed landfill to the nearest residence and western site boundary on Headquarters Road is about 1.75 miles, while the distance from the center of the landfill to the nearest property boundary on Silver Lake (Timber Point) is about 3 miles. The impact at Timber Point was determined to be dramatically lower than at the nearest residence and western site boundary on Headquarters Road. Therefore, the discussion in the EIS was restricted to the Headquarters Road site.

12. The Draft EIS presented the mitigation plan that was proposed by Weyerhaeuser at the time of issuance, and stated that Weyerhaeuser would coordinate with federal and state resource agencies to develop a final mitigation plan. Since the Draft EIS was issued, a Technical Advisory Committee consisting of representatives of Ecology, the Washington Department of Wildlife (WDW), the Washington Department of Fisheries (WDF), the Corps of Engineers, EPA, the U.S. Fish and Wildlife Service (USFWS), and the National Marine Fisheries Service (NMFS), was formed to assist Weyerhaeuser in formulating acceptable mitigation for losses of aquatic resources. Based on recommendations from

this committee, a revised mitigation plan has been developed (see Appendix A, *Proposed Natural Resources Mitigation Plan*). Sections I.B.1.g, Proposed Natural Resources Mitigation Plan, II.A.5, Plants and Animals, and II.A.6, Wetlands, have also been revised to reflect the currently proposed mitigation plan.

As discussed in the response to Letter No. 69, Comment 9, the proposed mitigation plan will continue to be refined through coordination with federal and state resource agencies.

13. See responses to Letter No. 69, Comments 13 and 25.

14. Safeguards in the leachate transfer area are described in Section I.B.1.d(4)(c), Leachate Storage and Transfer. Containment structures would be provided to collect potential spills. These structures would consist of berms and shallow ditches along both sides of the rail lines, and a ground cover (such as a geomembrane or concrete system) sloped toward ground drains. Any spilled leachate or stormwater runoff collected in the ground drains would be conveyed to a sump structure, where it would be pumped back to the holding pond.

    A more detailed design for the leachate transfer area will be provided in Part 2 of the solid waste permit application, which would have to be approved by Ecology prior to issuance of the permit. Specific procedures for accomplishing leachate transfer will be included in the Plan of Operation, which will also be submitted with Part 2 of the permit application and require Ecology approval. See response to Letter No. 69, Comment 16 for a discussion of the appropriate level of design detail in an EIS.

    With regard to the effect of leachate spills in Sucker Creek on Silver Lake water quality, see response to Letter No. 62A, Comment 1. The potential for spills from multiple cars is addressed in the response to Letter No. 69, Comment 13.

15. See responses to Letter No. 8, Comment 3; Letter No. 69, Comment 2; and Letter No. 62, Comments 3 and 4. Table I-1 of the EIS has been revised to provide waste quantities expected from three sources: 1) Weyerhaeuser operations within Cowlitz and Wahkiakum counties (approximately 750,000 cubic yards), 2) Weyerhaeuser operations outside the two-county area (approximately 150,000 cubic yards), and 3) non-Weyerhaeuser waste generated within the two-county area (approximately 150,000 cubic yards). Exact predictions of waste quantities are not possible, because they depend on economic factors that cannot be foreseen. For purposes of the analyses in this Final EIS, it is assumed that 1,000,000 cubic yards per year of waste would be accepted at the landfill, or 30,000,000 cubic yards over the next 30 years.

16. See response to Letter No. 8, Comment 2.

17. The EIS has been revised to indicate that the distance to Silver Lake is 1.8 miles. This is the shortest distance from the edge of the landfill footprint to the edge of the wetlands adjacent to the lake, as measured on a USGS 7.5 minute series topographic map. The 2.5 mile distance referred to in the Draft EIS is the approximate distance from the edge

of the landfill footprint along the Southern Tributary and Sucker Creek to the edge of Silver Lake itself. These distances are horizontal distances as taken from the map, and do not reflect drops or rises in terrain.

18. For consistency, the word "could" in the section you refer to has been changed to "would". The word "would" is often used in an EIS instead of "will" due to uncertainty as to whether the proposal will be approved, or what alternative will be selected. "Would" as used in this EIS indicates commitments or actions that will take place if the proposal or an alternative site plan is approved. The statement that "the landfill bottom grading plan is generally intended to parallel the groundwater contours..." has been revised for clarity. It now reads, "The landfill bottom grading plan is designed to generally parallel the groundwater contours..." In other words, the statement was meant to convey the purpose or intent of the design rather than a lack of commitment on the part of Weyerhaeuser. Also, see response to Comment 19 below.

19. Specific field investigations would be conducted prior to construction of each disposal cell, and designs would be developed that take into account the depth to groundwater. Under the proposed construction quality assurance plan, there would be full-time monitoring of cell construction, and adjustments would be made in the grading plan to accommodate any unforeseen groundwater conditions.

    It is difficult to know if the bottom grade exactly parallels the groundwater and maintains exactly a 5- to 10-foot separation from the bottom liner. That is the reason for the word "generally" in the sentence you refer to (see response to Comment 18 above). As discussed in the description of the hydraulic gradient control system (HGCS) in Section I.B.1.d(3) of the EIS, if groundwater unexpectedly rose to levels higher than assumed, the HGCS would act as an underdrain to prevent groundwater from impinging on the underside of the liner. The maximum 35-foot excavation referred to in the EIS would take place at or near some of the ridges within the landfill footprint.

20. Permeability tests on soil to be used in the landfill liner would be conducted prior to use of the soil in the field. Both the testing of soil material and actual installation of the soil liner and FML would be monitored through the proposed construction quality assurance (CQA) plan (see Section I.B.1.d(4)(a), Bottom Liner). This plan would be submitted to Ecology with Part 2 of the solid waste permit application, and would have to be approved by Ecology before the permit is issued. During construction, CQA reports would be prepared by a registered engineer retained by Weyerhaeuser. These reports would document that the liner and other aspects of the landfill were constructed in accordance with the design intent. These reports would be submitted to and approved by Ecology. The construction site would always be open to visits by regulatory agencies, and Ecology staff would make frequent inspections. Ecology would have the authority to stop construction of the landfill if there was continued non-compliance with any permit conditions.

21. See response to Comment 20 above.

22. See response to Comment 14 above.

23. See responses to Comments 10 and 14 above. It is anticipated at this time that 10 rail tank cars would be available to transport leachate from the proposed landfill to the Longview mill wastewater treatment plant. Due to the ability to store leachate in the holding pond during large storm events, 10 rail tank cars are expected to be sufficient. However, more would be acquired if operational experience indicates they are needed. Also, see response to Transcript No. 2, Comment 20.

24. As discussed further in Section II.A.3, Surface Water, the only leachate constituents considered in the water quality analysis were ammonia and chemical oxygen demand, since these were the only constituents present in high enough concentrations to be potentially toxic to fish (EPA, 1986b). A listing of the chemical constituents expected in the landfill leachate is provided in Table II-5. Also, see responses to Letter No. 62A, Comment 1 and Letter No. 69, Comment 13.

25. See responses to Letter No. 1, Comment 1 and Letter No. 69, Comment 13.

26. As discussed in Section I.B.1.d(4)(a), Bottom Liner, the CQA plan referred to in the response to Comment 20 above would include selective destructive seam testing; 100 percent non-destructive seam testing for leaks; and full-time monitoring during liner installation. Also, see responses to Letter No. 37, Comment 3 and Letter No. 65, Comment 1.

27. The EIS follows the format specified in the SEPA Rules (WAC 197-11-430 and -440). As is typical in an EIS, the discussion in Section II is divided into separate evaluations of each "element of the environment" potentially affected by the proposed landfill. These elements are discussed separately for two reasons: 1) the technical analysis for each element of the environment was conducted by a specialist in that field, and 2) agency review of an EIS is often performed by technical specialists on the agency staff, each of whom is primarily interested in one or two fields rather than the whole EIS. Due to the interrelationship of various elements of the environment (such as groundwater and surface water, surface water and fisheries, surface water and wetlands, etc.), as well as the SEPA requirement for a Summary, an EIS does tend to require some repetition and reference to information in other sections.

28. As discussed in Section I.A.1, Purpose and Need, the Health District has decided to limit the alternatives evaluated in the EIS to the No-Action Alternative and other means of accomplishing the Proposal's objectives on the same site. This is consistent with the SEPA Rules [WAC 197-11-440(5)(d)] and with a 1991 ruling by the State Pollution Control Hearings Board (Washington State Environmental Hearings Office, 1991). The information on Weyerhaeuser's site selection process was included in the Introduction to the Draft EIS (Section I.A.2, Site Selection Process) for background information only. To avoid confusion, most of that information has been removed from the Final EIS text. However, Weyerhaeuser's *Alternatives Analysis*, submitted to the Corps of Engineers as part of the Section 404 permit process, is still included in Appendix C of the EIS. This

is intended not for purposes of SEPA compliance, but to provide additional information to assist agencies in making the balancing judgments necessary to support permit decisions.

Although alternative sites are not evaluated in this EIS, they will be evaluated in detail by the Corps of Engineers as part of the Section 404 permit process. For non-water dependent uses that require filling of "special aquatic sites", such as wetlands, federal regulations place the burden on the applicant to rebut the presumption that there are practicable alternatives that do not involve special aquatic sites.

LETTER NO. 10

Patrick C. Wilkins
2505 S. Silver Lake Rd.
Castle Rock, WA 98611
August 25, 1992

Cowlitz/Wahkiakum Health District
1516 Hudson
P.O. Box 458
Longview, WA 98632

Re: Draft Environmental Impact Statement Weyerhaeuser Company's proposed solid waste dump at Headquarters Camp.

The Fisheries portion of the Draft Environmental statement is deficient in that it downplays the importance of Sucker Creek as spawning area for coho salmon.

The people who did the electroshock fishing in June 1990 and January 1991 to guess the total numbers of each species of fish in the creek, point to the presence of juvenile steelhead trout, indicating successful spawning. The DEIS also states coho salmon may also spawn in Sucker Creek, but that it was not possible at the time to determine whether the juvenile salmon caught via electrofishing were naturally spawned or were the plants put in the stream by the Washington Department of Fisheries in May of 1990.

Well, of course those coho are long gone and surviving adults should be on their spawning run back from the Pacific this fall and winter.

But, by golly, there are juvenile coho salmon in Sucker Creek right now. Electrofishing done by a Department of Wildlife representative just last week turned them up in far greater numbers than did the consultant scientists two years ago. And he can't either determine whether they are natural spawn or plants. We can't find anyone who planted them. Department of fisheries in Olympia has no record that there have been any new stockings of coho in Sucker Creek. And a Fisheries biologist says it is likely these new coho are the result of natural spawn, produced by last year's heavy run of coho in the Toutle.

The point is, here is another outstanding reason not to muck around with Sucker Creek.

I'm submitting the total raw footage photographed of this electrofishing as a picture record of the coho.

Sincerely,

Pat Wilkins

GOES WITH EXHIBIT "A"

RESPONSE TO LETTER NO. 10

Pat Wilkins

The videotape you provided with your letter has been reviewed by the fishery consultants on the project team (Beak Consultants, Inc.). Also reviewed was a memo from John Loch of the Washington Department of Wildlife (WDW), which summarizes the results of WDW's August 20, 1992 electrofishing survey (see memo attached to Letter No. 53). The results of the August electrofishing survey are in general agreement with a previous electrofishing survey conducted July 7-8, 1992 by the project fishery consultants. In fact, it appears that some of the same water was sampled in July that your video shows was sampled in August. The July electrofishing survey was done in response to comment letters submitted by the National Marine Fisheries Service (NMFS) and U. S. Fish and Wildlife Service (USFWS) in response to the Corps of Engineers public notice of the Section 404 permit application. A detailed report on the survey was submitted to WDW, the Washington Department of Fisheries, USFWS and NMFS, and is included in Appendix K of this EIS.

The primary objective of the July 1992 survey was to determine whether the 1991 replacement of the 1310 Road culvert had improved access for anadromous fish to the upper reaches of the Southern Tributary. The reach between the 1310 Road crossing and the C&C/Woods rail crossing west of the site was carefully surveyed to determine whether coho or steelhead were present. Although both juvenile and adult cutthroat trout were captured throughout the reach, no coho salmon or steelhead trout were found. Robert Bicknell, a WDW biologist, observed the electrofishing crew through about half of this reach.

Electrofishing was also conducted in the pool immediately downstream of the 1330 Road crossing and for about 1200 feet upstream of the 1330 Road crossing. Juvenile coho were found in most of the pools electrofished in this reach, which is the same reach shown in your video. In addition, electrofishing was conducted in the Southern Tributary from the confluence with Sucker Creek upstream for about 300 feet and for about 400 feet downstream of the 1310 road crossing. Two juvenile coho were caught in the lower 300 feet of the Southern Tributary. An abandoned beaver dam located about 250 feet upstream from the mouth of the Southern Tributary may have blocked access to adult coho in the fall of 1991. No coho were captured upstream of the beaver dam.

Although the presence of juvenile coho salmon in lower Sucker Creek was discussed in the Draft EIS, the relatively high numbers of naturally reproduced coho salmon juveniles found during the summer of 1992 warrants additional discussion in the EIS. Therefore, Section II.A.5, Plants and Animals, has been revised to discuss the results of the July 1992 electrofishing survey. Because coho salmon are known to utilize small headwater tributaries for spawning and rearing, the fishery consultants agree with WDW that an upstream extension of coho distribution to the C&C/Woods railroad crossing on the Southern Tributary is possible. Such an extension could occur with or without the proposed landfill. If it did occur, there would be a change in the

existing species composition and relative abundance of fish in the Southern Tributary downstream of the railroad crossing.

Presently, the rearing capacity of the Southern Tributary for juvenile coho salmon is limited by several factors. During the summer, flow and pool habitat are limited. During the winter, there is little side channel or off-channel pool habitat available. Studies in other western Washington streams have shown that when side channel and off-channel pool habitat is available, juvenile coho salmon will seek it out. It also has been documented in other streams that coho juveniles that spend the winter months in off-channel pool habitat grow larger and have better survival rates than coho juveniles that stay in the main channel (see Section II.A.5, Plants and Animals).

Recognizing these limiting factors and the potential value of enhancing coho salmon runs in Sucker Creek, coho salmon-rearing habitat enhancement is incorporated in the revised *Mitigation Plan* for the proposed landfill (see revised Appendix A of this EIS and response to Letter No. 9, Comment 12). The revised *Mitigation Plan* calls for development of a series of small interconnected off-channel ponds in a meadow area adjacent to the lower 800 to 1000 feet of the Southern Tributary. These ponds would be connected to the main channel by a small outlet drain. Both deep water cover and shallow water foraging habitat would be developed in each pond. Construction of similar ponds on a very small tributary of the Clearwater River in Washington has proven successful in enhancing coho production.

In the revised *Mitigation Plan*, the diversion channel would be designed primarily to enhance wetlands, rather than to also provide mitigation for fisheries impacts as previously proposed. However, enhancement of pool habitat in the Southern Tributary downstream of the proposed landfill boundary has been retained. Sections I.B.1.g, Proposed Natural Resources Mitigation Plan, II.A.5, Plants and Animals, and II.A.6, Wetlands, have been revised to reflect the key elements of the proposed *Mitigation Plan*. The latter two sections also discuss the likelihood of success of proposed fisheries and wetland mitigation measures.

LETTER NO. 11

8/25/92

Solid Waste
Corps of Engineers/North Pacific Districts:

Draft Environmental Impact Statement.

Headquarters Camp Solid Waste Disposal Facility.

the "Dump" to us.

(1) Last June (1991) the public hearing, comments & letters were to be part of this so-called Draft EIS. (nearly 100 opposed)

Yesterday I copied the letters at the CWIPD. I am going over them to see if I find areas not covered in this Draft EIS. - 5000 signatures on a petition on file opposed to Dump.

I really can't believe how little is covered by this draft, Volume I. Repeat / Repeat / Repeat in area's.

(2) The 7 areas of controversy (Ground water quality, surface water quality, wetlands, air quality + odor, aesthetics, rail operations - took all of 5 pages, of the approximate 150 pages Draft.

(3) Lets take the alternatives. What happened to them? Taylor Rd (2 places) & Barnes Drive. Gone. CWIPD - answer that.

In their place: has been put (besides Hdqts as a site)

(2) Alternative A: Set this: Same site - 14 acres smaller, 1 million Cu. yds of waste less - that is an alternative?

CWI&D & DOE answer that - We don't think so.

Now comes alternative B - 90 acres less, 12,000,000 less cy Waste but get this, again: the same site. CWI&D & Doe answer that - is that an alternative? We don't think so.

Though, coming up is another alternative - No action alternative, we have to agree with that one - no permit issued for that Hdqtrs site or Alternative A & B.

(4) But there is a better alternative. I receive the state sepa listings, a couple of months back I read where Klickatat Landfill was expanding 940 acres & would accept exactly the wastes Weyerhaeuser had to dump. You have to give Weyerhaeuser Credit, they must be looking at other options, at least it sounds like it to us.

(5) Of course weyr. says "to expensive", can't compete on the market, if we don't get the Dump, can't update the mill at Longview, "etc. You have read or glanced at their big ads in the papers, I'm sure -

But I contend Weyh. is in a better position then most of their competition because they own their land/timber. Paid $6 an acre way back when. Their competition has to buy their land and/or timber at today's high market price.

(5) If Weyerhaeuser wants to use economics, why hasn't CWHD & DOE asked for Weyerhaeuser Co. records + see if this is a legitimate issue? Or are they using this as a pressure-

(6) tool? Why don't they keep their wastes on Longview where the mess is at now & cheap, no transportation cost + not leave mess for future generations

(6) Why not an independent site study? Done by state standards?

(7) (7) Why not settle the economic question?

(8) Why is there so little in the draft about Silver Lake + the pollution the dump would make to it, a lake of state wide significance?

(9) "CWHD + DOE - are you here to protect the people?

OR are you here, to cave in to big business interests?

Rae "CWHD": OBey the laws of this County, this state, and this country; protect our Health.

No dump at Hdqtrs Camp.
No permit.
Clara Wilkins, Ch. N.C.EC.

RESPONSE TO LETTER NO. 11

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. The Health District and its consultants carefully reviewed the public hearing testimony and all letters received during the scoping period for the EIS. However, SEPA does not require that the lead agency respond directly to each scoping comment or that all the issues raised during scoping be evaluated in the EIS. As required by SEPA, the EIS evaluates only those issues that relate to the probable significant adverse impacts of the proposal. SEPA specifies that an EIS be concise and not excessively detailed or overly technical, and that the text of an EIS not exceed 150 pages. Also, see response to Letter No. 9, Comment 27.

   The Health District made note of the petition with 5000 signatures opposed to the landfill, and it will be retained as part of the public record. However, the purpose of an EIS is to evaluate the probable significant adverse impacts of a proposal and its reasonable alternatives, not to provide a forum for a vote on a project.

2. The discussion of areas of controversy (groundwater quality, surface water quality, aquatic resources, wetlands, air quality and odor, aesthetics, and rail operations) in the EIS Summary is approximately 6 pages long. However, most of the approximately 150-page EIS text is devoted to a more detailed description of the affected environment and impacts in these key areas, as well as a description of project features designed to mitigate impacts in these areas. As required by SEPA, the 6-page discussion in the Summary summarizes the key conclusions of the EIS text.

3. See response to Letter No. 9, Comment 28. Alternative Site Plans A and B meet the SEPA definition of "reasonable alternative" in that they meet or approximate the objectives of the proposal at a lower environmental cost (less land area affected, fewer acres of wetlands filled, and an improved alignment of the diversion channel). Your support for the No-Action Alternative is noted.

4. As discussed in Section I.A.1, Purpose and Need, Weyerhaeuser's primary objective is to take control over disposal of its own solid waste as part of an integrated solid waste management system. Export of its industrial solid waste to the Roosevelt Regional Landfill in Klickitat County would not meet or approximate that objective, and is not considered a reasonable alternative for purposes of this EIS.

5. All language in the EIS that relates development of the proposed landfill to expansion of the Longview mill has been removed. As a factual statement, the EIS still indicates that one of Weyerhaeuser's three objectives in proposing to own and operate its own landfill is stabilization and reduction of solid waste disposal costs. SEPA does not require that

the EIS provide an analysis of issues such as economic competition and profit [WAC 197-11-448(3)].

With regard to locating a landfill near the Longview mill, SEPA does not require that the EIS evaluate alternatives other than the no-action and on-site alternatives (see response to Letter No. 9, Comment 28). In this case, Weyerhaeuser conducted its own study of alternative sites, which did not identify any suitable sites near the mill.

6. See response to Letter No. 9, Comment 28.

7. See response to Comment 5 above.

8. Section II.A.3, Surface Water, and its supporting technical reports evaluate in detail the potential for the proposed landfill to contaminate Silver Lake via nutrient and sediment input through the surface water drainage system, leaks in the bottom liner of the landfill, and accidental spills of leachate in tributaries to the lake. The EIS concludes that the proposed landfill would have no significant adverse impact on Silver Lake water quality or aquatic resources. Also, see responses to Letter No. 62, Comment 9 and Letter No. 62A, Comment 1.

9. Your support for the No-Action Alternative is noted.

LETTER NO. 12

TO THE COWLITZ WAHKIAKUM HEALTH DEPARTMENT

(1) The Columbia and Cowlitz Railroad is owned by the Weyerhauser Company. Their tracks run from Longview mill site to their Green Mountain mill.

In Volume 1 of Draft EIS on Page S-20 & 21 it is noted that 2 extra trains per day would cause delays of 3 to 4 minutes and would occur 4 times between 6 am and 6:30 pm. Each train would pull 18 cars of Pulp Sludge in waste containers.

(2) As the Special Pulp Sludge Dump train leaves the Weyerhauser mill on the Columbia River at Longview, the first well traveled street it crosses is Industrial Way. (See Exhibit 1). The second street is Washington Way--another well used street.

The tracks cross # 2 drainage ditch just before it crosses the third main street, Ocean Beach Highway, then crosses Tori Lane, then crosses another branch of # 2 drainage ditch, then 32nd Avenue. The tracks here are less than 20 yards from the retail buildings, which includes the Fred Meyers complex. The next street crossing is Olympia Way, then 30th Avenue. Again the tracks are 20 yards from the 30th Avenue shopping center with a Safeway store. Very near the tracks, from 30th Avenue, east where it comes to Pacific Way, residential houses are about 20 to 30 yards from the tracks. Then the tracks cross the side creek from ditch # 6 to Lake Sacajawea. Cascade Way is the next crossing, before the tracks get into West Kelso, it goes by within 10 to 30 yards of all the retail and commercial businesses including the Sizzler and Pay N Pak.

As the tracks reach West Kelso, they cross Clark Street, Fisher's Lane, 5th Avenue, Long Avenue and Columbia Heights Road. The Longview City Water Plant is 15 yards from the tracks, as the train turns north up river, parallel to the Cowlitz River. The tracks are 20 to 50 yards from the Westside Highway and the Cowlitz River. The tracks are about 50 to 70 yards from the intake part of the Longview Water Plant. Also, directly across the river from Kelso's Water Plant. The train tracks for the next 1 1/4 mile are less than 40 yards from the upstream of the Cowlitz River.

They cross Nevada Drive, Alpha Drive, Beulah Drive, Beacon Hill Drive and Westside Highway (SH#411) on elevated tracks. It was between the Westside Highway and Beulah Drive, that the last derailment of 8 chip cars occurred during the last week of July 1992. This was 700 yards by rail from the Cowlitz River railroad bridge. Approximately 40 to 50 yards from the Cowlitz River down a very steep slope.

The area around the Beacon Hill road has residential houses and retail businesses that were missed by the derailment or wreck with 8 over turned chip cars by a very small margin. Incidently the chips covered a culvert running under the tracks. If this accident had happened in the winter time, where would all the water go???

The Weyco train bridge crosses the Cowlitz on an elevated level. As it reaches the East side of the river it continues elevated over the Cowlitz Gardens Road, then around the Rocky Point rock where it is about 20 feet above North Pacific Avenue

and 70 feet directly above the Cowlitz River. This makes the total distance from West Kelso to the point where the tracks leave the river about 1 3/4 miles. ONE AND THREE QUARTER MILES OF VERY CLOSE ACCESS TO THE RIVER AND KELSO AND LONGVIEW WATER PLANTS.

Exhibit # 2 shows the track crossing from Nevada Drive then crossing to the Ostrander road area. As the tracks leave Rocky Point it crosses the Northern Pacific Railroad, Interstate 5, Nicholson Road, Evergreen Road, Holcomb Acres Road, and Guffer Road.

On Exhibit 3, the tracks enter the Ostrander Creek Canyon where it crosses Ostrander Road, Lenora Lane, and Headquarters Road. The tracks cross Ostrander Creek numerous times as it winds it way up to the Headquarters site.

Ostrander Creek drains into the Cowlitz river about 2 miles from the WATER PLANTS of Longview and Kelso.

It is estimated that the Headquarters site has a distance factor of 43 miles round trip. None of this distance is out of the Cowlitz River Drainage.

(3) Most of the railroads in Washington have replaced their rails with 1/4 mile rails. That means NO RAIL JOINTS FOR 1/4 mile. The Columbia/Cowlitz railroad has not done this. In the Draft EIS, Volume 1, Page I-14, it states that the rail line was upgraded in 1991 to meet Federal Class 2 rail standards. The improvements they claim were new Ballast (road bed), new rails, improved drainage and other modifications. What other modifications?

In July 1992 an eight car wreck or derailment dumped wood chips only a few yards from the Cowlitz River. Last October 3 or 4 miles beyond the Headquarters site a seven car derailment dumped lumber, hog fuel, etc on top of the fill located over Hemlock Creek.

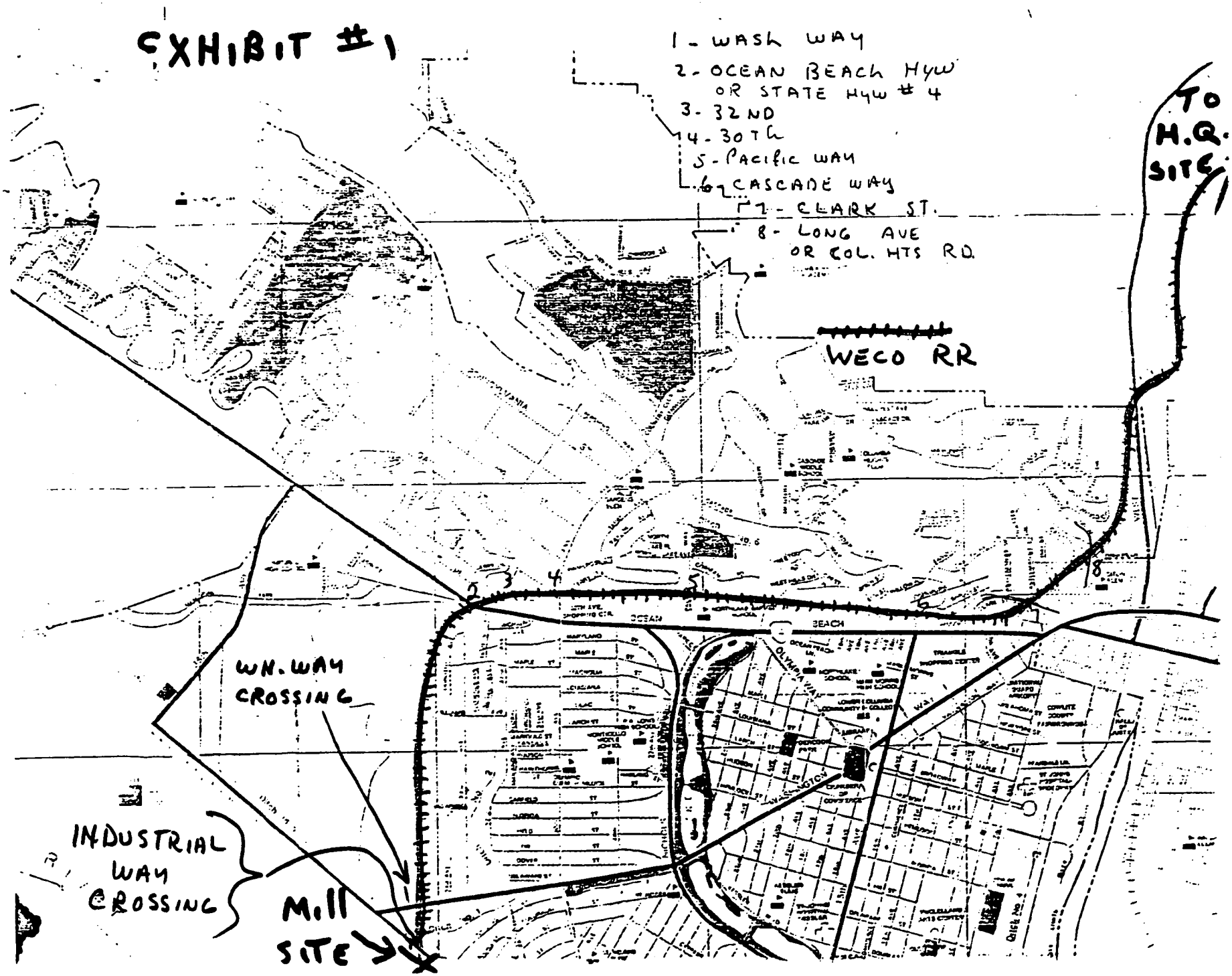
In the EIS Volume 1 on Page S-14 someone has estimated a derailment would happen every 200 years. With the October 1991 and July 1992 derailments only 10 months apart that is 400 years of wrecks. In the last 4 years there has been at least 4 derailment with cars tipped over. That is 800 years of derailments. That would make a man wonder doesn't it????

WHAT CRITERIA WAS USED FOR THE 200 year occurrence?????

DON BELDING
PRESIDENT OF FRIENDS OF SILVER LAKE

Don Belding
Aug 24 1992

EXHIBIT #1


1 - WASH WAY
2 - OCEAN BEACH HYW OR STATE HYW # 4
3 - 32ND
4 - 30TH
5 - PACIFIC WAY
6 - CASCADE WAY
7 - CLARK ST.
8 - LONG AVE OR COL. HTS RD.
TO H.Q. SITE
WECO RR
WN. WAY CROSSING
INDUSTRIAL WAY CROSSING
MILL SITE
OCEAN BEACH

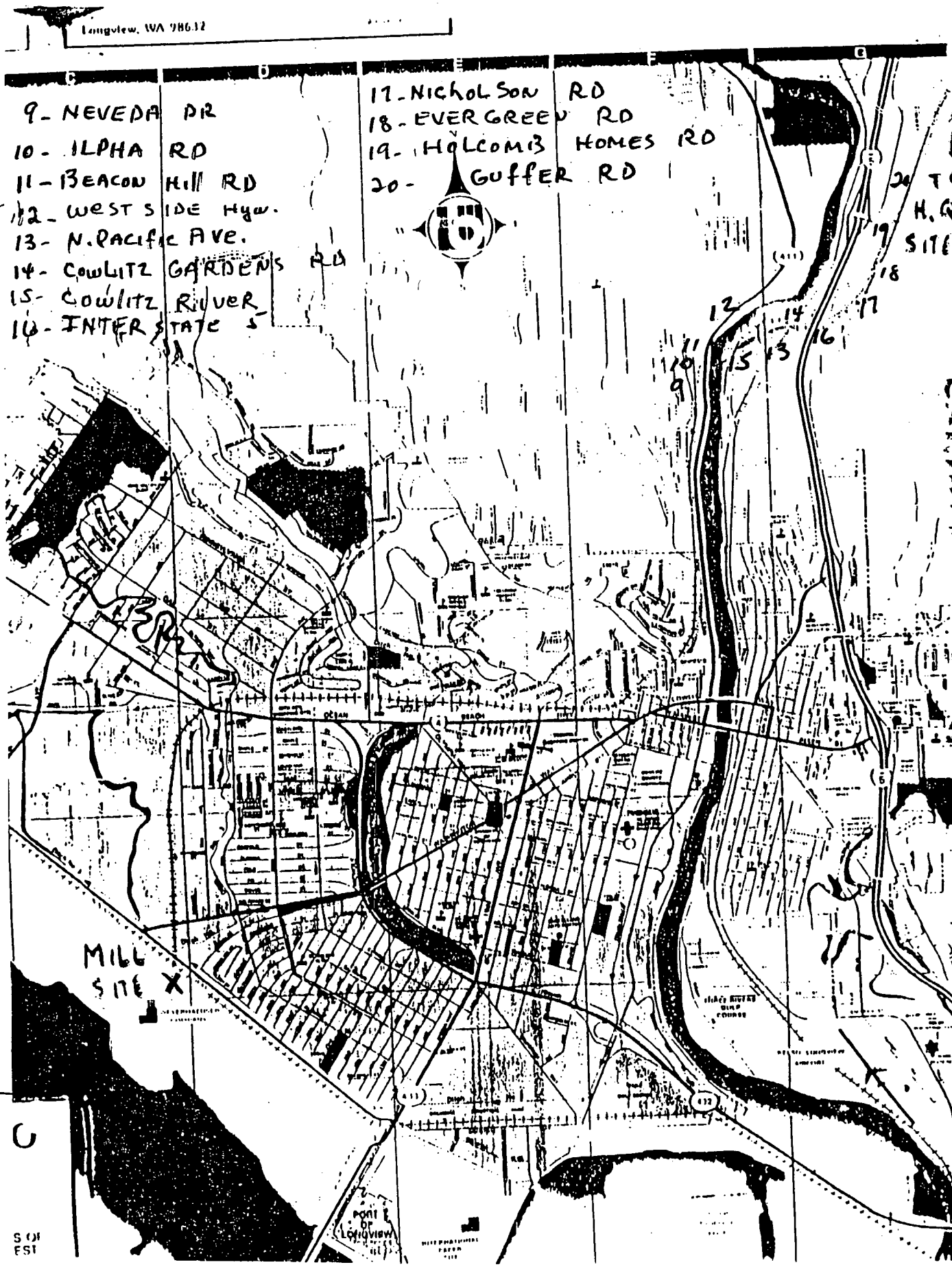
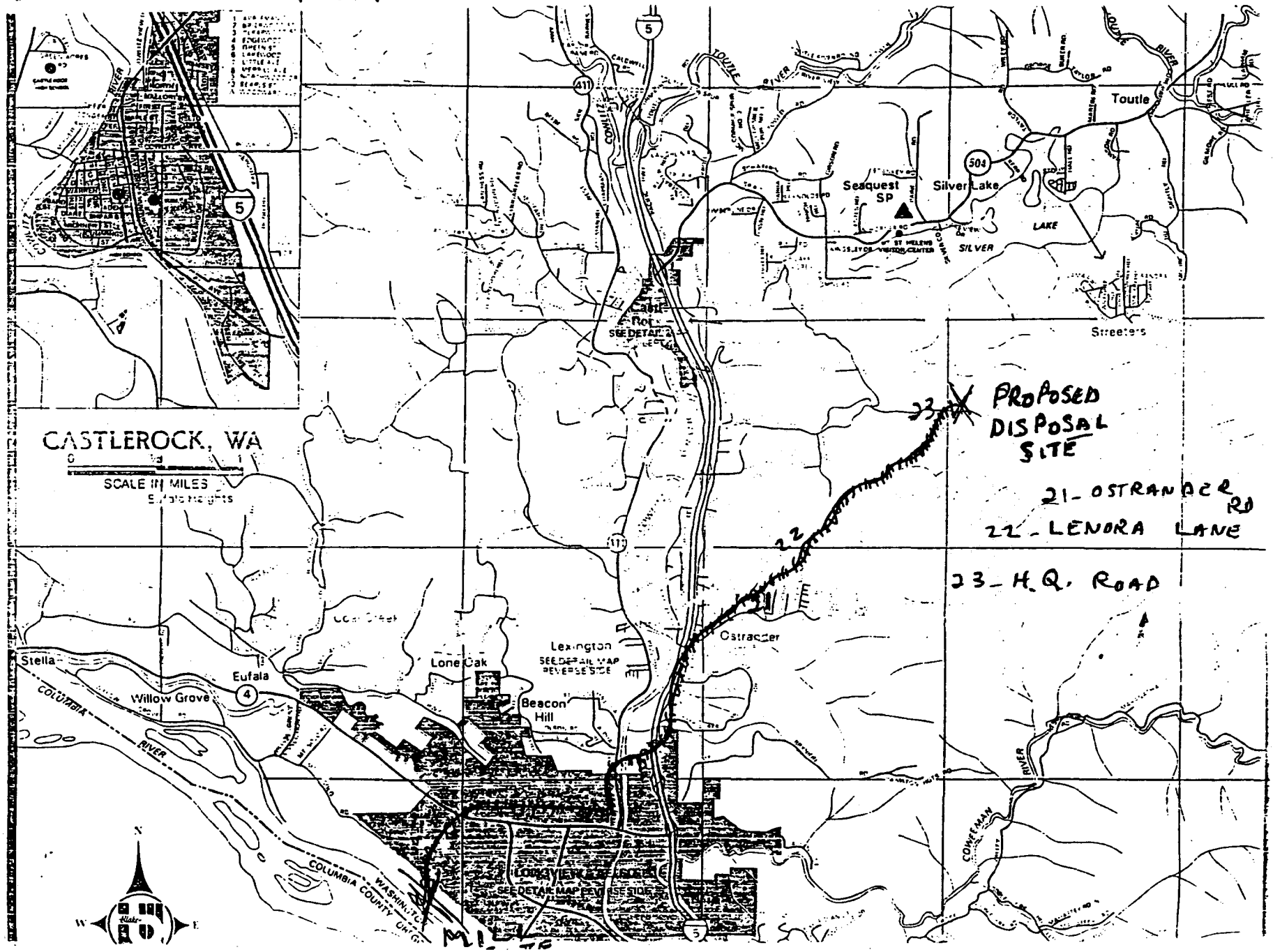

Longview, WA 98632
9- NEVEDA DR
10- ILPHA RD
11- BEACON HILL RD
12- WEST SIDE Hyw.
13- N. PACIFIC AVE.
14- COWLITZ GARDENS RD
15- COWLITZ RIVER
16- INTERSTATE 5
17- NICHOLSON RD
18- EVERGREEN RD
19- HOLCOMB HOMES RD
20- GUFFER RD
20 TO H.Q. SITE
MILL SITE X
EXHIBIT
PORT OF LONGVIEW

EXHIBIT #3


CASTLEROCK, WA
SCALE IN MILES
PROPOSED DISPOSAL SITE
21- OSTRANDER RD
22- LENORA LANE
23- H.Q. ROAD
Toutle
Seaquest SP
Silver Lake
Streeters
Ostrander
Lexington
Lone Oak
Beacon Hill
Eufala
Willow Grove
Stella
COLUMBIA RIVER
COWLITZ RIVER
TOUTLE RIVER
LOWER VIEW
COLUMBIA COUNTY
WASHINGTON

RESPONSE TO LETTER NO. 12

Don Belding, President
Friends of Silver Lake

1. Comment noted. Further detail on rail operations is included in Section II.B.6, Transportation. With or without waste import, two trains per day would be required to haul solid waste of all types (see Table I-1 of the EIS) to the landfill, and to haul leachate from the landfill to the Longview mill wastewater treatment plant. This would result in four crossings of at-grade intersections per day. The approximate number of rail cars (or leachate tank cars) per train would be 15 to 20, causing delays of up to 3 to 4 minutes at each intersection assuming a speed of 7 miles per hour. Average delays at the State Route 4 crossing, assuming random arrival of cars at the intersection, would be 10 to 15 seconds.

2. See response to Letter No. 69, Comment 13 and Letter No. 1, Comment 1.

3. See response to Letter No. 69, Comment 13.

LETTER NO. 13

Marvin L. Cole
GENERAL CONTRACTOR, INC.
P.O. BOX 751 1331 BALTIMORE
LONGVIEW, WASHINGTON 98632
3) 425-6516
..X: (206) 425-8413

August 25,1992

David Riggs
Director of Environmental Health
Cowlitz - Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs,

The impact of the proposed Weyerhaeuser Solid Waste Facility on Headquarters Road is a necessary and economically progressive community action.

After reviewing the Environmental Impact Statement, I applaud Weyerhaeuser's efforts in developing this plan in the best interest of both the economy and the environment. As proposed, this type of modern facility will help resolve our critical shortage of disposal sites, while maintaining an environmental control.

I urge you to accept Weyerhaeuser's proposal and to issue the permits as applied for.

Respectfully submitted,

Marvin L. Cole

RESPONSE TO LETTER NO. 13

Marvin L. Cole
General Contractors, Inc.

Your support for the proposed landfill is noted.

RENTAL
SALES
SERVICE

"QUALITY EQUIPMENT"
"QUALITY SERVICE"

125-2350
1002 TENNANT WAY - LONGVIEW, WA 98632
PORTLAND LINE 224-9596
FAX 206-425-3417

Valley
RENTALS • INC.

786-8408
6070 LINDERSON WAY
TUMWATER, WA 98501

CONTRACTORS EQUIPMENT - MANLIFTS - TRUCKS - TRUCK CRANES - DOZERS - LOADERS - BACKHOES - COMPRESSORS - AIR TOOLS - FORKLIFTS - SCAFFOLDING - SAFETY SUPPLIES

My name is John McKenzie & I have lived in LV 20 years having moved here from PDX.

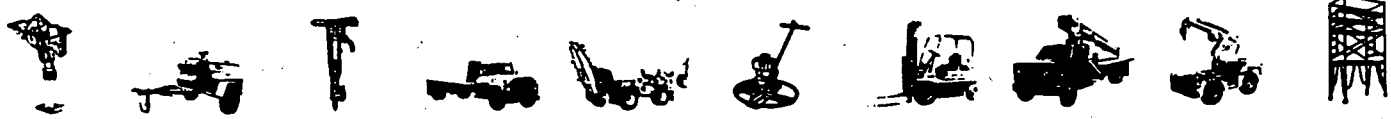
I have worked at Valley Rental for all of the 20 years

I would like to comment on the project from a business & personal point of view

I have been to 4 of the meetings Tom Skandlan has presented & open forum at RA Long. I feel I have gotten some good information on the project.

I feel Weyerhauser has spent the time & engineering to develop a workable solution to there waste problem. It's not an open pit, but something that is designed to hold & treat any waste which might leach out.

I feel in today business world we all need to look at means of handling our own waste &



"QUALITY EQUIPMENT"
"QUALITY SERVICE"

425-2350
1002 TENNANT WAY - LONGVIEW, WA 98632
PORTLAND LINE 224-9596
FAX 206-425-3417

Valley
RENTALS • INC.

786-8408
6070 LINDERSON WAY
TUMWATER, WA 98501

CONTRACTORS EQUIPMENT - MANLIFTS - TRUCKS - TRUCK CRANES - DOZERS - LOADERS - BACKHOES - COMPRESSORS - AIR TOOLS - FORKLIFTS - SCAFFOLDING - SAFETY SUPPLIES

8-25-92

being responsible to manage it, locally if possible. There can only be so many Land fills in Eastern Wash. or Ore.

The time is here where we as a Community have to stand up & recognize we have to deal with our own waste problem, whether it be our home or business.

There is also the factor of jobs. I am concerned if Weyerhauser does close the plant, where are the new jobs? We need to think about our towns future & the future of our kids if they want to live & raise family's here.

If we really analyze what the growth potential will be if Weyerhauser stays in town to modernize & expand the jobs created will mean a big boost for our town & the surrounding areas.



RENTAL
SALES
SERVICE

125-2350
1002 TENNANT WAY - LONGVIEW, WA 98632
PORTLAND LINE 224-9596
FAX 206-425-3417

Valley
RENTALS • INC.

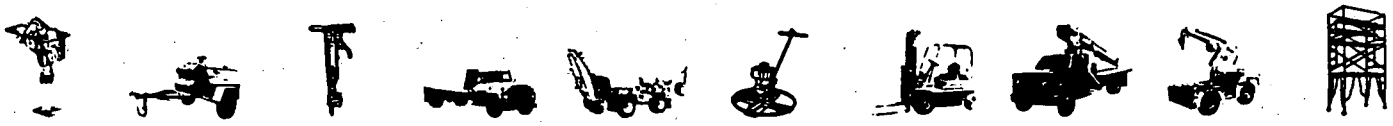
"QUALITY EQUIPMENT"
"QUALITY SERVICE"

786-8408
6070 LINDERSON WAY
TUMWATER, WA 98501

CONTRACTORS EQUIPMENT - MANLIFTS - TRUCKS - TRUCK CRANES - DOZERS - LOADERS - BACKHOES
COMPRESSORS - AIR TOOLS - FORKLIFTS - SCAFFOLDING - SAFETY SUPPLIES

You don't have to look very far back to see what happened to the steel industry, automobile & even logging to see it can happen there to the paper industry.

We all want a clean enviroment to live in, but we also need an economy to provide us with a good standard of living. I for one think this Hand bill is a big step in right direction.



RESPONSE TO LETTER NO. 14

John McKenzie
Valley Rentals, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 15

IM STEVE HANSON, AND I AM HERE THIS EVENING AT THE BEHEST OF BOTH THE LONGVIEW AND KELSO CHAMBERS OF COMMERCE. I AM IMMEDIATE PAST PRESIDENT OF THE LONGVIEW CHAMBER OF COMMERCE, WHICH REPRESENTS SOME 700 SMALL AND LARGE BUSINESSES AND PROFESSIONS . I AM ALSO PAST PRESIDENT OF THE KELSO CHAMBER AND AM HERE TO REPRESENT THEIR 270 MEMBERS.

AS THE SPOKES PERSON FOR THE CHAMBERS WE WOULD LIKE IT KNOWN THAT WE ARE IN STRONG SUPPORT OF THE WEYERHAEUSER COMPANIES PROPOSED HEADQUATERS CAMP SOLID WASTE DISPOSAL FACILITY. WE HAVE REVIEWED THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND FIND THAT IT IS AN ENVIRONMENTALLY AND ECONOMICALLY SOUND SOLUTION TO THE SOLID WASTE NEEDS OF THE COMPANY. THE CONCLUSIONS OF THE STATEMENT ARE "THAT THE MAJORITY OF SIGNIFICANT IMPACTS CAN SUCESSFULLY BE AVOIDED, REDUCED OR COMPENSATED FOR BY THE MITIGATION MEASURES PROPOSED AS PART OF THE PROJECT.

AS THE FACILITY WOULD BE PART OF THE COMPANYS OVERALL MODERNIZATION WE ARE IN FURTHER SUPPORT OF THE PROJECT FOR TWO ADDITIONAL REASONS.

FIRST, WEYERHAEUSER HAS PROVEN, OVER THE YEARS IN OUR COMMUNITY TO BE A GOOD CORPORATE CITIZEN. THE COMPANY HAS UNSELFISHLY GIVEN MILLIONS OF DOLLARS TO NUMEROUS COMMUNITY PROJECTS AND FACILITIES IN LONGVIEW-KELSO. THOUSANDS OF LOCAL AREA CITIZENS HAVE BENEFITED FROM THEIR GENEROSITY THRU THE PROGRAMS THEY HAVE SUPPORTED. THE LIST IS LONG. WEYERHAEUSER HAS GREATLY IMPACTED OUR ENVIRONMENT BY MAKING THIS A BETTER PLACE TO LIVE.

NOT ONLY HAS THE COMPANY BEEN A GOOD CORPORATE CITIZEN, BUT AS A MAJOR EMPLOYER IN THE AREA THE TAXES THEY PAY CONTRIBUTE SUBSTANTIALLY TO THE OVERALL ECONOMIC WELL BEING OF OUR COMMUNITY.

WHERE WOULD WE BE WITHOUT WEYERHAEUSER ? ? ? :

WITHOUT THEIR CORPORATE GOOD CITIZENSHIP ? ? ?

WITHOUT THE TAXES THEY PAY HOW MANY OF OUR SERVICES,PROGRAMS, AND FACILITIES WOULD BE CUT FROM LOCAL BUDGETS?

WITHOUT THE JOB BASE THEY PROVIDE HOW MANY OF OUR LOCAL BUSINESSES WOULD WE LOSE?

TALK ABOUT AN ENVIRONMENTAL IMPACT..... ! ! ! !

YES, THE PROPOSED WASTE MANAGEMENT SYSTEM IS OF GREAT IMPORTANCE TO WEYERHAEUSERS PLANS TO UPGRADE AND MODERNIZE MILL FACILITIES IN LONGVIEW AND THE REGION. AND IT IS IMPORTANT TOO, BOTH ENIVRONMENTALLY AND ECONOMICALLY, TO THE BUSINESS, PROFESSIONAL, AND INDUSTRIAL COMMUNITY I AM HERE REPRESENTING TONIGHT AS SPOKESPERSON FOR BOTH THE LONGVIEW AND KELSO CHAMBERS OF COMMERCE.

RESPONSE TO LETTER NO. 15

Steve Hanson
Longview and Kelso Chambers of Commerce

Your support for the proposed landfill is noted.

LETTER NO. 16

FRIENDS of SILVER LAKE

225B LAKEVIEW DRIVE
SILVER LAKE, WA 98645
(206) 274-7866

COMMENTS TO WEYCO EIS

August 24, 1992.

(1) We were asked to address the items in the EIS and ask questions which we hope to see answered in the final EIS statement. We would like a copy of the final EIS and am requesting it here to see if these are addressed.

(2) 1. SITE: We see no data which looks at other VIABLE sites. A site which is too small for this operation is not a viable site. Since site selection has been presented in the EIS, and we would like to see all data on the Collins- Tennant way site, which though not mentioned in the site selection study, was looked at by WEYCO staff and consultants as a possible site. We want to see reports on that inspection . We want to know why it was turned down.

(3) 2. DATA Entire EIS Lacks data to back up testing,, life of liner, amount of rain, figures for a derailment of more than one car, etc. How much leachate will result when 2" of rain falls on 5 acres of open land?. Where is it stored?

(4) 3. TESTING All testing is proposed to be done by WEYCO at 3 month intervals, with reports to Health Dept . This is the same process used at Radakovich dump, and no problems were discovered until citizens protested. Page I-23 says detection systems would be tested as "deemed appropriate" deemed by whom? Who will pay for this testing? Will DOE test this site. When? How often? Will the county health Department test this site. When? By Whom. Who will pay for it.?

(5) 4. SUPPOSITIONS. Many suppositions are made, example; Though a variance is required to allow a dump in the wetlands, this variance has not been given. In this EIS it is implied that it will be. Correspondence from Federal and State agencies to the Corps of Engineers does not indicate such a permit will be

(6) forthcoming. How is this being addressed by each agency? Will approval be given before construction starts? Will all DOE concerns outlined in the February 7, 1992 letter from DOE Engineer, Roland Ugochuka to CWHD be addressed in this EIS?.

(7) 5. SCOPE OF EIS This EIS addresses only Wahkiakum and Cowlitz, waste.--WEYCO has asked that the Cowlitz County Solid Waste Management Plan -(chapter 9) allow waste from other counties. This has been approved by Cowlitz County Solid Waste Advisory Committee,(which is top heavy with vested interests, In addressing this chapter, Nelson Graham, Chairman, said, " Not to allow incoming waste might 'hurt' local industries".) This

EIS should address the fact that WEYCO expects importation of waste from other areas to be placed at the Headquarters site. Who are those industries. Where are they. What is the transportaiton plan from those areas? How will this amterial be checked? By whom?

(8) 6. HAZARDOUS WASTE page-I4 c says "If a derailed tank car fell into Sucker Creek or Ostrander Creek at low flow and ruptured a valve, it would significantly impair water quality and kill all fish and most other aquatic organisms downstream to Silver Lake and the Cowlitz River, respectively." With that in mind, how is this material be deemed non hazardous? The chemicals from De-inking of newsprint is not addressed. What are they? Will newsprint be brought in from other countries or states, as has been suggested previously? Where does it come from? Do we know the content of that newsprint? How is that tested?

DOE, in a letter, November 28, 1990, to Congresswoman Unsoeld, says, regarding the WEYCO waste at the Radcovich dump, "FURTHER TESTING OF THE UNTREATED CLARIFIER SOLIDS, BOILER ASH, LIME DREDGES AND GRITS WAS CONDUCTED BY THE DEPARTMENT OF ECOLOGY AND WEYERHAEUSER. RESULTS OF THE ANALYSIS INDICATED SOME TOXIC ORGANIC COMPOUNDS IN THE CLARIFIER SOLIDS AND INCREASED LEVELS OF BIOLOGICAL ACTIVITY OCCURRING WITHIN THE MATERIAL. MORE OF THESE MATERIALS WERE DESIGNATED DANGEROUS OR HAZARDOUS WASTE AND THEREFORE NOT APPROPRIATE FOR DISPOSAL AT A SOLID WASTE FACILITY.' This same waste is proposed for Headquarters. How has it been changed? Will WEYCO be allowed to burn all waste brought in, as well as its own waste?. How will this waste be rendered non hazardous?

Waste from like mills, ITT Rayonier, Port Angeles and Boise Cascade, St. Helens, is called by those companies in their employees handbooks, hazardous. How is WEYCO waste less hazardous? What makes it different?

(9) 7. GROUND WATER AT 5'? S-8, Does Liner at 5 feet above groundwater comply with the MFS? None of the concerns of DOE regarding groundwater, as per DOE letter of Feb 7, 1992 to CWHD have been addressed. Deeper aquifer not addressed. Where is it? How deep and how big?.

(10) 9-4 all data is based on the supposition that all but 5 acres will be covered, except for 3 summer months. Is borrow area, source of much sediment, always covered except in summer?'Who does sthisx covering. How is it monitored

(11) 8 a, SILT Where is the silt deposited after it fills up the retention ponds. Is it placed out of watershed of Silver Lake? Are the ponds likely to wash out in heavy rainfall? How prevented?

(12) 9. AMOUNT OF LEACHATE. All estimates are on an "average" rainfall. Can leachate be retained in winter at site if accident on rail delays removal? Where? How much rainfall on 5 acres at 2"? How much is uncovered in spring and summer when could have, and have had 2" rain? How much leachate produced?

(13) 10. GAS s-9-6 What is "sufficient gas". More details on 'enclosed flair' are needed. What chemicals are produced? The prevailing wind is directly over Silver Lake. This is not mentioned.

(14) 11, MITIGATION WITH AGENCIES Letters of May 22, 1992, from WDW, EPA, and Dept of Interior, Fish and Wildlife, to the Corps of Engineers, shows WEYCO and those agencies are not even close to agreement on mitigation. This EIS implies they are in agreement. When do you expect to have confirmation and agreement with these agencies. What is the extent and changes in that mitigation

(15) 12. DERAILMENTS s-14 Derailment data is based on nationwide figures on mainlines, resulting in a 200 year occurrence of a possible derailment. Derailments on this line are frequent, EIS should be based on data from the rail line which will be used. Results, we suspect, will be considerably oftener than 200 years. How was this figure arrived at, specifically. How does this rail comparea with those used for examples?

(16) 13, TRANSFER STATION LOCATION- s-17 Transfer station is placed in the most vulnerable spot, the area most apt to have an accident, and directly above a steep drop to Sucker Creek Safeguards not adequately addressed. EIS says 20,000 gal of leachate would be deleted by Sucker Creek when got to Silver Lake. Summer flow or winter Flow? Flow not checked below transfer station. How many cars considered? One?
What would happen if two or more derailed at this poin ?

(17) 14. WASTE AMT I1 repeats 2 counties waste only, which we know not expected. I-7 page one says waste 742,000 I-8 says 892,000 What is the real amount of waste from all sources expected next 30 years.

(18) 15 THREATS; I-10 EIS says, "Weyerehaeuser has indicated that this delay (of approving Headquarters site) could affect the company's consideration of facility expansions or commitments to new facilies in the region."

THIS THREAT IS NOT APPROPRIATE FOR AN ENVIRONMENTAL IMPACT STATEMENT.. and should be disregarded by all respondents and removed from final EIS.

(19) 6. DISTANCES I-13 Silver lake is 1 1/2 miles not 2 1/2 from facility. Sucker Creek has direct access to Silver Lake. Steep terrain, a drop of 800 feet in that distance, plays a part, but not mentioned in EIS. You will make it steeper. What is the fianl drop from the peak of your new mountains to the Silver Lake 486.5 elevation of Silver Lake

(20) 17. LANGUAGE. EIS often says WEYCO "Could" -- when" WIll" is implied--- Would as in I-14. I-14 c. Also, the word 'intended' 1-16-2 is used instead of"will" EIS Implying the action will be done, but no committment. Willyou cange these coulds to will?

(21) 16. BOTTOM GRADING I-16 2 grading is 'intended' to be more than 5-10 feet above groundwater level. How does dozer operator know, since groundwater level varies in dump site. You say he will excavate 35 feet deep--where?

(22) 17,. RECOMPACTED SOIL I-17 This was depicted as clay in earlier news releases and after our insistance on seeing the clay changed to recompacted soil. (soil on site). When is this tested for impermeability?, by whom? results ?

(23) 18. CONSTRUCTION INSPECTIONS. I-21 EIS says an engineer is always on site -- during construction? only? When?--WEYCO or agency monitoring this? Written reports required? What are the penalties for noncompliance?

(24) 19, SPILLED LEACHATE AT SITE I-23. What is the "impermeable ground cover" which catches spilled leachate at this most venerable area of the transfer? More data needed.

(25) 20. TANK CARS. How loaded? Will always have 10 cars on hand at both sites ?
Will you have enough storage for 2" Rain in one day on five a acres if rail is down, because of a derailment ,five days ,as it was this month after a spill?.

(26) 21. CONTAMINATION OF SILVER LAKE II-23 G. EIS says 20,000 gallons of leachate would impact Sucker Creek, but Silver Lake would not be affected except at the mouth of Sucker Creek. The chemical, ammonia, only addressed. Will this spill involve only ammonia? What other chemicals released in a spill? Have you made allowance for the fact that Silver Lake is behind a dam with no overflow out of the lake 6 months of the year. Leachate will remain in the lake. More than one car of 20,000 gallons could be spilled. In the last derailment on this line last week, seven cars were overturned. The one before that, six months ago, five were overturned. Amounts should be figured for more than one car accident. Your figures are for one car overturned. What happens if 5 cars spill, as happened above Hemlock creek last fall?.

(27) 22. KELSO AND LONGVIEW WATER SUPPLY. EIS says spilled leachate would not hurt Kelso water supply, for leachate would have 7,100 and 10,100 feet to be diluted by the Cowlitz river if

spilled onthe bridge. What if a derailment happened closer to the water supply, as it did last week?, (the rail goes closer to the water supply than the bridge.) What happens if seven cars (as happened last week near this area) are overturned? How many cars is this based on, one? What happens if the tanks overturn closer to the water supply than the figure you have given. The rail is 60 yards from the rail.

(28) 23. LINER AND SEALS No mention is made of the manufactures' guarantee of the liner or method of sealing, monitoring of sealing, conditions required and how met.

.....

(29) Note; there is much repetition in the information given in the EIS. Repetition, as every salesman and writer knows, is a tool to make audience and reader remember (and believe what the writer or salesman says is true?).

(30) Though this EIS calls for one site--Headquarters or no action. Site selection activities, though not made a part of this EIS, is used (pg S-2), This is not appropriate for this EIS.

The site selection study shows that no site other than the Headquarters site was every truly considered by WEYCO. The site selection study will show that other sites were eliminated for flaws which existed, but were ignored at the Headquarters site.

Also, other less environmentally damaging sites are available, but not mentioned in the EIS. If you are going to mention site selection activites, all information should be given. What is result of "Headquarters held for further study" report. May we have a copy of that included? As mentioned in item #1 we would like a mention of the "Collins or Tennant Way site" we have proposed, and which your consultants and staff looked at and rejected.

FRIENDS OF SILVER LAKE

Martha Belding

Martha Belding, Secretary.

RESPONSE TO LETTER NO. 16

Martha Belding, Secretary
Friends of Silver Lake

1. The Health District has sent Friends of Silver Lake copies of all three volumes of the Final EIS.

2. See response to Letter No. 9, Comment 28.

3. See responses to Letter No. 9, Comments 2 and 10.

4. See response to Letter No. 9, Comment 3. Weyerhaeuser would pay for the monitoring and testing included in the Plan of Operation. Ecology and the Health District would make regular site inspections, although not on a prescribed schedule. Duplicate sampling or independent sampling by these agencies is always an option if they deem it appropriate.

5. See response to Letter No. 9, Comment 4.

6. See response to Letter No. 8, Comment 1.

7. See responses to Letter No. 8, Comment 3; Letter No. 17, Comment 1; Letter No. 22, Comment 2; and Letter No. 62, Comment 4.

8. See response to Letter No. 17, Comment 1.

9. See response to Letter No. 9, Comment 7.

10. See response to Letter No. 9, Comments 3 and 8. The site operations staff or a contractor would be responsible for installing temporary plastic cover.

11. See response to Letter No. 9, Comment 9.

12. See response to Letter No. 9, Comment 10.

13. See response to Letter No. 9, Comment 11.

14. See response to Letter No 9, Comment 12.

15. See response to Letter No. 69, Comment 13.

16. See response to Letter No. 9, Comment 14.

17. See response to Letter No. 9, Comment 15.

18. See response to Letter No. 8, Comment 2.

19. See response to Letter No. 9, Comment 17. As discussed in Section II.A.1, Earth, the maximum elevation of the proposed landfill would be 1,250 feet MSL compared to an existing on-site maximum elevation of 1,080 feet MSL.

20. See response to Letter No. 9, Comment 18.

21. See response to Letter No. 9, Comment 19.

22. See response to Letter No. 9, Comment 20.

23. See response to Letter No. 9, Comment 20.

24. See response to Letter No. 9, Comment 14.

25. See responses to Letter No. 9, Comments 10 and 14.

26. See response to Letter No. 9, Comment 24.

27. See responses to Letter No. 1, Comment 1 and Letter No. 69, Comment 13.

28. See response to Letter No. 9, Comment 26.

29. See response to Letter No. 9, Comment 27.

30. See response to Letter No. 9, Comment 28.

LETTER NO. 17

Cowlitz-Wahkiakum Counties
AUG 26 1992
Health District

COWLITZ WAHKIAKUM HEALTH BOARD

Attached are two lists of material and substance's identified in the booklet from two other Pulp plants.

Boise Cascade from St. Helens, Oregon and ITT Rayonier Inc. in Port Angeles, Wash.

Also attached is a letter from Linda Smith (Mrs. Steve Smith) to the editor of the Daily News. A picture of a tank truck that rolled over at the approach to the Harry Morgan bridge at the Longview Wye on April 10, 1991.

Additional letters are from the Norpac Communications meeting on 3/26/90 and the Port Dock meeting June 1991.

(1) Weyerhaeuser environmentalist's, Ken Johnson and Cal Palmer denied from April 1990 to November 1990 that any dioxin was in the pulp sludge. They finally admitted dioxin was in the sludge.

Weyco and the C-W Health offfice both say that all the waste and sludge to be hauled is non-hazardous.

Boise Cascade identifies several hazardous liquids and substances that are used in paper making. They include Hydrogen Sulfide, Sulfur Dioxide, Chlorine, Chlorine Dioxide Solution. Chlorine Dioxide is potentially lethal. Other hazardous liquids included are Green liquor, white liquor, black liquor, Nitric acid, filming Amrines, Muriatic acid,Sulfuric Acid, Caustic Soda and Dioxin.

The ITT Rayonier booklet also identified hazardous properties and liquids in their Pulp methods. Adhesive 944,TLV 100 PPM, adhesive 1222, adhesive rollend PR-500, ammonia NH3 & NH4OH TLV 25 PPM, ammonia base SSL (Spent Sulfite Liquor), anti freeze (citgo), TLV 50PPM or 125 mg/m3, hydrogen peroxide H2O2, Hydrogen Sulfide H2S, TLV PPM, mercury H6, nitric acid, TLV 22PPM.

Linda Smith's letter refers to the situation of how will the waste and sludge at the Longview Mill site be identified and removed before being shipped to Headquarters dump site. As can be seen from her letter the description of the material is hazardous. With Phenal 2,3,4,6 tetrachloro. Persistent halogenated hydrocarbon is extremely hazardous.

The picture of the tanker turned over at the approach to the Cowlitz River bridge spilled about 2000 gallons of liquid sodium chlorate, a highly explosive substance when dry--also a smaller amount of sodium dichromate, a known cancer causing material. This cargo was headed to Weyco, which uses this chemical to bleach paper.

The Norpac Communications letter proves that Dioxin is in the sludge from the Chlorine Bleach plant.

The Port Dock meeting in January 1991 was for the purpose of identifying hazardous materials from anywhere.

Hazardous wastes can come from a multitude of conditions and places. For example, solvents, degreasers, cleaning fluids, laboratory chemicals, preservatives, used oil, pesticides acids, compounds of heavy metals and a broad range of industrial chemicals.

All these liquids or solids are included but not limited to being hazardous material.

(2) With all of the above mentioned hazardous material what happens when it all begins to trickle or run full bore when a heavy RAIN STORM hits Headquarters Dump??????

Sucker Creek is 1 1/2 miles from silver Lake to the Dump Footprint. From the middle of May to the middle of November, no water runs out of the lake. The 300 foot weir is dry. ANY AND ALL leachate that enters Silver Lake lays around in the bottom or suspended in the water. All the chemicals in the bottom never leave and pollute the water, kill fish, birds and animals.

There isn't any way that leachate from the Dump isn't going into Silver Lake. The only two things that are forever---------- are TAXES AND DEATH.

After an 8 year battle, COWSLIP (Clean Out Weeds Silver Lake Is Possible) promoted the county and WDOE to make up a grant for 2.6 million to put grass eating carp in the lake and build an access park with boat ramp, camping sites, picnic areas, fishing docks etc. This will help the family orientated lake recovery from the invasion of many weeds. WE DO NOT WANT TO LOOSE THE LAKE AGAIN.

DON BELDING, PRESIDENT
FRIENDS OF SILVER LAKE

Don Belding

I.

DEFINITION OF HAZARDOUS MATERIALS SUBJECT TO REGULATION

A. Types of Regulated Hazardous Materials.

A great variety of hazardous materials are now regulated by federal and state laws. These laws were passed because of increasing concern over the presence of hazardous materials in our environment, and the threat that such materials pose to human health. In fact, almost any chemical or other material that poses a potential threat to human health or the environment is now subject to regulation, whether or not it is a "waste." This part I discusses how these materials are defined and identified under the various regulatory schemes.

1. "Hazardous Substances" Under CERCLA and the Washington Model Toxics Control Act.

The most far-reaching liability schemes for the cleanup of hazardous waste sites are the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), also known as the federal Superfund law, and, in the State of Washington, the new Washington Model Toxics Control Act (Initiative 97). How these laws create liability for the cleanup of hazardous substances is discussed in part II of these materials.

CERCLA and the Model Toxics Act apply to a broad category of hazardous materials called "hazardous substances" that are present at inactive or abandoned waste sites. Although the terminology is the same, the scope of hazardous substances covered by the Model Toxics Act is broader than hazardous substances under CERCLA. For example, petroleum products are exempted from CERCLA, while they are expressly covered by the Model Toxics Act. Thus, the Model Toxics Act would apply to cleanup of petroleum contamination existing at a former service station site, while the federal CERCLA would be inapplicable. Section B below discusses how a particular material comes to be a hazardous substance under CERCLA.

2. "Hazardous Wastes" Under RCRA and the Washington Dangerous Waste Regulations.

The second major category of hazardous materials consists of "hazardous wastes" under the federal Resource Conservation and Recovery Act (RCRA) and the State of Washington Dangerous Waste Regulations. The important thing to remember about RCRA and the Dangerous Waste Regulations is that they provide for "cradle-to-grave" regulation of hazardous wastes at active facilities, rather than inactive waste sites. Thus, RCRA and the Dangerous Waste Regulations apply to ongoing activities that can range all

print shop and medical clinic. The definition of hazardous wastes under these laws is discussed in Section E below.

3. Other Hazardous Materials of Concern.

Although the liability and regulatory schemes discussed above are very far reaching, they do not cover the whole waterfront of hazardous materials. Certain hazardous materials are accorded special treatment under other statutes. These materials may, under certain circumstances, also be subject to CERCLA, the Model Toxics Act, RCRA and/or the Dangerous Waste Regulations. Included among them are:

a. Asbestos

b. PCBs

c. Petroleum products

d. Radioactive wastes

e. Agricultural pesticides

B. What Is a "Hazardous Substance" Under CERCLA?

1. Any Hazardous Substance Listed by CERCLA.

Many of the substances subject to CERCLA are listed by the federal Environmental Protection Agency (EPA) in a table that appears in the Code of Federal Regulations at 40 C.F.R. § 302.4. Hundreds of hazardous substances are listed by chemical names, along with their regulatory synonyms and various codes, including CAS registry numbers, RCRA waste numbers, and minimum reportable quantities. The list is far too extensive to be discussed in any detail at this point.

a. Criterion.

The criterion for listing a hazardous substance is that, when released into the environment, the substance may present substantial danger to public health, welfare or the environment. A broad variety of commonly used substances falls within this criterion, including but not limited to solvents, degreasers, cleaning fluids, drycleaning fluids, laboratory chemicals, radioactive sources, preservatives, a broad range of industrial chemicals, pesticides, acids, and compounds of heavy metals.

b. Reportable Quantities.

CERCLA requires that any person in charge of a vessel or a facility must immediately notify the National Response Center in Washington D.C., as soon as he or she has knowledge of any release of a hazardous substance in a quantity equal to or exceeding the reportable quantity in any 24-hour period. The telephone numbers for the National Response Center are 800-424-8802 or 202-426-2675. Thus, each CERCLA hazardous substance listed at 40 C.F.R. § 302.4 has a corresponding minimum reportable quantity expressed in both pounds and kilograms. These minimum reportable quantities can range all the way from one pound on up to 5,000 pounds, depending on the threat posed by the substance to human health and the environment. The term "release" is very broad and includes any spilling, leaking or other emitting of a hazardous substance into the environment, including the abandonment of barrels containing hazardous substances.

2. Any RCRA Hazardous Waste.

The Universe of hazardous substances under CERCLA also includes all materials identified as hazardous wastes under RCRA. A discussion of RCRA hazardous wastes is included in Section E below.

3. Any Hazardous Substance or Toxic Pollutant Designated Under the Clean Water Act.

The federal Clean Water Act regulates the discharge of pollutants from point sources into surface waters of the United States. The Act's state counterpart, the Washington Water Pollution Control Act, applies more broadly to the discharge of pollutants into surface and ground waters and even into the ground itself. Regulations issued by EPA under the federal Clean Water Act list hazardous substances and toxic pollutants that are also considered to be hazardous substances under CERCLA.

4. Any Hazardous Air Pollutant Listed Under the Clean Air Act.

Likewise, the federal Clean Air Act establishes a broad category of hazardous air pollutants that are listed in regulations published by EPA. These hazardous air pollutants are considered a subcategory of CERCLA hazardous substances. Thus, CERCLA applies not only to solid and liquid substances but also to gaseous and particulate matter in the air.

LIST-1-A: ABBREVIATED SITE LOCATION LISTIN Exhibit # 1 VERSION: 1

REGION: 10

EPA ID	SITE NAME	CITY NAME	CNTY NAME	CNTY CODE	NFA FLAG (C0304)
WA3891406339	USDOE-BPA COVINGTON SUBSTATION	KENT	KING	033	
WAD009487513	WESTERN PROCESSING CO INC	KENT	KING	033	
WAD067156489	WIDING TRANSPORTATION INC	KENT	KING	033	NFA
WA1170023419	NAVAL UNDERSEA WARFARE (4 AREAS)	KEYPORT	KITSAP	035	
WAD000711804	HANSVILLE LANDFILL	KINGSTON	KITSAP	035	
WAD028035137	CHEM SECURITIES SYSTEM INC	KIRKLAND	KING	033	NFA
WAD085197945	GOLDEN PENN OIL CO OF SEATTLE	KIRKLAND	KING	033	NFA
WAD980639298	KING CO - HOUGHTON LDFL	KIRKLAND	KING	033	
WAD051239960	PACIFIC CHEMICAL	KIRKLAND	KING	033	NFA
WAD980639108	KITTITAS CO - RYEGRASS BALEFILL	KITTITAS	KITTITAS	037	NFA
WAD980511851	UNIV OF WASHINGTON PACK FOREST DSPL SITE	LaGRANDE	PIERCE	053	NFA
WAD009490640	OSTROM MUSHROOM FARMS	LACEY	THURSTON	067	
WAD041333816	PACIFIC SAND & GRAVEL	LACEY	THURSTON	067	NFA
WAD980511612	SNOHOMISH CO - LAKE STEVENS LDFL	LAKE STEVENS	SNOHOMISH	061	NFA
WAD050075662	LAKEWOOD SITE	LAKEWOOD	PIERCE	053	
WAD000643437	WESTERN FARM SERVICES INC	LATAH	SPOKANE	063	NFA
WAD980665517	WHATCOM CO - CEDARVILLE LDFL	LAWRENCE	WHATCOM	073	NFA
WAD044110633	AMERICAN CYANAMID CO	LONGVIEW	COWLITZ	015	NFA
WAD980664443	COWLITZ CO - COAL CREEK DSPL (CLOSED)	LONGVIEW	COWLITZ	015	
WAD010745917	INTERNATIONAL PAPER CO WOOD PRODUCTS	LONGVIEW	COWLITZ	015	NFA
WAD009041443	LONGVIEW FIBRE CO	LONGVIEW	COWLITZ	015	NFA
WAD980639579	LONGVIEW, CY OF, GERHART GARDENS (OLD)	LONGVIEW	COWLITZ	015	
WAD980665145	OSTRANDER ROCK	LONGVIEW	COWLITZ	015	NFA
WAD980834501	RADACHOVICH LDFL	LONGVIEW	COWLITZ	015	
WAD098297831	REYNOLDS METAL - LONGVIEW CABLE PLANT	LONGVIEW	COWLITZ	015	NFA
WAD057068561	REYNOLDS METALS CO. LONGVIEW REDUCT.PLT	LONGVIEW	COWLITZ	015	NFA
WAD009041450	WEYERHAEUSER CO	LONGVIEW	COWLITZ	015	
WAD980722789	SILVER MOUNTAIN MINE	LOOMIS	OKANOGAN	047	
WAD980978365	ARNESSON LABOR CAMP	LYNDEN	WHATCOM	073	NFA
WAD070392345	BEDLINGTON LABOR CAMP	LYNDEN	WHATCOM	073	NFA
WAD980978423	EINSFIELD LABOR CAMP	LYNDEN	WHATCOM	073	NFA
WAD980978241	J. DOMMING PRIVATE WELL	LYNDEN	WHATCOM	073	NFA
WAD980835318	LYNDEN AIRPORT	LYNDEN	WHATCOM	073	NFA
WAD980978308	MEADOWDALE WATER ASSOC WELL	LYNDEN	WHATCOM	073	NFA
WAD057315624	NOOKSACK VALLEY DISP-LYNDEN TRANSFER STA	LYNDEN	WHATCOM	073	NFA
WAD009486651	LYNNWOOD PLATING INC	LYNNWOOD	SNOHOMISH	061	NFA
WAD991281866	GRANDVIEW, CY OF GRANDVIEW LDFL	MABTON	YAKIMA	077	
WAD980639736	MALTBY WAREHOUSE & FIELD	MALTBY	SNOHOMISH	061	NFA
WA8660030931	USEPA-MANCHESTER LABORATORY	MANCHESTER	KITSAP	035	
WA2170023426	USNAVY - NAVAL SUPPLY CENTER PUGET SND	MANCHESTER	KITSAP	035	
WAD047848122	KING CO - CEDAR HILLS LDFL	MAPLE VALLEY	KING	033	NFA
WAD980511745	QUEEN CITY FARMS	MAPLE VALLEY	KING	033	
WAD980986723	GOBER MARSHALL SEPTAGE SITE	MARSHALL	SPOKANE	063	
WAD980511794	SPOKANE CO - MARSHALL LDFL	MARSHALL	SPOKANE	063	NFA
WAD076635358	BIRINGER BERRY FARM	MARYSVILLE	SNOHOMISH	061	NFA
WAD980185789	BOEING COMPANY TULALIP TEST SITE	MARYSVILLE	SNOHOMISH	061	
WAD980639256	TULALIP INDIAN TRIBE - MARINE DSPL	MARYSVILLE	SNOHOMISH	061	
WA2570090066	USAF-MCCHORD AFB, AREA A	MCCHORD AFB	PIERCE	053	
WA1570090067	USAF-MCCHORD AFB, AREA C	MCCHORD AFB	PIERCE	053	
WA0570090068	USAF-MCCHORD AFB, AREA D	MCCHORD AFB	PIERCE COUNTY	053	
WA9570090069	USAF-MCCHORD AFB, AREA E	MCCHORD AFB	PIERCE	053	
WA5570090071	USAF-MCCHORD AFB, BLDG 1173	MCCHORD AFB	PIERCE	053	
WA6570090070	USAF-MCCHORD AFB, BLDG 792	MCCHORD AFB	PIERCE	053	
WAD078204021	INLAND FOUNDRY CO INC	MEAD	SPOKANE	063	
WAD000695508	KAISER ALUMINUM MEAD WORKS	MEAD	SPOKANE	063	
WAD980511661	MICA LANDFILL	MICA	SPOKANE	063	
WA1690553275	USDOT-FAA MICA PEAK	MICA	SPOKANE	063	
WAD980738025	B & L WOODWASTE FILL	MILTON	PIERCE	053	
WAD980723027	NORTH TACOMA LDFL	MILTON	PIERCE	053	NFA
WAD980639140	US GYPSUM CO MYLEBOS CR DUMP SITE	MILTON	PIERCE	053	
WAD980975957	MONROE LANDFILL	MONROE	SNOHOMISH	061	
WAD054655352	GOLTZ ROOFING	MOSES LAKE	GRANT	025	
WAD980664775	INTERNATIONAL TITANIUM	MOSES LAKE	GRANT	025	NFA
WAD988466355	OLD LARSON AFB-GRANT CO. APPT	MOSES LAKE	GRANT	025	
WAD980724165	NORTHWEST TRANSFORMER SERVICES CO (NORTR	MOUNTLAKE TERRACE	SNOHOMISH	061	NFA
WAD980664551	SKAGIT CO SEPTIC TANK LAGOON	MT VERNON	SKAGIT	057	NFA
WA2971590003	USAF - DEFENSE FUEL SUPPORT	MUKILTEO	SNOHOMISH	061	
WA2570024222	USAF- MAHAN AIR FORCE STATION	NEAH BAY	CHALLAM	009	
WAD980976229	KING 4 COAL CO. MINE, A	NEWCASTLE	KING	033	NFA
WAD980977250	NEWCASTLE MINE - AIR VENT	NEWCASTLE	KING	033	NFA
WAD980976104	NEWCASTLE MINE TIMBER SHOOT	NEWCASTLE	KING	033	NFA
WAD980723258	NEWHALEM DUMP	NEWHALEM	WHATCOM	073	NFA
WA0141190074	USDOI-BLM KABBA-TEXAS MINE	NIGHTHAWK	OKANAGAN	047	
WAD980639991	KING CO - CEDAR FALLS LDFL	NORTH BEND	KING	033	
WA5210890096	USA-COE-HAMILTON ISLAND LDFL	NORTH BONNEVILLE	SKAMANIA	059	
WAD980639116	ISLAND CO - HASTIE LAKE LDFL	OAK HARBOR	ISLAND	029	NFA
WAC980639173	ISLAND CO - OAK HARBOR LDFL	OAK HARBOR	ISLAND	029	
WAD060051356	MELCO MFG	OAK HARBOR	ISLAND	029	
WA5170990059	NAVAL AIR STATION WHIDBEY IS - AULT FLD	OAK HARBOR	ISLAND	029	
WA5170990058	NAVAL AIR STATION WHIDBEY IS-SEAPLANE BS	OAK HARBOR	ISLAND	029	
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	

Exhibit #1 "A"

To the Editor:

"All land disposal methods will eventually fail (Office of Technology Assessment: U.S. Government Printing Office). The only question is when. Sooner or later, any secured landfill will leak due to: tears in the plastic liners caused by machinery or freezing temperatures, from leachate (the liquid that filters through the solid waste) disintegration of the liner, from crushing of leachate collection pipes by the weight of the waste, from clogging of the perforations in the leachate collection pipes by debris, or from disruption of the protective cover by erosion, new construction, or subsidence.

In evaluating the safety of chemical dumps, it is necessary to look at the entire cycle--not just the storage of waste materials. The Weyerhaeuser industrial waste cycle is to begin with inspection at the marshalling facility. How will the debris be "inspected to ensure that no hazardous material is present?" As of 1985, Weyerhaeuser's Longview Division generated the following wastes (source: Wa. State Dept. of Ecology):

Waste #	Description	Toxicity Level
D001	Ignitibility	Hazardous
D007	Chromium	Hazardous (extraction procedure)
D009	Mercury	Extremely Hazardous (extraction procedure)
F005	At least one of the following: toluene, methyl ethyl ketone, carbon disulfide, etc.	Dangerous
K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving process using creosote and/or pentachlorophenol.	Dangerous to Extremely Hazardous
U212	Phenol, 2, 3, 4, 6 tetrachloro. Persistent, halogenated hydorcarbon.	Extremely Hazardous

How are these chemicals to be detected and extracted from solid waste? What other toxic chemicals will be present in various wastes from the construction industry and other mills in the area?

The next step is the transportation of the waste to the dump site: Weyco has stated that plans are to transport by rail. Just this month rail cars were dumped in the Longview area, and cars periodically de-rail on the Weyerhaeuser rail system. And we frequently read of illegal dumping enroute to waste facilities as waste generators try to cut costs, lured by large profits and lax law enforcement.

So far the waste products have been "handled" by several people: those who extract the materials from industrial waste "holding tanks", those who transport it to

the marshalling facility, those who inspect and remove certain materials, and those who transport by rail. Add to this those who handle the material at the dump site: those who unload, transport, bury, test, excavate, etc. This brings the total number of people involved in the landfill cycle to double digits, at least. What is the probability that "human error" will occur over a period of years?

Weyerhaeuser has "assured" the public that there will be no adverse effects on the environment. Given the odds for human and/or mechanical error and Weyerhaeuser's past waste disposal methods, logic points in the other direction.

Chemical waste is only safe if a number of systems work as they should, if a number of people act properly, if there is no mishandling of the waste, if there is no mechanical failure, and if no acts of God (such as weathering over time, freezing, or extreme weather changes) intervene. What are the odds? Sooner or later, the tip of the iceberg reveals the iceberg.

Linda K. Smith
Silver Lake
274-4004

Daily News 4-10-91

Exhibit # 1 B

speeding before spill, police say

By Andre Stepankowsky
The Daily News

The driver of the double tanker truck that jackknifed and spilled about 2,000 gallons of a hazardous chemical at the Longview Wye Wednesday lost control because he was speeding, the Washington State Patrol says.

The truck was traveling 57 mph around a curve on which the recommended speed is 40 mph, Sgt. Mike Murphy said today.

Investigators know the precise speed because the 1980 Freightliner is equipped with a continuous speed recorder, a device sometimes called a "tattle tale."

Murphy said the hitch connecting the main tanker truck to a trailing tanker was worn and rusted and perhaps could not withstand the strain of a high-speed turn.

"That tank was not fully loaded, so the weight shifted in the curve," Murphy said. "The strain on the connection was too much."

He said the driver, 51-year-old Kenneth G. Lamb of Seattle, was given a speeding ticket but no other charges are planned. Lamb was wearing a seat belt and was not injured.



Daily News photo by Roger Werth

District 2 firefighters and a crew from an environmental company clean up hazardous chemicals spilled Wednesday morning near the Longview Wye

Arrow Transportation Co. of Portland agrees that Lamb was driving too fast. Company safety director Bruce Leonard said Lamb has been suspended and may be fired, even though he had a clean driving record to this point.

But Leonard disagreed that the truck's hitch was in bad repair. In fact, he said, the hitch of the trailing tanker never detached from the steel cross-member that connected it to the leading tanker. The trailing tanker hit a highway divider in the turn, fell over and broke off the cross member from the lead tanker, Leonard said.

Murphy and Leonard each quoted a state Department of Transportation commercial vehicle safety inspector to back their statements.

Arrow Transport, which serves western Canada and the United States, has a fleet of 275 trucks.

The accident at 8:30 a.m. Wednesday occurred on an exit ramp leading from Interstate 5 southbound to Tennant Way in Kelso. It spilled about 2,000 gallons of liquid sodium chlorate, a highly explosive substance when dry, and a smaller amount of sodium dichromate, a known cancer-causing chemical.

Some of the chemical washed down drainage basins and into a wetland area to the north.

Cleanup efforts were expected to be finished this afternoon, said state Department of Ecology spokeswoman Jonna VanDyke. Rural Fire District 2 began the initial cleanup and containment, but Riedel Environmental Services Inc. of Portland is the main cleanup contractor.

VanDyke said crews are having to vacuum up soil and water in the marshland. They will dig up sediments near the drainage outfalls and take water and soil samples for tests to determine whether the cleanup is adequate, she said.

Crews even had to wash down the car of one motorist who crashed through barriers blocking off traffic.

The wetland, partially filled with Mount St. Helens sediment dredged from the Cowlitz River, is far from a pure waterway to begin with and does not contain much wildlife, VanDyke said. Rain runoff from the highway drains into it, which is like washing a greasy garage floor into a waterway.

"It wasn't exactly pristine to begin with," VanDyke said.

Arrow Transport must pay cleanup costs, which coupled with the cost of the lost cargo may total $30,000, Leonard estimated. The cargo was headed to Weyerhaeuser Co., which uses the chemical to bleach paper at its pulp mills.

VanDyke said DOE still is investigating the accident and does not know yet whether it will fine Arrow Transport.

Tennant Way — officially known as State Route 432 in that area — was open in both directions this morning. But the southbound off ramp remained closed.

Truck dumps liquid

Daily News 4-10-91

Chemical cleanup clogs traffic; I-5 exits closed

By Kathleen Reinholdt
and Julie McDonald
The Daily News

A semi-trailer truck jackknifed and spilled hundreds of gallons of a hazardous chemical onto a Longview highway this morning, sending emergency service workers and cleanup crews scrambling and blocking traffic for hours.

A massive cleanup effort was under way after about two-thirds of a 2,800-gallon tank of liquidluted sodium chlorate spilled on Tennant Way .est of the Harry Morgan Bridge. The mixture contained small amounts of another hazardous chemical, sodium dichromate, a known cancer-causing agent, said Don Elliott of Atochem North merica, the Tacoma manufacturer.

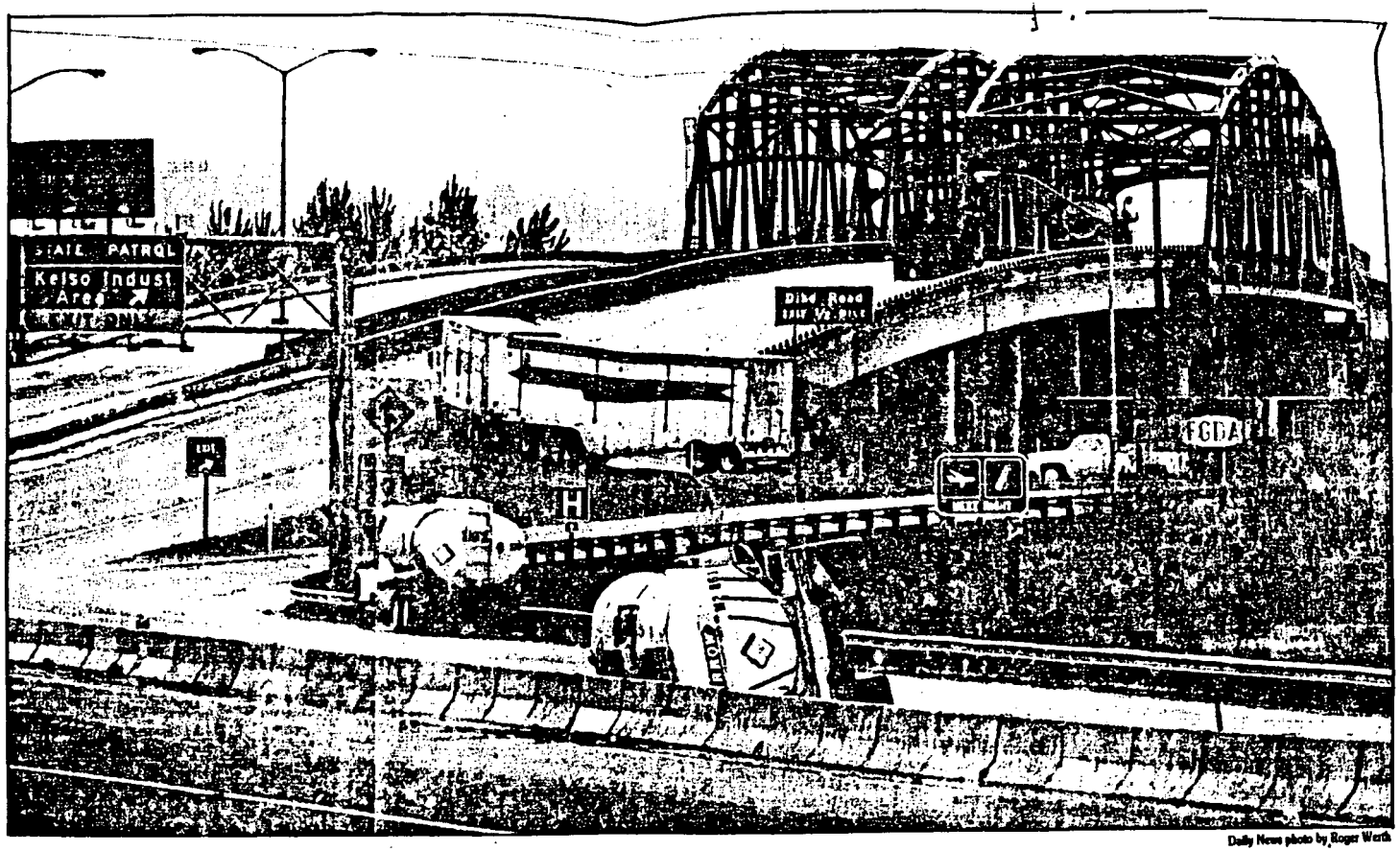
The liquid was being transported to the Weyerhaeuser Co. paper mill in Longview, where it is commonly used in paper bleaching.

Interstate 5 exits at the Longview Wye were likely to be closed much of the day because of the spill, officials said. Drivers forced to use alternate routes clogged streets in both Kelso and Longview this morning.

The incident began shortly before 8:30 this morning when the tanker-truck owned by Arrow Transportation Co. of Portland jackknifed sideways. The tank broke loose from the truck and ruptured.

The truck driver, Kenneth Lamb of Tacoma, was not injured. The Washington State Patrol had no indication this morning what may have caused the truck to jackknife.

A police officer overheard on a scanner this morning near Longview was sodium chlorate, made with small concentrations of sodium dichromate or bichromate.



Daily News photo by Roger Werth

Traffic near the Longview Wye is halted after a trailer flips, spilling liquid sodium chlorate onto the roadway. The hazardous material is used to bleach paper.

traffic was closed within an hour.

According to state patrol Lt. Louis Walker, emergency personnel were working as quickly as possible to dam off a highway catch basin near the spill. Walker said some of the liquid had already drained into the basin.

State fisheries and Coast Guard officials were being called to the scene, although Walker said he knew of no immediate risk of the contaminated water reaching nearby waterways.

Police and other emergency workers near the spill were required to wear protective suits and breathing apparatus to avoid direct contact.

Damp weather today was fortunate for cleanup workers having to deal with the spill.

Spilled chemical is used to bleach paper

Chemicals: The chemical that spilled this morning near Longview was sodium chlorate, made with small concentrations of sodium dichromate or bichromate.

Use: Sodium chlorate is a powerful oxidizing agent, which reacts with sulfuric acid to produce chlorine dioxide. The mixture is used to bleach pulp so paper will be whiter. Sodium dichromate is a material used to make sodium chlorate.

Quantity: The truck that tipped over held 2,800

Hazards: In its liquid form, sodium chlorate isn't flammable. But it can be combustible if it dries. In its dry state, it has the consistency of salt. In large quantities of dry powder, sodium dichromate or bichromate can kill fish and cause cancer in humans. However, the mixture in the truck was dissolved (six grams per liter) and diluted.

Cleanup: The chemicals can be vacuumed, soaked up with rags or absorbed by sand or a

Exhibit # 1 "E"

NORPAC

Employee Communications Meeting
3/26/90

Attendees:

Judy Werner	Roland Hill	Scott O'Neil
Irineo Gonzalez	Diana Baker	Keith McCauley
Dick Rasmussen	Pete Crosby	John Walkush
Ed Opitz	Fred Zambroski	Ron Blood

General Information:

1. Roland Hill, Irineo Gonzalez and Scott O'Neil introduced themselves and gave us a little background on their employment and families.

   Welcome aboard!

2. Quality issue - print quality. Jujo elevated the priority of improvement in letterpress print quality to #1. We're having problems with poor ink receptivity which translates to poor print quality.

   On the domestic side, Treasure Chest experienced a roll break problem with 64" rolls. This order appears to be a misapplication of newsprint. Twenty three rolls will be returned for testing. U.S.A. Today experienced poor runnability due to baggy rolls.

3. Safety - The incident rate at the end of February was 5.06. We had two recordables for February, like we did in January. Staff members and department representatives will be attending 2 days of training April 3 & 4 to learn the best ways to manage safety to help us move to departmental safety programs.

4. Project - It looks like everything is about on schedule for a start up of the De-Ink plant on April 1st. We may be pushed. The Paper Machine start up date of August is looking good. The budget is o.k. The next Project Review Meeting will be April 17. The Presidents of Rust & Beloit will be here.

5. Visitors - We have some important visitors coming the next two months. On May 2, the President of Jujo, Mr. and Mrs. Miyashita will be here. On May 24 the President of Yomiuri, Mr. Kobayashi (our biggest customer) will be at NORPAC. The next day he will be dedicating the friendship bell in Seattle. June 11, the Senior Executive of Asahi will be here.

Comment: The reliable methods is nice because you have a booklet for each position so if someone new comes in they can get the booklet and look through it.

Comment: It will be good also to get all crews doing things the same way.

Comment: People developing the reliable methods are the ones working the jobs. You get people involved from all crews and get the highest quality with best safety.

Question #18 Is NORPAC looking for new export customers?

Response: Our export is solely to Japan. When the mill first started we sold to Venezuela and Brazil due to market conditions. There is an agreement with Jujo and Weyerhaeuser that Jujo will handle the customers in the far east, not Weyerhaeuser. We're dealing with the West Coast and Japan. We would probably try to make more products if needed due to market conditions instead of going to other countries.

Question #19 Is NORPAC the largest in U.S.?

Response: No, we're the 4th largest in the world. Bowater Calhoun is the largest in the U.S.

Question #20 How many machines does Bowater Calhoun have?

Response: 5 or 6.

Question #21 Is Bowater just domestic?

Response: Yes.

Comment There's no place that will have 3 state of the art machines like we will have at NORPAC. We won't be that far behind Bowater in newsprint capacity when #3 is on line.

Question #22 Will #3 run strictly on recycled paper?

Response: No, we will use recycled on all 3 machines. California sales will go 40% de-ink and the rest of de-ink production will be divided up between production of other grades.

Question #23 How toxic is the De-ink? Will it go to Headquarters where they're trying to put in a landfill.

Response: We've done some lab analysis for toxics and heavy metals and they're virtually non-existent. Very easily landfill material. It will go to Headquarters.

Question #24 Isn't some of that used for potting soil?

Response: Yes, you can take sludge from the clarifier, Compost it and sell it as potting soil. The problem is you can get enough in a day to supply Washington. Also because it comes from the Chlorine Bleach plant, they have found a small amount of dioxin.

Fred
Fred Zambroski jaw

FZ:jaw

RESPONSE TO LETTER NO. 17

Don Belding, President
Friends of Silver Lake

1. The fact that a waste material may contain small amounts of hazardous constituents does not mean that the waste is a dangerous or hazardous waste as defined by state or federal regulations. To designate a waste material as a solid waste, versus a dangerous or hazardous waste, it is necessary to conduct laboratory tests specified by state law (WAC 173-303). Test results are reviewed by the Health District and Ecology. Required tests include chemical analyses, the toxicity characteristic leaching procedure (TCLP) protocol promulgated by EPA, fish bioassays, and oral toxicity tests on rats. All Longview mill wastes to be disposed at the proposed landfill have been tested, and test results indicate conclusively that the wastes are properly designated solid wastes, and are not dangerous or hazardous (Parker, 1990).

   Weyerhaeuser indicates that wastes proposed to be imported have also been tested and designated as solid waste. Wastes to be imported would be retested before disposal at the proposed landfill, and test results submitted to Ecology and the Health District for review.

   Throughout the life of the landfill, any new wastes to be disposed at the facility, or any changes in existing wastes, would be similarly tested and designated. Periodically, all wastes would be retested to ensure continued compliance with state law. Non-Weyerhaeuser generators would be required to show evidence that they have properly designated their wastes, and no waste would be accepted at the solid waste recycling and transfer facility without this showing. Further information on waste designation and waste acceptance criteria for the proposed landfill is now included in Section I.B.1.f(3), Waste Inspection and Acceptance Program. Also, see response to Letter No. 22, Comment 2.

   Dioxins and furans currently occur periodically at very low concentrations in the ash component of the Weyerhaeuser pulp mill waste that would be disposed at the proposed landfill. However, dioxins and furans have a very low water solubility, are strongly bound to soils and small particles, and are not easily leached. Therefore, it is unlikely that dioxins or furans would be present in the leachate from the proposed landfill at levels that would pose a significant risk to human health or the environment (see correspondence from BAS Laboratories Limited, 1992, in Appendix P of this EIS). In addition, Weyerhaeuser has implemented process improvements to reduce or eliminate dioxins and furans from its pulp mill wastes, and further improvements are planned.

   The 40 pages of attachments on the hazards of certain substances used at the Boise Cascade mill in St. Helen's, Oregon, and the ITT Rayonier mill in Port Angeles, Washington, have not been included in this Final EIS to reduce volume. This material will be retained by the Health District as part of the public record on the project, and is

available for review at the Health District office in Longview. See response to Letter No. 9, Comment 1.

2. See responses to Letter No. 9, Comments 10 and 17 and Letter No. 62A, Comment 1.

LETTER NO. 18

My name is Chet Gardner and I'm master of the Silver lake Grange.

(1) As you well know that the silver lake Grange has been a very outspoken opponit of this Proposal of the Weyerhaeuser Company to put a Dump or a so called Land Fill over across and upon Sucker creed; just a short ways from Silver lake.

Our Organization has passed several Resolutions; being opposed. These resolutions have been sent to the Cowliz-Wahkiakum Health District, and to the washington State Department of Ecology.

Now those resolutions were not made in jest.

(2) We consider the reply made to those resolutions by the Washington State Department of Ecology; the same as a binding contract.

On June 21, 1990 the Washington state Department of Ecology did promise

Major environmental and public health issues that must be addressed by Weyerhaeuser are.

1. Proctection of the water quality at Silver Lake.
2. Protection of existing wetlands on and near the project
3. Protection of the Transportation issues.
4..Protection of the Ground waters
5. Conform to the Cowlitz Solid Waste plan.
6. Conformance with Chapter 70.95

Then in reply to the Silver Lake Grange Resolution of March 28, 1991; The Washington State Department Of Ecology did State on July 1, 1991; to a letter addressed to Patric and Clara Wilkins.

Mind you our Resolution was sent on the last part of March 1991; but it took the Ecology Department until July 1, 1991 to gain an answer to people in the Silver Lake Area.
Anyway this is what Ecology said.
July 1, 1991 Concerns voiced by citizens and governmental agencies will be thoroughly considered during the solid waste permitting and SEPA process.

Now to us these letters are the same as a contract to us; they were accepted in good faith, We believed that the concerns that we expressed would be considered. THEY WERE NOT.

We see nothing in this Sepa process that takes into account the other studies that have been done on the condition of the water within Silver Lake.
This was a promise to our Grange that this would be done.

Also we have a third letter from the Washington State Department of Ecology. This letter states that.(During the course of this Review-SEPA Process, both agencies hope to address all concerns regarding the project which have been brought to light over the last few nonths.

We consider that from these letters we have a binding contract with the State of Washington. We consider this contract is binding upon the Washington State Department of Ecology. To proceed is a breach of Contract.

Many other items have been raised regarding this Dump that have not been addressed. WE URGE THERE CONSIDERATION NOW.

(3) There are other problems that have not been addressed in the SEPA report. What will the consistency of the fill material be--once the many cells are filled up. What would an earth quake of six on the rector scale do to the fill that is over 200feet deep and wet and slushy.

(4) How can Weyerhaeuser company be allowed to work in a Water Shed that has Co-Ho fry fish in it.

(5) Where is the aquifer study that we requested--I mean a real study that will include the barrow area.

(6) This SEPA report talks of a 20 year storm. why did it not address also a 50 year and a 100 year flood. Where does the excess water go in this case? If all of that water was cought, that may run off an open cell; say of 5 to 30 acres as the report says the Company intends to do with the 20 year storm; how may train tank cars will it take, for a 50 or 100 year storm.

(7) This IES does not address the Psychological problems left from mt.st
Last but not least it seams that the word MITIGATION is the most
(8) important word in this report,it is used over and over again.

I think I know why that word is utmost important to this SEPA report. It is used so often and why.

MITIGATE__according to the American Heritage Dictionary

TO MODERATE (a quality or condition) in force or intensity, to ALEVIATE. to become MILDER. Gentle, mild.

IN OTHER WOrds to let off the hook.

(9) Perhaps it would be well for the Cowlitz-Wahkiakum Heals District and the Washington State Department of ecology to review the Clean Water Act of 1987; Public Law 100-4 by the United states congress. Look to see what can be discharged into the now waters of the United States I really do not understand how this Application has advanced this far.

than you.

FROM SILVER LAKE REHABILITATION PROJECT, 1976 (ENTRANCO ENG. REPORT)

IV. BIBLIOGRAPHY

(1) Annon, 1946. Silver Lake - Cowlitz County; Preliminary Report; Problem. State of Washington Department of Game.

Bhagat, Surinder K., Gary C. Bailey, William H. Funk, Jerry E. Ongerth, John F. Orsborn. 1975. Study of Silver Lake Eutrophication - Current Problems and Possible Solutions. State of Washington Water Research Center, Washington State University and the University of Washington, Pullman, Wa.

Bortleson, G. C., N.P. Dion, J. B. McConnell and L. M. Nelson. 1976. Reconnaissance Data on Lakes in Washington. U. S. Geological Survey, State of Washington, Water Supply Bulletin, No. 43, Vol. 4.

Call, Willard A. 1974. Soil Survey of Cowlitz Area, Washington. U. S. Department of Agriculture, Soil Conservation Service in cooperation with Washington Agricultural Experiment Station. APO.

(2) Marvich, E. S. 1947. Reports on Fishing Lanes Cut in Dense Weed Beds at Silver Lake, Cowlitz County and Weed Control by Poison in Silver Lake, Cowlitz County. Fisheries Management Division, State of Washington Department of Game, Olympia, Wa.

Weinmann, Frederick C. 1973. Preliminary Report, Aquatic Weed Growth in Silver Lake. State of Washington, Department of Natural Resources, Surveys and Marine Land Management, Olympia, Wa.

(4) Wetzel, R. G. 1965. Techniques and Problems of Primary Productivity Measurements in Higher Aquatic Plants and Periphyton; in Primary Productivity in Aquatic Environments. C. R. Goldman (ed); University of California Press, Berkeley, Calif.

WSU (Washington State University). 1974. Summary of Existing Water Quality Data on Silver Lake, Cowlitz County, Washington. Environmental Engineering Division, Pullman, Wa.

HAVE NOT FOUND ANY OF THESE REPORTS

Resolution

WHEREAS: The Silver Lake Grange No. 105 is an Agricultural organization which was formed to promote the preservation of our Natural Resources and to represent the best interest of our members and neighbors.

AND WHEREAS: the Weyerhaeuser Company of Tacoma, Washington does propose to install a solid waste, (Industrial Waste) disposal site within Cowlitz County, In our Silver Lake water shed.

AND WHEREAS: there has been no less than three Ecological Studies of the Silver Lake Water Shed; to find ways to save Silver Lake from dying.

AND WHEREAS: each study that was done did recomend that the Company change it's logging practice within the fragile Ecological Water Shed of Silver Lake.

AND WHEREAS: there was a public meeting held at the Toutle Lake School on February 26, 1990, attended by some 150 residents of the Silver Lake area. The Weyerhaeuser Company did explain it's proposal for the development of the Solid Waste Site; not one person present, being a resident within the Silver Lake region expressed approval of the dump being established in our water shed. People were adamantly opposed to the project.

NOW THEREFORE: the Silver Lake Grange No. 105, does go on record as opposed to the establishment of any and all disposal of waste material within the Silver Lake Water Shed.

BE IT FURTHER RESOLVED: that copies of this resolution be sent to the other Subordinate Granges of Cowlitz County; to the Cowlitz County Pomona Grange; to the Washington State Grange; to the Board of County Commissioners of Cowlitz County; the Governor of the State of Washington; the legislators of the 18th and 19th districts of the State of Washington and our United States Congressmen and Senators in Washington D.C.

Adopted this 8th day of March, 1990.

Daniel E Hleeker

Master in the Chair; Silver Lake Grange No. 105

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

June 21, 1990

Chet F. Gardner
North Cowlitz Environmental Council
3148 Spirit Lake Highway
Silver Lake, Washington 98645

Dear Mr. Gardner:

Thank you for your letters to Governor Gardner and myself concerning the proposed Weyerhaeuser solid waste management facility near Silver Lake. The Governor has reviewed your letter and asked me to respond to you directly.

To date, the Department of Ecology has not received any plans for construction of the proposed "Headquarters Camp" landfill. It must be stressed that this project is still in the preliminary stages of planning and has many environmental and regulatory hurdles to cross before a permit for construction will be considered.

Major environmental and public health issues that must be addressed by Weyerhaeuser are:

1) Protection of the water quality at Silver Lake.

2) Protection of existing wetlands on and near the project.

3) Transportation issues for moving the waste from Longview and other areas to the project site.

4) Protection of the groundwater.

5) Conformance with the Cowlitz County Solid Waste Management Plan.

6) Conformance with State Waste Reduction and Recycling Requirements of Revised Code of Washington 70.95. This conformance is required as part of the solid waste comprehensive plan amendment to be produced by the Cowlitz-Wahkiakum Governmental Conference. This amendment is required in order to deal not only with the proposed Weyerhaeuser facility, but with other facilities within Cowlitz and Wahkiakum Counties.

The project proponents must complete a detailed engineering and hydrogeologic study of the site, apply for and receive a National Pollutant Discharge Elimination System (NPDES) permit, complete an Environmental Impact Statement (EIS), apply and receive a local air quality permit, and submit and have approved an amendment to the Cowlitz County Solid Waste Management Plan. All of these items must be satisfied prior to the applicant submitting an application for a solid waste permit.

I assure you that Ecology will thoroughly review all documents related to the proposed solid waste management facility to make certain it will not pose a hazard to human health or the environment.

Thank you for sharing your concerns with me. We will add your name to our mailing list regarding this issue.

Sincerely,

Christine O. Gregoire

Christine O. Gregoire
Director

COG:jca 0507-01.COG

cc: Kirk Cook

RESOLUTION

Whereas: The Silver Lake Grange #105 of Cowlitz County, Washington has long been a strong supporter of the many works of improvement that have been recommended to improve the water quality of Silver Lake, and has been a outspoken opponent to the proposed solid waste dump planned by Weyerhaeuser Company to be within the Silver Lake watershed.

And Whereas: Our Grange was informed by a letter from the Washington State Department of Ecology, in behalf of the Governor of the State of Washington, which letter was sent to the Worthy Master of the Silver Lake Grange.

And Whereas: This letter from the Washington State Department of Ecology states that there are many groups like our Grange who are very concerned about any potential negative environmental and aesthetic effects which may result from the construction and operation of the Sucker Creek landfill.

And Whereas: There have been no less than four (4) ecological studies made upon this lake and watershed.

And Whereas: These four studies are an accumulation of information and evidence as to what is causing the rapid eutrophication of Silver Lake, and likewise there is much evidence gained and available to the Department of Ecology from residents living within the Silver lake watershed that could lead to the arrest and conviction of persons responsible for this violation of the Clean Water Act of the State of Washington and the Clean Water Act of the United States of America.
Each study (of the four now complete) should show the accumulation of nitrate upon the bottom of Silver Lake. The last study shows that the fertilization accumulation now nears 2,000,000 pounds... in the first two inches of the bottom of the lake.

Now Therefor: The Silver Lake Grange #105, assembled in its hall on this 28th day of March, 1991, does strongly request that an earnest investigation be conducted; that this information be assembled, reviewed and verified, so legal action may be taken by the Department of Ecology against the violators.

Passed this 28th day of March, 1991.

Signed S/
Master

S/
Secretary

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

July 1, 1991

Patrick & Clara Wilkins
2505 S. Silver Lake Rd
Castle Rock, Washington 98611

Dear Mr. & Mrs. Wilkins:

Thank you for both of your letters to Director Christine Gregoire regarding the proposed landfill above Silver Lake. She has asked me to respond to you directly.

As the Silver Lake Grange resolution, dated March 28, requested, the Department of Ecology will thoroughly review all information pertaining to Silver Lake. Concerns voiced by citizens and governmental agencies will be thoroughly considered during the solid waste permitting and SEPA process. The process outlined in RCW 70.95 and WAC 173-304 are designed to ensure that a solid waste facility will be sited, constructed, and operated with as little negative impact to the environment and public as possible, within the constraints of current technology. The solid waste permitting process is administered by the local health department, with technical support from the Washington State Department of Ecology.

In the case of the proposed Headquarters Road Landfill, the Weyerhaeuser Company has submitted a solid waste permit application to the Cowlitz-Wahkiakum Health District (CWHD) for consideration. The CWHD is engaged in the first phase of the Environmental Impact Statement (EIS) scoping process, and has asked that the Department of Ecology be part of that review process. The purpose of this process is to solicit comments from the public and other agencies regarding the merits of the proposal. Thus far, issues regarding the facility siting criteria, transportation, water quality, wetlands, and design have been brought to the CWHD's attention and will be dealt with in the EIS. As you are aware, the Pollution Control Hearings Board has ruled on the appeal by the Weyerhaeuser Company regarding the conformance of the Headquarters's Road project with the Cowlitz County Solid Waste Comprehensive Plan. This ruling removes the major planning hurdle because the project was deemed in conformance with the plan as long as waste was not imported from outside either Cowlitz or Wahkiakum Counties.

Thank you again for sharing your concerns. If you have further questions, please contact Mr. Kirk Cook, Solid Waste Unit Supervisor in our Southwest Regional Office, at (206) 586-6484.

Sincerely,

Tom Eaton
Program Manager
Solid & Hazardous Waste

TE:gmz 052403 - 050701

cc: Christine Gregoire
Kirk Cook
Chester Gardner

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

March 5, 1991

Mr. Chester Gardner
3148 Spirit Lake Hi-Way
Silver Lake, Washington 98645

Dear Mr. Gardner:

Thank you for your letter to Governor Gardner regarding Weyerhaeuser Company's proposed landfill above Silver Lake. He has asked me to respond to you directly. Please accept my apology for the delay in writing to you.

The concerns in your letter, dated December 18, 1990, mirror those of several individuals, government agencies, and environmental organizations. These groups, like yourself, are very concerned about any potential negative environmental and aesthetic effects which may result from the construction and operation of the Headquarters Road Landfill. The Solid Waste permitting process will require that all concerns of the public and governmental agencies be voiced. This will ensure that not only this proposal, but any solid waste handling site will be sited, constructed, and operated in a manner which is wholly protective of public health and the environment.

The solid waste permitting process is administered by the local health departments, with technical support from the Washington State Department of Ecology. The process outlined in RCW 70.95 and WAC 173-304 are designed to ensure that a solid waste facility will be sited, constructed, and operated with as little negative impact to the environment and public as possible, within the constraints of current technology.

In the case of the proposed Headquarters Road Landfill, the Weyerhaeuser Company has submitted a solid waste permit application to the Cowlitz-Wahkiakum Health District (CWHD) for consideration. While the application is not complete, the CWHD has elected to review the application and subsequent supporting documentation for content and conformance with the solid waste permitting requirements contained in WAC 173-304-600. The CWHD has asked that the Department of Ecology be part of that review process. The purpose of the review is to determine from a technical, environmental, and public health standpoint whether the proposal has merit. During the course of this review, both agencies hope to address all concerns regarding the project which have been brought to light over the last few months.

Finally, as you are aware, the Pollution Control Hearings Board is considering an appeal by the Weyerhaeuser Company. The appeal is based on a determination by the CWHD that the Headquarters Road Landfill project is not in conformance with the local solid waste comprehensive plan. The CWHD was joined by the Department of Ecology in the opinion that a comprehensive plan amendment was needed before a solid waste permit could be issued. It must be stressed that the comprehensive plan issue is but one hurdle in the permitting process. Each requirement set forth by federal, state, and local jurisdiction must be satisfied before a permit could be issued.

Throughout the next few months there will be public hearings held on the State Environmental Policy Act issues, the Comprehensive Plan Amendment, and the Environmental Impact Statement. Public hearings will also be held regarding the U.S. Corps of Engineers 404 Permit, the Department of Wildlife Hydraulic Permit, and the issuance of the Solid Waste Permit.

If you have further questions please contact Mr. Kirk Cook, Solid Waste Unit Supervisor in our Southwest Regional Office, at (206) 586-6484.

Thank you for sharing your concerns.

Sincerely,

Christine Gregoire

Christine O. Gregoire
Director

COG:gmz 159138

cc: Governor Gardner
Kirk Cook

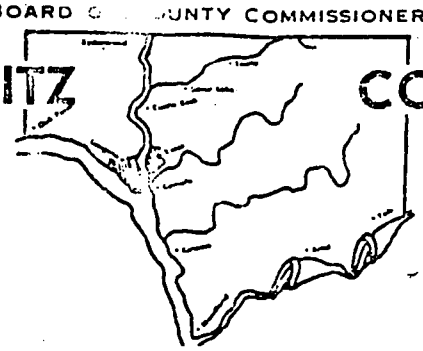
Daryl Jenkins presented the 1973 Alcoholism Services Plan Amendment for Cowlitz-Wahkiakum Counties for the second six month of 1973. He was directed to obtain the signatures of the Lower Columbia Council on Alcoholism and the C-W Coordinating Board before it was signed by the Board of County Commissioners.

Commissioner Gardner presented a copy of a letter to Governor Daniel J. Evans and requested that it be entered in the record.

8
970

BOARD OF COUNTY COMMISSIONERS

COWLITZ COUNTY



JAMES F. BERRY ..... DIST. NO. 1
BERNARD C. SCHEURICH ..... DIST. NO. 2

C F. GARDNER ..... DIST NO. 3
ELEANORE KOLSTAD ..... CLERK OF BOARD

KELSO, WASHINGTON 98626

September 7, 1973

Governor Daniel J. Evans
State Capitol
Olympia, Washington 98501

Dear Governor Evans:

Over our many years of public service in the State of Washington it is not too often that I have had the pleasure to call upon the Governor of the State for some assistance. A problem has arisen here in Cowlitz County which I deem to be of utmost importance for all of the constituency of the State of Washington and does have some rather interesting environmental considerations that truly warrants the cooperation of all departments.

I am sure that you have heard of Silver Lake in Cowlitz County. I am not sure that you have had the pleasure of venturing upon its waters and using it for recreational purposes. But certainly many people from Olympia have been down and enjoyed the lake. Silver Lake is a body of water about one mile wide and six miles long. Its average depth is about eight and one-half feet deep. This lake used to fluctuate between four to six feet annually. This shallow body of water has been plagued by weed growth for some time. It has been slow in the process of dying. Where there was once a few ownerships on the lake, there now abounds many hundred. In fact, a small town has nearly appeared at the east end of the lake thus adding to the problem of nutrients in the lake. We have a very active group of people who over the years worked on the stabilization program which was completed in 1971, which work was done by the U.S. Soil Conservation Service under Public Law 566. The people have formed their flood control district around the lake and pay an annual assessment for the works of improvement. There is a State park, "Seaquest", which affords annual recreation to literally hundreds of thousands of people. There are boat launching ramps both private and by the Washington State Game Department which afford access and until this year were heavily used.

Governor, it has been interesting to watch the life cycle and to watch the death of this body of water. Over the past four months it has been my pleasure to take many well informed people out on this body of water to try to analyze what actually is causing its now rapid death. These have included conservation specialists with WSU, acquatic weed specialists, legislators, assistant directors of game, our own health officer, and anyone else who may have a suggestion to help a decaying situation.

I believe you are in receipt of my communiques to Mr. George Weyerhaeuser in 1969 and likewise my follow-up communiques regarding the forest practices and the fertilization programs that the Weyerhaeuser Company did initiate in the headwaters of Silver Lake. Mr. Weyerhaeuser's letters have been most cordial but always sidestep the real issue of such forest practices within the watershed of such a deteriorated body of water. In 1969 the fertilization program disregarded the small streams feeding the lake and nitrate deposits from the helicopter fell well within these small streams. One helicopter can place well over 100,000 pounds of fertilizer in the watershed per day. As near as I can determine, well over 1,000,000 pounds of nitrates were placed in the watershed in 1969. The biologist, the acquatic weed specialist, the soil and water conservationist from WSU, and the nursery specialist that I have had the pleasure of conversations with the last four months, have all agreed that such a program will produce leaching of fertilizer, at least 10%, which must directly enter this already troubled body of water. Should their assumption be right, it would mean that over 100,000 pounds of a form of nitrate should have entered this body of water before this time.

On March 27, 28, 29, and 30, 1973, Weyerhaeuser Company once again proceeded to fertilize the watershed of Silver Lake. These are dates that I personally saw the fertilization program in process. It is my understanding that this year's program extended some twelve days and totally disregarded the shorelines of the lake. Herewith is enclosed a statement of the people who saw the fertilizer placed well within the lake itself. The weed growth this year has been astronomical. There has been a complete fish kill of the "small fry" or this year's spawn. As the nitrate moves through the lake in its normal flow, a rapid weed growth is very apparent. The rehabilitation at this time appears to be almost impossible when we realize that there could well be another 1,000,000 pounds of urea in the watershed and that with a likely 10% leachate or another 100,000 pounds to enter this body of water. Or let us cut that 10% margin down to 1% allowing only 10,000 pounds of urea leachate to enter this body of water and it becomes very apparent how impossible the task really is.

With these facts in mind one begins to realize the delicate margin on this earth between life and death. It is apparent that this body of water on this little parcel of earth is extending its hand to ask for help. And since it is

a parcel of life, it is quite obvious we can no longer ignore it. Therefore, I appeal to you for any assistance that your office can afford for the problem is so great now that the local people can no longer pack this burden alone. I extend to you a cordial invitation to come down to the lake for a first hand view of the situation. I am sure that you will find the people most receptive to any suggestions that you may offer. Any consideration given this matter will be greatly appreciated.

Sincerely,

C.F. Gardner

C.F. GARDNER, Commissioner
District No. 3

P.S. Samples taken Wednesday, August 29, 1973, on the very edge of Silver Lake have proven to be organic fertilizer with the following content remaining in the pellets and on the leaves under the trees:

Leaves		Granules
0.58%	Phosphorus	4.8%
0.16%	Nitrogen	1.4%

RESPONSE TO LETTER NO. 18

Chet Gardner, Master
Silver Lake Grange

1. Your opposition to the proposed landfill is noted.

2. Comment noted. All of the issues you list are addressed in the EIS. Potential impacts on Silver Lake water quality are addressed in Section II.A.3, Surface Water; impacts on wetlands in Section II.A.6, Wetlands; transportation issues in Section II.B.6, Transportation; potential impacts on groundwater in Section II.A.2, Groundwater; and conformance to the Cowlitz County Solid Waste Plan and RCW 70.95 in Section I.A.4, Consistency with the Comprehensive Solid Waste Management Plan and RCW 70.95. Section II.A.3, Surface Water, makes frequent reference to, and reflects the conclusions of, the *Final Report, Silver Lake Restoration Phase I: Diagnostic/Feasibility Study* by the State of Washington Water Research Center at Washington State University (Moore et al. 1990). This is the most recent and definitive study of the lake, and incorporates other relevant past data and information on the lake, such as Bhagat et al. (1975). The responses to Letter No. 11, Comment 8, Letter No. 62, Comment 9, Letter No. 62A, Comment 1, and Letter No. 69, Comment 13 are also relevant to your concern about the water quality of Silver Lake.

   With regard to letters received by the Health District during the EIS scoping process, see response to Letter No. 11, Comment 1.

3. In accordance with the MFS [WAC 173-304-130(2)(a) and (f)], the seismic regime and proximity to faults were considered in siting the proposed landfill. As discussed in Section II.A.1, Earth, slope and foundation stability analyses will be performed for the site during final design (that is, for Part 2 of the solid waste permit application). These analyses will consider potential failures of both the natural foundation and the constructed landfill under static and seismic loading conditions.

   The impacts of earthquakes on the landfill and liner system, as well as the impacts of pyroclastic flows, ash falls, and mud flows due to a blast from Mt. St. Helens, will be considered. The Mt. St. Helens fault zone is recognized as the closest identified Holocene fault to the site. The final design of the proposed landfill, including landfill height, side-slope steepness, and bottom grading plan, will reflect the results of these stability analyses. Standard geotechnical measures will be incorporated in the design to ensure stability under reasonably expected seismic conditions. Further information on the seismic characteristics of the Headquarters Site is included in Part 1 of the solid waste permit application, which is available for review at the Health District office.

   With regard to your question about the consistency of the fill material, the various waste types would differ substantially in moisture content. Those with high moisture content

would gradually dewater within the landfill. Dewatering liquid would be collected in the leachate collection system beneath the waste (see Section I.B.1.d(4)(b), Leachate Collection and Removal System).

4. Section II.A.5, Plants and Animals, has been revised to reflect the results of electrofishing surveys in July 1992 that found higher numbers of coho in Sucker Creek than were previously believed to be present (see response to Letter No. 10). With the proposed mitigation measures, the landfill would not be expected to significantly affect coho spawning and rearing.

5. Section II.A.2, Groundwater, discusses the potential impacts of the proposed landfill on the shallow aquifer system. Further information is provided in the geology and hydrogeology report submitted in support of Part 1 of the solid waste permit application (Sweet Edwards/EMCON, 1991c). The responses to Letter No. 8, Comment 1 and Letter No. 41, Comment 1 are also relevant.

6. All site drainage structures, including the diversion channel and sedimentation/detention ponds, will be designed to convey a 100-year peak flow event. In addition, final design calculations indicate that the sedimentation/detention basins would detain peak flows from all storm events up to and including the 100-year event following landfill closure and during all interim development stages. Detained stormwater would be released at a rate no greater than the existing peak runoff rate from the site.

   The proposed design reflects the recommendation of Ecology (see Letter No. 71, Comment 4), and meets or exceeds stormwater management criteria and guidelines established by the Washington Department of Fisheries Habitat Management Division (*Stormwater Management Interim Criteria and Guidelines for Protection of Stream Channels and Aquatic Life*, January 1990) and Ecology (*Stormwater Management Manual,* February 1992). These criteria and guidelines were established to maintain the integrity of downstream systems and prevent significant adverse impacts from hydrologic modification, sedimentation, or decreased water quality. A draft plan for stormwater management has been reviewed by Ecology and will be included in the final NPDES permit application. Coverage under an NPDES permit is a condition to construction.

   The response to Letter No. 9, Comment 10 is also relevant to your concern about leachate holding capacity.

7. Psychological problems left over from the eruption of Mt. St. Helens are not considered relevant to the purpose or content of this EIS.

8. You are correct that "mitigation" is an important word in any EIS. The SEPA Rules require that an EIS identify mitigation measures, if any, for identified probable significant adverse impacts. The use of the word "mitigation" in this EIS is consistent with the definition in the SEPA Rules (WAC 197-11-768).

9. See response to Letter No. 43.

LETTER NO. 19

Lower Columbia College

1600 Maple • P. O. Box 3010 • Longview, WA 98632-0310 • Phone (206) 577-2300

Cowlitz-Wahkiakum Counties
AUG 2 6 1992
Health District

HEALTH DISTRICT PUBLIC HEARING ON WEYERHAEUSER APPLICATION FOR SOLID WASTE PERMIT

As an educator and college president, I am aware of the benefits to a community of the presence of a strong industrial base. Weyerhaeuser Company has provided a foundation for economic strength in Southwest Washington for many years. Its continued presence as a healthy and competitive industry is critical, not only to the economic vitality of our community but also to its overall quality of life.

I recognize that the development of the sanitary landfill is linked to the modernization of the pulp plant, which, in turn, is linked to the long-term welfare of our community. That this modernization go forward is even more important to us now that Trojan will be closed in 1996. Resolution of the landfill issues in a prompt, constructive manner also is essential. I am encouraged by the environmental impact statement prepared by the Cowlitz-Wahkiakum Health District and its consultant. It seems to me that the issues have been thoughtfully and carefully addressed. I encourage the Health District to give timely and favorable consideration to the request before it for the solid waste permit.

Vernon R. Pickett
President

RESPONSE TO LETTER NO. 19

Vernon R. Pickett, President
Lower Columbia College

Your support for the proposed landfill is noted.

RESPONSE TO LETTER NO. 18

Chet Gardner, Master
Silver Lake Grange

1. Your opposition to the proposed landfill is noted.

2. Comment noted. All of the issues you list are addressed in the EIS. Potential impacts on Silver Lake water quality are addressed in Section II.A.3, Surface Water; impacts on wetlands in Section II.A.6, Wetlands; transportation issues in Section II.B.6, Transportation; potential impacts on groundwater in Section II.A.2, Groundwater; and conformance to the Cowlitz County Solid Waste Plan and RCW 70.95 in Section I.A.4, Consistency with the Comprehensive Solid Waste Management Plan and RCW 70.95. Section II.A.3, Surface Water, makes frequent reference to, and reflects the conclusions of, the *Final Report, Silver Lake Restoration Phase I: Diagnostic/Feasibility Study* by the State of Washington Water Research Center at Washington State University (Moore et al. 1990). This is the most recent and definitive study of the lake, and incorporates other relevant past data and information on the lake, such as Bhagat et al. (1975). The responses to Letter No. 11, Comment 8, Letter No. 62, Comment 9, Letter No. 62A, Comment 1, and Letter No. 69, Comment 13 are also relevant to your concern about the water quality of Silver Lake.

   With regard to letters received by the Health District during the EIS scoping process, see response to Letter No. 11, Comment 1.

3. In accordance with the MFS [WAC 173-304-130(2)(a) and (f)], the seismic regime and proximity to faults were considered in siting the proposed landfill. As discussed in Section II.A.1, Earth, slope and foundation stability analyses will be performed for the site during final design (that is, for Part 2 of the solid waste permit application). These analyses will consider potential failures of both the natural foundation and the constructed landfill under static and seismic loading conditions.

   The impacts of earthquakes on the landfill and liner system, as well as the impacts of pyroclastic flows, ash falls, and mud flows due to a blast from Mt. St. Helens, will be considered. The Mt. St. Helens fault zone is recognized as the closest identified Holocene fault to the site. The final design of the proposed landfill, including landfill height, side-slope steepness, and bottom grading plan, will reflect the results of these stability analyses. Standard geotechnical measures will be incorporated in the design to ensure stability under reasonably expected seismic conditions. Further information on the seismic characteristics of the Headquarters Site is included in Part 1 of the solid waste permit application, which is available for review at the Health District office.

   With regard to your question about the consistency of the fill material, the various waste types would differ substantially in moisture content. Those with high moisture content

LETTER NO. 20

J.H. KELLY, INC.

August 25, 1992

Cowlitz-Wahkiakum Counties
AUG 26 [illegible]
Health District

Mr. David Riggs
Director of Environmental Health
Cowlitz Wahkiakum Health District

Re: Weyerhaeuser's Headquarters Camp Disposal Facility
Support for Issuance of Solid Waste Permit

PREPARED STATEMENT FOR PUBLIC HEARING

As a long time local resident and business owner, I've followed with interest Weyerhaeuser's approach to solving its long term need to be responsible for its own solid waste. I've also followed with interest Weyerhaeuser's decision making process regarding its future in Longview. The long term economic benefits to the community are obvious if they proceed with their plans to modernize their pulp mill. I firmly believe that gaining control of and responsibility for their solid waste is a key element in Weyerhaeuser's decision on whether or not to proceed with the modernization. Therefore, the long term economic benefits of granting a Solid Waste Permit are also obvious to me.

Throughout their process to find the best possible location for a disposal facility, I've been impressed with Weyerhaeuser's determination to find the most environmentally sound site that's possible. I'm not surprised, therefore, that the Draft Environmental Impact Statement concludes that Weyerhaeuser's plan to develop the Headquarters Camp site is an environmentally sound one.

I fully support the issuance of a Solid Waste Permit for the Headquarters Camp site.

Dan Evans
President and CEO

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD WE ARE AN EQUAL OPPORTUNITY EMPLOYER

RESPONSE TO LETTER NO. 20

Dan Evans, President and CEO
J.H. Kelly, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 21

Cowlitz-Wahkiakum Counties

AUG 26 1992

Health District

Patrick C. Wilkins
2505 S. Silver Lake Rd.
Castle Rock, WA 98611
August 26, 1992

Cowlitz/Wahkiakum Health District
1516 Hudson
P.O. Box 458
Longview, WA 98632

Re: DEIS, Weyerhaeuser Company's
proposed dump at Headquarters Camp.

Proponents of Weyerhaeuser's proposed Headquarters Camp dump were profuse in their praise of the company at the Draft Environmental Impact Statement hearing held last night in Longview. Much of the testimony was not directed specifically to the DEIS, so I hope opponents tonight will be granted the same latitude.

Proponents say they believe Weyerhaeuser "has really done its homework" on the dump planning and that there will be no significant environmental harm from its being placed in the Silver Lake watershed. They say they trust Weyerhaeuser.

Well, this company in which they have placed their trust, recently was called the worst polluter in the state and the second worst in the nation by the Environmental Protection Agency. This is also the company that in 1991 narrowly escaped felony prosecution in connection with the dumping of paint in the Chehalis River. Plea bargaining reduced the charges to five misdemeanors. But even at the misdemeanor level the fine was half a million dollars.

Closer to this project the North Cowlitz Environmental Council produced a video documentary in the spring of 1990 expressing concern about Weyerhaeuser's environmental track record:

Culverts on Sucker Creek that blocked fish passage; an inactive but open debris dump at the company's Green Mountain mill; a tire dump in an old rock quarry near the proposed landfill; the company's contribution to Longview's polluted drainage ditch/slough problem. And Weyerhaeuser's contribution to the pollution problems of Silver Lake.

Weyerhaeuser responded to that criticism. A new water level culvert was installed on the south fork of Sucker Creek. Another on the main stem of the stream was simply removed. The dump at Green Mountain mill was capped with several feet of sand. That's commendable. But why must it be up to the public to point out such environmental wrongs, before they are made right?

Also, it appears the effluent situation at Longview has not improved. And Weyerhaeuser has not contributed to the betterment of Silver Lake.And were it not for the fire closure of the area, I could, today, lead you to another long-forgotten tire dump, an active rock quarry operation on the south fork of Sucker Creek, another culvert that is a barrier to fish passage, and a waste debris dump in a rock pit where the waste was simply bulldozed up the banks when the pit was reopened for rock production, and the clearcut of the very headwaters of Sucker Creek.

In the dump siting process itself there have been things to set off questions about the appearance of fair play.

Weyerhaeuser's environmental chief who chaired the Cowlitz/ Wahkiakum Solid Waste Advisory Committee at a time when the company had filed its first application for the dump. And who suggested Weyerhaeuser could supply the language for any needed amendments to the solid waste plan.

The current head of the Department of Ecology, the agency which has embraced Weyerhaeuser in production of the dump, who previously was the head of the state's Department of Community Development at the time when that agency approved 90-million dollars worth of port development bonds for Weyerhaeuser projects, including the dump.

The current project manager for the Headquarters landfill who was previously employed by the Department of Ecology.

I'm not suggesting that these individuals have been, or are, doing anything wrong. In fact, for my part I think they've just moved on to new jobs. But I hope they would be as sensitive to the appearance of conflict of interest as they would be if I were to stand up here and say they all ought to be in jail. And they should not be surprised if such appearance of conflict of interest gives rise to the appearance of suspicion and setting off questions about the appearance of fair play amongst dump opponents. Are we getting fair play?

In February of 1990 when Weyerhaeuser first announced its plan, it also wanted to ban recording of that meeting. Yet the company claims it wants an open dialogue about its proposal.

In August of 1992 at the initial meeting of a citizens committee to study the Silver Lake watershed, the Weyerhaeuser representative demanded a ban on recordings, including videotape photography. Yet the company claims it wants an open dialogue about its proposal.

In the first week of September 1992 a meeting is scheduled in Olympia between Weyerhaeuser, various agencies, and a company that specializes in the type of planning and work it would take to rechannel the south fork of Sucker Creek. Here's a great chance for open dialogue, but not one opponent has been invited to that meeting.

In short, I don't think Weyerhaeuser really cares about the people who really care about Sucker Creek and Silver Lake. And I think the Draft Environmental Impact Statement, rather than pointing to a safe dump operation , details a proposal for potential environmental disaster.

Sincerely,

Pat Wilkins
NCEC Bd member

RESPONSE TO LETTER NO. 21

Pat Wilkins, Board Member
North Cowlitz Environmental Council

Comments noted.

LETTER NO. 22

I

8/26/92
Silver Lake.

David Rapp: Cowlitz - Wah Health Dist.

Draft Environmental Impact Statement:

(1) the fact sheet of the Draft EIS, second paragraph "the proposed landfill would have the capacity of approximately 45.8 cubic yards of in-place waste, etc. We hold you to that figure. 45.8 cubic yards.

(2) The fact sheet also states (3rd paragraph): the landfill would accept only forest products manufacturing waste and construction + demolition waste from Weyerhaeuser operations in Cowlitz - Wah. Counties, as well as similar waste from other generators in the two-County area. No hazardous, dangerous or municipal waste would be accepted. We will hold you to that also. Who will monitor this waste [illegible]?

(3) Who will monitor the noise. I now hear logging practice Tooting 8 - 10 miles away. Who decides if the noise to my ears is Negligible Weyer Co. or Me?

④ Stability: I sent alot of material on Mt St Helens, an earthquake fault near by, information on earthquakes in the Northwest. but the Draft EIS just skimmed over stability of the site. Yet it sets nearly 500 above Silver Lake, a lake made by Mt. St. Helens.

⑤ the railroad; will it last 30-50 years more? Even though the Federal Govt. ~~mandated upon~~ grading the rail line, still wrecks. I have lived most of my life 500 ft from that line + I know when that train runs, when they have wrecks, as usual Weyerhaeuser is not giving out the true facts.

⑥ What kind of tank cars are they going to use? The California spill last fall used double liner tank cars which punctured. Disaster!! Leachate into Ostrander Creek, Sucker Creek, Cowlitz River.

⑦ What kind of rail cars to bring the different wastes up to headquarters proposed dump? Weyerhaeuser now takes the

Drinking sludge to Roosevelt [illegible] & you guess it - only a tarp over the waste. And we are to believe, weigen - the Health Dept & D.O.E who went over this draft before publication. These questions have been asked before and never answered

(8) the Gas monitoring system would not be put into operation until it becomes dangerous to the public. In fact it sounds like it would not be there until there would be problems. Does not the Resource Conservation & Recovery act (RcRa) cover that? Who will monitor the methane gases? who will say its over/under 5% Volume at the property boundries? also who will monitor the oxygen?

(9) The support facilities - there is a complaint filed at D.O.E we are told on the PCB's at Hoffs Camp - that has to be check into. ——

(10) IV

You, sir said not to ask questions.
We have to keep asking questions because
Weyerhaeuser & has never put in a dump
before - they don't know the answers -
So we will continue to ask questions -
over & over & over again

But the main question: Is
why did Cowlitz-Wahkiakum Health District
& Dept of Ecology approve such a deficient
Draft Environmental Impact Statement?

[illegible]
North Cowlitz Environmental
Coalition

President most of the time
since 1985.

RESPONSE TO LETTER NO. 22

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. The Fact Sheet has been corrected.

2. The EIS has been revised to reflect the fact that solid waste from Weyerhaeuser operations outside Cowlitz and Wahkiakum Counties would be imported to the proposed landfill (see response to Letter No. 8, Comment 3). Weyerhaeuser's solid waste permit application specifies that no dangerous, hazardous, or municipal waste will be accepted at the landfill, and the solid waste permit would include that same limitation. The Cowlitz-Wahkiakum Health District would monitor incoming waste on a regular basis, in addition to the daily monitoring by Weyerhaeuser operations personnel. Additional information on waste inspection and waste acceptance criteria is now included in Section I.B.1.f(3), Waste Inspection and Acceptance Program. Also, see response to Letter No. 17, Comment 1.

3. Noise from all project sources, including train operations, was evaluated in accordance with EPA guidelines designed to evaluate the significance of increases in community noise levels. Project-generated noise would be below the level considered significant under these guidelines. This does not mean that noise from trains and other landfill-related operations would not be audible at times to some individuals. Because no significant increases in community noise levels are expected, no noise monitoring is proposed. As discussed in Section II.B.1, Noise, the Federal Railroad Administration would monitor train operations to ensure that they meet federal noise emission standards. Also, see responses to Letter No. 26, Comments 5 and 6.

4. See response to Letter No. 18, Comment 3.

5. See responses to Letter No. 69, Comments 13 and 25.

6. See response to Letter No. 69, Comment 13.

7. See response to Letter No. 1, Comment 3.

8. See responses to Letter No. 9, Comments 3 and 11.

9. See response to Letter No. 44, Comment 2.

10. Comment noted. As lead agency, the Cowlitz-Wahkiakum Health District has sole responsibility for the contents of the EIS. Numerous revisions have been made in response to comments on the Draft EIS.

LETTER NO. 23

L.K. Comstock & Company, Inc.
A COMSTOCK GROUP COMPANY
since 1904

COWLITZ-WAHKIAKUM
COUNTIES
AUG 28 1992
HEALTH DISTRICT
LKC92-109

August 24, 1992

Cowlitz-Wahkiakum Health District
1516 Hudson Street
Longview, WA 98632

Attn: **David Riggs**
Director of Environmental Health

Subject: **Weyerhaeuser Company - - Headquarters Camp**
Solid Waste Disposal Facility

David,

This letter is written in support of the above mentioned facility which we feel is an important part of the long-term solution to Cowlitz County's solid waste issues.

Weyerhaeuser has plans for mill modernization with which the solid waste disposal facility is intimately tied and will determine Weyerhaeuser's ability to compete in the future market of the pulp and paper industry. Being a major employer in our local area, this is important to the future job market and long-term economic health of both the community and local business.

We support Weyerhaeuser's efforts to impliment/construct and utilize a state-of-the-art solid waste disposal facility which is designed to meet or exceed all regulations and agree with the studies that have determined Headquarters Camp as the optimal site for such a facility.

Very truly yours,
L. K. Comstock & Company, Inc.

Douglas D. Orcutt
Vice President

kh

RESPONSE TO LETTER NO. 23

Douglas D. Orcutt, Vice-President
L.K. Comstock & Company, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 24

Cowlitz Clean Sweep Inc.

340 OREGON WAY, SUITE C
LONGVIEW, WASHINGTON 98632
(206) 423-6316

COWLITZ-WAHKIAKUM COUNTIES
AUG 28 1992
HEALTH DISTRICT

August 26, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz - Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Subject: Weyco Landfill Proposal - EIS Comments

Dear Mr. Riggs:

(1) Like all businesses we have to reduce our generated waste streams by waste reduction, consolidation and continous recycling efforts.

However, there will always be a need for wastes that are non-hazardous to be disposed or handled in some manner as presented to you by Weyerhaeuser Company. By allowing Weyerhaeuser to operate its own site facility. We will be a more self-supporting community based on the following points;

1. Weyerhaeuser will only place non-hazardous materials on their site allowing easier responsible management of such waste streams locally as oppossed to operating a facility outside our community.

2. By monitoring and operating stipulations, Weyerhaeuser would be managing their own non-hazardous materials site, which would be a private landfill for such needs.

(2) As compared to other landfills, that take many other generators waste streams, and mix such wastes together the Weyerhaeuser site could be managed more efficiently as having only one source, and or generator.

(3) 3. The draft EIS supports that this landfill would meet or exceed landfill requirements for that such as municipal landfills even though these standards are well above the required for wood waste sites.

(4) Also, the EIS addresses worst case scenarios none of which would have significant impacts on the environment of surrounding habitats.

This landfill will be on private lands with several buffer zones that would again reduce the aesthetic impacts that other landfills such as municipal sites, simply cannot offer.

(5) 4. Finally - by allowing Weyerhaeuser to operate their private facility this insures the financial responsibility that the owner must provide at their expense for such requirements. That protect the environment and related habitats - without any burdens to the local tax payers.

I myself live next to a closed landfill that did not have minimum functional standards such as imposed on sites today - as well as other sites here in the county.

Weyerhaeuser's proposed wood waste facility cannot even be compared to other landfills, especially the one I live next to. As this site would be a step in the right direction for proper waste management practices.

Thank you,

Jeff Wilson

Jeff Wilson,
President, CCS Inc.

RESPONSE TO LETTER NO. 24

Jeff Wilson, President
Cowlitz Clean Sweep, Inc.

1. Comments noted.

2. In addition to its own waste, Weyerhaeuser is proposing to also accept similar types of waste from third-party generators in Cowlitz and Wahkiakum counties.

3. The proposed landfill is considered a "limited purpose landfill" rather than a wood waste landfill for purposes of applying the Minimum Functional Standards for Solid Waste Handling (MFS). As discussed in Section I.B.1.a, Project Overview, the proposed landfill would be designed and operated in accordance with the MFS. However, a variance would be needed from the locational standard that prohibits locating a landfill's active area in a wetland (see responses to Letter No. 9, Comment 4 and Letter No. 38, Comment 6). The proposal goes beyond the MFS requirement for a buffer zone.

4. The EIS concludes that a spill from a leachate tank car into Sucker or Ostrander creeks at low flow would have a significant adverse impact on water quality and aquatic resources. However, as noted in the response to Letter No. 69, Comment 13, the probability of occurrence of such a spill is so low that the potential for significant adverse impacts could be considered remote and speculative. For further discussion, see Section II.A.3, Surface Water. With regard to buffer zones, see the last sentence of response to Comment 3.

5. Comment noted.

LETTER NO. 25

140 Evans Rd.
Toledo, Wn.
98591

Cowlitz/Wahkiakum Health Dist.
1516 Hudson
Longview, Wn.

Dear Sirs:

I am a Toledo resident and love Silver Lake and the Seaweedsy area that drains into it. Our family has camped, and recreationed around it for over 40 years.

We have closely followed the pros & cons of the proposed Weyerhaeuser dumpsite that would possibly contaminate and pollute Silver Lake and Sucker Creek.

I feel Weyerhaeuser is a "great" company that has provided good employment and jobs for hundreds and hundreds of our area's citizens. They also have been wonderful to the public about opening their lands to the hunting and recreation which we all enjoy and should appreciate.

I have no preferences as to whether the site be established or not - Nobody likes a dump site, but we know there has to be one somewhere.

If it is "safe" put it there, but if there is a possibility of contamination to the Lake - No -

(over)

You are the peoples representatives to determine the safety factors and the responsibility lies with you and your knowledge of the job, which I feel, is a specialty area not common to most of us out here.

We trust you to make the right decision for all our sakes and know you would also feel badly if the decision were wrong.

Just want you to know I support whatever decision you and responsible agencies decide.

Best wishes

Gary Springer

COWLITZ-WAHKIAKUM
COUNTIES

AUG 28 1992

HEALTH DISTRICT

RESPONSE TO LETTER NO. 25

Gary Springer

Your support for agency decisions on the proposed landfill is noted.

MR. DAVID RIGGS
DIRECTOR OF ENVIRONMENTAL HEALTH
COWLITZ-WAHKIAKUM HEALTH DISTRICT
LONGVIEW, WASHINGTON

8-27-92

COWLITZ-WAHKIAKUM COUNTIES

AUG 31 1992

HEALTH DISTRICT

RE: COMMENTS ON (DEIS) DRAFT ENVIRONMENTAL IMPACT STATEMENT.

DEAR MR. RIGGS:

I KEN HENDERSON ALONG WITH NUMEROUS PROPERTY OWNERS AND RESIDENTS OF THE SO. SILVERLAKE RD. AREA BETWEEN HEADQUARTERS RD. AND HEADQUARTERS CAMP ARE DEEPLY CONCERNED OVER THE FOLLOWING SIGNIFICANT IMPACTS OF THE (DEIS) STATEMENT WHICH HAS COMPLETELY IGNORED THE HEALTH, WELFARE AND RIGHTS OF THE COMMUNITY.

(1) . . . . LOSS IN PROPERTY VALUE:
(2) . . . . NOISE AND ODOR:
(3) . . . . HEALTH AND WELFARE:

(4) FOR THE LAST 2 YEARS, THE RESIDENTS OF THIS AREA HAVE BEEN GOING THROUGH A STRESSFULL PERIOD OVER THE IMPENDING LANDFILL SITE, ONLY TO FIND THAT THEIR COMMENTS HAVE FALLEN ON DEAF EARS AND HAVE BEEN COMPLETELY IGNORED BY THE BUREAUCRACY.

(5) THE STATEMENT CONCLUDES THAT THE RESIDENTS WOULD EXPERIENCE SHORT TERM IMPACTS FROM ADDITIONAL TRAIN NOISE.

THE FACT IS; THEY ARE TALKING ABOUT 50 YEARS OF TRANSFERRING WASTE THROUGH A GROWING COMMUNITY ON A RAIL LINE THAT RUNS WITHIN 35 FEET OF SO. SILVERLAKE RD. AND WITHIN 40 YARDS OF ACTUAL RESIDENCES.

SEE FIGURE 3 ... RESIDENTIAL AREA MAP ... (ATTACHED)

CONT.

(6) THE LAST 2-MILES OF R.R. TRACK HEADING TO HEADQUARTERS CAMP MUST BE RELOCATED, AND A COMPLETELY PRIVATE ROAD RUNNING ADJACENT THE TRACKS BE ESTABLISHED FOR ROAD ACCESS.

SEE FIGURE 3... RESIDENTIAL AREA MAP... (ATTACHED)

RESIDENTS ARE ALREADY TALKING OF IMPENDING LAWSUITS. THIS ISSUE MUST BE ADDRESSED AND ACTED UPON.

WEYERHAEUSER MUST MAKE THESE CONCESSIONS. THEY ARE TALKING ABOUT 50 YEARS. IF THIS CONCESSION CANNOT BE MET; THE LANDFILL MUST BE DENIED.

SINCERELY,

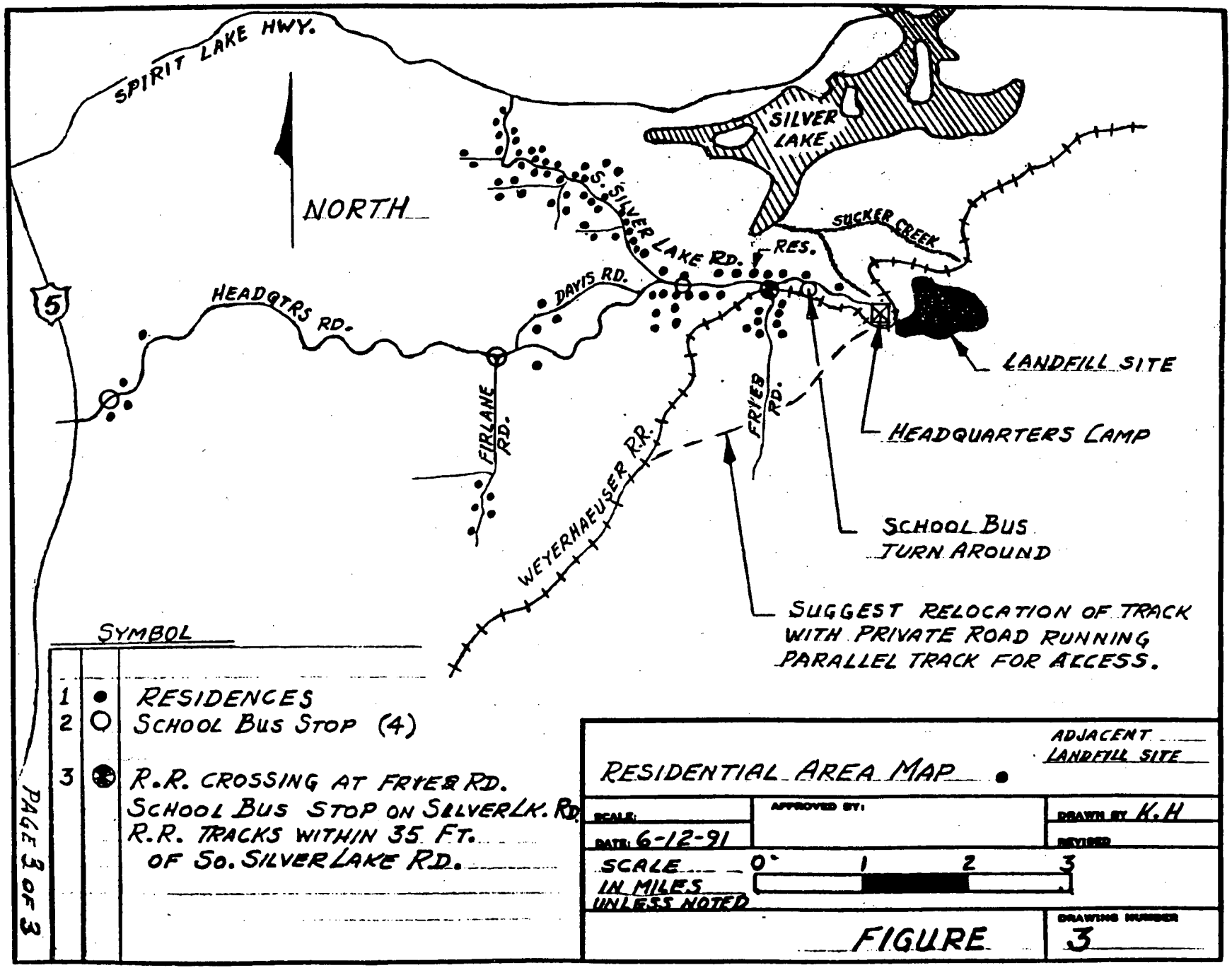
Ken Henderson
PH. 274-7070

RESPONSE... REQUESTED

8-27-92

K. Henderson
2620 S. Silverlake Rd.
Castle Rock, WA 98611

CONT.


SPIRIT LAKE HWY.
NORTH
SILVER LAKE
S. SILVER LAKE RD.
SUCKER CREEK
RES.
DAVIS RD.
HEADQTRS RD.
5
FIRLANE RD.
WEYERHAEUSER R.R.
FRYER RD.
LANDFILL SITE
HEADQUARTERS CAMP
SCHOOL BUS TURN AROUND
SUGGEST RELOCATION OF TRACK WITH PRIVATE ROAD RUNNING PARALLEL TRACK FOR ACCESS.
SYMBOL
1 ● RESIDENCES
2 ○ SCHOOL BUS STOP (4)
3 ⊗ R.R. CROSSING AT FRYER RD. SCHOOL BUS STOP ON SILVER LK. RD. R.R. TRACKS WITHIN 35 FT. OF SO. SILVER LAKE RD.
PAGE 3 OF 3
ADJACENT LANDFILL SITE
RESIDENTIAL AREA MAP
SCALE:
APPROVED BY:
DRAWN BY K.H
DATE: 6-12-91
REVISED
SCALE IN MILES UNLESS NOTED
0 1 2 3
FIGURE
DRAWING NUMBER 3

RESPONSE TO LETTER NO. 26

Ken Henderson

1. Impacts on property values need not be discussed in an EIS, because they relate to profits and personal income [WAC-197-11-448(3)]. For purposes of the EIS, detailed analyses were conducted to determine impacts on elements of the environment typically associated with compatibility with adjacent land uses, including air quality and odor (Section II.A.4), noise (Section II.B.1), human health (Section II.B.2), and visual aesthetics (Section II.B.4). The EIS concludes that the proposed landfill would not result in significant adverse impacts on these elements of the environment.

2. See response to Comment 1 above.

3. See response to Comment 1 above.

4. It is assumed that you are referring to comments made during the EIS scoping period. See response to Letter No. 11, Comment 1.

5. The EIS (Section II.B.1, Noise) concludes that noise from passing trains would be very noticeable at residences along the tracks, but would not result in significant increases in community noise levels according to EPA guidelines (see response to Letter No. 22, Comment 3). The additional two round-trip trains per day added to the one or two current round-trips would be within the historic level of use of the railroad (five or six round-trips per day).

6. Since the EIS does not identify any probable significant adverse impacts to residents associated with rail operations, the mitigation measure you suggest is not considered warranted. As noted in the response to Comment 5 above, train traffic during landfill operations would be within the historic level of use of the railroad.

LETTER NO. 26A

COWLITZ-WAHKIAKUM
COUNTIES

AUG 31 1992

HEALTH DISTRICT

Jan D. Gano
104 Sandwood Crest
Castle Rock, WA 98611
August 27, 1992

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson Avenue
Longview, Washington 98532

Dear Mr. Riggs,

Please accept these comments on the Solid Waste Permit for Weyerhaeuser's proposed Headquarters Camp Solid Waste Disposal Facility.

I have reviewed the proposal and the Draft EIS. The Health District should issue the Solid Waste Permit without delay.

As designed, this project presents a low risk of significant negative impacts to the environment. Weyerhaeuser is to be commended for its willingness to build a facility that goes well beyond the standards normally required for disposal of these types of wastes. The facility is "over-designed" and will prevent significant off-site impacts. The wastes to be disposed of here are not classed as "hazardous" and pose much less risk than household garbage.

Considering many alternative sites, this is an excellent location. There are no nearby residents who might be disturbed by noise, light, glare, or odor. With the multitude of safeguards designed into this facility, the risk of off-site pollution is acceptably low.

The safety of the rail line to the site has been questioned. This is a valid issue. However, the risk of negative impacts from the operation of this line must be kept in perspective. The rail line is a current operation with existing risks. Other forms of transport to this or other sites entail greater environmental risk than rail.

This is a sound project. It offers a low risk, long term solution to a current waste disposal problem. Further delay of this facility will needlessly impact the economics of many of Weyerhaeuser's operations in the county and directly impact the general economy of the Longview area. I urge you to issue this permit without delay.

Sincerely,

Jan D Gano

RESPONSE TO LETTER NO. 26A

Jan D. Gano

Your support for the proposed landfill is noted.

LETTER NO. 26B

WASTE CONTROL 425-4302

- RESIDENTIAL CARTS
- COMMERCIAL CONTAINERS
- INDUSTRIAL DROP BOXES
- RECYCLING FACILITY

EFFICIENT PUNCTUAL SERVICE

August 26, 1992

COWLITZ-WAHKIAKUM COUNTIES

AUG 31 1992

HEALTH DISTRICT

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs,

My name is Joe Willis and with my brother, Kevin, we operate Waste Control Inc., which has the WUTC permit to collect solid waste in the unincorporated areas of Cowlitz County as well as the contract to collect waste in the cities of Longview, and Kelso. We also operate Waste Control Recycling Inc. a company that sorts and processes recyclables. We have a concern about the proposed Weyerhaeuser Headquarter Landfill that we would like to address.

Our Concern is if Weyerhaeuser is not allowed to put in their landfill if they meet or exceed the state requirements, then Cowlitz County will not have an Industrial Waste landfill that meets state regulations and that can take the kind of waste that the industrial sector in this county produces. As a Waste Hauler of that type of material, this would hurt our Industrial customers. Weyerhaeuser's proposed landfill could provide for a long term solution to the County's Industrial waste stream, which is significant when compared to other counties.

Kevin and myself would like to encourage the permit to be issued for this project, even though our family has property on Silver Lake and use the lake for recreation. We feel that the MFS for landfills as well as other precautions that Weyerhaeuser would take will assure the protection of Silver Lake. Thank you for your time.

Sincerely,

Joseph D. Willis
Waste Control Inc.

Kevin T. Willis
Waste Control Recycling Inc.

RESPONSE TO LETTER NO. 26B

Joseph D. and Kevin T. Willis
Waste Control

Your support for the proposed landfill is noted.

LETTER NO. 27



NORTH PACIFIC PAPER CORPORATION
BOX 2069 LONGVIEW, WA 98632
(206) 636-6400
FAX (206) 423-1514

COWLITZ-WAHKIAKUM
COUNTIES

SEP 0 3 1992

HEALTH DISTRICT

September 1, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

As the Vice President and mill manager for North Pacific Paper Company I thought it important to share NORPAC's views concerning the proposed Headquarters Camp landfill.

NORPAC is proud to be an important part of the solution to the municipal waste crises this region and country face. Every day, NORPAC produces high quality recycled newsprint which keeps 600 - 700 tons of old newspapers from going to landfills. Six hundred tons of old newspapers translate to one semi load of paper every hour, 24 hours a day, 365 days a year. It also represents on a daily basis essentially all of the newspapers produced and sold in Washington, Oregon and Idaho.

It is important to understand that even though we are part of the solution, our manufacturing processes create wastes which in turn must be disposed of. For every 600 tons of old newsprint which are recycled, there is approximately 100 tons of fibers which will not make quality newsprint. After we have done everything we can to minimize this waste material - including recycling and reuse, as well as incineration - waste remains which must be disposed of in an environmentally secure landfill.

It is also critical to understand that a disposal facility which provides us an economically stable, long-term disposal capacity is vital to NORPAC's future. NORPAC, like

Weyerhaeuser Company, has been faced with increases in our costs of doing business over the last several years. You have all read about raw materials cost, supply, and the spotted owl impact on our region. The impact of the Columbia River salmon run and its impact on energy costs will impact our ability to make a quality product at the lowest cost and still meet our customers' needs. Without a comprehensive strategy for handling our recycled waste, we will not be able to keep our costs under control. This solid waste program give us assurance that we can manage our waste problems and we will not be disadvantaged in the market place.

We strongly support Weyerhaeuser's efforts to site the Headquarters Camp disposal facility. We believe that not only is it a critical project for NORPAC's future, but it is also an environmentally sound project. The non-hazardous nature of the waste, the intense site selection process that has been undertaken, the state-of-the-art design which surpasses any other landfill designed for these types of waste in the Western states, and the specific operational processes and environmental standards that Weyerhaeuser will demand create a synergy that we feel will exceed the test of meeting our responsibility to protect the environment.

We believe that there is no credible alterative that would be more environmentally sensitive and economically strengthening to our region. NORPAC looks forward to the expedient review of this proposal by the Health District and the Department of Ecology.

Sincerely,

John C Walkush

John Walkush
Vice President and Mill Manager

RESPONSE TO LETTER NO. 27

John Walkush, Vice President and Mill Manager
NORPAC

Your support for the proposed landfill is noted.

Weyerhaeuser
Paper Company

Longview, Washington 98632-7117
Tel (206) 425-2150

Weyerhaeuser

COWLITZ-WAHKIAKUM
COUNTIES

SEP 0 8 1992

HEALTH DISTRICT

August 27, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

I am writing to you as Vice President and Mill Manager of the Weyerhaeuser-Longview mill complex and also as an active community member.

Weyerhaeuser-Longview is at a critical juncture in its 60 plus year history. In fact, probably at no time in our history have we faced the challenges we see before us today.

I subscribe to the theory that the cornerstone for a strong country is a viable economy that supports its social systems, education, military, and other systems. At the community level, a dynamic business environment provides higher quality of life. A strong economic climate and healthy environment are critical to our high quality of life and I am committed to achieving these ideals.

Because of the rapid pace of change in the world, past practices and ways of doing business will not be successful in the future. We must design our facilities (technology, equipment, people, systems, quality and environmental capabilities) for tomorrow, not today. Change is a necessity if we are to remain a viable business and employer in the region.

Fortunately, we have a path to make Longview a competitive facility in our chosen global markets of tomorrow. Our plans call for massive change and major investments...major highlights are:

- Our pulp mill modernization project - which replaces the existing pulp mill with state-of-the-art technology - is a key project for Longview's future and will require an investment of several hundred million dollars.
- Becoming customer focused.
- Building a greater degree of quality assurance into our processes and products.
- Improving our work systems to globally competitive levels and integrating quality principles into our business methods.

Another critical factor is our proposed Headquarters Camp landfill. I often get asked why is Weyerhaeuser investing in a landfill - it's not our core business. The answer is simple - it supports our competitive capabilities in a very competitive marketplace while allowing us to manage our own destiny. The project provides a win for the environment and a win for Weyerhaeuser's and the region's economy. Community sensitivity over landfills no longer allows a company like Weyerhaeuser-Longview, with over one billion dollars invested, to put its fate in the hands of independent landfill operators. The risk is too high.

This project is critical from several perspectives. First of all, it is important to understand that disposal capacity for industrial solid waste has reached a critical point in Cowlitz County. A solution is needed now. Our proposal provides that solution.

Secondly, the landfill is part of a carefully planned integrated waste management program. Our program is congruent with the State's solid waste management plan which includes waste reduction, recycling, incineration with energy recovery, and disposal. Weyerhaeuser management of the facility is necessary for future flexibility in managing our current businesses and developing future business opportunities. This will be particularly important for our paper recycling businesses.

Third, I am proud of our employees efforts to reduce waste resulting from our manufacturing processes. We have seen a 70% annual reduction in solid waste since 1981. However, even with continuing efforts to reduce and recycle, waste remains that currently requires disposal. This is why Headquarters Camp is so important to us. Recognizing that we will always have materials which require disposal, we are committed to manage the disposal of this waste in order to safeguard the environment and be responsible to the community.

Finally, perhaps the most important reason this facility is so critical to the future of Weyerhaeuser in Longview, is that Headquarters Camp landfill gives us control over our destiny. By taking long-term control and responsibility of our wastes, we can maximize environmental protection and create long-term disposal capacity while controlling costs and liability. This is a major benefit to the community as well as the company and our employees.

There are a number of factors that gives us confidence that this project is environmentally sound:

- The facility will receive only forest products manufacturing wastes and minor amounts of construction and demolition debris. No hazardous or dangerous waste will be allowed.
- Extensive siting studies have determined that Headquarters Camp is the best site when all environmental issues are collectively evaluated.
- The state-of-the-art facility design far exceeds current regulatory standards for handing forest product manufacturing wastes.
- The facility will be operated to conservative environmental standards.
- We will carry out environmental monitoring during operation and after closure with close scrutiny by the regulatory agencies.

As a company and as individual employees, we have taken great care to develop an environmentally sound integrated waste management plan. Headquarters Camp is a critical part of this plan and a key element in our efforts to make Longview a world class facility that can compete effectively in the world markets of tomorrow.

I believe everyone - our employees, community, and local residents - can be proud of this project and look forward to a stronger future with its implementation. Collectively, we can provide the quality of life in Cowlitz County that meets the needs of the community as a whole.

Thank you for the opportunity to present our views and share our vision for a solid and dynamic future in Cowlitz County.

Sincerely,

Gary Healea
Vice President and Mill Manager

RESPONSE TO LETTER NO. 27A

Gary Healea, Vice President and Mill Manager
Weyerhaeuser Paper Company

Comments noted.

To whom it may concern,

I would like to express my concern and displeasure at the toxic waste dump being built at Headquarters by the W. Company.

This area should be brought up to its original beauty, a clear, clean lake, forests, and wild life. The W. company is doing its best to denude the forests, and have succeeded in making Headquarters Road a thing of ugly, not beauty.

Please reassess your findings, they are not complete, and there are other sites that the w. company could have their dump.

Sincerly

Verna M. Troxel

Verna M. Troxel
117 Sandra Road
Silverlake, Was., 98645

RESPONSE TO LETTER NO. 28

Verna M. Troxel

Your concern about the proposed landfill is noted.

LETTER NO. 29



LONE STAR NORTHWEST

LONGVIEW DIVISION
1100 3RD AVENUE
LONGVIEW, WASHINGTON 98632
(206) 423-8112

COWLITZ-WAHKIAKUM
COUNTIES

SEP 0 8 1992

HEALTH DISTRICT

August 31, 1992

David Riggs
Director of Environmental Health
COWLITZ-WAHKIAKUM HEALTH DISTRICT
1516 Hudson
Longview, WA 98632

REFERENCE: WEYERHAEUSER HEADQUARTERS CAMP PROJECT

Dear Mr. Riggs:

The purpose of this letter is to support Weyerhaeuser's proposed disposal facility at Headquarters Camp. This landfill project is vital not only to the Weyerhaeuser company, but also to the overall economic health of the entire Longview-Kelso and surrounding communities. This project means jobs. Jobs which will feed, clothe, and educate families, buy homes, and support government services in these communities.

However, economics are not the only reason this important project should proceed. This project is well thought out, and environmentally responsible. It is part of a complete solid waste management system for the Weyerhaeuser mill. It emphasizes waste reduction, reuse, recycling and incineration with energy recovery before any remaining wastes go to disposal. The facility went through an extensive site evaluation that was undertaken by two completely independent consulting teams. These teams looked at numerous locations for the site of the landfill and both of them independently analyzed and determined that headquarters campus was best suited for that site.

The facility has been designed as a state-of-the-art system that meet or exceed all regulatory requirements. That far exceeds the disposal standards generally required for wood wastes. The monitoring that will occur by governmental overseers and company officials will ensure that throughout its entire 30 year history of operation it will meet all these environmental protection measures.

In summary, I would like to encourage that this project be approved both because of it is important and because it Weyerhaeuser has proposed a project that meets all permit requirements.

Sincerely yours,
LONE STAR NORTHWEST

James A. Repman
Executive Vice President

JAR:jab

cc: Ted Hutchinson

RESPONSE TO LETTER NO. 29

James A. Repman, Executive Vice President
Lone Star Northwest

Your support for the proposed landfill is noted.



COWLITZ-WAHKIAKUM COUNTIES

SEP 0 1992

HEALTH DISTRICT

August 31, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson St.
Longview, WA 98632

RE: Proposed landfill, Headquarters Camp.

Dear David:

I would like to take a moment to express my opinion in favor of the new proposed solid waste facility at Headquarters Camp. I do recognize that feelings and opinions on this issue run strong and varied, hence one tends to stray from the real issue. The real deciding issue is whether or not has Weyerhaeuser Co. meet all the various governing agencies requirements associated with the use, operation, and installation of the newly proposed facility, I believe, in fact that they have and with good faith. It would appear to me, that those who disfavor a new facility see it as a case of big business buying their way through governmental agencies to get whatever they desire.
The only real opposition for the facility is sponsored by the "not in my back yard" special interest group, who have dredged up support by every possible fringe element that may have a possible impact or interest against Weyerhaeuser Co. or progress. This facility is needed by both Weyerhaeuser and Cowlitz County (to include surrounding areas).
Please, lets have state of the art solid waste facility that will serve the needs of our community now, and for a great deal of time in the future.

Respectfully,

P.R Worth

P.R. Worth

RESPONSE TO LETTER NO. 30

P.R. Worth

Your support for the proposed landfill is noted.

LETTER NO. 30A

COWLITZ-WAHKIAKUM
COUNTIES

SEP 0 3 1992

HEALTH DISTRICT

September 1, 1992

David Riggs
Cowlitz Wahkiakum Health District
1516 Hudson
Longview Washington

David;

Yesterday, I left, with your receptionist, documents for you. These include; The Washington Department of Fisheries final report, July 1987 though Dec 1991, for the salmon habitat enhancement activities on the Toutle River. This was pursuant to the cooperative Agreement between the U. S. Corps of Engineers and State of Washington to mitigate the salmon habitat lost at the Sediment Retention Dam on the North Fork of the Toutle River.

Also enclosed was a copy of an August 25, 1992, letter from John Loch, Toutle River Fishery Biologist, WDW, to Bob Becknell Habitat Biologist, WDW.

The letter from John Loch is the report on the electro shocking done on Sucker Creek 8-20-92. This report shows many COHO fingerlings are in Sucker Creek. The location of the shocking is up stream from the 1330 road crossing where the new 7 foot replacement culvert was installed this past year,

The report to the Corps was done by Greg Johnson, WDF Habitat Management Division. The Corps funded the study in response to mitigation caused by a lost run at the retention structure on the North Toutle, and loss of Salmon in the Toutle watershed.

Pages 5 thru 12 of the spawner survey show no COHO in Sucker creek from 11-87 thru 12-27-90. The only fish plant in Sucker Creek was May 23, 1990 --page 20 (We are hopeful that these fish will migrate back in late fall winter and spring of 1992 and 1993.) The COHO fingerlings found 8-20-92 are from fish born 1989, and returned winter 91 or spring 92.

Thus, the conclusion that this present run is a wild run of COHO. We have testimony from many locals who say Sucker creek years ago was well known as a "Salmon" creek, and fished by them, so they are not surprised.

Don Belding

Don Belding

225 Lakeview Drive
Silver Lake, Wa. 98645

RESPONSE TO LETTER NO. 30A

Don Belding

Pursuant to WAC 197-11-440(7), the material you left with the Health District will be retained for the public record and is available for review at the Health District office (see response to Letter No. 9, Comment 1). The report on salmon habitat enhancement activities on the Toutle River, and the Washington Department of Wildlife memo on the electrofishing of Sucker Creek, were reviewed by the project fishery consultants. They agree that the juvenile coho salmon found in Sucker Creek in the summer of 1992 were probably the result of natural spawning (see Letter No. 31 from the Washington Department of Fisheries, and the response to Letter No. 10). With regard to whether the present run of coho is a "wild run", see response to Letter No. 53, Comment 1.

With regard to the letters you provided from the Department of Wildlife and Ecology in response to the Corps of Engineers public notice, both agencies have submitted comment letters specifically directed toward this EIS (see Letter Nos. 69 and 71 and their corresponding responses). With regard to the February 7, 1992 letter from Roland Ugochuku of Ecology, see response to Letter No. 8, Comment 1.

LETTER NO. 31

JOSEPH R. BLUM
Director

STATE OF WASHINGTON
DEPARTMENT OF FISHERIES
COLUMBIA RIVER FISHERIES LABORATORY
16118 N.E. 219th St., P.O. Box 999 • Battle Ground, Washington 98604 • (206) 696-6261

COWLITZ-WAHKIAKUM COUNTIES
SEP 0 3 1992
HEALTH DISTRICT

September 2, 1992

Mr. David Riggs
Cowlitz County Dept. of Health
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

I've been informed that the Washington Department of Wildlife electroshocker sampled Sucker creek, tributary to Silver Lake in Cowlitz County, in early summer of 1992 to determine fish species composition and abundance. This sampling indicated the presence of juvenile coho salmon.

A search of Washington Dept. Fisheries (WDF) (the state salmon management agency) records and conversation with WDF employees, indicated that the stream was not stocked in the spring of 1992. Therefore, the coho juveniles would be the result of natural coho spawning which occurred in the fall of 1992.

The presence of adult coho salmon in Sucker Creek in fall 1991 would be consistent with a large run of coho which returned to the WDF Green River Hatchery, tributary of the North Toutle River. A fish ladder at the outlet of Silver Lake allows adult coho salmon to enter the lake and ascend tributary streams such as Sucker Creek.

Sincerely,

Wolf Dammers
Fish Biologist
Columbia River

WD/th

RESPONSE TO LETTER NO. 31

Wolf Dammers, Fish Biologist
Washington Department of Fisheries

Comment noted. See responses to Letter No. 10 and Letter No. 30A.

LETTER NO. 32



COWLITZ-WAHKIAKUM
COUNTIES

SEP 0 3 1992

HEALTH DISTRICT

September 2, 1992

Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

ATTN: David Riggs

Dear Mr. Riggs:

I am responding to your request for comments on the Headquarters Camp Landfill site. I have attended two hearings and four meetings where Tom Skanlan has presented a very complete picture of how the landfill will be constructed.

I am the general manager of Valley Rentals Inc., having been with them for 20 years. I am also the current president of the Lower Columbia Contractor's Association. After hearing both sides present for and against arguments, I feel it will be beneficial both from an economic standpoint and for the community to use the Headquarters Camp site.

In this day and age, where businesses are held responsible for wastes generated in the course of their business from start to finish, it is beneficial for them to have complete control of the waste product. Use of this landfill would also extend the life of our County Landfill, thus benefiting the community.

Approval for this solid waste facility will affect whether or not Weyerhaeuser modernizes or closes the Longview mill. The long-term affect if Weyerhaeuser does close this mill would be devastating to our community. We need good-paying jobs, and jobs with career benefits. If Weyerhaeuser is not here, the community will not grow and our children will have no future here in Cowlitz County. This would also send a message to other businesses that might want to locate here.

1002 TENNANT WAY • LONGVIEW, WASHINGTON 98632 • (206) 425-2350 FAX (206) 425-3417
6070 LINDERSON WAY • TUMWATER, WASHINGTON 98501 • (206) 786-8408

There are no easy solutions to living in a clean environment, but the propsed landfill is a positive step in the right direction. I would urge you to issue the Solid Waste Permit requested by Weyerhaeuser.

Thank you for your consideration.

Sincerely.

John E. McKenzie
Manager

RESPONSE TO LETTER NO. 32

John E. McKenzie, Manager
Valley Rentals, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 33

September 2, 1992

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Gentlemen:

This letter is written to express my strong support for the Headquarters Camp Solid Waste Disposal Facility. I attended last years public meeting in Toutle June 4, 1991 and this years public meeting in Kelso August 25, 1992. In doing so I was able to see both sides of the issue and separate fact from emotion. The opponents of the waste disposal site are really saying "not in my backyard". This is their real issue, and the fact is they are miles from the site. Their issues, however sincere, are not based on facts and what is right for Cowlitz County.

There will be a lot said about the design of the facility which far exceeds existing facilities in terms of safety to the environment and other vital issues. The one part of the issue that needs to be looked at is the integrity and the sensitivity of Weyerhaeuser to the needs of the community and their stewardship of the environment.

I have watched Weyerhaeuser grow and observed the change in their company philosophy regarding the environment. To say that they, or we, have not made mistakes in our handling of the environment would not be a true statement. We all have made mistakes, and we all are now paying the price for our incorrect judgements in the past. Today with Weyerhaeuser, there is no doubt as to their priorities. Their #1 concern is the safety of their employees as well as the public. On an equal basis with safety is their concern and sensitivity to the stewardship of the environment. You talk about proponants for saving the environment, Weyerhaeuser has a vested interest to see to it that the environment is protected for generations to come. They know that protecting the environment long term makes good business sense.

The other issue that nees to be looked at is the integrity of Weyerhaeuser and Weyerhaeusers management. Gary Healey is a man of unquestionable integrity. I have worked with Mr. Healey on various community supporting boards and found him to be a man of great principle, understanding and good old American common sense. With Mr. Healey at the helm, this communities' interests have been more than well served. His leadership in our community as well as Weyerhaeuser has been outstanding. He supports this project at Headquarters Camp. There is no doubt in my mind that this is a safe project and a project that will benefit the community if Mr. Healey has put his reputation

on the line to sponsor.

Long term, Weyerhaeuser is with us and has the financial strength to see this project to its final and safe conclusion. Not many companies have this level of long term safety commitment to the community built into their systems. Again, I hardily support the granting of a permit for this very worthwhile project at Headquarters Camp.

Sincerely,

F.W. (Ted) Palin

RESPONSE TO LETTER NO. 33

F.W. (Ted) Palin

Your support for the proposed landfill is noted.

LETTER NO. 34

DOUGLAS M. O'CONNOR, D.D.S.
F.A.G.D., F.A.D.I.
911 - 11TH AVENUE, SUITE B
LONGVIEW, WASHINGTON 98632

TELEPHONE 206 636-3900

COWLITZ-WAHKIAKUM COUNTIES
SEP 1 1 1992
HEALTH DISTRICT

September 4, 1992

Mr. David Riggs
Director of Enviromental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

I am writing concerning The Draft Enviromental Impact Statement for Weyerhaeuser's proposed Headquarters Camp Solid Waste Disposal Facility. My experience with Weyerhaeuser indicates that they are a responsible and caring company and will do everything possible to manage the site appropriately.

As a small business man in the community, Weyerhaeuser has helped me in appropriately dealing with hazardous materials. As a past president of the United Way of Cowlitz County and the United Ways of Washington, I have seen their concern for people both on the local and state level. Currently I am on the Board of Education for the Longview School District and the Weyerhaeuser Company assists the schools in numerous ways.

Sincerely,

Douglas M. O'Connor

Douglas M. O'Connor, D.D.S.
F.A.G.D., F.A.D.I.

RESPONSE TO LETTER NO. 34

Douglas M. O'Connor, D.D.S.

Your support for the proposed landfill is noted.

LETTER NO. 35

Interstate Wood Products, INC.
2308 TALLEY WAY
KELSO, WASHINGTON 98626

09/03/92

COWLITZ-WAHKIAKUM COUNTIES
SEP 09 1992
HEALTH DISTRICT

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

RE: Weyerhaeuser Silverlake Landfill

Interstate Wood Products, Inc. is a trucking company hauling wood chips in Washington and Oregon. We employ approximately sixty people. Our existance depends on the pulp mills.

On behalf of myself, the employees and families of Interstate Wood Products, Inc. I would encourage you to approve the permit of Weyerhaeuser for their landfill. Weyerhaeuser has gone beyond the requirements for construction of the landfill. Weyerhaeuser has also proven that they are good corporate citizens of Cowlitz County.

Again I would encourage you to approve Weyerhaeuser's permit as Weyerhaeuser needs this to be economically competitive. Interstate Wood Products, Inc. needs this to continue operation. Cowlitz County needs this economically and environmentally.

Thank you.

Don Lemmons

Don Lemmons
I.W.P. Employees and Families

Interstate Wood Products, INC.

2308 TALLEY WAY
KELSO, WASHINGTON 98626

RE: Weyerhaeuser Silverlake Landfill

NAME(PRINT)	SIGNATURE	ADDRESS
SUE HAMBLIN	Sue Hamblin	2005 TIBBETTS DR. #107 LONGVIEW, WA 98632
EVAN BLANKENSHIP	Evan Blankenship	714 S. 8th KELSO, WA 98626
Cristina McKee	Cristina McKee	2142 - 48th AVE. - Longview, WA 98632
DAVID SWIFT	David Swift	12330 Chappel Rd. ARLINGTON WASH
DALE LEINAAR'S	Dale W Leinaars	1770 Rose Valley Rd Kelso WA 986[illegible]
DON SCHAEFER	Donald J Schaefer	410 ROE RD. WINLOCK, WA. 98596
[illegible]	[illegible]	649 25th Longview WA 98632.
[redacted]	[redacted]	
KEN NOOTENBOOM	Ken Nootenboom	443 State Hwy 506 Toledo Wa.
PL BRETZ	PL Bretz	263 Jone Jew Rd Toledo Wa
CLAYTON SALIKIN	Clayton Salikin	74866 Doane RD Rainier, ORE. 97048
ARNOLD E FITCH	Arnold E. Fitch	32231 Bishop RD OR. 97048
PHIL KOSKI	Phil Koski	3103 PERCHING WAY 98632
Steve McNally	[illegible]	209 21st AVE SW APT F203 PUYALLUP 98371
JERRY L. McNEIL	Jerry L McNeil	482A STATE HWY 506 TOLEDO 98591/00
FRANK Steiner	[illegible]	217 Longview ave toledo wa 98591
Douglas Dodge	Douglas Dodge	74866 Doane Rd #79 Rainier Ore
Jerry Ward	[illegible]	835 32 Ave Longview WA 98632
Tristan Weskett	Tristan Weskett	1044 18th Ave Longview WA
MEL VENARD	Mel Venard	111 Studebaker pl. Castle Rock 98611
Kurt McKee	Kurt McKee	2142 48th AVE - Longview WA 98632
Rick Fuhrman	Rick Fuhrman	466 Ross Rd Kelso 98626
[illegible]	[illegible]	715 L Hollywood Ave Castle Rock Wa 98611
Thomas J Burdick	Thomas J Burdick	1661 33rd Ave. Longview Wash.

Interstate Wood Products, INC.

2308 TALLEY WAY
KELSO, WASHINGTON 98626

RE: Weyerhaeuser Silverlake Landfill

NAME(PRINT)	SIGNATURE	ADDRESS
Bruce Ashton	Bruce Ashton	705 Broadway Longview.
Barbara Seidl	Barbara Seidl	799 PH 10 Castle Rock WA 98626
Frank Schouten	Frank Schouten	1506 Cowlitz Way
Nancy Enriquez	Nancy J Enriquez	121 Manteca Dr Kelso, Wa 98626
Clara Lemmons	Clara M. Lemmons	107 Johnson Ln. Kelso, WA 98626
Robert Lemmons	Robert Lemmons	5400 Mackenzie #64 Kelso, WA 98626
Sharon Lemmons	Sharon Lemmons	5400 Mackenzie #94 Kelso, WA 98626
GERALD R. LEMMONS	Gerald R. Lemmons	2326 MT BAKER VIEW KELSO, WA 98626

RESPONSE TO LETTER NO. 35

Don Lemmons
Interstate Wood Products, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 36

COWLITZ-WAHKIAKUM COUNTIES
SEP 09 1992
HEALTH DISTRICT

September 5, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Sir:

(1) As new landowners in the Streeter area of Silver Lake, we have just recently become aware of the proposed Weyerhaeuser land fill that will surely ruin our investment.

We have talked to many of our neighbors and we are all convinced that this proposal will not only decimate the land value, it will ruin any chance of taking advantage of the revenue that could come our way from the new highway being built to Mt. St. Helens.

(2) One neighbor, a prominent employee of Weyerhaeuser, assures us that not only will the landfill pollute our lake with many toxic chemicals, including dioxins, it will cause medical problems to the residents. He has worked near one of these dumps and said, "All employees who worked downwind from the dump experienced intense headaches, nausea and respiratory problems.

(3) Why put this dump on a lake after investing millions of dollars toward the Visitor Center, the new highway, and the purchase of Asian carp to help clean the lake? The tourists will get one whiff of the dump and turn around. And if they do stay, they not only will catch fish they can't eat, they may very well experience medical problems. Word of mouth would soon have Silver Lake blackballed as a vacation area.

(4) This landfill will only profit Weyerhaeuser, at the expense of everyone who enjoys living and visiting here.

We demand the permits be denied, and are apalled that they are even being considered.

Very Sincerely,

Karen A Elwood
Karen A Elwood
Voters Registration #175551

Robert J. Elwood
Voters Registration #175552

Robert J Elwood

RESPONSE TO LETTER NO. 36

Karen A. and Robert J. Elwood

1. See response to Letter No. 26, Comment 1.

2. See response to Letter No. 17, Comment 1. During a brief period in 1990 when wastewater treatment solids were being piled at the Mt. Solo Landfill, equipment operators moving a pile of decomposing wastes did experience short-term respiratory irritation. Such impacts are not unusual where any type of decomposing waste material is disturbed. Medical exams revealed no permanent health impacts. With appropriate handling of the wastewater treatment solids, the respiratory irritations were eliminated. Appropriate waste management practices would also be utilized at the proposed landfill to address these concerns.

3. See response to Letter No. 11, Comment 8.

4. Your opposition to the project is noted.

LETTER NO. 37

8/12/92.

Headquarters Camp Solid Waste Disposal Facility.

D & 95

Volume 2

appendices B-1

July 1992

(1) B: Weyco Headquarters - Lenin Leak Scenario

Weyerhaeuser Co. is using M.F.S. (Minimum Functional standards) when they have promised the Very Very Best. We need, want & have been promised (on tape) the Maximum!!!

(2) Ground Water studies & the Bonaparte & Gross studies talk about holes in liner. The imperfections in this liner material is terrible. A dump should not go in at this site with this not such a good "state of the art" liner. Don Belding punches holes in the liner, what will the caterpiller, spreader do? Rocks, Demolition debre

(3) Also I commented at the Public

hearings & letters to CWDD about the snow zone in this area. Sent a map of this, Nothing in this DEIS address this. this limit can not be welded in these conditions, also 70 inches of rain. We have had some very cold conditions here. I have lived

④ most of my life here. the trains have to be dug out, the track has to be dug out (several feet of snow in one night) one time the big snow plow got stuck on So. Silver Lake Rd. a small snow plow came to the rescue. It got stuck, too. All the people up here got shovels out. We dug & dug & cleared enough snow away that the two plows got out.

the trains will not run no will there be road travel at times. (how will the leachate be taken to Longview for treatment?

⑤ Also weyerhaeuser promised (on Video tape) no pollution of Silver Lake. We will hold them to that promise but I see

: that there is talk of leakage (Leak ~~Scenario~~) Sorry! leakage & pollution of Sucker Creek & Silver Lake is not good enough. Read my pen No dump above Silver Lake.

Clara Wilkins Chairman
Worth Cowlitz Env. Council

RESPONSE TO LETTER NO. 37

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. See response to Letter No. 24, Comment 3. The EIS concludes that, with the proposed liner design, there would be no significant adverse impacts on water quality. The Washington Department of Ecology and other permitting agencies will evaluate the adequacy of the proposed design as part of their respective permitting processes. The response to Letter No. 69, Comment 16 is also relevant.

2. See responses to Letter No. 62A, Comment 24; Letter No. 63, Comment 19; and Letter No. 69, Comment 14.

3. As is true for construction of other types of facilities, there are optimum conditions under which the liner system should be installed. These conditions would be specified in the construction quality assurance plan (see response to Letter No. 9, Comment 20).

4. See response to Letter No. 9, Comment 10.

5. Comment noted. See response to Letter No. 11, Comment 8.

LETTER NO. 38

Draft EIS - Weyco Dump project (Hoffstadt Camp) 8/21/92
Cowlitz Wah Health District
David Riggs

(1) (c) Has weyerhaeuser Co. gone upon the Cowlitz-Wah. Health District the "Total proposal"? All interdependent parts of the proposal?, including all proposed phases? Have you allowed an evaluation of Cumulative effects of the entire proposal? the property the dump is to be put on is timber land. the Cumulative effects have to be considered —

(2) (2) Why is the public notice of what will be addressed in the Draft EIS not been addressed. No alternate site is being considered except at the same site, (Smaller Versions of site) although the public notice that we commented on said the D & IS would. Barnes Drive was brought back in after my testimony at June 1991 public Hearing. With talking with your staff I was told "the corps of Engs will address alternate sites" - Sorry, not good enough we say. the Draft Environmental Impact Statement is deficient — We can not accept it,

(3) also I was told not enough information was given on the two taylor road sites & Barnes Drive site — why wasn't there? These were to be part of the Draft. We want the 3 sites Two taylor Road + Barnes evaluated, wells drilled, information on aquifers, How those sites will be effected or not on Water, air, earthquakes, Mt. S.T. Helens, Close to the same procedures as the Hoffmanture site. We do not accept Weyer. site selection study — it is too

See Barnie Re: Kitsap Co.

(4) flawed and the first study by Schmidt did not include the Hdytas site as it is now proposed - why?

(5) Also the U.S. Soil Conservation said the Hdytas site was not good for a landfill. Weyerhaeuser co then did their own survey. Why? Are you going to accept Weyco. Co's survey or the U.S. government's? and if you choose weyerhaeuser, why?

(6) On page F-3 of SEPA Rules paragraph 4, the project does not have to go through the SEPA process to be rejected.

Reject the project now. You have the option. It is an environmental unsafe project - Reject it now -

Clara Welkers North County Environmental Council Chairman:

(7) See: Barrie v. Kitsap Co., 93 Wn. 2d, 843, 613 P. 2nd 1148 (1980) (alternate sites)

RESPONSE TO LETTER NO. 38

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. The EIS does take into consideration the cumulative impacts of all phases of the proposal. The impacts of a proposal are the differences between environmental conditions with and without the proposal. In the case of the proposed landfill, timber harvesting would occur on the site whether or not the landfill is approved.

2. See response to Letter No. 9, Comment 28.

3. See response to Letter No. 9, Comment 28.

4. See response to Letter No. 9, Comment 28.

5. See response to Letter No. 41, Comment 16.

6. An agency may deny a permit without SEPA review of the proposed action only if it is clear without SEPA review that the proposed action could not meet permit requirements. As discussed in Section I.B.1.a, Project Overview, the proposed landfill would be designed and operated in accordance with the state Minimum Functional Standards for Solid Waste Handling (MFS). A variance would be required from the locational standard prohibiting the location of the active area of a landfill in a wetland. However, the MFS allow applications for variances from specific standards (WAC 173-304-700). Therefore, the Health District must provide the opportunity for environmental review under SEPA. This EIS will assist permit-giving agencies in determining whether permit requirements, including requirements for the wetland variance, are fully met. The response to Letter No. 9, Comment 4 is also relevant to the variance process.

7. See response to Letter No. 63, Comment 15.31.

Draft EIS

8/25/92

Cowlitz-Wah Health District
David Regis
Weyerhaeuser Dump (proposed Hoffstrs project)

I will be quoting from the State Environmental Policy Act.
Sepa Handbook
Sepa Rules, WAC 197-11
Sepa RCW 43.21C
Prepared by Dept. of Ecology
Environmental Review Section.

COWLITZ-WAHKIAKUM COUNTIES
SEP 09 1992
HEALTH DISTRICT

(1) Page A-1
The State Environmental Policy act (Sepa), Chapter 43.21C RCW is intended to ensure that environmental values are considered (in addition to technical + economic considerations) by state + local government officials when making decisions. Sepa contains specific policies + goals which apply to actions at all levels of government within the state, except the judiciary + State legislature. The Sepa Rules (Dept. 197-11-WAC) were adopted to implement SEPA + to establish uniform requirements + guidance for compliance to SEPA.

(2) SEPA has 4 primary purposes as listed in Chapter 43.21C RCW
1. To declare the state policy which will encourage productive + enjoyable harmony between people + their environment.
This dump - "dump" will do that? productive + enjoyable Harmony? You call the public meeting on any of the enjoyable Harmony? You call putting a dump

above a lake, that is an enjoyment
to the people, a productive move?
We, the people do not agree —
We want to know where the productive
& enjoyable harmony comes in. From
day one this community has been
as close as any community with
its "Don't dump on Silver Lake"
as any community, Comp't. Our
concerns have fallen on deaf ears
to this mighty corporation, to
Dept. of Ecology & to our County
Commissioners & to the Health
Dept.

(3) 2. To promote efforts which will prevent or
eliminate damage to the environment or biosphere.
I see no effort that you, the lead
agency, tried to explain to Weyerhaeuser
company that they picked a bad site,
except the very first answer to
the permit application where Dick Jones
said the ~~site~~ was poor to good. Nothing
that I can find — con papers of meetings
where this site would be discouraged
or eliminated early on. You did
require this S.E.P.A but where did
you discuss & leave a paper trail on
the project to early on - or as early on -
going over the difficulty of this project?
Weyerhaeuser could have the opportunity
to withdraw the this project and
still does.

Nothing has been said how this project will effect not only the environment but the biosphere — why not?

(4) (3) to Stimulate the health & welfare of the people.

A dump that will ruin our water (most of us have well or spring water) air (We have pretty good air here - we don't live in the stench in Longview & Kelso - but alone the damaging air people can't see there close to "the largest mills in the world" You the Health Dept D.O.E. & the County Commissioners elected to represent us, not big Business have not said one dam bit about our health or welfare - Why not?

(5) (4) To Enrich the understanding of ecological systems & natural resources important to the state & the nation. a dump is a natural resource? Please explain that one - a dump Natural? but alone a resource? Answer me that. Explain in the FEIS how this will be important & help the ecological systems - a dump - answer me that -

(6) On Page A-2 - Feasibility & Critical issues can be identified, discussed and in many cases, worked out before

the process begins, the applicant can then make informed + reasoned choices about how to proceed. If the Health Dept. would have done its job + not went along with the powerful company of Weyerhaeuser Co. the project should have been stopped long ago. Why didn't you?

(7) Public involvement: Now there is where you Weyerhaeuser Co., have by our estimation, have done the people an injustice — It says here on page A-2 " The goal of SEPA is a much more than simple procedural. the projects are modified mitigation is accomodated + the public is made to feel more comfortable in a successful SEPA process. the latter function cannot be achieved by preforming the process in a "black Box" Public involvement — How Many times have you met Weyerhaeuser + not allowed us on there? How many times were we treated from participating in the process? Repeated efforts should be made to involve the public — Repeated efforts were made to Not involve the public. Have We been given an opportunity to participate in the Environmental analysis? No informal meetings were ever held with any of the citizens that I know of. Most of the public meetings We were Made

us to feel unwelcome.

Page A-2 open + fluid public involvement process is a Key to avoid polarized positions which can lead to needless + unpleasant conflict.

(8) We, the community where the dump is to be, opposed this site, you have done very little + Weyerhaeuser have done very little, + the County government has done very little to find a suitable site. Not this horrible, deplorable site above this lake of state wide significance.

Wake up & Follow S E P A. You + Weyerhaeuser Co. are not. When will you begin? Deny this permit, You have not followed Sepa Purpose.

Clara Wilkins, Chairman
North County Environmental Council.

RESPONSE TO LETTER NO. 39

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. Comment noted.

2. Comment noted.

3. The purpose of this EIS is to identify, evaluate, and, if possible, recommend mitigation measures for, the probable significant adverse impacts of the proposed landfill. The SEPA Rules require that an EIS only address impacts to elements of the environment listed in WAC 197-11-444. With regard to alternative sites, see response to Letter No. 9, Comment 28.

4. The EIS does not conclude that the proposed landfill would "ruin" water and air or affect human health. See the EIS Summary (Sections D.1, Groundwater Quality, D.2, Surface Water Quality, and D.5, Air Quality and Odor) for a discussion of the key conclusions of the EIS in these areas. With regard to human health, see Section II.B.2, Human Health.

5. See response to Comment 2 above. It is important to keep in mind that the purposes you are referring to are the purposes of SEPA (and therefore the purposes of this EIS), not the purposes of the proposed project. This EIS meets the purpose of SEPA by providing information that allows an understanding of the ecological systems and natural resources on the Headquarters Site, and how the proposed landfill would affect those systems and resources.

6. Any proposed project that appears to meet permit requirements must be reviewed by the lead agency under SEPA. See response to Letter No. 38, Comment 6.

7. Comments noted. The Health District has offered the public the opportunity to comment on the proposed landfill through scoping meetings and public hearings on the Draft EIS, and has met all the requirements of the SEPA Rules for public notification and involvement.

8. Your opposition to the proposed landfill is noted.

D&EIS - Wyco.Co. proposed Hdfls Comp
David Reggio
Cow-Wah Health District.

8/28/92

Dear Mr. Reggio: Reading the SEPA rules:
WAC 197-11-460

Issuance of FEIS

(1) Part (6) The lead agency shall issue the FEIS within 60 days of the end of comment period of the DEIS, unless the proposal is unusually large in scope, the environmental impact associated with the proposal is unusually complex or extensive modifications are required to respond to public comments

(7) The Form + content of the FEIS is specified in 197-11-560.

Since this dump (landfill) will be the second largest in the state, and very complex I am asking that the Cow-Wah Health District the lead agency, with DOE, take more than the 60 days to answer the many, many questions, problems, environmentally unsound proposal for the Headquarters site + its so called alternatives (Smaller sites at same site.). (3 original alternatives gone)

(2) I am also specifying that you follow 197-11-560 - FEIS response to Comments (a) Modify alternatives including the proposed action. The original 3 alternatives were thrown out, (Reason?)

and the two alternatives now in the D.E.I.S are not the same, they are smaller alternatives of the same site.

(b) Develops & evaluate alternatives not previously given detailed consideration by the agency. Here we go again, this should include Two Taylor Rd - Barnes Drive (original alternatives) + 25 sites I submitted earlier, the Collen's site, the site across from Barnes Drive site, the 4730 site the Mint farm are some that dispensity should be considered.

(3) the Wagner site selection study (of 1990) as I have repeated before, is a site selection study made around the Hdqtrs site after the Feb 1990 public meeting where Wagner said (Frank Gutierrez) this is the site, period!! Plenty of rigging was done & News items to back these facts. the Cahm Hill study earlier had a Hdqtr site but not this site they (Wagner) proposed - Why - answer me that,

(4) In the dropt, no where is Taylor Rd (2 sites) + Barnes Drive site evaluted - the original alternatives, Also should there have been a environmental impact statement been done on sites for Conlit County?

(5) the Health Dept. says sites can't be asked of private landfills - Show me where the law says that ~~~

Clara Wilkins Ch.
North County Env. Council.

RESPONSE TO LETTER NO. 40

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. Given the complexity of the proposed project, the Health District did not feel constrained to issue this Final EIS within 60 days of the end of the Draft EIS comment period. The District has taken the time necessary to respond to all issues raised in comment letters and public testimony on the Draft EIS.

2. WAC 197-11-560 provides a list of possible responses to comments on a Draft EIS, not required responses. With regard to alternative sites, see response to Letter No. 9, Comment 28.

3. See response to Letter No. 9, Comment 28.

4. With regard to the issue of alternative sites as it relates to this EIS, see response to Letter No. 9, Comment 28. The question of whether there should have been an environmental impact statement on sites for the Cowlitz County Landfill is not relevant to this EIS.

5. See response to Letter No. 9, Comment 28.

Draft EIS
Proposed Waste Landfill Hoffstadt Bluffs Camp
Att: David Riggs

Cowlitz-Wahkiakum Counties
SEP 10 1992
Health District

9/8/92

(1A) Enclosed are questions on items necessary to fulfill the requirements of a hydrogeologic assessment under WAC 173-304-600

(1) WAC 173-304-600 (3)(b)(i)(A)+(B)
Local/Regional Geology & Hydrology
Evaluation of Bedrock & Soil Types.
Figure 3-3 - Lack of data beyond relatively shallow depths (piezometers or wells drilled) makes site specific characterization of a deeper aquifer system impossible -
Further investigation of the basalt/andesite layer should be undertaken to determine the relationship with the shallow aquifer system the draft EIS

(2) Keeps talking about Seismic Design of the landfill should be considered. Faults ??

(3) WAC 173-304-600(3)(b)(i)(C) Depths to Groundwater
the interaction between precipitation & groundwater level fluctuations need

(4) to investigated more. the leachate and storm water holding facilities on the maps I looked at fit a landfill like eastern Washington/Oregon where there is dry weather - need much larger facilities -

Direction & flow rate of local ground water

(5) WAC 173-304-600(3)(b)(iii)(D)

Have you adequately characterized the direction & flow rate of local ground water? as late as January 1992 it appeared inadequate to D.O.E. Should have more geotechnical & hydrogeologic testing to determine hydraulic conductivity porosity + ground water flow velocity + preferential flow paths.

Groundwater flow rate.

(6) Your hydraulic conductivity of that large of a dump is based on 4 Slug (rising head) tests. They are of limited value for such a large area.

Ecology required limited pumptesting of aquifers underlying the proposed LR + Wilco proposed facilities as a method of verifying slug test results - Why has that not been done at Wilco's Adams site?

Your calculations were based on a single water level measurement taken (you say) Aug 1990. Need to determine ground water flow velocities which is an assumption or unverifiable fact, Not fact more testing -

(7) Ground water flow direction need to do an analysis of the possibility of deeper aquifer systems

underlying the dump site - Interaction if any, the deep system has with the shallow groundwater should be investigated - has this been done?

(8) If this is a recharge area such as you classified this area earlier where is the data for this statement - is it true?

(9) Did you (always) do a tabulation of surveyed reference points on each casing from which the water level measurements were taken?

Direction of Regional Groundwater
WAC 173-304-600(3)(b)(i)(E)

(10) Analysis of local aquifers systems?
WAC 173-304-600(3)(b)(i)(F)

I have water rights to my spring Two miles away - Several wells have been drilled - codes of water -
WAC 173-304(w) what is the seasonal/mean annual flow? Wetlands?

(11) WAC 173-304-600(3)(b)(i)(I)

Were water samples ever taken? I know I read when the water was quite pure but were not done? also the location where the samples came from.

(12) WAC 173-304-600 (3)(b)(v)(J)

Calculation of site water balance.

need to calculate the site water balance wasn't in any of the earlier books - was a citation of the methodology used to determine the water budget? Verification earlier was impossible

(13) will that lower the Decker Creek - Silver Lake amounts of water? Can the coho just returned flow with lower water levels - what about Silver Lake + the 83,000 carp just planted there -

(14) WAC 173-304-600 (3)(b)(i)(J)

Conceptual design of ground surface water monitoring systems

Only 4 wells? One upgradient & 3 downgradient wells? You will not be able to monitor that size of a landfill. Need more wells drilled -

the system is not adequate.

(15) WAC 173-304-600 (3)(b)(i)(L)

land use in the area.

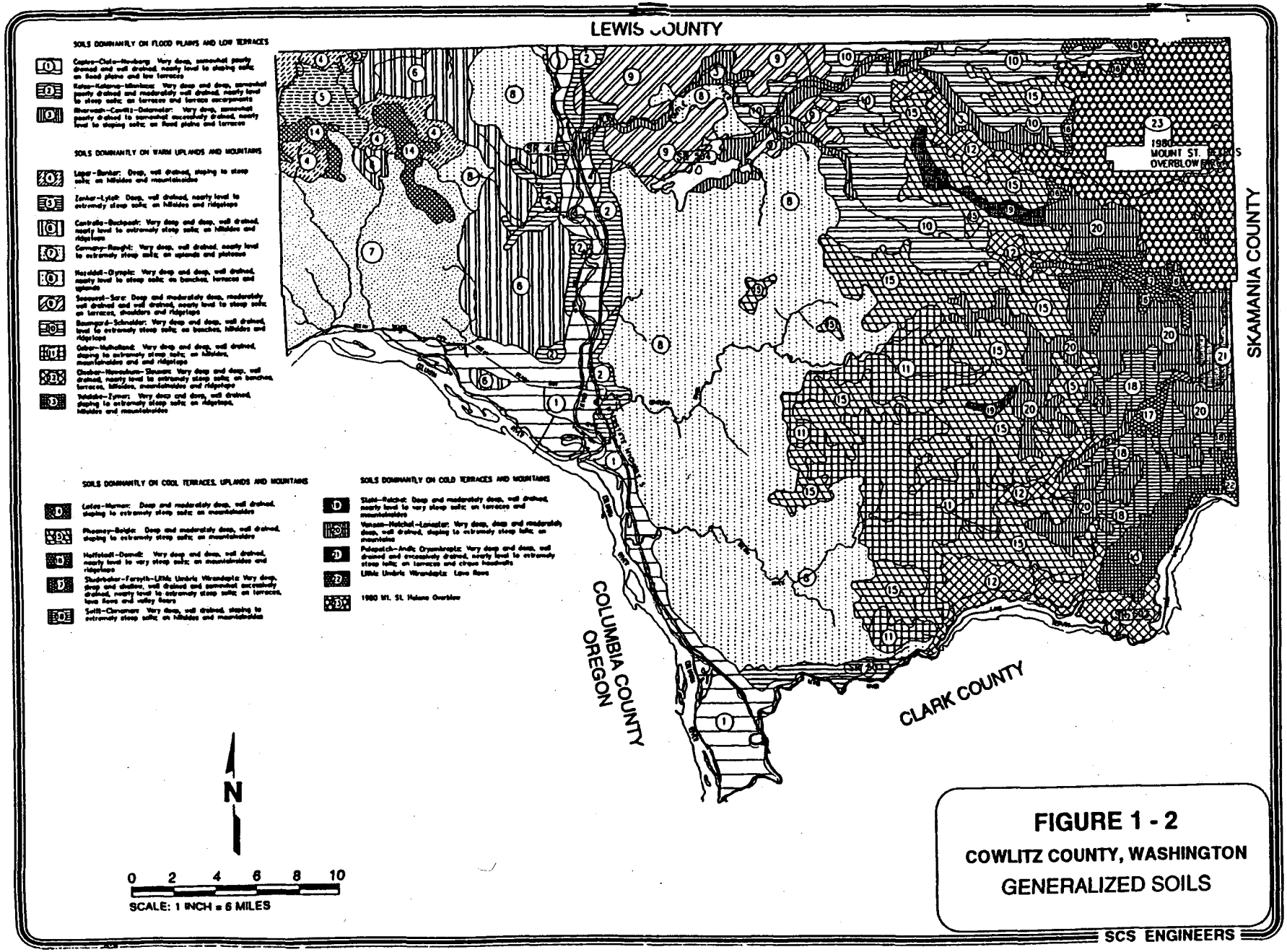
How can you go & plant trees & take tax write offs & then go into dump business on same land? How you checked if Ecology is allowed a change in land use? Just because

they are Weyerhaeuser & doesn't mean this has been looked into. Please do.

(16) WAC 173-304-600 (3)(b)(i)(A) Topography of the site. U.S. Soil Conservation said it was not a good site for a dump. In DEIS - Weyer says its an excellent site - wrong - check with US Soil Conservation - I sent you the information last June after public meeting —

the soil weyer says is there is different than the US Soil Conservation and now the Cowlitz County Public works Solid Waste (1992) Comprehensive plan also goes with what I say — they have a map & it shows Olympic soils + Hazeldell Soils. attached

Clara Wilkins Chr.
NCEC
2505 So Silver Pk Rd
Castle Rock, WA 98611


LEWIS COUNTY
SKAMANIA COUNTY
COLUMBIA COUNTY
OREGON
CLARK COUNTY
SOILS DOMINANTLY ON FLOOD PLAINS AND LOW TERRACES
SOILS DOMINANTLY ON WARM UPLANDS AND MOUNTAINS
SOILS DOMINANTLY ON COOL TERRACES, UPLANDS AND MOUNTAINS
SOILS DOMINANTLY ON COLD TERRACES AND MOUNTAINS
1980 MT. ST. HELENS OVERBLOW
N
0 2 4 6 8 10
SCALE: 1 INCH = 6 MILES
FIGURE 1 - 2
COWLITZ COUNTY, WASHINGTON
GENERALIZED SOILS
SCS ENGINEERS

RESPONSE TO LETTER NO. 41

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1A. Your comments refer to WAC 173-304-600(3)(b), which are site characterization requirements for a solid waste permit application. For purposes of the EIS, it is only necessary to characterize the site to the extent necessary to allow an evaluation of the probable significant adverse impacts of the proposed landfill. The site characterization requirements are addressed in detail in Part 1 of the solid waste permit application, which has been reviewed and accepted by Ecology. Ecology's initial review comments and EMCON Northwest's responses are addressed in the response to Letter No. 8, Comment 1.

1. Surface geologic mapping of the site and well logs at the Headquarters Camp provide sufficient information to interpret subsurface geology at greater depth than the depths of the wells. This type of interpretation is a standard practice of the geologic profession.

   As discussed in Section II.A.2, Groundwater, the shallow aquifer impact analysis (Appendix E of the EIS) shows that there would be no significant adverse impacts on the shallow groundwater from a potential leak in the landfill liner. It would follow that any impact to the deeper aquifer would be even less due to greater dilution. Therefore, a detailed characterization of the deeper aquifer zone is not necessary to evaluate probable significant adverse impacts.

2. See response to Letter No. 18, Comment 3.

3. See responses to Comment 1A above and Letter No. 63, Comment 15.46.

4. See responses to Letter No. 9, Comment 10 and Letter No. 18, Comment 6.

5. See response to Comment 1A above. Additional hydraulic testing has been conducted at the site per discussions with Ecology. Water level measurements have been collected at all the site wells and piezometers for over 2 years.

6. See response to Comment 5 above.

7. See response to Comment 1 above.

8. Water budget calculations that describe the recharge/discharge relationship are discussed in Section II.A.3, Surface Water. As noted in the introduction to that section, further details are provided in the surface water hydrology report in Appendix E of the *Environmental Technical Report* (Beak, 1991a). This report, as well as other background material for the EIS, is available for review at the Health District office (see Section N

of Fact Sheet and response to Letter No. 9, Comment 1). The responses to Comment 10 below and Letter No. 69, Comment 39 are also relevant.

9. See response to Comment 1A above.

10. Section II.A.2, Groundwater, discusses the potential impact of the proposed landfill on groundwater recharge. Very little of the precipitation that falls on the landfill site recharges the groundwater aquifer beneath the site. Most of the precipitation is evapotranspirated (taken up by plants) or discharged via the shallow groundwater system to adjacent streams as runoff. Therefore, the relatively small amount of groundwater recharge prevented by the liner would not significantly lower groundwater levels beneath the landfill, or have any measurable effect on wells in the project area. With regard to the remainder of this comment, it is not clear what section of the MFS you are referencing or what your concern is. Also, see response to Comment 1A above.

11. The locations of water sampling, and the parameters for which tests were conducted, are described in the geology/hydrology report listed in the EIS references as Sweet-Edwards/EMCON (1991c). This report was submitted to the Health District and Ecology in support of Part 1 of the solid waste permit application, and is available for review at the Health District office. Also, see response to Comment 1A above.

12. See response to Comment 8 above.

13. See responses to Comment 10 above and Letter No. 56, Comment 2.

14. See responses to Letter No. 9, Comment 3 and Letter No. 69, Comment 9.

15. The Headquarters Site has been removed from the tax rolls as managed timber land. Also, see response to Letter No. 63, Comment 16.46.

16. Soil mapping by the U.S. Soil Conservation Service (SCS) is very generalized, and is not adequate to support site-specific design. Therefore, further characterization of on-site soils was conducted through exploratory backhoe pits and drilling. Results are reported in the geology/hydrology report submitted in support of Part 1 of the solid waste permit application (see response to Comment 11 above).

    As noted in Section II.A.1, Earth, the Weyerhaeuser soil classification terminology differs from that used by SCS. Most of the soils on site belong to the SCS-defined Olympic Association. The differences in terminology have no effect on the ability to evaluate the probable significant adverse impacts of the proposal, and are therefore not of concern for purposes of this EIS.

LETTER NO. 42

Comments on DE&S
Proposed Weyco landfill (Hulphers Site)
att: David Riggs.

9/2/92

Cowlitz-Wahkiakum County Health District
SEP 10 1992

On April 16, 1991 the Pollution Control Hearings Board issued findings, Conclusions & Order on Summary Judgement (PCHB No. 90-165)

(1) Reviewing the document it Says Page 6: the district has Responsibility, whether permit application Conforms etc. (Enclosed copy of Judgement - Underline & marked)
The State of Washington Dept. of Ecology also Has to review this permit to Determine Compliance RCW 70.95.185.
Have you? Has D.O.E.?

(2) The permit is for 500,000 tons but yet the DE&S says Weyer wants to dump nearly 900,000 tons (per yr),

(3) the permit is for non-Hazardous Wastes (Weyco says) As the biggest polluter in the state: How are you & D.O.E. going to give Weyco the permit? How is the Hazardous & Non-Hazardous waste going to be segregated? How are you going to fine them? You haven't yet that I know of - the Mt. Solo landfill is on the Superfund list - But no fine. (DOE to David Riggs C-W-H-D - March 5, 1991) not even a slap on the wrist.

(4) Letter Mar 21, 1991 D.O.E. to David Riggs on Nopac Sludge. How did you determine that the Sludge couldn't go to Mt. Solo landfill but would be OK to put up here at Hulphers Landfill?

(5) What is "crystal violet liquid"? Is it hazardous? What happens to the containers now? A source said weyco dumping 3 containers per day into my tank at work (5-gallon) & that it is highly corrosive. (Norpac)

(6) Also in 1988 (Sept) 18-24 drums of water-based paint sludge (letter to Robert Radakovich from Weyco Ken Johnson) was to be dump at that (now mt-Solo landfill) landfill. weyco said its not dangerous waste under WAC 173-303, since this is not covered it the permit, will this sort of waste be allowed at the Hidden Valley site?

(7) In Feb 1988, they (Weyco) sent Radovich a letter saying 40-50 drums of Non-Hazardous Materials - state mixed spent chemicals - Quote: the disposal contractor working this job determined through test information & material safety data sheets that some wastes are not dangerous. We attempted to sewer these drummed materials but the chemical had set up through time (?) & was now solid, would be delivered. Were they? Are we going to have that kind of inspection of Material when this Drum problem was OKed by Weyco's Ken Johnson their Regional Environmental Engr.?

April 15, 1983, 90+ drums were to be dumped. Paint sludges, Veneer dryer scrubber sludge & solvent Cement Waste.

(8) Weyerhaeuser co has not shown the

residences of this area that they can be trusted to monitor the materials that will go through their recycling center. I recommend (+ fuel for the CWHD standpoint) that the CWHD + DOE hire a full time employee (3 persons if center open 24 hrs a day) to monitor these materials at the Weyerhauser Co. recycling site.

Clara Welker Ch.
North Cowlitz Env. Council
2505 So. Silver Lk Rd
Castle Rock WA 98611
206-274-9179

RESPONSE TO LETTER NO. 42

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. The Pollution Control Hearings Board stated that, pursuant to RCW 70.95, the Health District and Ecology have the responsibility to determine whether the solid waste permit application conforms to the approved Comprehensive Solid Waste Management Plan. The Health District's determination as to conformance is discussed in the EIS in Section I.A.4, Consistency with Comprehensive Solid Waste Management Plan and RCW 70.95. Ecology's determination will be made as part of the solid waste permitting process.

2. See responses to Letter No. 8, Comment 3 and Letter No. 9, Comment 15. Part 2 of the solid waste permit application will be for 1,000,000 cubic yards (rather than tons) per year, which is consistent with the analyses in this EIS. The response to Letter No. 62, Comment 4 is also relevant to waste quantities.

3. See response to Letter No. 17, Comment 1.

4. The problems associated with sludge disposal at the Mt. Solo Landfill (primarily odor) related to the decomposition of unincinerated wastewater treatment solids that were stored in an open pile, without mixing with other wastes or periodic cover, in close proximity to adjacent residents. These conditions would not occur at the proposed site. Pursuant to the Plan of Operation, all wastes received at the facility would be mixed, deposited in a cell, and periodically covered. In addition, to the extent possible in the future, Weyerhaeuser intends to incinerate its wastewater treatment solids, eliminating any odor issues. With the exception of the waste pile discussed above, this waste stream was successfully managed at Mt. Solo Landfill without significant off-site odor impacts.

   If odors are generated at the proposed landfill from the production of landfill gas, an active gas collection and destruction system would be implemented (see response to Letter No. 9, Comment 11). The response to Letter No. 17, Comment 1 is also relevant.

5. Comment noted. See response to Letter No. 17, Comment 1.

6. Comment noted. See response to Letter No. 17, Comment 1.

7. Comment noted. See response to Letter No. 17, Comment 1.

8. Your recommendation is noted.

LETTER NO. 43

D&S Proposed weyer. Co. Dump project Hoffstro Camp.

Cow. Wah. Health Dist
1516 Hudson ST.
Longview WA 98632

9/10/92.

Dear Ms Riggs:

How do you, CWHD, Dof Weyerhaeuser Co. get around the Clean Water act? a dump on top of a stream?

Is this a non-dependent water project or a water dependent project? Review the Clean Water Act very carefully - a project has to abide by the laws of this country. This project does not comply with the Clean Water act.

Clara Wilkins Ch.
North County Env Council
2505 S. Silver Lk Rd
Castle Rock, WA, 98611

RESPONSE TO LETTER NO. 43

Clara Wilkins, Chairman
North Cowlitz Environmental Council

The Federal Water Pollution Control Act as amended (also known as the Clean Water Act) authorizes states to develop water quality standards and establish permitting programs to prevent degradation of ground and surface water quality. Water quality standards developed by states must be at least as stringent as federal water quality standards. Section II.A.2, Groundwater, and II.A.3, Surface Water, evaluate the potential impacts of the proposed landfill in terms of compliance with applicable state and federal water quality standards. In effect, this is the same as evaluating the project's compliance with those provisions of the Clean Water Act that the state is authorized to implement, and that are of concern in a SEPA EIS.

Although the Clean Water Act authorizes states to develop standards and establish permitting programs to prevent degradation of water quality, Section 404 of the Act authorizes the Corps of Engineers to establish a permitting program for the discharge of dredged or fill materials into waters of the United States. A Section 404 permit is required to develop a landfill at the Headquarters Site due to the proposed discharge of fill material into wetlands.

The Corps of Engineers evaluates Section 404 permit applications in accordance with EPA regulations referred to as the "Section 404(b)(1) guidelines". These regulations, which differentiate between water dependent and non-water dependent uses (such as the proposed landfill), are not applicable to the SEPA process or to the state permitting processes. However, before the Corps of Engineers can issue a Section 404 permit, it must receive certification from the Washington Department of Ecology that the proposed project complies with state water quality standards developed pursuant to the Clean Water Act. The water quality certification specifies conditions that the applicant must comply with to ensure compliance with the Act.

The responses to Letter No. 9, Comments 4 and 28 are also relevant to this issue.

LETTER NO. 44

Cowlitz - Wankiakum Counties

SEP 10 1992

Health District

D & D's

Weyco Dump (proposed Hoffer Rd)

To

Cow-Wah Health District

1516 Hudson ST

Longview, WA. 98632

att: David Riggs

9/10/92

(1) Does the proposed weyco Hoffer dump conform to the Growth Management Act? (Wash. State)

Does the Growth management Act (State of Washington) include industrial sprawl such as this would be? Has the Cow-Wah Health District (Lead agency) + D.O.E. investigated this possibility?

The Wash. State Growth Mgts. Act opposes such developments in outlying areas - no support systems such as pre dipt. sewer lines.

(2) Have you checked the Hoffers Camp area (to be re-opened) for out dated septic tanks - PCB's on the property, oil/Paint dumping into Sucker Creek. Areas are polluted on the Hoffers Camp property.

Clara Wilkins Ch.
NC.EC.
2505 So. Silver Lake Rd
Castle Rock, WA. 98611

RESPONSE TO LETTER NO. 44

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. Cowlitz County is not required, and has not opted, to develop comprehensive land use plans and development regulations pursuant to the Growth Management Act, because its population did not increase by more than 10 percent in the 10 years prior to the effective date of the Act (RCW 36.70A.040).

2. Weyerhaeuser would conduct an environmental assessment of relevant portions of the Headquarters Camp area, and would take any necessary actions consistent with the assessment before landfill construction begins.

LETTER NO. 45

Cowlitz - Wahkiakum Counties

SEP 10 1992

Health District

D E S

Proposed Weyer. Landfill - Hdqtrs Camp

att: David Resp

Sept 4, 1992

the issuance of Determination of Significance Scop (Public Meeting Notice for open house & public meetings - June 4 & 5, 1991.)

(1) you identified the following area's for Public (June 1991) review & Comment (Not all area's in the State # Rules WAC 197-11 Sepa RCW 43.21C scop should be addressed - But I address all of the area's) - earth - air - water plants & animals, fisheries, wetlands, environmental health, land use, cultural resources, transportation, an visual resources.

Technical areas to be covered within these Hearing areas include seismicity, surface & ground water quantity/quality, lake water quality, noise, spill risk & Spawning area's.

Weyerhaeuser covered Earth, air, Surface Water, ground water, plants - animals, noise, land Aethetics, Historic - Cultural preservation, Transportation & public Services, wetlands, human health only in DEIS.

(2) Nothing has been addressed to the Mt. St. Helens Eruption (18 miles away) the fault in the area - the earthquake potential in the area (God, they are closing Trojan Down). the CWU & DOE is taking this area of concern too lightly (you say you have gone over the DEIS & So does DOE)

I am enclosing short comments on the subjects I feel address in the DEIS. (3 pages)

Clara Watkins Chr

North Cowlitz Envr Council

2505 So Silver Lk Rd Castle Rock, WA 98611

I additional comments - (NC & C)

Natural Environment:

③ Earth: DEIS Volume I July 1992 - This setting Geology - Paragraph 2 -
may have resulted from the regional folding event or from
rotation along faults - also Wyo going by 5 to 50 million
years ago. To tell with them. It's now - Trojan Shutting
down - earth quake fault. I've told you, sent clipping of
Mt St Helens fault also the county commissioners wanted them
building because of increased worry of new data on earthquakes.
Look into this more - why haven't you?

Groundwater

④ Groundwater (II 7) move 0.6 to 3 ft in a month. Come
on - we are not in eastern Oregon. There are many, many
ways for that water to get to Silver Lake & our water
supplies very fast. What about the elevation 1000 ft down to 550
~~Surface Water~~ feet & how fast that moves?

⑤ Not only do we have above average rain fall
(70 inches) but Wyo. cut all the trees in the
Watershed so the trees roots do not soak up some of the
water & nothing to hold back the water. You should look
at the surface water at the headwaters of Sucker creek where
the landfill will be.

Air Quality

⑥ We used to smell Fibre up here (18 miles). So Don't
tell me, I'm not going to smell the dump two miles (2 miles)
⑦ away. Climate you say (II 26) snow comes down to 1000 ft. I've
seen 3+4 ft of snow & I'm lower than that. Talk about Drifts!!!

Plants & Animals

⑧ The plants & animals haven't had much chance of
survival at the dump site because of extensive logging
practices. We do see deer, elk, eagles, ospreys but
you don't go into the animals you will bring - mice
Rats, etc - Flies

(9) Transportation — Railroad steel in need of alot of repair - what about the rails that should be welded? what about all the wrecks since the limbers been upgraded? Hdqtrs Road can't hold up to logging trucks let alone all the trucks from wastes & leachate if used

Public Service & Utilities

(10) Only public service is telephone & lights. Weyco used to have a firetruck at Hdqtrs. Should have truck there at all times since Castle Rock fire department is 10 miles away. What about septic tanks or a new sewer system at Hdqtrs?

(11) Also why not make weyco put in a public water system above the dump for the residences down stream? free.

(12) Also in Seattle, Boeing gave city of Seattle concessions, such as buses, parks. Ole Weyco can afford to clean up Silver Lake after all the pollution it has caused the lake. That is the concession we ask for - Clean up of Silver Lake - No dump ~~at~~ above Silver Lake

Clara Wilkins chr.
2505 So. Silver Lake Rd., Castle Rock, WA 98611

(13) Wetlands - wetlands went from 40 acres (reliable source told me) to 13.03 in this report (the Corps of Engr. had another total. When you pay people (wages) to do the survey & CWLD - DOE - US Corps of Built Environment Engr. all believe you; It is not an objective survey. Govt should do it. Noise -

(14) Like I've said before: am a broken record. I hear the train coming - miles away (too loud?) I hear the logging 5 - 10 miles away - I lived when Hdqtrs was running & I heard them. They did not run equipment 12 hrs a day 6 days a week. I will have my hearing tested the day the dump opens. Human Health

(15) You people care about our health - JUST Plain Bullshit. Excuse me - I have pucky. If you do - its no permit - Land Use

(16) What about the Kid's tree farm. Talk about a heartless bunch of corporate people. Also isn't it replanted in a tree farm - What about Topes?

(17) Aesthetics - Come on. What a beautiful site !!! look up at a 250 mound of corporate garbage. Also I've said it before & the weyerhaeuser people have contacted me - I can see proposed site from rental property I have - Value prop -
Historical/Cultural preservation

(18) Hdqtrs Camp is last of logging Camp in area I guess wyssa is not proud of that

RESPONSE TO LETTER NO. 45

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. All the issues you list are discussed in the EIS under one of the Section II headings. The heading in the EIS is Human Health rather than Environmental Health, because other aspects of environmental health are discussed in other sections (for example, Sections II.A.2, Groundwater, II.A.3, Surface Water, and II.A.5, Plants and Animals).

2. See response to Letter No. 18, Comment 3.

3. See response to Letter No. 18, Comment 3.

4. Groundwater flow velocity depends not only on gradients, but on the hydraulic conductivity and porosity of the formation. The groundwater velocities calculated for the Headquarters Site are typical of volcanic material of the type found at the site. Although the precipitation in western Washington is much greater than eastern Washington, this is not a factor that influences groundwater flow velocities.

   Most of the shallow groundwater from beneath the site will eventually discharge to Silver Lake. There are no hydraulically downgradient wells between the site and Silver Lake.

5. Surface water-related issues, including runoff, are evaluated in Section II.A.3, Surface Water. Also, see response to Letter No. 11, Comment 8.

6. The principal odor from pulp and paper mills is due to reduced sulfur compounds emitted from a number of sources, including some (such as smokestacks) that are above the ground. Therefore, under meteorological conditions conducive to odor formation, the mills can be smelled from long distances. In contrast, the primary source of odor at the proposed landfill would be landfill gas produced from anaerobic digestion (biological activity under oxygen-depleted conditions) of buried or covered waste material.

   As discussed in Section II.A.4, Air Quality, landfill gas from the Mt. Solo landfill would be expected to be similar to that produced by the proposed facility, because similar types of waste were accepted. Only one reduced sulfur compound has been found in Mt. Solo landfill gas at levels exceeding the analytical detection limit. Modeling conducted for purposes of the EIS indicates that, even with no mitigation (no combustion of landfill gas in flares), there would be no significant odor impact 2 miles away. As discussed in the response to Letter No. 9, Comment 11, if a gas control system is determined to be needed, the high-temperature flares would destroy virtually all the reduced sulfur compounds in the landfill gas. The responses to Letter No. 42, Comment 4 and Letter No. 62A, Comments 11 and 13 are also relevant to the subject of odor.

7. The 1000- to 2000-foot snow line referred to in the EIS is for a typical year and is the lowest elevation at which there is sustained snow cover throughout most of the winter, rather than short term transitory snow cover.

8. So-called "vectors" such as mice, rats, and flies require control measures at municipal solid waste (household garbage) landfills due the presence of putrescible materials such as food waste. However, vectors would not be a problem with the proposed industrial solid waste stream.

9. See responses to Letter No. 69, Comments 13 and 25.

10. Fire protection at the landfill would be provided by Weyerhaeuser in accordance with the Plan of Operation. A discussion of fire response has been added to the EIS (see Section I.B.1.f(5), Fire Response). Sewage disposal for the small number of landfill employees would be addressed during final design. If a new sewage disposal system is needed, it would meet all applicable Health District regulations. Because there would be no probable significant adverse impacts associated with such a system, it is not addressed in the EIS.

11. The EIS concludes that the proposed landfill would have no significant adverse impact on public water supplies, so no mitigation is necessary.

12. Your comments and opposition to the proposed landfill are noted.

13. The acreage of wetlands affected by the proposal and alternatives and reported in the EIS was verified in a field survey by the Corps of Engineers in March 1992. See response to Letter No. 56, Comment 3.

14. See responses to Letter No. 22, Comment 3 and Letter No. 26, Comment 5.

15. Your comment and opposition to the proposed landfill are noted.

16. Comment noted. See response to Letter No. 41, Comment 15.

17. See responses to Letter No. 47, Comment 28 and Letter No. 63, Comments 16.49 and 16.50.

18. Comment noted.

LETTER NO. 46

Don & Martha Belding
225 Lakeview Drive
Ph: (206) 274-7866
Silver Lake, WA 98645

Cowlitz-Wahkiakum Counties
SEP 10 1992
Health District

1

September 10, 1992

Cowlitz Wahkiakum Health District
1516 Hudson
Longview Washington

att; David Riggs

Response to EIS Proposed WEYCO Industrial Waste Dump

In addition to the testimony and letters given at that time I would like to add;

(1) The EIS does not adequately address the flood problem in Sucker Creek Canyon. To say the EIS addresses a 25-year flood is not adequate.

Sucker Creek is the second largest contributor to Silver Lake (WSU study). There are only two major streams into Silver Lake, and Sucker Creek and Hemlock.

Silver Lake is 3,250 acres of water. It is contained by a 300' weir. We have records for the last 13 years showing the amount of water going over this weir. And we also have records of how fast Silver Lake level rises . Our records show the lake, all 3,250 acres, has risen as much as 4 1/2" in two days. The water over the 300 foot weir has been as high as 18' deep.

Sucker Creek Canyon is crossed by a WEYCO railroad bridge. and two roads. Those roads have in the past had two two-foot (total four foot clearance) culverts to move water. The railroad has washed out in floods. The roads have washed out several times. Those Culverts have recently been replaced with 7' high culverts . And the floods come fast. Our neighbor , Curly Carnine, was once picking berries on one side of Sucker Creek was stranded when Sucker Creek rose from flooding.

We have records of the lake rising from rain in the area back of Sucker Creek, when there was no rain over Silver Lake.

The Silver Lake dam and weir were built to control flooding. Before it was built, the lake would rise so quickly it flooded Highway 504. The water would recede, usually, in a day.

Enclosed is a diagram of the watershed into Silver Lake. (Provided by the Silver Lake Flood Control District), showing where the water came from. . The terrain above the Sucker Creek Canyon is considerably higher than the 486.5 level of the lake, and the water comes in rapidly after a rain..

And flooding is getting worse each year. . Clear cut logging in much of the watershed has resulted in more water coming faster through this canyon , And it can only get worse, for logging in this area is going on today, and more is scheduled.

Our dock was built 10 years ago to be above flooding, and was not flooded for many years. It has been overflowed four times the last three winters. Water was three inches over the dock last fall in a sudden storm. The water receded in two days..

(2) John Robinson, at the second public meeting addressing the Eis, gave figures which showed that the storage capacity and the number of tank cars (10) is not adequate to address rainfall on the five acres of dump proposed to be left uncovered in winter. He did not even address the sudden and heavy rainfall, such as we have in this area. We are not told if the borrow area (20 acres) is covered.

(3) Nor, has snow pack runoff been addressed. This area has been known to have snow more than a foot deep. If this snow should be melted by a heavy rain, how is it handled?

(4) No statistics are given in the EIS of recent increases of run off or how much more runoff is expected after the logging which is going on. Nor, are figures given on how much more is expected after the construction, which will result in loss of the present barriers to flooding.

(5) The flooding we have personally observed and recorded. I do not see addressed in the EIS.

I am reminded of a true story I heard from a governmental representative who said, " Agencies often think of public involvement as a pain in the keister, but sometimes we should listen. He told of a government project to bring electricity to an Eskimo village in Alaska. Extensive studies were made by the agency, and it was decided the best way to proceed was to string lines over a certain ridge.

The local native chief told the agency. "The lines will blow down in winter. That ridge has high winds in winter." He was ignored, and the lines blew down three times before the agency put the lines in the lowlands. I'm certain that native , who was waiting for electricity to his village, thought agencies were also a pain, and he probably didn't use the term, keister.

So, we citizens maybe a pain in the keister, to you agency people, but we live here, we know this area. We promise you if this dump is put in this canyon, it will be flooded, and the

leachate will come into Silver Lake and on to the Toutle and the Cowlitz River. Count on it.

And you who are charged with protection of the environment won't have to live with it. The people of this County will. The EIS is totally inadequate in addressing flooding of this canyon.

Martha Belding

Martha Belding,
Silver Lake.

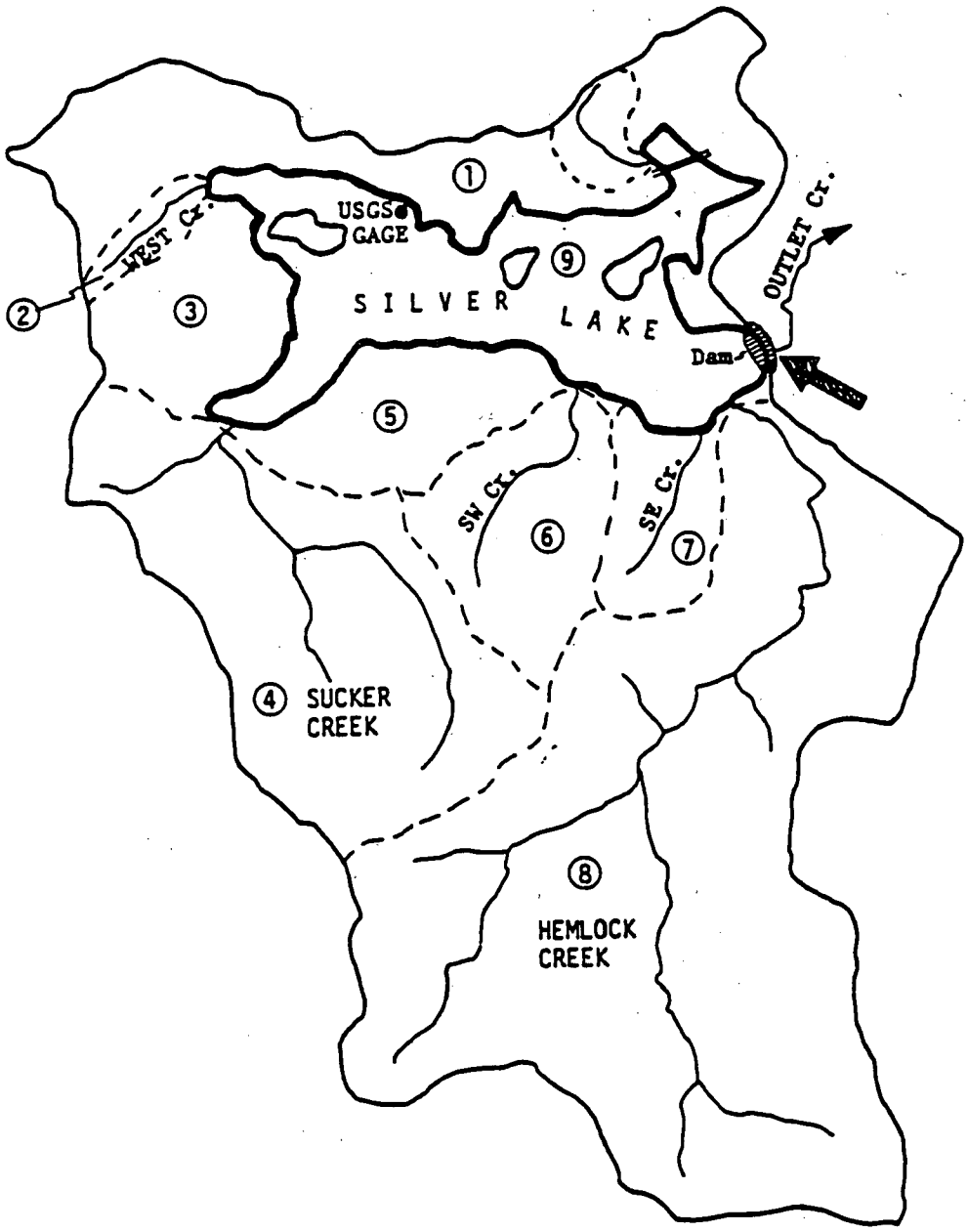


Figure 4. Silver Lake subbasin designations. (from Bhagat et al., 1975).

91-0604.B

RESPONSE TO LETTER NO. 46

Martha Belding

1. Section II.A.3, Surface Water, discusses the effect of the proposed landfill on stormwater runoff into Silver Lake. The 380-acre Headquarters Site is only a small percentage (about 1.4 percent) of the total drainage area contributing runoff to Silver Lake. Therefore, with the proposed detention of peak flows (see response to Letter No. 18, Comment 6), the landfill would have no significant impact on the flooding potential of Silver Lake.

2. See responses to Letter No. 9, Comments 8 and 10, and Letter No. 63, Comment 15.68. In considering the capacity of the leachate pond to accommodate precipitation, it makes no difference whether the form of precipitation is snow or rain.

3. See responses to Letter No. 9, Comment 10 and Letter No. 18, Comment 6.

4. See response to Comment 1 above.

5. See response to Comment 1 above.

Sandoz 1

COWLITZ-WAHKIAKUM
COUNTIES

SEP 10 1992

HEALTH DISTRICT

P.O. Box 6042
Olympia, Washington 98502
September 7, 1992

Richard Jones
Cowlitz-Wahkiakum Health District
P.O. Box 458
Longview, WA 98632

Dear Mr. Jones:

(1) *PLEASE SEND ME NOTICE OF FUTURE PUBLIC MEETINGS ABOUT THE PROPOSED HEADQUARTERS CAMP SOLID WASTE DISPOSAL FACILITY, AND COPIES OF ANY FUTURE DRAFT AND/OR FINAL EIS. I HAVE REQUESTED THIS INFORMATION FROM YOUR OFFICE OVER THE PHONE AND IN WRITING, AND HAVE NOT TO DATE RECEIVED IT EVEN ONCE. THOSE OF US WHO LIVE OUTSIDE OF THE IMMEDIATE AREA DO NOT HAVE ACCESS TO NEWSPAPER NOTICES. THANK YOU.*

Here are my comments on the draft Environmental Impact Statement for the proposed Headquarters Camp Solid Waste Disposal Facility.

(2) I.3. While Weyerhaeuser should certainly be commended for efforts to reduce waste and move toward less toxic end products of the pulp process, their efforts in this direction are hardly the point in this EIS, which should address what actually will happen. "Significantly reduced chlorinated organic compounds" are not the same as "no chlorinated organic compounds". The use of chlorine dioxide substitution mentioned on page I-4, for example, reduces overall organochlorine discharges by about 40%. How will waste be tested for dioxin, furans and other toxic organochlorines, and what assurance do those of us who own land near the proposed disposal facility site have that **all** contaminated waste will be separated out and **not** hauled to Headquarters Camp? What extra monitoring, hauling, and dumping precautions will be taken precisely because kraft technologies are so likely to contain organochlorines? What if these substances - highly toxic to fish, animals and humans - are accidentally introduced into the fill waste? Are the proposed back-up systems and monitoring procedures enough to keep dioxin (which I believe is classed as a hazardous substance) out of Salmon Creek, Silver Lake and the groundwater? I am also concerned about the effective life of the liner of waste "cells", as organochlorines are known to persist in the environment. Will the liner outlast the carcinogenic and mutagenic characteristics of these compounds?

(3) Have independent - i.e., not directly paid for by Weyerhaeuser - chemical tests been performed on the materials listed in table I-1 (page I-9)? If not, they should be, and results listed in the final EIS. We deserve information that proves to us that the solid waste Weyerhaeuser proposes to bury in our backyards - and on a slope leading directly into a large lake used by hundreds of recreationists - is free of dangerous, hazardous, and toxic chemicals. Clay binder and ink from newsprint recycling, to cite just one example, may

contain heavy metals. What do the other substances listed in the table contain? This information is vital to human health, not to mention the health of the watershed ecosystem.

(4) (I'm not willing to accept the statistics on page II-11-12. I don't know how they were obtained or who did the tests. Perhaps this information could be included in the final EIS.)

(5) I am concerned about the type of waste classified on page I-9 as "non-Weyerhaeuser solid waste." These materials are treated rather casually in this draft EIS, but many substances toxic to animals, fish and humans are used or have been used in construction. Just one such substance is PCP (pentachlorophenol), which is soluble in water, extremely toxic to fish and readily absorbed through human skin, gastrointestinal tract and lungs. (Some PCP is apparently already present in Weyerhaeuser pulp mill waste; see Table II-5.) A spill of construction/demolition waste during a heavy rain could introduce PCP into the proposed landfill area. (I am aware that the definition of "demolition waste" in WAC 173-304 specifically excludes treated wood, asbestos and "construction waste"; I'm also aware that laws are not always followed to the letter. And we are dealing with health here, a realm in which a single mistake can result in disease and death. The Exxon Valdez disaster in Alaska is an example.) Are liners, etc., able to contain PCP and other substances once or currently used in construction? Other concerns include asbestos and lead paint, both dangerous to humans in particulate form, or if ingested. One can't help noticing that although Weyerhaeuser says it currently generates about 220,000 cubic yards of landfill waste per year, the planning figure used in this draft EIS is 750,000 cubic yards. If both figures are accurate, will construction waste - the disposal of which is a potential money-maker for Weyerhaeuser - make up the difference? How will construction waste be monitored to keep dangerous and hazardous materials out of the landfill? Will the test wells and monitoring procedures include test protocols for these and other substances and chemicals contained in construction/demolition waste, as well as those regularly found in pulp mill waste?

(6) There is also a clear implication that the proposed waste disposal site will be used in place of recycling during market swings which make recycling temporarily unprofitable (page I-7). This seems frankly duplicitous to me, given the positive tone of the draft EIS about Weyerhaeuser's efforts to cut down the waste stream and to recycle what it can back into the paper-making process. If the waste can be recycled, it should be. One of the goals of the Washington State Solid Waste Plan is that waste reaching a landfill "will contain no material that is reusable, recyclable or compostable" (page 13).

(7) I.5. It seems to me that a draft EIS is not the place for Weyerhaeuser to make comments (or, perhaps, threats) about possible future expansions in its local operations. Nor do I think that the possibility of delay in approval of a waste disposal site suitable for their use should rush approval of a possibly unsuitable site - i.e., that at Headquarters Camp. Building a landfill in a large recreational lake watershed, near private dwellings, is a serious step liable to have consequences for years to come. If Weyerhaeuser has chosen to put all their efforts into the Headquarters site, then delayed approval or rejection of that site is their problem. I find it irrelevant here.

(8) Page I-14. Who will be doing further inspection and evaluation of off-site waste at the SWRTF? Who will be monitoring the inspectors?

(9) Page I-21. Who will be monitoring construction of the bottom liner? Who will hire and monitor the "registered engineer"? And will the "rigorous construction quality assurance program" be followed for every single cell? Just how vulnerable to plant roots and burrowing animals is the cell liner?

(10) Pages I-26-27. How will run-on water from undisturbed land be diverted? Will the diversion structure be earthen? Concrete? How much erosion are we talking about? And will the diversion system have the capacity to handle a 100 year flood event/storm? We're talking about pollution of a large lake system here; I think every eventuality should be prepared for. I also don't see where allowances have been made for increased run off that will result from construction and soil compaction of roads, parking lots, etc. Who will monitor the reconstruction of the Southern Tributary diversion channel, and as time passes, the success of the new route?

(11) Pages I-27-28. At least one cell of the proposed landfill will be open during at least one 25-year storm event (during the 30 year active life of the operation) and quite possibly a 50 or 100-year event. What happens to leachate in such a case? What potential damage will it do?

(12) Page I-28. Who will monitor Weyerhaeuser's adherence to erosion control and sedimentation standards?

(13) Page I-30. Who will monitor gas generation, and under what standards will the necessity for a gas control system by judged? Who will be responsible for seeing that Weyerhaeuser designs and installs an adequate system? This should not be left to the complaints of local citizens.

(14) Page I-34. The comment about using "used tires" to hold down sheets of plastic cover is an example of the kind of attitude residents near the landfill fear. Tires can be recycled. They shouldn't be at the proposed landfill. (Washington State's Solid Waste Plan designates tires as "special waste" which require special or separate handling. Page 38.) What's to prevent workers from simply throwing them in the open cell? What other inappropriate waste and waste disposal methods will be used at the proposed landfill?

(15) Page I-35. What exactly is "the extent feasible" in reducing fugitive dust emissions? Feasible in terms of expenditures on Weyerhaeuser's part, or in terms of human health? This should be detailed much more clearly. And who will decide which control measures will be employed and when? Again, this should not depend on the volume and frequency of citizen complaints. And won't pulp chip washer fines contribute to the fugitive dust emissions? How much? How will watering of roads and exposed fill areas, as part of the dust control measures, be accomplished? What water will be used, and how will it be

sprayed? This should be detailed, as the two most likely sources of water - Salmon Creek and the leachate - are not acceptable. Exactly what chemicals will be used for dust-suppression? (See S-23, Table S-1.) Will these chemicals contribute to air pollution? While I'm glad that the draft EIS lists possible dust control measures, I'd like to know that these will be used as part of standard practices at the proposed landfill.

(16) Pages I-36-37. Who will monitor Weyerhaeuser's proposed wetlands mitigation? What authority will the monitor have to require changes?

(17) Pages I-37-38. Who will monitor Weyerhaeuser's proposed wildlife mitigation? What authority will the monitor have to require changes and adjustments?

(18) Page I-38, ff. I'd like to see details of the monitoring programs as part of the final EIS. In every case, I want to know who will do the monitoring and how often, exactly what monitoring procedures will be measuring, who will oversee the monitoring, who pays for it, where and when results will be made accessible to the public, and who will enforce laws and require mitigation of and penalty for leaks, spills, lapses in compliance with laws, etc. I'd also like to know who takes over the maintenance of the landfill and the watch on the environment if Weyerhaeuser goes out of business.

(19) Page II-12. Why isn't any data included here about expected construction/demolition waste materials? Even if they make up only 15% of the final fill, that is a significant percentage. And I notice that chemical analysis results are not included here for other materials Weyerhaeuser itself intends to dump, at least not in a form I can recognize - log sort yard debris, box dump waste, de-inking sludges, other paper recycling reject fiber, pulp chip washer fines, miscellaneous mill solid waste, etc. (Compare lists on pages I-9 and II-12.)

(20) Page II-23. As a member of the family owning the nearest privately-held lakeshore land to the proposed landfill site, I find even the once-in-200-year-spill hazard too risky. This is a chance I do not wish to take, particularly in light of Weyerhaeuser's history of poor maintenance and poor operating procedures (failing brakes, high speeds, overweight cars) on this rail line.

(21) Page II-25. Re HGCS monitoring, see comment for page I-38, ff.

(22) Page II-25. Again, the derailed leachate tank care scenario is a risk I do not care to take. And what mitigation steps will Weyerhaeuser take if water quality does not return to pre-spill conditions within a few days? "Likely" is not a good enough measure of probability when we are talking about ecosystem health - and the value of recreational and residential land. How will Weyerhaeuser return water quality to pre-spill levels, replace the fish and aquatic organisms killed or harmed by the spill; in short, make the stream healthy again? I would like a detailed plan here. Who is responsible for requiring and monitoring their efforts in this case?

(23) Page II-41. See note to page II-25. And what is "the life of the project"? Surely groundwater should be monitored for as long as the substances dumped in the landfill remain potentially harmful to humans and/or animals and fish.

(24) Page II-43. As a member of the family owning the nearest privately-held lakeshore land to the proposed landfill site, I find even the once-in-200-year-spill hazard too risky. This is a chance I do not wish to take, particularly in light of Weyerhaeuser's history of poor maintenance and poor operating procedures (failing brakes, high speeds, overweight cars) on this rail line.

(25) Pages II-46-47. How will animals and birds be kept from drinking possibly contaminated water (run-off ponds, etc.)? How will they be kept from burrowing into ponds and basins, thus allowing leakage of possibly contaminated water?

(26) Pages II-62-63. Have studies been done which examine the chemical composition of the type of waste Weyerhaeuser proposes dumping at Headquarters as it decomposes under landfill conditions? Do we know exactly what we might be dealing with during a lining leak several years - or decades - into the proposed project? If so, what? And why aren't organochlorines considered in Tables II-13 and 14?

(27) Page S-20 Aesthetics

I would like to see information about lights used in the proposed landfill, and their visibility at night.

(28) Aesthetics as a concept means a great deal more than the visible "viewsheds" discussed here. For example, there is a deep emotional pleasure in walking in the quiet and beauty of a natural area relatively undisturbed by human beings. And peace of mind in knowing that I am breathing clean air, drinking clean water, and eating healthy fish uncontaminated by industrial waste. The proposed landfill, if approved, will take away that peace and pleasure. If the sound of a single logging truck engine carries from one end of the lake to another, so will the noise of trains, bulldozers, construction and trucks - regardless of what computer models or field tests show about "acceptable" levels. Rerouting a stream, disturbing eagles, putting a landfill in a predominantly forested watershed which feeds a large lake - these are affronts to aesthetic sensibility. The issue is not one of "if we can't see it, it's OK", but one of what human beings are willing to sanction. In my opinion, qualitative enjoyment of the forest, the wildlife/fish and of the entire watershed should be a consideration , as should ways of balancing any human disturbance (such as the proposed landfill) in harmony with the land and its other residents. The information presented in the draft EIS is extremely sketchy in this regard and woefully inadequate to a complete discussion of the aesthetic effects of the proposed landfill. This section should be entirely reconsidered.

(29) This draft EIS is seriously flawed by lack of detailed monitoring and mitigation plans, and by limited data on aesthetics. For example, I see absolutely no information about how spills and accidents will be mitigated or "cleaned up", particularly along rail lines and roads. Who pays for that? How will it be done? And if irreparable damage will result, shouldn't the project be put on hold until technology catches up to potential disaster?

(30) Despite Weyco's self-advertised improvements in technology used at its Longview plant, there are technologies currently in use in Europe which cause even less damage to the environment. Weyco is now the largest pulp producer in the world; surely technical knowledge and the resources to acquire least-damaging technologies are within their grasp, as are the means to educate people about using unbleached paper products and recycled materials. Frankly, I think the bind they purport to be in re waste disposal is at least partly of their own making, and the urgency simply a test of what "the market" (i.e., citizens and local regulatory agencies) will bear. I remain unconvinced that I should undergo a health risk - and diminution of the quality of a much-loved natural area - simply so a large for-profit business can dispose of the dangerous and unsalable by-products of their own outdated technologies.

Joli Sandoz

Joli Sandoz

RESPONSE TO LETTER NO. 47

Joli Sandoz

1. Your name has been added to the list to receive the notice of availability of the Final EIS. As indicated in that notice, copies of the EIS are available for review at a number of locations, and can be purchased from the Cowlitz-Wahkiakum Health District. If it is not convenient to come to the Health District office in Longview, you may send a check or money order payable to the Cowlitz-Wahkiakum Health District to the address listed in the notice, and the Health District will mail you a copy.

2. See responses to Letter No. 17, Comment 1 and Letter No. 9, Comment 2.

3. See responses to Letter No. 17, Comment 1 and Letter No. 16, Comment 4.

4. As discussed in the EIS section you refer to (Section II.A.2, Groundwater), data on leachate constituents were developed by comparing Mt. Solo Landfill leachate data with laboratory leachate data. (The types of contaminants found in Mt. Solo Landfill leachate would be expected to be similar to those from the proposed landfill, because similar types of waste were accepted.) For each leachate constituent, the highest value observed from either the Mt. Solo Landfill leachate data or laboratory leachate data was used in the liner leak analysis. Laboratory leachate data was obtained by performing an EPA-approved leaching procedure known as the toxicity characteristic leaching procedure (TCLP) on the types of waste that would be disposed at the proposed landfill. Some of the tests were performed in Weyerhaeuser's laboratory, which is an Ecology-approved laboratory, while others were performed by third-party Ecology-approved laboratories.

5. See responses to Letter No. 17, Comment 1 and Letter No. 9, Comment 2. With regard to anticipated waste quantities, see responses to Letter No. 62, Comments 3, 4, and 6.

6. See response to Letter No. 63, Comment 15.26.

7. See responses to Letter No. 8, Comment 2 and Letter No. 11, Comment 5.

8. See responses to Letter No. 16, Comment 4 and Letter No. 22, Comment 2.

9. See Letter No. 9, Comment 20. The construction quality assurance plan is established at the permitting stage and followed for all subsequent work. The proposed polyethylene liner material is very resistant to root penetration. Furthermore, vegetation including the root zone would be stripped and removed from the site prior to construction of the bottom liner. Due to the roadbed and fill slopes around the perimeter of the landfill footprint, vegetation (other than herbaceous weeds) would not grow within 30 feet of the lined area, further reducing the potential for damage from root growth.

Research in West Germany indicates that rats do not chew, and possibly avoid, the types of materials used in flexible membrane liners. For example, when polyethylene liner material was placed in a cage with rats, there were no signs of gnawing after 20 months (Wasser and Boden, 1968). Therefore, burrowing animals would not be expected to damage the proposed polyethylene liner.

10. Section I.B.1.d(5)(a), Southern Tributary Diversion Channel, discusses the diversion of surface water runon. As discussed in that section and in the response to Letter No. 61, Comment 16, the diversion channel would be designed to react to and recover from large storm events in a manner similar to a natural channel. The diversion channel would be created by excavation. It would not be concrete-lined, but high-gradient sections would be armored with rock to withstand flood flows. Low-gradient sections would be grass-lined. Also, see response to Letter No. 61, Comment 16.

    The amount of erosion expected during initial first-year construction activities is discussed in detail in Section II.A.3, Surface Water. Monitoring of the construction of the diversion channel would occur as part of the construction quality assurance plan for the landfill (see response to Letter No. 9, Comment 20). With regard to monitoring after construction, see response to Comment 16 below; Letter No. 9, Comment 3; and Letter No. 69, Comment 9. Also, see response to Letter No. 18, Comment 6 for a discussion of the ability of the sedimentation/detention ponds to handle large storms.

11. See response to Letter No. 9, Comment 10.

12. Compliance with erosion and sedimentation control standards would be required under the NPDES permit for the project, which would be issued by Ecology. In addition to continual monitoring by the landfill operations staff, Ecology would make regular inspections to ensure compliance with permit conditions.

13. See response to Letter No. 9, Comment 11.

14. The use of used tires to anchor plastic cover material is a universal practice, and is one of the ways in which used tires are recycled (the definition of recycling under RCW 70.95 includes reuse of waste materials). The only waste accepted and waste disposal methods used at the proposed facility would be those that are in compliance with the facility's solid waste permit, which would be issued by Ecology. The operation of the facility in compliance with permit conditions would be enforced by the Health District and Ecology under their solid waste programs.

15. The text you refer to has been revised for clarification (see Section I.B.1.f(2), Fugitive Dust Control). Standard EPA-recommended measures discussed in that section would be used to reduce fugitive dust emissions to the maximum extent possible. Although these methods are the most effective dust control methods available, they would greatly reduce, but may not totally eliminate fugitive dust. Weyerhaeuser would use whatever combination of these measures is necessary to meet federal and state air quality standards at the site boundaries, as required by the MFS [WAC 173-304-460(2)(b)(ii)]. The

Southwest Washington Air Pollution Control Agency (SWAPCA) is the agency responsible for ensuring compliance with air quality standards. Also, see responses to Letter No. 62A, Comments 14 and 15.

Watering of roads and areas of exposed soil as a dust control measure would be accomplished with a water truck for roads and a water truck or agricultural spray system for exposed areas. The proposed water source is existing on-site wells. With regard to the use of chemicals for dust suppression, there are a variety of commercially available products that can be used for this purpose without contributing to air pollution. No suppressants that could contribute to atmospheric concentrations of pollutants would be used.

Regarding pulp chip washer fines, this material has a relatively high moisture content, greatly reducing the potential for dust formation. No dust problems have occurred during disposal of this material at the Mt. Solo Landfill, and none would be expected at the proposed landfill. Also, pulp chip washer fines have proven increasingly valuable in manufacturing particle board and in paper-making processes. With increased recycling of this material, less of it will require landfill disposal.

16. Fish, wildlife, and wetlands experts from a qualified consulting firm would monitor the fish, wildlife, and wetlands mitigation measures. Mitigation, and contingency plans in the event the agreed-to mitigation is not successful, will be incorporated as conditions of hydraulic project approval (issued by the Washington Department of Wildlife) and the Section 404 permit (issued by the Corps of Engineers). These agencies would likely participate in the monitoring of mitigation efforts, and would have the authority to require changes consistent with the conditions of their respective permits.

17. See response to Comment 16 above.

18. See responses to Letter No. 9, Comment 3 and Letter No. 69, Comment 9. The MFS require that owners of private landfills keep a continually updated estimate of landfill closure and post-closure costs, and establish financial assurance mechanisms in an amount equal to those costs (WAC 173-304-468). A variety of financial assurance mechanisms are acceptable, including establishing a trust fund with an entity which has authority to act as a trustee and whose trust operations are regulated by a federal or state agency; and a surety bond guaranteeing payment into a closure and post-closure trust fund. The wording of the trust agreement or surety bond must be approved by Ecology.

19. See responses to Letter No. 62, Comment 6 and Letter No. 17, Comment 1.

20. Comment noted. See responses to Letter No. 69, Comments 13 and 25.

21. See response to Letter No. 9, Comment 3.

22. See responses to Letter No. 69, Comment 17 and Letter No. 62A, Comment 1.

23. As noted in Section I.B.1.h, Landfill Monitoring Programs, environmental monitoring will be conducted during the life of the landfill and during the closure and post-closure periods (see response to Letter No. 62, Comment 15). The sentence you refer to has been revised for clarification.

24. Comment noted. See responses to Letter No. 69, Comments 13 and 25.

25. The only water directed to the sedimentation/detention basins would be surface water runoff from inactive or closed areas of the landfill. Therefore, water in these basins would not be connected to the leachate collection system and would not be of concern with respect to possible use by wildlife.

Runoff from the 5-acre active landfilling area would be directed to the leachate holding pond, along with leachate collected in the leachate collection system beneath the landfill. As discussed in Section I.B.1.d(9), the leachate holding pond would be fenced to control access to this facility. The fencing material and height would be selected to maximize its effectiveness in keeping wildlife out of the pond area. Nonetheless, as discussed in Section II.A.5, Plants and Animals, the leachate pond could prove toxic to birds that are not deterred by the fence. Also, amphibians and small mammals could possibly burrow under the fence and be exposed to leachate. The leachate pond would be surrounded by a 15-foot wide road outside of the fence. The gravel road and cut and fill slopes adjacent to the gravel road would be poor habitat for burrowing animals and thus decrease the likelihood that burrowing animals would occur near the pond.

The leachate pond would be monitored on a regular basis by landfill operations personnel, and by a wildlife biologist as part of the monitoring program associated with the *Proposed Natural Resources Mitigation Plan* (see Appendix A of this EIS). If wildlife mortalities occur in the leachate pond area, the Washington Department of Wildlife (WDW) would be notified, and Weyerhaeuser would coordinate with WDW to determine appropriate additional measures to prevent such mortalities. For example, netting could be used to prevent bird access to the pond if necessary.

With regard to potential leakage of the leachate pond due to burrowing animals, the leachate holding pond would be constructed with a double geomembrane liner, with a leak detection system between the liners (see Section I.d.1.d(4)(c), Leachate Storage and Transfer). Figure I-7 in the EIS shows the design concept for the double liner system. As noted in the response to Comment 9 above, the polyethylene liner material used in such facilities has not been known to be damaged by burrowing animals.

26. See responses to Comment 4 above and Letter No. 17, Comment 1. The text you refer to in Section II.B.2, Human Health, has been revised to discuss "organochlorines" (dioxins and furans).

27. Section I.B.1.d(9), Support Facilities, has been revised to describe the proposed lighting for the landfill, and Section II.B.4, Aesthetics, has been revised to evaluate the impacts of the proposed lighting. Current plans for the landfill would allow operation up to 6

days per week from 7:00 a.m. to 7:00 p.m., although Weyerhaeuser does not expect to have to operate the landfill for more than 10 hours per day, 5 days per week. These hours of operation would require lighting of the active area for safety purposes about 3 hours per day (about 1 hour at dawn and 2 hours at dusk). Lighting may be required for up to 6 months of the year. As discussed in the revised aesthetics analysis, due to the directed intensity and general southward or eastward orientation of the proposed active area lighting, there would be no significant off-site impacts. The impacts of other lighting for the proposal, including fixed lighting for the maintenance facilities and vehicular headlights, would also not be significant.

28. The purpose of the aesthetics analysis in an EIS is to evaluate alteration and obstruction of views (see WAC 197-11-660). As discussed in Section II.B.4, Aesthetics, construction of the proposed landfill would alter the aesthetic character of the Headquarters Site. However, due to the distance of the landfill from the nearest viewpoints, the existence of view obstructions, and the retention of trees for visual screening, the EIS concludes that there would be no significant adverse impacts on views from off-site properties.

    The other aspects of aesthetics that are of concern to you are discussed in other sections of the EIS, including Sections II.A.2, Groundwater; II.A.3, Surface Water; II.A.4, Air Quality; II.A.5, Plants and Animals; II.B.1, Noise; and II.B.2, Human Health. With regard to the audibility of noise, see response to Letter No. 22, Comment 3.

29. See responses to Comment 28 above; Letter No. 9, Comment 3; and Letter No. 69, Comments 9, 13, and 17; and Letter No. 71, Comment 9.

30. Comment noted. See responses to Letter No. 17, Comment 1; Letter No. 39, Comment 4; and Letter No. 63, Comment 15.26.

(1)

9/9/1..2

Dear Sirs

(1) I attended both meetings on the WECO Proposed landfill, the first meeting was attended mostly by Vendors and Officials of WECO, but most of the people had not read the EIS booklet so there main concern was economics and not Environment.

The second meeting was attended by mostly the people that the landfill will really effect, there were many reasons given why the people in this area dont want this landfill, one of the reasons was WECO is one of the biggest polluter in our nation.

(2) One thing that wasnt said is with all WECO railroad cars hauling landfill material how are they going to haul lumber and chips out of there Green Mtn. mill, now if they plan on use Spirit Lake Hwy., this Hwy is a very busy Hwy. and will be more so by next year, I can

(2)

Just see tourists and lumber trucks on this busy Hwy.

If WECO decides to use Headquarter road to haul landfill material by truck this road bed will not handle this added heavy loads, and will need constant repair that we the people of Cowlitz County pay for.

(3) And I hope you are aware of our shortage of water which will be polluted by this project.

Thank You
Robert Schreiner

RESPONSE TO LETTER NO. 48

Robert Schreiner

1. Comment noted.

2. If the proposed landfill is approved, Weyerhaeuser would acquire new or refurbished rail cars that would be dedicated to the transport of solid waste. Landfill-related trains would be scheduled so as to avoid conflicts with trains hauling lumber and chips from the Green Mountain mill. As discussed in Section I.B.1.c, Waste Transportation and Rail Loading/ Unloading Facilities, Weyerhaeuser would use trucks to haul solid waste and leachate only in the event of a rail shutdown in excess of one week and as a temporary emergency measure. Trucks would be used to haul lumber and chips from the Green Mountain mill under similar conditions.

3. The EIS concludes that there would be no significant unavoidable adverse impacts on surface or groundwater quality except in the unlikely event of a leachate tank car spilling into a small creek at low flow. As discussed in the response to Letter No. 69, Comment 13, the probability of occurrence of such a spill is so low that the potential for significant adverse impacts on water quality could be considered remote and speculative.

NORTHWEST ENVIRONMENTAL ADVOCATES

COWLITZ-WAHKIAKUM COUNTIES
SEP 10 1992
HEALTH DISTRICT

September 9, 1992

David Riggs and Richard Jones
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Columbia/Willamette RiverWatch
133 S.W. 2nd Ave. #302
Portland, OR 97204

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the Headquarters Camp Solid Waste Disposal Facility

Dear Mr. Riggs and Mr. Jones:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Headquarters Camp Solid Waste Disposal Facility. We believe this project is not in compliance with the Washington State Minimum Functional Standards for Solid Waste Handling (MFS), WAC 173-304, or Section 404 of the Clean Water Act.

(1) The MFS standards do not permit the location of a landfill in a wetland area. It is unacceptable, as stated on page S-5, 1(a), that ..."a variance would be required from the MFS locational standard..." Not only is it unacceptable to destroy wetlands for this purpose, but wetland conditions create numerous problems for the stability of landfills as has been determined with landfills all around the country. The MFS standards have been designed to guide the siting process. The applicant should not attempt to bypass these standards by applying for a variance, but rather, should adhere to the established guidelines.

(2) This project is not in compliance with Section 404 (b)(1) guidelines of the Clean Water Act.

> Section 230.10(a) states:
> "..no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences."
>
> Section 230.10(a)(3) states:
> "Where the activity associated with a discharge which is proposed for a special aquatic site (as defined in Subpart E) does not require access or proximity to or siting within the special aquatic site in question to fulfill its basic purpose (i.e., is not "water dependent"), practicable alternatives that do not involve special aquatic sites are presumed to be available, unless clearly demonstrated otherwise."

(3) The DEIS fails to adequately demonstrate that alternative sites are unavailable. The DEIS claims that the impacts will not be significant. However, filling and rerouting a stream, filling thirteen acres of wetlands and converting 312 acres of vegetated land to a landfill certainly (4) constitute significant impacts. The DEIS offers no discussion of the limitations on the success of wetland mitigation and stream realignment.

(5) Also, since wetlands, riffle/pool complexes, and vegetated shallows are defined as special aquatic sites in Section 404 (b)(1), Subpart E, Section 230.41, Section 230.43 and Section 230.45 and since this project is not a "water dependent" use, wetland fills and fills of the tributary of Sucker Creek for this landfill project are clearly inappropriate.

(6) It is unclear whether stormwater management features, such as bioswales, will be counted as mitigated wetlands. If so, it clearly is inappropriate to apply these stormwater management areas as part of the wetland mitigation plan. Stormwater runoff from the landfill is a significant nonpoint source of pollution which can have deleterious effects on wetlands.

(7) References are also made in Appendix A (p.1-10) and on page S-3 to the different types of waste which will be dumped at the landfill. The DEIS does not provide information on contaminants found in these wastes. There is general reference in the Groundwater and Surfacewater sections on expected contaminants, but there is no connection between a specific waste stream and those contaminants. For example, pulp mill wastes, boiler ash and de-inking wastes would contain dioxins and furans, some of the most toxic substances ever produced. However, there is no reference in (8) the DEIS to these substances. The Human Health section (II-60) fails to refer to specific contaminants and human health risks from these contaminants via air, surfacewater contamination or consumption of contaminated fish, etc. A general discussion is grossly inadequate and does an injustice to the public at risk from exposure. Also, the Plants and Animals Section (II-30) fails to discuss potential for bioaccumulation of contaminants. The public cannot meaningfully comment on potential impacts from this project without this information.

(9) Reference is made (p.I-23) that the leachate from this landfill will be sent to the Longview wastewater treatment plant (WWTP) which discharges to the Columbia River. The DEIS fails to discuss the contaminants in the leachate and how much is removed in the treatment process. These wastes may contain dioxins; it should be noted that the Columbia River violates water quality standards for the dioxin compound, 2,3,7,8-TCDD. Additional sources of this compound to the river will not be permitted.

(10) In summary, this project should adhere to MFS standards and is not in compliance with Section 404 of the Clean Water Act. A paucity of information on the contaminants in the various wastes to be dumped at the landfill is provided in this DEIS which renders the public unable to provide meaningful comments on the potential impacts from this project. We request that a supplemental DEIS be issued which clearly identifies the wastes, the contaminants found in those wastes, the sources of the wastes and the potential impacts to human health, wildlife, habitats, surface and groundwater from those contaminants. The supplemental DEIS should also include a discussion of the limitations on success for wetland mitigation and stream realignment projects. A more complete discussion of alternative sites is also necessary.

Thank you for your consideration of our concerns.

Sincerely,

Nina Bell (per mtk)

Nina Bell
Executive Director

RESPONSE TO LETTER NO. 49

Nina Bell, Executive Director
Northwest Environmental Advocates

1. With regard to the compliance of the proposed landfill with the MFS, see response to Letter No. 38, Comment 6. The wetland conditions found on the landfill site do not pose a stability problem, because they do not consist of deep deposits of materials that could settle.

2. See response to Letter No. 43 below and the second paragraph of the response to Letter No. 9, Comment 28.

3. With regard to alternative sites, see response to Letter No. 9, Comment 28. With regard to the significance of the issues you refer to, the EIS concludes that the filling of wetlands and streams would result in significant unavoidable adverse impacts if the proposed mitigation does not prove successful (see Section C of EIS Summary). The 380 acres of commercial timber land converted to landfill use under the Proposal represents less than 0.1 percent of the 440,000-acre St. Helens Tree Farm of which it is a part. Therefore, the Final EIS concludes that this conversion would not constitute a significant unavoidable adverse land use impact. The EIS also concludes that the conversion would have no significant adverse impacts on wildlife (Section II.A.5, Plants and Animals), and appears to be consistent with the intent of the Cowlitz County Comprehensive Plan (Section II.B.3, Land Use).

4. Sections II.A.5, Plants and Animals, and II.A.6, Wetlands, have been revised to provide further discussion of the likelihood of success of fisheries and wetland mitigation measures. The proposed off-channel ponds to enhance coho salmon rearing have proven successful on a similar small tributary in Washington (see response to Letter No. 10). Providing an adequate water supply to establish wetland soil and vegetation conditions is the most critical factor in the success of created wetlands. The proposed created wetlands would be supported by surface flows from the diversion channel, as well as groundwater sources. Therefore, the probability for success is considered high. Also, see response to Letter No. 62, Comment 14.

5. See response to Letter No. 43. The placement of fill in a special aquatic site is permitted under Section 404(b)(1) guidelines if it is adequately demonstrated that there is no practicable alternative that would have less impact on the aquatic ecosystem, or, if there is such an alternative, that it results in other significant adverse environmental consequences [40 CFR 230.10(a)]. Also, see second paragraph of response to Letter No. 9, Comment 28.

6. The proposed biofiltration swales and sedimentation ponds are not part of the wetland mitigation plan. The reference to these facilities in the original mitigation plan was

intended as a comparison of features providing sediment control and biofiltration functions in the project area under pre- and post-project conditions. The revised *Mitigation Plan* in Appendix A of this EIS (see response to Letter No. 9, Comment 12) no longer includes reference to the proposed surface water management facilities.

7. See response to Letter No. 17, Comment 1.

8. The Human Health section (Section II.B.2) does refer to the specific compounds that would pose the greatest potential risk to human health, evaluates all the pathways you mention in your comment, and addresses the potential for chronic buildup of pollutants in the fish resources of Silver Lake. That section concludes that the proposal would not have a significant adverse effect on human health. Because the waste to be disposed at the proposed landfill is not dangerous or hazardous as defined by state or federal regulations, a more detailed health risk analysis is not considered necessary to allow a reasoned choice among the alternatives evaluated in the EIS. The proposed landfill monitoring programs (Section I.B.1.g, Landfill Monitoring Programs) would allow problems to be detected and corrected before any significant bioaccumulation occurred. The response to Letter No. 17, Comment 1 is also relevant.

   From a more technical standpoint, the ability of organisms to concentrate a substance in their tissue is indicated by a number called a "bioconcentration factor" (BCF). The fish BCFs for most substances detected in the leachate that could bioaccumulate (arsenic, barium, cadmium, total chromium, nickel, and zinc) range from approximately 16 to 47. According to EPA (1989), BCFs less than 300 are not considered significant for aquatic species.

   Mercury, silver, and pentachlorophenol have BCFs that exceed 300 (5,500, 3,080, and 770, respectively). However, the concentrations of these substances expected to be present in leachate from the proposed landfill are low (approximately 0.009 mg/L, 0.002 mg/L, and 0.005 mg/L, respectively). Also, the concentrations of these substances that would result after mixing with the Cowlitz River or Silver Lake would be below EPA-established criteria for the protection of aquatic organisms (acute and chronic), as well as below state and federal maximum contaminant levels.

   In addition, the concentrations of these substances in organisms due to bioaccumulation would be expected to be below predicted concentrations in the water, because organisms could avoid the substance or prey that have consumed it, or exposure time could be insufficient to achieve equilibrium in living tissue. Furthermore, food chain transfers would not be expected to lead to biomagnification (that is, a higher concentration in the consumer than in the contaminated source). Therefore, no significant adverse impacts to either human health or the environment would be expected.

9. The wastewater treatment plant at the Longview mill is already permitted to accept Mt. Solo leachate, which would be expected to have similar constituents to leachate from the proposed landfill (see response to Letter No. 47, Comment 4). The addition of the average daily leachate flow from the landfill (estimated at 67,000 gallons per day) to the

average daily flow currently handled by the Longview wastewater treatment plant (60,000,000 gallons per day) would have a minimal impact on the capacity of the facility. No change would be required in the NPDES permit for the facility, because the permit already reflects the potential acceptance of leachate from the proposed landfill.

The Longview mill wastewater treatment plant currently meets water quality-based effluent limits for the dioxin compound 2, 3, 7, 8 - TCDD. In addition, this compound has been non-detectable in the wastewater treatment solids for the last 3 quarters; and in the effluent, for over a year.

10. Comments noted. See responses to specific comments on these issues above. Changes have been made in the EIS in response to issues raised in comment letters on the Draft EIS. This is the process required by the SEPA Rules (WAC 197-11-560).

LETTER NO. 50

METAL FABRICATION
MACHINE WORK
WELDING

WAYRON

1133 California Way
Longview, WA 98632
(206) 425-8600
Fax No. 206-425-1816

Cowlitz-Wahkiakum Counties
SEP 10 1992
Health District

September 10, 1992

Mr. David Riggs
Director of Environmental Health
Cowlitz Wahkiakum Health District
1516 Hudson
Longview, WA 98632

RE: WEYERHAEUSER'S HEADQUARTERS CAMP DISPOSAL FACILITY
SUPPORT FOR ISSUANCE OF SOLID WASTE PERMIT

Mr. Riggs:

As a long time local resident and businesswoman, I've followed with interest Weyerhaeuser's approach to solving its long term need to be responsible for its own solid waste. I've also followed with interest Weyerhaeuser's decision making process regarding its future in Longview. The long term economic benefits to the community are obvious if they proceed with their plans to modernize their pulp mill. I firmly believe that gaining control of and responsibility for their solid waste is a key element in Weyerhaeuser's decision on whether or not to proceed with the modernization. Therefore, the long term economic benefits of granting a Solid Waste Permit are also obvious to me.

Throughout their process to find the best possible location for a disposal facility, I've been impressed with Weyerhaeuser's determination to find the most environmentally sound site that's possible. I'm not surprised, therefore, that the Draft Environmental Impact Statement concludes that Weyerhaeuser's plan to develop the Headquarters Camp site is an environmentally sound one.

I fully support the issuance of a Solid Waste Permit for the Headquarters Camp site.

Sharon Bergman
Executive Vice-President

SB:aea

RESPONSE TO LETTER NO. 50

Sharon Bergman, Executive Vice President
Wayron

1. Your support for the proposed landfill is noted.

9/10/92

DE>S

Proposed weyco Landfill (Hdqt. Camp) — Cowlitz Wahkiakum Counties

To

Cow-wah. Health District — Health District

1516 Hudson St.

Longview, WA 98632

att.: David Reigo

the Pollution Control Hearings Board findings, Conclusions + order on Summary Judgement : weyerhaeuser Co + Wilco Service, Inc. V Cowlitz-Wah. Health District + DOE, et al.

Order on Summary Judgement.

PCHB No 90-165

Page 16 - last paragraph -

(1) In addition, it has not been determined whether a United States Army Corps of Engineers Section 404 permit is needed. If such permit is required, compliance with the federal National Environmental Policy act ("NEPA") would also be necessary.

(2) also XI says the proposed solid waste facilities will nonetheless have to conform to the State of Wash. Minimum Functional Standards + the State Env. Policy act (Sepa). the DOE has been very lacking in information and I don't see the dump conforming to MFS —

Clara Wilkens Chair - ACEC
2505 So. Silver Lk Rd, Castle Rock, WA 98611

RESPONSE TO LETTER NO. 51

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. A Section 404 permit is needed for the proposed filling of wetlands, and compliance with NEPA is required. See response to Letter No. 9, Comment 4.

2. See response to Letter No. 38, Comment 6.

DEIS
Weyco Dump proposal (Hdqtrs Camp) Wkz - Wahkiakum Counties
To
Cow-Wah. Health District
1516 Hudson St
Longview WA 98632
att: David Regijo

11 1992
District

9/10/92

(1) Does the Hdqtrs Camp dump Project conform to the Washington Growth Management Act?

(2) This project would be clear out in no mans land. The only facilities we have is telephone & lights.
There is no fire dept. 10 miles away is Castle Rock - Toutle's 15 miles away.
no sewers. Have you checked the Hdqtrs Camp to see if the septic tanks (from the 1950) is adequate? new septic tanks up to the County's Codes may have to be installed

(3) Have you checked out the area for contaminants (the Hdqtrs shop) such a PCB's, oil & paint dumped into Sucker Creek

Clara Wilkins Chr.
N.C.E.C
2505 So. Silver Lk Rd
Castle Rock WA 98611

RESPONSE TO LETTER NO. 52

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. See response to Letter No. 44, Comment 1.

2. See response to Letter No. 45, Comment 10.

3. See response to Letter No. 44, Comment 2.

Comments on DEIS
Proposed Weyco Landfill (Hdqts site)
att: David Riggs.

9/8/92
Castle Rock, WA

Lewis-Wahkiakum Counties
SEP 11 1992
Health District

(1) A natural spawning Coho has been found. Washington State Wildlife stocked many, (Copy enclosed) in the upper Sucker creek area recently.

Illegal Culverts probably prevented them from reaching the upper portion of the creek - or dump site. These culverts were replaced (finally) in 1991. The Endangered Species act has to be considered here.

The dump project should not be permitted to continue.

Fish habitat, a natural spawn is worth more than a dump.

(2) No permit = yes to fish. Check if the project conforms to the Endangered Specie Act.

Clara Wilkens
2505 So. Silver Lake Rd
Castle Rock WA, 98611
206-274-9179

Draft: Discussion only

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Date: August 25, 1992

To: Bob Bicknell, Habitat Biologist

From: John Loch, Toutle River Fishery Biologist

RE: Sucker Creek: electrofishing data

Sucker Creek (tributary to Silver Lake) was electrofished by a three man team on 8/20/92. We surveyed 127 meters at the location we discussed earlier. Our method was to use the single pass removal technique described by Johnson (1988) and Strange et al. (1989). We sampled 50 juvenile coho and nine cutthroat trout. Population information for this section given below:

Species	Aver. Fl	Observed	Estimated	#/m2
Coho	68 mm	50	70	0.28
Cutthroat	122 mm	9	12	0.05

This information for your files. I will send you a copy of Strange et al., also.

References:

Johnson, T.H. 1988. Juvenile sea-run cutthroat trout presence, abundance, and density for tributaries entering south Puget Sound during August and October; 1987. Wash. Dept. Wildl. Fish. Mgmt. Div. Rept. 88-18. 20p.

Strange, C.D., M.W. Aprahamian, and A.J. Winstone. 1989. Assessment of a semi-quantitative electric fishing sampling technique for juvenile Atlantic salmon, Salmo salar L., and brown trout, Salmo trutta L., in small streams. Aquaculture and Fisheries Management 20: 485-492.

RESPONSE TO LETTER NO. 53

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. With regard to the presence of naturally spawning coho in lower Sucker Creek, see response to Letter No. 10. With regard to the Endangered Species Act, the lower Columbia River coho salmon was considered for listing as an endangered species by the National Marine Fisheries Service (NMFS) within the past two years. However, investigations by NMFS revealed that the existing lower Columbia River coho salmon stocks are either hatchery stocks or mixtures of wild and hatchery stocks. No genetically pure wild stocks of coho were found. Therefore, the lower Columbia River coho salmon was not listed as a federal threatened or endangered species.

2. Comment noted. The SEPA Rules require that an EIS discuss threatened or endangered species that may be impacted by a proposal [WAC 197-11-440(6)(c)(i)]. As discussed in Section II.A.5, Plants and Animals, no federal or state-listed threatened or endangered plant or animal species were identified within the study area in field surveys or through contacts with resource agencies.

9/11/92

T.: D.S.

On weyco proposed landfill (Hodgins Camp.)
to
Cowlitz - Wah. Health District.
1516 Hudson St.
Longview, WA., 98632

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

att: David Riggs:

A tape on electroshocking Coho salmon was sent to the C.W.H.D. This electro-shocking was done by State Wildlife Dept. Mr. Patrick Wilkens did the filming.

We would like that tape to be part of the D & DS as it was sent to you during the comment period.

Clara Wilkens Chs. NE&C
2505 So. Silver LK Rd
Castle Rock, WA 98611

RESPONSE TO LETTER NO. 54

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. See response to Letter No. 10. The videotape on electrofishing of Sucker Creek has been viewed by the Health District and the fisheries consultant for the EIS, and will be retained as part of the public record on the proposed landfill. Persons interested in viewing the videotape may do so at the Health District office in Longview.

9/11/92

DEIS
Weyco Dump Project (Proposed Dump Hdqtrs Camp)
To
Cowlitz - Wah. Health District
1516 Hudson St
Longview, WA., 98632
Att: David Reggio

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Enclosed is the video: Silver Lake:
Hope + Despair

(1) This video is to be a part of the comments on the Draft EIS on Weyco project (Proposed Dump - Hdqtrs Camp.) Script included.

Clara Wilkins Ch.
N.C. E.C.
2505 So. Silver Lk Rd.,
Castle Rock, WA., 98611

9/11/92 Script - Part 2 Comments of DEIS Proposed Merger Dump Hodgins Camp, To Cow - Wah. Health Dept. attn: David Rego

DRAFT #3 / COPY

Patrick C. Wilkins
2505 S. Silver Lake Rd
Castle Rock, WA.
98611

SILVER LAKE: ITS HOPE AND DESPAIR

PRODUCED BY: NORTH COWLITZ
ENVIRONMENTAL COUNCIL
SILVER LAKE, WA.

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

(SOT: TAPE #11-A IN: 00:57:43, RUNS TO TIME, THEN UNDER FOR NARRATION)

(2) 1 (TRACK:) SPRING, 1992. A BIG CELEBRATION AT SILVER LAKE, WASHINGTON. TENS OF THOUSANDS OF FISH WITH THE LOVELY NAME OF AMUR, HAVE COME TO SAVE THE DAY. IT IS HOPED THESE GRASS EATING CARP WILL CHEW THROUGH STUBBORN MILFOIL, A WATER WEED THAT IS CHOKING SILVER LAKE TO DEATH.

(SOT: TAPE #15-A IN: 00:02:51 RUNS TO TIME, THEN UNDER FOR NARRATION)

2 (TRACK:) BUT CONTRARY TO THE GOOD THE FISH MIGHT DO IS THE CONTINUING CONTRIBUTION LOGGING HAS MADE TO THE DETERIORATION OF THE LAKE, COUPLED WITH A PLAN TO DUMP INDUSTRIAL WASTES ON OVER 300 ACRES IN ITS WATERSHED. IT IS A SITUATION IN WHICH OVER TWO-MILLION DOLLARS WILL BE SPENT ON EFFORTS TO SAVE THE LAKE, WHILE 20-MILLION DOLLARS MAY BE SPENT ON A PROPOSED PROJECT THAT MIGHT ONLY HELP DESTROY IT; A SITUATION IN WHICH SILVER LAKE IS CAUGHT BETWEEN HOPE AND DESPAIR.

(MUSIC FULL/ SOTUNDER: TO TIME)

TITLE FONT: SILVER LAKE: ITS HOPE AND DESPAIR (HOLD TO TIME)

PRODUCER FONT: PRODUCED BY: NORTH COWLITZ
ENVIRONMENTAL COUNCIL
SILVER LAKE, WASHINGTON

DIRECTOR FONT: DIRECTED BY: PAT WILKINS

(SOT: TAPE #11-A IN: 01:38:04 RUNS TO TIME, THEN UNDER FOR NARRATION)

3 (TRACK:) SILVER LAKE IS FAMOUS. IT IS ONE OF THE BEST BASS FISHING LAKES IN THE PACIFIC NORTHWEST. BASS CLUBS THROUGHOUT THE REGION RACE TO TOURNAMENT ANGLING.

(SOT: CONTINUE #11-A TO TIME, FOLLOWED BY SERIES OF EDITS ON TAPE #13-A IN: 00:04:27 AND TAPE #12-A IN: 01:38:26 TO TIME. CATCHING, LANDING, WEIGHING OF FISH, NAT SOUND)

4 (TRACK:) FROM JANUARY TO JUNE IT'S A BLAST. GREAT FUN. BUT IN THE LONG HOT DAYS OF SUMMER, THE SEASONAL SURGE OF AQUATIC PLANTS, PRINCIPALLY THE UBIQUITOUS MILFOIL, MAKES PLAY PRACTICALLY IMPOSSIBLE. THEN THERE ARE ONLY THE MOST DETERMINED FISHERMEN,

FEWER SWIMMERS, AND VIRTUALLY NO WATER SKIERS. (Page 2)
THE HARD FACTS SET OUT IN A 1990 STUDY OF SILVER LAKE BY WASHINGTON STATE UNIVERSITY SCIENTISTS BLUNTLY DISCLOSE THAT IF STEPS ARE NOT TAKEN TO WARD OFF THE WEED ATTACK THE LAKE WILL BECOME A SWAMP WITHIN THE NEXT DECADE.
AND WHILE IDENTIFYING THE SOURCES THAT ARE CAUSING THE RAPID EUTROPHICATION ... FOREST PRACTICES, RESIDENTIAL DEVELOPMENT, AND ANIMALS ... THE INVESTIGATORS ALSO RECOMMENDED WAYS TO ATTACK THE PROBLEM. PRINCIPAL AMONG THEM ARE WATERSHED MANAGEMENT, PUBLIC EDUCATION AND INTRODUCTION OF THE HUNGRY, VEGETARIAN CARP.

(SOT: MUSIC/OLDTIME FIDDLERS IN: 00:23:05, TO TIME THEN UNDER FOR NARRATION. EDIT ADDITIONAL SCENES OF MUSICIANS PLAYING OVER SU, AS NARRATION CONTINUES)

5 (TRACK:) SILVER LAKE RESIDENTS, WORKING MOSTLY THROUGH AN ORGANIZATION CALLED CONTROL OF WEEDS IN SILVER LAKE IS POSSIBLE ... COWSLIP ... FOUGHT FOR AND WITH COUNTY OFFICIALS FOR THE STUDIES AND SUBSEQUENT FUNDING TO IMPLEMENT LAKE RESTORATION. IN MAY OF 1992 THERE WAS CAUSE FOR CELEBRATION. THE FISH WERE COMING. THERE WAS FEASTING.

(SOT: MUSIC UP, TO TIME THEN UNDER FOR NARRATION. EDIT SCENES OF PARADE #14-A IN: 00:30:12)

6 (TRACK:) AND A PARADE TO ANNOUNCE THE ARRIVAL OF THE FIRST SHIPMENT OF THE RAVENOUS FISH. AFTER YEARS OF STUDY, A CLEAN WATER ACT GRANT THROUGH THE WASHINGTON DEPARTMENT OF ECOLOGY MADE IT POSSIBLE TO HELP THE LAKE.

FONT: WILDLIFE LEAGUE DOCK
(SCENE, WATERHOSES SPRAY 00:32:20) 83-THOUSAND OF THE CARP ANESTHETIZED TO REDUCE THE STRESS OF LITERALLY BEING POURED INTO THE LAKE, WERE PLANTED AT VARIOUS PLACES AROUND ITS EDGE TO HELP DISTRIBUTE THEM THROUGHOUT THE LAKE.

FONT: STREETER'S RESORT DOCK
(SCENE FISH RELEASE #14-A 00:57:43) AT ONE OF THE DELIVERY SPOTS, DELIGHTED CHILDREN HELPED IN THE DISTRIBUTION.(pause) AT LEAST WE THINK THEY HELPED.

(SOT: EDIT SCENES OF KIDS & FISH #14-A IN 00:59:20, RUNS TO TIME, THEN UNDER FOR NARRATION)

7 (TRACK:) IT IS HOPED THE FISH ARE NOW DOING WHAT THEY DO BEST, CHOMPING THE MILFOIL AT A PACE THAT MAY SOON SHOW SOME ENCOURAGING INROADS ON THE STUFF.(SCENE, GRASS CARP EATING, #19-A)

FONT: OUTLET DAM
(SCENE , FISH SCREEN CONSTRUCTION, 10-A IN:00:47:21) AT ABOUT THE SAME TIME THE AMUR FISH ENTERED THE LAKE, WORK WAS COMPLETED ON CONSTRUCTION OF A SCREENING STRUCTURE AT THE LAKE'S OUTLET, TO KEEP THEM FROM WANDERING AWAY INTO THE NEARBY TOUTLE RIVER.

THE SCREENS ALSO PROVIDE FOR ENTRY INTO THE LAKE OF SPAWNING RUNS OF MIGRATING FISH; OF PARTICULAR IMPORTANCE TO ANTICIPATED RETURNS OF COHO SALMON TO SUCKER CREEK, ONE OF TWO OF THE LAKE'S IMPORTANT TRIBUTARIES.

SO, THERE IS HOPE.

FONT: HEADQUARTERS CAMP, SILVER LAKE WATERSHED
(SCENE, LOG TRUCK, H.Q. CAMP IN B.G., 15-A IN: 00:23:28)

BUT IN THE SILVER LAKE WATERSHED THERE IS CAUSE FOR CONCERN. WEYERHAEUSER COMPANY PROPOSES TO ESTABLISH AN INDUSTRIAL WASTE DUMP HERE AT ITS DEFUNCT OLD HEADQUARTERS CAMP; A LANDFILL THAT OVER THE NEXT 30 TO 60 YEARS WOULD COVER OVER 350 ACRES, FILLING AN AREA OF CRITICAL WETLANDS, A YOUNG FOREST, AND THE SOUTH FORK OF SUCKER CREEK.

FONT: KEN JOHNSON, WEYERHAEUSER COMPANY
(SOT: #4-A IN:
OUT:
FONT: WEYERHAEUSER COMPLEX, LONGVIEW, WA
(SCENE, LONGVIEW PLANT #2 IN 07:48:26)

(TRACK:) WEYERHAEUSER HAS PUBLICLY STATED THE DUMP IS A CRUCIAL PART OF A PLANNED 300-MILLION DOLLAR RENOVATION OF ITS LONGVIEW, WASHINGTON PLANT.

AS PART OF THAT 300-MILLION DOLLAR PACKAGE THE COMPANY ALSO WON WIDE RANGING CONCESSIONS FROM EMPLOYEE UNIONS, UNDER THREAT THAT THE PLANT MIGHT OTHERWISE BE SHUT DOWN. THAT IS ONE OF THE SAME ARGUMENTS USED TO PROMOTE THE DUMP.

(SCENE: PEOPLE IN TREES, #1-A IN: 00:51:05)

AT HEADQUARTERS CAMP ONE CAN SEE FIRSTHAND THE RESULTS OF WEYERHAEUSER'S BOAST "THE TREE GROWING COMPANY." KIDS HELPED TO PLANT THIS NEW FOREST, FIFTH GRADERS FROM LONGVIEW SCHOOLS BACK IN 1984. ONE OF THEM, JANETTE (JANET) GOINS, WAS DELIGHTED THAT THE YOUNG TREES ARE NOW BEGINNING TO OVERCOME THE BLEAKNESS OF THE CLEARCUT THAT SENT THE OLD FOREST TO MARKET. BUT SHE EXPRESSED MISGIVINGS THAT THE FUTURE OF THESE SAPLINGS IS NOW IN DOUBT.

FONT: JANETTE GOINS
(SOT: WILKINS: IN: #1-A 00:57:50 "WHAT DID YOU THINK..."
JANET: OUT: #1-A 00:58:26 "...NOT A LOT OF PEOPLE HOLD."
FONT: SUCKER CREEK

(TRACK:) THE SOUTH FORK OF SUCKER CREEK TUMBLES THROUGH THIS SITE. A PRETTY STREAM WITH AN UNPRETTY NAME. YET IT IS HOME TO CUTTHROAT AND RAINBOW TROUT, AND THE SEAGOING RAINBOW, STEELHEAD. AND THERE ARE ATTEMPTS TO REINTRODUCE SALMON RUNS. NEARLY 10-THOUSAND COHO SMOLTS WERE PLANTED HERE IN THE SPRING OF 1990 BY THE STATE FISHERIES DEPARTMENT. THEY SHOULD BE RETURNING SOON TO SPAWN.

FONT: AUGUST, 1992
(SOT: BEEP OF ELECTROSHOCKER IN: HOLD TO TIME, THEN UNDER FOR NARRATION)

(3) (TRACK:) AND IN AUGUST OF 1992 NATURE LENT A HAND. AND IT WAS WONDERFUL NEWS. AN ELECTROSHOCK FISH SURVEY BY A DEPARTMENT OF WILDLIFE BIOLOGIST TURNED UP JUVENILE COHO SALMON IN GOOD NUMBERS, MORE THAN HAD BEEN COUNTED IN THE STREAM IN DECADES.

FONT: JOHN LOCH
WASHINGTON DEPT OF WILDLIFE
(SOT:) LOCH: IN: #
OUT:

(TRACK:) WITHIN HOURS AFTER LOCH'S DISCOVERY IT WAS CONFIRMED THAT THE YOUNG COHO WERE, INDEED, NATURAL SPAWN; PROBABLY PRODUCED BY ADULTS FROM A HEAVY RUN OF COHO IN THE TOUTLE RIVER INTO WHICH SILVER LAKE FLOWS IN THE FALL AND WINTER OF 1991-92.
IS THIS THE PLACE TO PUT A DUMP?

FONT: ~~(FISHERMAN)~~ Dan Collins
(SOT: IN: #15-A 01:25:36 "THE LAKE HAS GOT AN ..."
OUT: 01:25:48 "...TO DESTROY IT."

(SOT: (DAVE BALLINGER)
IN: #12-A 01:02:38 "THEY'RE GONNA RUIN ..."
OUT: "...A LOT OF GOOD PEOPLE

(SOT: SCENE, SIGNS #15-A IN: 01:39:15 & 21-A IN: 01:13:3, SCENE RUNS TO TIME, THEN UNDER FOR NARRATION)

(4) (TRACK:) STRONG LOCAL OPPOSITION HAS BEEN VOICED SINCE WEYERHAEUSER FIRST ANNOUNCED ITS PLAN IN FEBRUARY OF 1990.
THE NORTH COWLITZ ENVIRONMENTAL COUNCIL, THE SILVER LAKE GRANGE, AND FRIENDS OF SILVER LAKE HAVE SPEARHEADED THE DRIVE TO INFORM THE PUBLIC, POLITICIANS, VARIOUS AGENCIES AND WEYERHAEUSER WHY THEY FEEL THE COMPANY MADE A BAD CHOICE IN SITES. MOST OF IT HAS TO DO WITH SAVING SILVER LAKE. BUT A GREAT DEAL OF IT IS CONCERN ABOUT PEOPLE'S SAFETY AND HEALTH ... AND TRUST.

FONT: BOB SCHREINER, LAKE RESIDENT
(SOT: SCHREINER: IN: #17-A 01:03:28 "I WAS OVER IN YAKIMA..."
OUT: 01:03:40 "...NOT A GOOD NEIGHBOR."
(B Roll headlines)

FONT: LOIS COOPER
STREETERS RESORT
(SOT: LOIS IN: "
OUT: "

FONT: KEN CAVEN
VOLCANO VIEW RESORT
(SOT: KEN IN: "
OUT: "

13 (TRACK:) AND THERE WAS EARLY AND CONTINUING OPPOSITION TO THE DUMP PLAN FROM THE WASHINGTON ENVIRONMENTAL COUNCIL, THE UMBRELLA ORGANIZATION FOR ALL ENVIRONMENTAL GROUPS. WEC PRESIDENT DARLENE MADENWALD.

FONT: DARLENE MADENWALD, PRES
WASH. ENV. COUNCIL
(SOT: MADENWALD: IN: #21-A 01:22:17 "THE WASHINGTON ENVIRON..."
OUT: 01:22:51 "...COMING INTO IT."

FONT: MT. SOLO LANDFILL, LONGVIEW, WA
(SCENE, MT. SOLO LANDFILL #17-A IN: 01:24:12)

14 (TRACK:) WEYERHAEUSER SAYS IT HAS TO GET RID OF ABOUT 700-THOUSAND CUBIC YARDS OF SOLID WASTE PER YEAR; PULP WASTE FROM PAPER MAKING, BOILER ASH, LOG YARD WASTE AND DEMOLITION DEBRIS. THE BULK OF THE WASTE GOES TO NEARBY MT. SOLO LANDFILL IN LONGVIEW. MT. SOLO IS A DUMP SITE UNDER NEIGHBORS' FIRE AND HAS FALLEN INTO DISFAVOR WITH THE STATE DEPARTMENT OF ECOLOGY. TO CLOSE OR NOT TO CLOSE THIS PRIVATE CONTRACTOR IS HAS BEEN A KNOTTY QUESTION. BUT IT SEEMS LATE 1993 WILL BE MT. SOLO'S END.

FONT: WEYERHAEUSER RAILROAD
(SOT: MUSIC FULL, SCENE WEYCO TRAIN #15-A 00:29:55, 15-A 00:48:38, 2-A 00:06:06, 21-A 01:45:12, 22-A 00:00:00, 32-A 00:36:47, A-24 00:02:38 RUNS TO TIME, THEN UNDER FOR NARRATION)

(5) 15 (TRACK:) IN ITS PLAN TO ATTEMPT TO MANAGE ITS OWN DUMP, THE COMPANY SAYS IT WOULD TRANSPORT ITS WASTE SIXTEEN MILES TO HEADQUARTERS CAMP ON ITS OWN RAIL ROAD. AND THAT TOXIC LEACHATE, THE WATER THAT PERCOLATES DOWN THROUGH THE WASTE WOULD BE TRAPPED, COLLECTED AND RETURNED IN TANK CARS TO ITS LONGVIEW PLANT FOR TREATMENT.

BUT EXAMINATION OF THE TRACK RECORD OF THE COMPANY LINE DISCLOSES A LONG HISTORY OF ACCIDENTS. ONE FORMER CREWMEN CLAIMS THAT IN THE TWENTY YEARS HE WORKED ON THE LINE THERE WERE HUNDREDS OF DERAILMENTS. IN AN HISTORIC NARRATIVE COMMISSIONED BY WEYERHAEUSER, THE ACCIDENTS ARE WELL-DOCUMENTED. MANY HAVE BEEN ONLY TIME-CONSUMING, COST-RUNNING INCONVENIENCES. BUT SOME HAVE BEEN SUCH INCIDENTS AS WILD, FEARFUL, OUT-OF-CONTROL CRASHES ON THE LONG STEEP OSTRANDER GRADE ... A DOWNHILL RUN THAT BEGINS AT HEADQUARTERS CAMP.

ONE COMPANY EDITOR, WRITING FOR A WEYERHAEUSER HOUSE NEWSPAPER DECLARED " IT'S SAID MAIN LINE ENGINEERS WON'T EVEN RIDE THIS FIVE MILE STRETCH, LET ALONE TRY TO OPERATE A TRAIN ON IT."

AND THE COMPANY PURPOSELY DETOURED ITS INSTALLATION OF A NATURAL GAS PIPELINE AWAY FROM ITS RAIL LINE AT OSTRANDER CREEK BECAUSE OF WHAT THE PERMIT APPLICATION CALLED "CONCERNS ABOUT STABILITY OF SOILS NEAR THE RAILROAD BED..."

FONT: SEPTEMBER, 1991
OVER THE PAST COUPLE OF YEARS THE COMPANY UPGRADED THE LINE. BUT EVEN A RENOVATED RAILROAD IS NOT A GUARANTEE AGAINST ACCIDENTS. THIS ONE OCCURRED BETWEEN WEYERHAEUSER'S GREEN MOUNTAIN MILL AND HEADQUARTERS CAMP IN SEPTEMBER OF 1991.

FONT: JULY, 1992
AND SEVEN CARS DERAILED IN JULY OF 1992 JUST AFTER CROSSING THE COWLITZ RIVER AT KELSO/LONGVIEW. SUPPOSE THE SPILL OF WOOD CHIPS HAD INSTEAD BEEN LEACHATE FROM THE PROPOSED DUMP. THE HAZARDOUS WASTE WOULD HAVE HAD THE POTENTIAL OF CONTAMINATING THE COWLITZ JUST ABOVE LONGVIEW'S WATER INTAKE PLANT.

FONT: HEADQUARTERS ROAD
(SOT: SCENE ROAD WORK, 5-A 00:16:58, 6-A 00:00:58, 10-A 00:00:00, 1-A 01:12:06 RUNS TO TIME, THEN UNDER FOR NARRATION)

6/2 (TRACK:) THE ROAD TO HEADQUARTERS CAMP IS NO GEM EITHER. WORK ON RECONSTRUCTION OF THE ROUTE TO FEDERAL STANDARDS BEGAN AT THE SAME TIME WEYERHAEUSER ANNOUNCED ITS DUMP PLAN, ALTHOUGH THE COUNTY DENIED IT WAS REBUILDING THE ROAD FOR THAT REASON.
IN ANY EVENT THE 706-THOUSAND DOLLAR FACELIFT DID NOT ~~TAKE~~ TAKE, PRINCIPALLY BECAUSE OF A NEW DAILY STREAM OF LOG TRUCKS THAT CONTINUALLY BEAT IT TO PIECES. THE NEW ROAD HAS BEEN IN A CONSTANT STATE OF REPAIR. CERTAINLY, IF A "FEDERAL STANDARDS" ROAD CAN'T HOLD UP TO LOGGING TRUCKS, IT CAN'T BE CONSIDERED SAFE FOR ANY POSSIBLE INCREASE IN TRAFFIC, SUCH AS TRUCKS CARRYING POTENTIALLY TOXIC AND DANGEROUS MATERIALS. OPPONENTS SHUDDER TO THINK THAT COULD HAPPEN IF THE RAILROAD WOULD GO DOWN.

(SCENE, H.Q. CAMP 1-A 00:34:46, #1 23:39:22)
WEYERHAEUSER SAYS THERE IS NO DANGER OF CONTAMINANTS, THE MOST FEARED ONE BEING DIOXIN, REACHING THE LAKE. STATE OF THE ART IN DUMP TECHNOLOGY THESE DAYS INCLUDES A PLASTIC LINER,

7 (SCENE, LINER KLTV TAPE)
SUCH AS THAT INSTALLED IN A NEW CELL AT THE COWLITZ COUNTY LANDFILL. THE IMPLICATION IS THAT THE LINER IS DURABLE AND TRUSTWORTHY. BUT THE FACT IS IT IS EASILY PUNCTURED, EVEN BY A BALL POINT PEN.

(SCENE, LIGHTENING FLASH, THUNDER #21-A 00:05:00, RAIN #21-A 00:43:42, STILLS OF FLOOD #17-A 00:29:42)

8/7 (TRACK:) SUCKER CREEK'S FLOW FURNISHES ABOUT 13 PERCENT OF THE WATER IN SILVER LAKE. AND OF COURSE, SOME OF THE NUTRIENTS THAT HAVE CONTRIBUTED TO THE LAKE'S PROBLEMS. STORM RUNOFF SUCH AS THAT IN NOVEMBER OF 1991, A YEAR IN WHICH OVER 70 INCHES OF RAIN FELL ON THE PROPOSED DUMP SITE, IS UNCONTROLLABLE. AND THEREFORE, THERE IS DANGER OF CONTAMINANTS REACHING THE LAKE IN JUST THIS WAY ALONE.

(SCENE. FISHERMEN IN THE RAIN 12-A 01:30:17, 01:02:57)

(9) WEYERHAEUSER HAS CREATED DIOXIN WITH THE CHLORINE BLEACHING OF PULP. AMONG CHEMICALS DIOXIN IS CALLED THE WORST OF THE TOXINS. BUT A COMPANY SPOKESMAN SAYS IT RECENTLY WENT TO CHLORINE DIOXIDE BLEACHING WHICH HAS DROPPED ITS DIOXIN OUTPUT TO VIRTUALLY "UNDETECTABLE" LEVELS.

FONT: THOM SCANLON

(SOT: # IN:
OUT:

(10) 18 (TRACK:) AND AS PART OF ITS MODERNIZATION THE LONGVIEW PLANT IS TO GO TO A PROCESS CALLED OXYGEN DELIGNIFICATION WITH HYDROGEN PEROXIDE BLEACHING BY 1995 ...FURTHER REDUCING DIOXIN.

BUT NEW RESEARCH SUGGESTS THAT DIOXIN MAY BE AN EVEN WORSE HEALTH THREAT THAN EARLIER BELIEVED.

THE PERIL MAY BE TO THE HUMAN IMMUNE AND REPRODUCTIVE SYSTEMS, AND BY SWITCHING ON GENES THAT PROMOTE THE GROWTH AND DIVISION OF ABNORMAL CELLS, THE CHEMICAL MAY ENHANCE A VARIETY OF CANCERS.

FONT: RESEARCH INDICATES: "...TINIEST AMOUNTS SUFFICIENT TO TRIGGER THIS EFFECT."

(SCENE, REPORT 40-A)

THE RESEARCH SUGGESTS THAT THE TINIEST AMOUNTS OF DIOXIN MAY TRIGGER THE EFFECT. IN LIGHT OF THIS INFORMATION PULP WASTE SHOULD BE BARRED FROM THE WATERSHED OF SILVER LAKE.

(11) AND OTHER WASTES PLANNED TO BE DUMPED ON THE SUCKER CREEK DRAINAGE, ALTHOUGH LISTED AS NONHAZARDOUS UNDER REGULATIONS, DO CONTAIN TOXIC COMPONENTS.

FONT: TOXIC WASTE INCLUDES: CADMIUM, ARSENIC, PENTACHLOROPHENOL, CHLORIDES AND MERCURY.

INCLUDED ARE CADMIUM, ARSENIC, PENTACHLOROPHENOL, CHLORIDES AND MERCURY.

FONT: HEADWATERS, SUCKER CREEK

(SOTUNDER/ MUSIC FULL SCENE, HEADWATERS SUCKER CREEK, RUNS TO TIME, THEN UNDER FOR NARRATION)

(12) 19 (TRACK:) THIS AREA IS THE VERY HEADWATERS OF SUCKER CREEK TODAY; CLEARCUT IN THE SUMMER OF 1991, A WASTELAND OF STUMPS AND DEBRIS, PERHAPS ALREADY OR SOON TO BE CONTRIBUTING EROSION AND DECAY TO THE PHOSPHORUS LOADING THAT HAS CAUSED THE WEED EXPLOSION IN THE LAKE.

PEOPLE AGAINST THE DUMP HAVE TRIED TO HELP SUCKER CREEK. IN FACT THE NORTH COWLITZ ENVIRONMENTAL COUNCIL ADOPTED THE CREEK IN LINE WITH A STATEWIDE ADOPT-A-STREAM PROGRAM. NCEC'S PROGRAM FOR THE STREAM SAID THERE SHOULD BE NO DAM BUILDING OR DIVERSION OF IT AS CALLED FOR IN THE DUMP PLAN.

FONT: MARTHA BELDING
FRIENDS OF SILVER LAKE
(SOT # (Refer wetlands, creek) IN:
OUT:

(13) 20 (TRACK:) SOON AFTER THAT WEYERHAEUSER PUT UP NEW GATES ON ALL ROADS LEADING TO THE LOWER PART OF THE STREAM, AND EVERYBODY WAS LOCKED OUT. THE LOCKOUT ALSO DENIED ACCESS FOR WHAT HAD BEEN A FAVORITE PASTIME HERE FOR OVER HALF A CENTURY ... VIEWING THE AREA'S WILD HORSE HERD.

AN OFFICER OF THE FRIENDS OF SILVER LAKE WHO WANTED TO CHECK ON POSSIBLE SPAWNING SALMON IN THE CREEK WAS TURNED DOWN AND TOLD HE WOULD BE ARRESTED IF FOUND INSIDE.

FONT: FILE FOOTAGE, 1990

(14) AN EARLIER DOCUMENTARY EXPRESSED CONCERN ABOUT WEYERHAEUSER'S ENVIRONMENTAL TRACK RECORD.

CULVERTS ON SUCKER CREEK THAT BLOCKED FISH PASSAGE; AN INACTIVE OPEN DEBRIS DUMP AT THE COMPANY'S GREEN MOUNTAIN MILL; RUNOFF EFFLUENT IN ROADSIDE DITCHES AT THE MILL; A TIRE DUMP IN AN OLD ROCK QUARRY; AND THE COMPANY'S CONTRIBUTION TO LONGVIEW'S POLLUTED DRAINAGE DITCH/SLOUGH PROBLEM.

FONT: TODAY '

WEYERHAEUSER RESPONDED TO THAT CRITICISM. A NEW WATER LEVEL CULVERT WAS INSTALLED ON THE SOUTH FORK OF SUCKER CREEK; ANOTHER ON THE MAIN STEM OF THE STREAM WAS REMOVED.

THE DUMP AT GREEN MOUNTAIN MILL WAS CAPPED WITH SEVERAL FEET OF SAND; THE TIRE DUMP DISAPPEARED.

BUT IT SEEMS THE EFFLUENT SITUATION AT GREEN MOUNTAIN AND LONGVIEW HAS NOT IMPROVED.

(SCENE, QUARRY OPERATION, 14-A 00:01:53, 14-A 00:17:03)

(15) AND ALTHOUGH WEYERHAEUSER HAS MADE IT MORE DIFFICULT TO FIND AND POINT OUT ITS NEGLECTED ENVIRONMENTAL THREATS, THERE IS THIS ACTIVE ROCK QUARRY OPERATION VIRTUALLY ON THE BANKS OF THE SOUTH FORK OF SUCKER CREEK; ANOTHER, APPARENTLY LONG FORGOTTEN, TIRE DUMP; ANOTHER CULVERT THAT IS A BARRIER TO FISH PASSAGE, AND A WASTE DEBRIS DUMP IN A ROCK PIT WHERE THE WASTE WAS SIMPLY BULLDOZED UP THE BANKS WHEN THE PIT WAS REOPENED FOR ROCK PRODUCTION.

THIS MATTER OF TRUST WAS ALSO FURTHER STRAINED WHEN PROPERTY OWNERS PETITIONING FOR SEWER LINE EXTENSION TO ADDITIONALLY PROTECT THE LAKE, ASKED WEYERHAEUSER TO JOIN UP.

FONT: DON BELDING, PRES
FRIENDS OF SILVER LAKE
(SOT: DON IN: Refer Sewer "
OUT: "

(16) 21 (TRACK;) ALSO THIS COMPANY IN WHICH THE PEOPLE ARE BEING ASKED TO PLACE MUCH TRUST, RECENTLY WAS CALLED THE WORST POLLUTER IN THE STATE AND SECOND WORST IN THE NATION BY THE EPA. AND IN 1991 NARROWLY ESCAPED FELONY PROSECUTION IN CONNECTION WITH DUMPING OF PAINT IN THE CHEHALIS RIVER. EVEN AT THE MISDEMEANOR LEVEL THE FINE AGAINST WEYERHAEUSER WAS A WHOPPING HALF-MILLION DOLLARS.

(17) BUT DESPITE THE COMPANY'S CHECKERED ENVIRONMENTAL RECORD IT SEEMS THE STATE DEPARTMENT OF ECOLOGY HAS BEEN IN LOCKSTEP WITH WEYERHAEUSER FROM THE BEGINNING. SUPPORTING THE DUMP PLAN AND EVEN CLAIMING IN A LETTER TO THE ARMY CORPS OF ENGINEERS CONCERNING THE WETLANDS ISSUE, THAT HEADQUARTERS IS THE "BEST PRACTICABLE" SITE, AND THAT ECOLOGY HAD EVEN PARTICIPATED IN THE ALTERNATE SITES STUDY.

AT A CITIZENS MEETING IN SILVER LAKE, ECOLOGY'S SOUTHWEST REGION DIRECTOR PAT LEE BACKTRACKED ON THAT LAST ONE BECAUSE IT WAS NOT TRUE.

FONT: PAT LEE, DOE

(SOT: LEE, #17-A 00:48:31 IN: "IF I HAD IT TO..."
00:49:04 OUT: "...UNDER STATE LAW."

22 (TRACK:) REMEMBER THIS WAS A LETTER INTENDED TO INFLUENCE THE CORPS DECISION WHETHER TO GRANT A PERMIT TO WEYERHAEUSER TO FILL WETLANDS, A CRUCIAL BLOCK TO ITS DUMP PLAN. BUT ECOLOGY HAS NOT CORRECTED THE LIE TO THE CORPS. THIS FROM AN AGENCY SUPPOSED TO BE THE ENVIRONMENTAL WATCHDOG OF THE STATE.

FONT: CLARA WILKINS, CHAIR
NORTH COWLITZ ENV. COUNCIL

(SOT: TAPE # (Refer ~~Clarke/Haynes~~ Conflict of Interest. DOE) IN:
OUT:

(18) 23 (TRACK:) OTHER STATE AND FEDERAL AGENCIES HAVE EXPRESSED SERIOUS DOUBTS ABOUT THE "PRACTICABILITY" OF THE SITE AND PLAN. CHIEF AMONG THEM IS THE FEDERAL ENVIRONMENTAL PROTECTION AGENCY WHICH ASKED THE CORPS TO DENY THE WETLANDS PERMIT. ACTION ON THE PERMIT IS STILL PENDING.

(19) (SCENE, BARNES DRIVE SITE, 17-A IN:00:36:36)
THE ONLY AGENCY OTHER THAN ECOLOGY TO APPROVE THE PLAN IS THE STATE TRANSPORTATION DEPARTMENT. BUT THAT'S BECAUSE THE HIGHWAY DEPARTMENT FEARS ITS OWN OX WILL BE GORED. YOU SEE, BARNES DRIVE ... THE PRINCIPAL ALTERNATE SITE, ABOUT 18 MILES NORTH OF LONGVIEW ... IS NEAR A RESTSTOP ON INTERSTATE 5 FREEWAY. BUT FROM A PRACTICABLE STANDPOINT, THE SITE IS ACCESSIBLE BY BOTH TWO-LANE PAVED ROAD AND RAILROAD, NO CREEK IS THERE AND WOULD INVOLVE LESS THAN TWO ACRES OF WETLANDS.

(SCENE, RABANCO SITE 17-A IN: 00:32:22
THERE ARE OTHER ALTERNATIVES: LONG HAUL TO EITHER KLICKITAT COUNTY'S RABANCO LANDFILL AT ROOSEVELT WHERE WEYERHAEUSER IS ALREADY SENDING ITS DE-INKING SLUDGE FROM THE NORPAC PLANT.

(SCENE, ARLINGTON SITE 18-A 00:00:00)
OR, WASTE MANAGEMENT'S FACILITY AT ARLINGTON, OREGON WHERE THE CITY OF SEATTLE CURRENTLY SENDS ITS GARBAGE. BOTH DEPOSITORIES ARE IN ARID REGIONS CONSIDERED IDEAL FOR WASTE DISPOSAL. IF WEYERHAEUSER IS REALLY CONCERNED ABOUT THE SAFEKEEPING OF ITS WASTE, THESE ARE GOOD ALTERNATIVES TO WATER-SOAKED HEADQUARTERS CAMP.

(20) A WIDE SPECTRUM OF PEOPLE HAVE JOINED THE FIGHT AGAINST THE DUMP. AN ELEMENTARY CLASS AT TOUTLE SCHOOL WROTE AND DREW THOUGHTFUL AND THOUGHT PROVOKING POSTERS AND LETTERS.
AT LAST COUNT OVER FOUR-THOUSAND PEOPLE HAD SIGNED PETITIONS PROTESTING THE LANDFILL.

(LOGGING SCENES, TO TIME THEN UNDER FOR NARRATION)

(21) 24 (TRACK:) WEYERHAEUSER BRAGS ABOUT ITS FOREST MANAGEMENT, CUTTING BIG TREES AND REPLANTING WITH LITTLE TREES. BUT FOR SILVER LAKE THE KEY IS WATERSHED MANAGEMENT. AND THE TIME IS NOW. NOW THE COMPANY HAS THE OPPORTUNITY TO JOIN IN REALLY MEANINGFUL WATERSHED MANAGEMENT PLANNING. BUT AT THE INITIAL MEETING TO FORM A CITIZENS COMMITTEE TO STUDY THE WATERSHED, A CRITICAL PART OF RECOMMENDATIONS TO HELP THE LAKE, WEYERHAEUSER'S REPRESENTATIVE STATED FLATLY THAT HE WOULD NOT SIT ON THE PANEL IF ANY NOTES, RECORDINGS OR VIDEOTAPING WERE DONE AT ANY OF THE MEETINGS. ONE COMMITTEE MEMBER RESIGNED OVER THE DISPUTE; IT'S AN ISSUE STILL HANGING.

FONT: CHET GARDNER, MASTER
SILVER LAKE GRANGE #105

(SOT: CHET Refer resignation IN:
OUT:

(MUSIC UNDER:)

25 (TRACK:) IN FEBRUARY OF 1990 WHEN WEYERHAEUSER FIRST ANNOUNCED ITS PLAN, IT ALSO WANTED TO BAN RECORDING OF THAT MEETING. YET THE COMPANY CLAIMS IT WANTS AN OPEN DIALOGUE ABOUT ITS PROPOSAL.

(22) TO SUM UP OPPONENTS VIEW THIS PROPOSED DUMP AS:
THE RUINATION OF SUCKER CREEK; ITS ULTIMATE END, EXCEPT TO ACT AS A CONDUIT TO FLUSH RUNOFF FROM THE DUMP.
FURTHER DEGRADATION OF SILVER LAKE AND MONEY BLOWN ON ITS CLEANUP.
RISK OF SLUMPS IN PROPERTY VALUES.
VISITORS LOST INTEREST BECAUSE OF THE DUMP STIGMA.
FORCING OF WILDLIFE TO OTHER RANGE.
IRRITATING NOISE AND NIGHT-LIGHTS.
RISKS TO PEOPLES HEALTH.
THE RISK OF BOTH TRANSFER AND DERAILMENT SPILLS.

LOSS OF THOSE FIFTH GRADERS FOREST.

AND THE FACT THAT IT JUST DOESN'T MAKE SENSE TO TRY TO SAVE SILVER LAKE, AND AT THE SAME TIME ALLOW THINGS THAT WILL CONTINUE ITS DETERIORATION.

WEYERHAEUSER SHOULD SERIOUSLY LOOK FOR ANOTHER SITE. AND JOIN FORCES WITH PEOPLE WHO REALLY CARE ABOUT SUCKER CREEK AND SILVER LAKE; PEOPLE WHO WANT SILVER LAKE TO LIVE.

(MUSIC FULL TO END)

(CREDIT ROLL, SOT: 21-A 01:46:20 IN:"THIS IS A LEGITIMATE..."
OUT: (TO TIME)

(SCENE, GRAHAM SITE 14-A 00:07:00)
26 (TRACK:) HEY, SEE THAT SIGN, THAT'S NOT OURS.

YOU'RE RIGHT. THAT'S UP AT GRAHAM, NEAR TACOMA.

MUCK CREEK?

YEAH.

THAT'S WORSE THAN SUCKER CREEK.

YEAH.

BUT THE DEAL'S THE SAME, THEY WANNA REROUTE THE CREEK, FILL IN WETLANDS AND MAKE A DUMP.

WEYERHAUESER?

NO. NOT WEYERHAEUSER.

BUT...GET THIS...A GUY NAMED WEYERHAEUSER IS OPPOSED TO IT.

WEYERHAEUSER?

YEAH. WEYERHAEUSER.

WHO WEYERHAEUSER?

WILLIAM WEYERHAEUSER.

OF <u>THE</u> WEYERHAEUSER FAMILY?

UHHUH, HE'S FAMILY.

PEOPLE UP THERE SAYS HE'S FOOTIN' THE BILL.

TO FIGHT THAT DUMP?

YEAH.

A WEYERHAEUSER NIMBY, EH?

I DON'T THINK HE'D LIKE THAT. YOU KNOW WE DON'T LIKE TO BE CALLED NIMBY.

HOW ABOUT KINDRED SPIRIT?

MAYBE.

THEY SAY HE'S A PSYCHOLOGIST.

GOOD. HE'S GONNA FIND OUT THIS KINDA STUFF CAN DDRIVE YOU CRAAAAZZY.

(MORE CREDIT ROLL TO END)

(WIND SOUND FULL TO END. ALTERNATE MUSIC)

RESPONSE TO LETTER NO. 55

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. The videotape on Silver Lake has been viewed by the Health District, and will be retained as part of the public record on the proposed landfill. Persons interested in viewing the videotape may do so at the Health District office in Longview. Comments in the script are responded to below.

2. Comment noted. See responses to Letter No. 11, Comment 8 and Letter No. 62A, Comment 1.

3. See response to Letter No. 10.

4. Comment noted.

5. See responses to Letter No. 69, Comments 13 and 25.

6. Due to the storage capacity of the leachate holding pond, tank trucks would be used to transport leachate infrequently, if at all. Also, see response to Letter No. 48, Comment 2.

7. See responses to Letter No. 11, Comment 8; Letter No. 17, Comment 1; and Letter No. 9, Comments 2 and 20.

8. See responses to Letter No. 18, Comment 6 and Letter No. 46, Comment 1.

9. See response to Letter No. 17, Comment 1.

10. See response to Letter No. 17, Comment 1.

11. See response to Letter No. 17, Comment 1.

12. Based on the erosion and sedimentation control efficiency projected in the EIS, the cumulative phosphorus loading to Silver Lake over the life of the landfill is expected to be less than would occur over the same period under existing conditions (see Section II.A.3, Surface Water). The responses to Letter No. 18, Comment 6 and Letter No. 69, Comment 16, are also relevant to erosion and sedimentation control.

    With regard to impacts on the Sucker Creek drainage, mitigation measures described in Section I.B.1.g, Proposed Natural Resources Mitigation Plan, are designed to replace and enhance water quality and habitat functions of that portion of the Sucker Creek drainage and wetlands impacted by the proposed project. Further detail on these mitigation

measures is provided in the *Proposed Natural Resources Mitigation Plan* in Appendix A of the EIS.

13. Comment noted. This year Weyerhaeuser prohibited public access to all its timber land in the region due to the extremely dry conditions and high risk of forest fires.

14. Comment noted.

15. Comment noted.

16. Comment noted.

17. Comment noted. See response to Letter No. 9, Comment 28.

18. Comment noted.

19. See response to Letter No. 9, Comment 28.

20. Comment noted. See response to Letter No. 11, Comment 1.

21. Comment noted.

22. Your opposition to the proposed landfill is noted. The issues you refer to are addressed in the EIS, with the exception of impacts on property values (see response to Letter No. 26, Comment 1). Although the issue of the "dump stigma" is not directly addressed in the EIS, the conclusions of the EIS indicate that the proposed facility would not significantly impact elements of the environment that draw visitors to the area (for example, aesthetics, Silver Lake water quality and fisheries, recreation, etc.).

LETTER NO. 56

DEIS on
Weyco Dering Proposal (Hogfish Camp)
Cow-Wah Health District
1516 Hudson ST
Longview, WA. 98632
Attn: David Riggs

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District
9/1/92

(1) Wetlands: I don't feel that the DEIS adequately assessed future wetland impacts & can't subsequently judge appropriate compensatory mitigation strategy. Again how can you address this? We need a very large bond (at least a Billion Dollars). How can you put a cost on wetlands that is a part of Silver Lake, a 'lake of State-wide significance'.

(2) Silver Lake can not afford to lose any more water. The 83,000 fish (carp) that was just planted need all the water the study (WW) asked & said was there for these fish.

(3) I can't understand the acreage of wetlands. I was told by an official, who is part of this government that is the lead agency that there was 40 acres of wetlands. Now you have it down to 11.93 acres. Weyco never started out with the 40 acres. I believe it actually is all the upper watershed, the headwaters of Sucker Creek is a wetland. I would say over 50% of the landfill (300+ acres) is wetlands.

(4) You (Weyco) had their own consultants Beak do the wetlands survey. I feel that the application to assess Wetland Habitat functions should use US Fish & Wildlife Habitat

evaluation procedures (HEP) + rating of each wetland to be filled created or enhanced using the Washington Dept of Ecology's Wetlands rating system

(5) In February of 1992 I watched while the US Corps of Engr, Wellliye, EPA were at the Hdqtrs landfill site. They Did not check the wetland boundry except walk down the outer creek at the edge of the landfill. Ariel photograph interpretation did not had at least the 40 acres.

(6) The wetlands issue has not been solved by the DEIS.

Clara Wilkins Ch.
North Cowlitz Env. Council
2505 So. Silver Lake Rd
Castle Rock, WA, 98611

RESPONSE TO LETTER NO. 56

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. Section II.A.6, Wetlands, addresses the direct impacts on wetlands due to construction of the proposed landfill, as well as potential future impacts to wetland habitat immediately downgradient of the site due to altered surface water flows. The latter wetlands lie between the northern project boundary and the railroad grade. The wetlands mitigation plan will include a monitoring program to assess the future impact, if any, to these wetlands, as well as a contingency plan outlining strategies to mitigate any such impacts. The proposed landfill would not significantly affect habitat composition, hydrologic conditions, or water quality of the Silver Lake wetland systems. The response to Letter No. 69, Comment 9 is also relevant.

2. The proposed landfill would not result in any significant loss of water from Silver Lake. All runoff from the site except that from the active landfill area would be discharged into the natural drainage system that contributes water to Silver Lake. Runoff from the active area would be diverted to the leachate holding pond, and transported by rail to the Longview mill wastewater treatment plant. The resulting reduction in water contribution to Silver Lake would be negligible, because the 5-acre active area is only about 0.02 percent of the total drainage area contributing runoff to Silver Lake.

3. The total acreage of wetland habitat within the project area was determined using the methodologies outlined in the 1989 *Federal Manual for Identifying and Delineating Jurisdictional Wetlands*. The initial survey, which is described in a report included as Appendix H of the *Environmental Technical Report* (Beak, 1991a), determined the location of wetland habitat through field investigations of on-site soils, vegetation and hydrologic conditions. Wetland boundaries were not flagged in the field at the time of the initial survey. Total area of wetland was determined through interpretation of stereo pair aerial photographs and an infrared aerial photograph of the project vicinity.

   In early 1992, the Corps of Engineers requested that all wetland boundaries on the Headquarters Site be flagged to facilitate Corps field verification of wetland area as part of the Section 404 permit process. This flagging was completed in February 1992, and wetland boundaries were adjusted to reflect additional information obtained from the flagging work. Again, stereo pair and infrared aerial photographs were used to determine total wetland area. A new estimate of wetland area based on the reconfigured wetland boundaries indicated that there is less wetland habitat on the site than initially estimated. Further information on the February 1992 flagging of wetland boundaries is included in Appendix I of this EIS.

   Representatives of federal, state, and local regulatory agencies with jurisdiction over wetlands have visited the site several times with the sole purpose of investigating the

wetland and stream habitats. In March 1992, a Corps of Engineers representative conducted a site visit to verify the wetland boundary delineation. The Corps confirmed that the placement of wetland boundaries in the field and aerial photo mapping were accurate.

The upper watershed of the Southern Tributary is predominantly upland habitat, with wetland habitat primarily limited to the immediate vicinity of the small drainages in the local area. The upper portion of the Sucker Creek watershed does support a large area of wetland habitat, including an extensive beaver pond system associated with the creek. Preservation of the forested wetland system associated with the beaver ponds is proposed as part of the *Mitigation Plan* for the project (see Appendix A of this EIS). The responses to Letter No. 9, Comment 12 and Letter No. 62, Comment 14, are also relevant to wetland mitigation.

4. The U.S. Fish and Wildlife Service classification system was used to classify the wetlands on the landfill site, and Ecology's 4-tiered wetland rating system was used to determine mitigation replacement ratios as recommended in Ecology's Model Wetlands Protection Ordinance. The goals of the mitigation plan are to replace the lost functions of the wetlands, with Ecology's recommended replacement ratios used a guidelines to determine adequate replacement ratios. The ratios have been set to compensate for the lag time in establishing or restoring wetland systems. Also, see responses to Comment 6 below and Letter No. 62, Comment 14.

5. Wetland boundary verification was not conducted during the February 1992 agency site visit. A Corps of Engineers representative conducted the wetland boundary verification in March 1992. With regard to the use of aerial photographs, see response to Comment 3 above.

6. The wetland investigations conducted in support of this EIS (see response to Comment 3 above), and the wetland elements of the *Proposed Natural Resources Mitigation Plan* in Appendix A, are considered more than adequate to identify the probable significant adverse impacts of the alternatives evaluated in the EIS and to make a reasoned choice among these alternatives. Also, see response to Letter No. 69, Comment 9.

9/10/92

T. E 05

Weyco dump proposal (Holtis Camp)
Cow - Wah Health Dept
1516 Hudson St
Longview, WA., 98632
att: David Rigg

Cowlitz Wahkiakum Counties
SEP 11 1992
Health District

(1) Silver Lake is a lake of Statewide Significance - Is Sucker Creek also part of this lake?

(2) The DE 05 says Sucker Creek is less than 20 cu. ft. per second - Show me —

(3) Should this not be reveiw by the Shorelines Hearings Board before ~~an~~ decision is made to issue a permit?

(4) Also rumor goes about that Weyerhaeuser Co. may run a pipeline from Holtis Camp to Longview Mill — Well, the gas line was run

From Ostrander to the mill site. We have the newspaper ad with comments that the gas line would have to be moved because of unstable ground on the Cowlitz R/R - L & C Railroad at Ostrander.

(5) Why has the health Dept. & D.O.E agreed/went along with Weyerhaeuser to run the waste up to Hoffo by rail & then the leachate back by tank cars

(6) to the mill? The railline is unsafe at Ostrander. This should be investigated. There is maps at public works/ Community Development on the original map & Revised Map on this gas line.

(7) No waste by rail - no waste by pipeline. We would demand another (Supp) EIS if Weyer. changes their plans —

Clara Wilkens Chr.
NCEC
2505 So. Silver Lake Rd.,
Castle Rock, WA. 98611

RESPONSE TO LETTER NO. 57

Clara Wilkins, Chairman
North Cowlitz Environmental Council

1. "Shoreline of state-wide significance" is a term used in the state Shoreline Management Act (RCW 90.58). Lakes are given this designation if they have a surface area of 1,000 acres or more measured at the ordinary high water mark. Rivers or segments thereof west of the Cascades are given this designation downstream of the point where the mean annual flow is 1,000 cubic feet per second (cfs) or more. As discussed in the response to Comment 2 below, Sucker Creek flows are far below 1,000 cfs.

2. Section II.A.3, Surface Water, has been revised for clarification. The estimated mean annual flow of 14.7 cfs is for Sucker Creek just below its confluence with the Southern Tributary (Beak, 1991a). The mean annual flow for Sucker Creek further downstream at its confluence with Silver Lake has been estimated at 25.4 cfs by Bhagat et al. (1975), about 9 cfs by Moore at el. (1990), and 18.0 cfs by Beak (1991a).

3. The Shoreline Management Act does not apply to shorelines on segments of streams upstream of a point where the mean annual flow is 20 cubic feet per second or less, or to wetlands associated with such upstream segments (RCW 90.58.030). As noted above, the estimated mean annual flow for Sucker Creek just below its confluence with the Southern Tributary is less than 20 feet per second. As a result, the Southern Tributary is not mapped as a shoreline in the Cowlitz County Shoreline Master Program. Therefore, no shoreline substantial development permit is required for the proposed landfill, and the Shorelines Hearings Board has no jurisdiction over the project.

4. The Proposal and alternative site plans do not include running a pipeline from Headquarters Camp to the Longview mill.

5. Ecology has not yet made a decision on the solid waste permit application. Permit decisions cannot be made until a minimum of 7 days after issuance of the Final EIS. With regard to rail safety, see response to Letter No. 69, Comment 25.

6. See response to Letter No. 69, Comment 25.

7. Comment noted. A leachate pipeline, if proposed, would require environmental review under SEPA.

LETTER NO. 58

9/10/92

WEOS
Weyco Dump Proposal (Hodgins Camp)
Cow-wah. Health District
1516 Hudson St
Longview, WA. 98632
Attn David Riggs:

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Enclosed is news article on the new "State of the Art" landfill at Longview, WA. That is the Cowlitz Co. landfill.

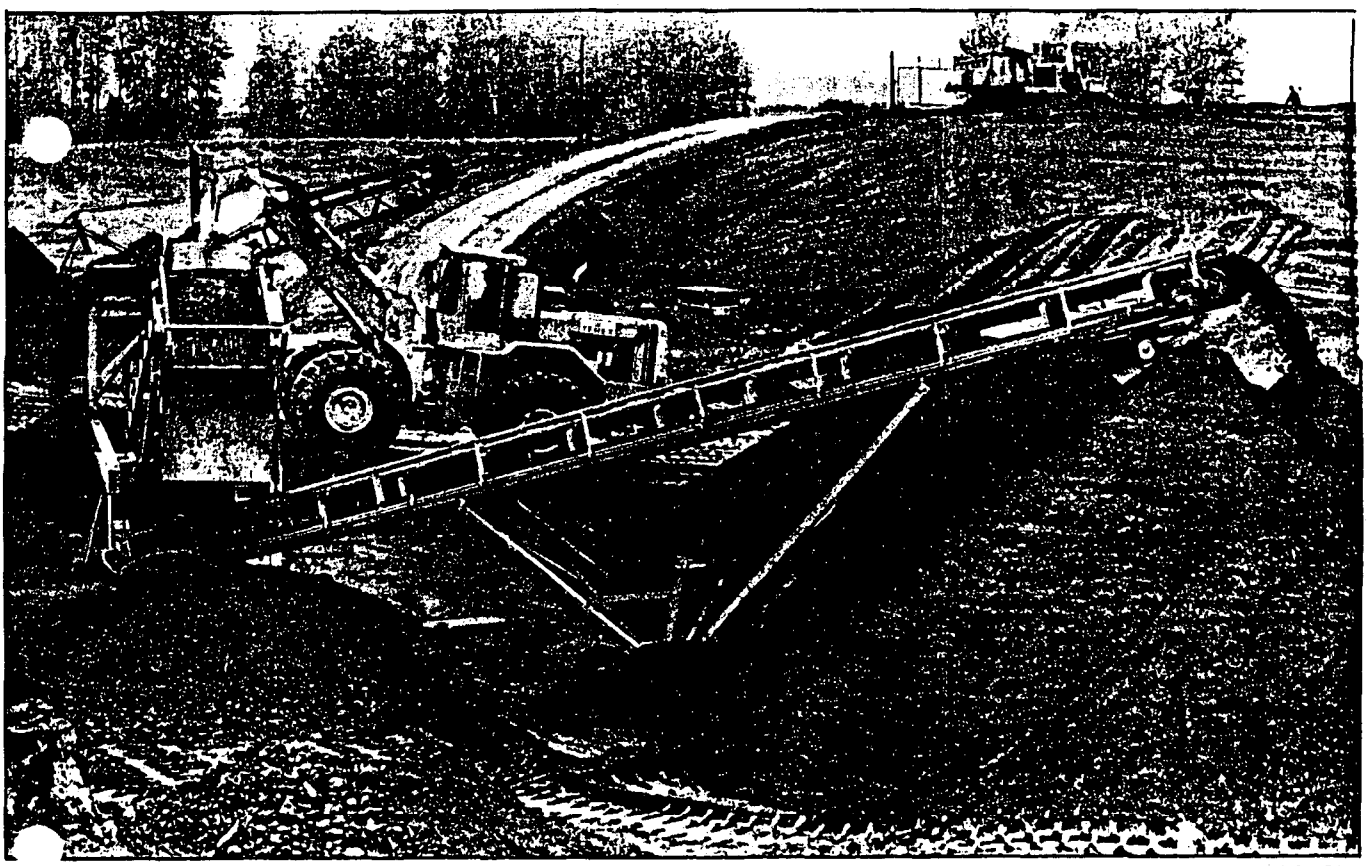
My goodness - little rocks have to removed - could have poked holes in the liner - at least there leachate (it) doesn't run down hill into a lake if it goes into the landfill.

Keep this in mind - this liner is no good - Will leak.

Clara Wilkins Chr. NC&C

2505 S. Silver Lake Rd
Castle Rock
WA. 98611

Rocky road



Daily News photo by Dave Rabert

Cowlitz County must spend $130,000 to sift landfill sand, to remove rocks that would puncture a rainproof plastic liner covering 38 acres of rubbish

Sifting of sand at landfill to cost $130,000

By Michael Lindblom
The Daily News

The sands of Cowlitz County have turned out to be too rocky for use in properly closing part of the landfill.

County taxpayers now must spend $130,000 for a contractor to sift through about 105,000 cubic yards of sand. Rocks more than one inch in diameter must be screened out.

The rocks could have poked holes in a thin plastic liner that will be installed to keep rainwater from leaking into the acres of garbage and dirt underneath, said Don Olson, county solid waste superintendent.

"It defeats the purpose of why you're putting in the liner in the first place — to create one, impermeable layer," Olson said.

The county is sealing about a million tons of rubbish people threw away between 1975 and 1991. Olson has likened the project to putting an umbrella and raincoat over the 38 acres of dirt and garbage. The landfill is located off Tennant Way near Longview.

Cowlitz County's staff thought the several piles of sand dredged from the Cowlitz River was free from stones and could be piled onto the liner, said Olson. However, landfill employees found that some larger rock already on the ground got mixed in, he said.

Workers had picked out the larger rocks and some driftwood by hand, but to continue doing so would delay the entire project, Olson said.

Some stones were 12 to 14 inches in diameter, and damaged the contractor's equipment, said Bob Kinghorn, vice president of Ground Improvement Techniques of Woodland, the main contractor.

County commissioners this morning approved an emergency spending order to free up the $130,000.

That cost represents about a 5.7 percent boost in the original landfill closure cost of $2.27 million.

Ground Improvement Techniques offered to do the work for about $270,000, which was "fairly excessive," said Olson. The county searched for a lower price and awarded a sifting contract to J.L. Storedahl and Sons Inc. of Kelso for about $130,000, he said.

Kinghorn said the reason for the cost difference arose because his company thought two screens were needed to properly sift the sand, and the county decided to use one screen.

Ground Improvement has three branches nationwide and has closed about 75 landfills, Kinghorn said.

"It's nothing unusual to have to spend more money on a landfill closure because there's so many things that are unknown," he said.

Sifting began last Wednesday and will take 30 to 40 days, Olson said. The sifting had to be rushed to avoid delays that would drive up total landfill closure costs, he said.

Ground Improvement is on schedule and possibly could begin laying a plastic liner today, Kinghorn said.

RESPONSE TO LETTER NO. 58

Clara Wilkins, Chairman
North Cowlitz Environmental Council

The article attached to your letter highlights the importance of a rigorous construction quality assurance plan such as would be followed during construction of the proposed landfill (see response to Letter No. 9, Comment 20).

DEIS
Weyco Dump (Proposed Hdqtrs Rd

To
Cow - Wah Health District
1516 Hudson
Longview, WA. 98632
Att: David Riggs

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

9/8/92

Enclosed is a map of Cowlitz County - the (Cowlitz Co. public works - E. County Solid Waste advisory board, SCS & Doe are all putting the 1992 Cowlitz County Comprehensive plan (Solid Waste) together.

Page 15 - Figure 1-2 Generalized soils (Copy enclosed) shows what the U.S. Soil Conservation service said & gave me the print out - Hazeldell & olympic soils. Not what weyco. claims by their study -

A copy of US Soil Conservation print out again provided for you also.

Talking with Weyerhaeuser people, Health Dept personal, looking at maps, etc. Weyerhaeuser Co. is putting a landfill on soil not conducive to a landfill.

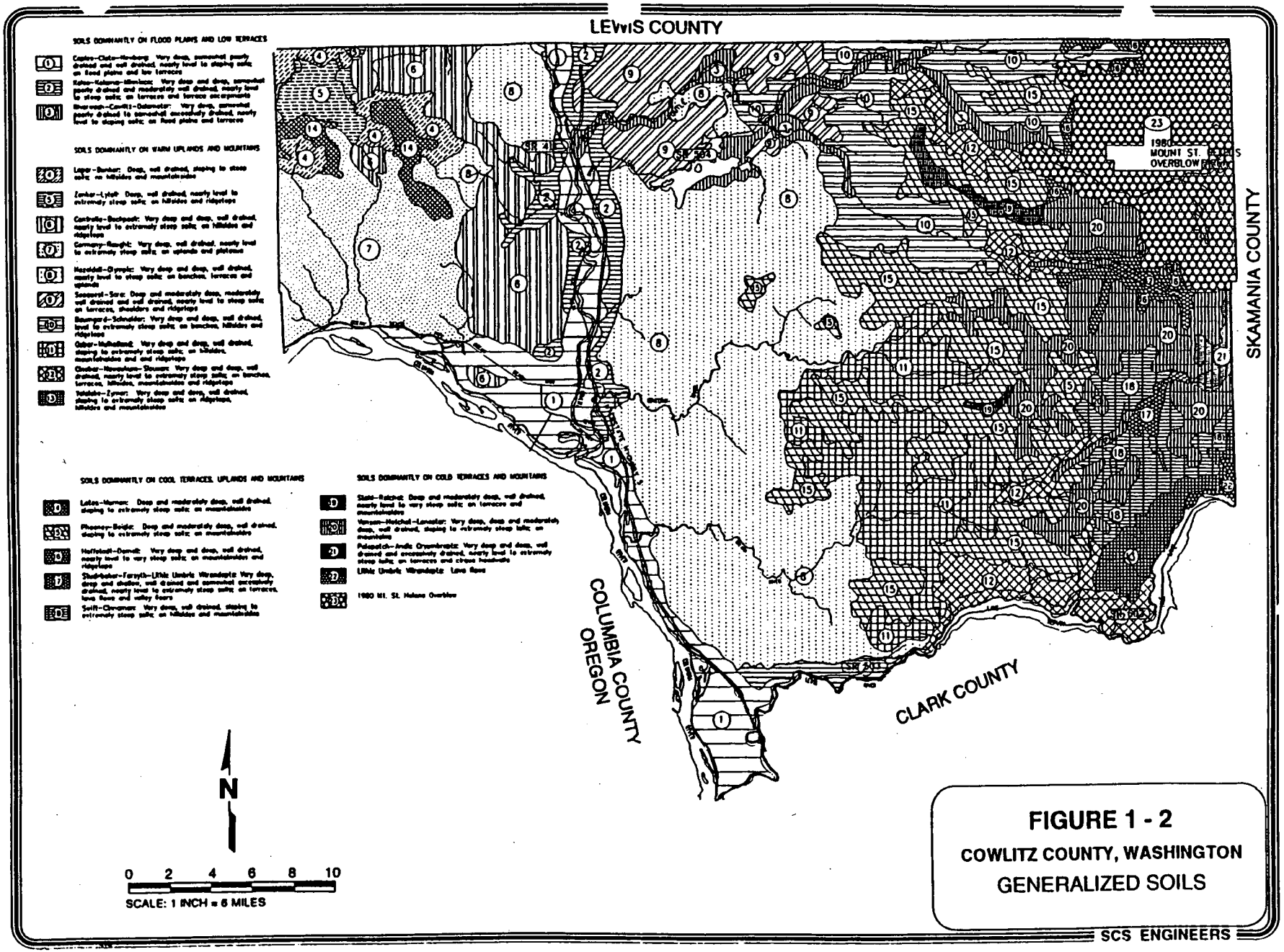


FIGURE 1 - 2

COWLITZ COUNTY, WASHINGTON

GENERALIZED SOILS

SCS ENGINEERS

WA1596 SOIL INTERPRETATIONS RECORD

400
HAZELDELL SERIE

MLRA(S): 2
REV. RFP, 5-88
XERIC PALEHUMULTS, FINE-LOAMY, MIXED, MESIC

HAZELDELL SOILS CONSISTS OF VERY DEEP WELL DRAINED SOILS ON FOOTHILLS FORMED IN RESIDUM AND COLLUVIUM FROM BASIC IGNEOI ROCKS. VEGETATION IS TREES. MAAT IS ABOUT 50F. MAP IS 45 TO 80 INCHES. THE 6S IS 150 TO 200 DAYS. TYPICALLY, THE SURFAC LAYER IS DARK BROWN GRAVELLY LOAM 19 INCHES THICK. THE SUBSOIL AND SUBSTRATUM IS STRONG BROWN GRAVELLY CLAY LOAM AND GRAVELLY LOAM TO 60 INCHES. SLOPES ARE 2 TO 65 PERCENT.

ESTIMATED SOIL PROPERTIES

DEPTH (IN.)	USDA TEXTURE	UNIFIED	AASHTO	FRACT >3 IN (PCT)	PERCENT OF MATERIAL LESS THAN 3" PASSING SIEVE NO. 4	10	40	200	LIQUID LIMIT	PLASTICITY INDEX
0-7	GR-SIL	CL, ML	A-6, A-7	0	70-85	60-75	55-75	50-65	30-50	10-15
0-7	CB-SIL	CL, ML	A-6, A-7	20-35	90-100	70-90	60-75	50-60	30-50	10-15
7-40	GR-CL, GR-L	CL, SC, GL, SM	A-6, A-7, A-5, A-7	0-15	75-85	60-75	55-70	40-50	30-45	5-20
40-60	GR-CL, GR-C	CL, GC, SC, ML	A-6, A-4, A-5, A-7	0-5	65-80	55-75	50-70	40-60	30-45	5-20

DEPTH (IN.)	CLAY (PCT)	MOIST BULK DENSITY (G/CM3)	PERMEABILITY (IN/HR)	AVAILABLE WATER CAPACITY (IN/IN)	SOIL REACTION (PH)	SALINITY (MMHOS/CM)	SHRINK-SWELL POTENTIAL	EROSION FACTORS K	EROSION FACTORS T	WIND EROD. GROUP	ORGANIC MATTER (PCT)	CORROSIVITY STEEL	CORROSIVITY CONCRETE
0-7	20-27	1.10-1.35	0.6-2.0	0.19-0.24	4.5-5.5	-	MODERATE	.24	5	-	5-10	MODERATE	MODERATE
0-7	20-27	1.10-1.35	0.6-2.0	0.18-0.24	4.5-5.5	-	MODERATE	.24	5	-	5-10		
7-40	35-60	1.10-1.45	0.6-2.0	0.13-0.21	4.5-5.5	-	MODERATE	.24					
40-60	40-70	1.25-1.45	0.6-2.0	0.13-0.20	4.5-5.5	-	MODERATE	.24					

FLOODING FREQUENCY	FLOODING DURATION	HIGH WATER TABLE DEPTH (FT)	HIGH WATER TABLE KIND	HIGH WATER TABLE MONTHS	CEMENTED PAN DEPTH (IN)	CEMENTED PAN HARDNESS	BEDROCK DEPTH (IN)	BEDROCK HARDNESS	SUBSIDENCE INIT. (IN)	SUBSIDENCE TOTAL (IN)	HYD GRP	POTENTIAL FROST ACTION
NONE		>6.0			-		>60		-		B	LOW

SANITARY FACILITIES

SEPTIC TANK ABSORPTION FIELDS	2-8%: MODERATE-PERCS SLOWLY 8-15%: MODERATE-PERCS SLOWLY, SLOPE 15+%: SEVERE-SLOPE
SEWAGE LAGOON AREAS	2-7% GR: MODERATE-SEEPAGE, SLOPE 2-7% CB: MODERATE-SEEPAGE, SLOPE, LARGE STONES 7+%: SEVERE-SLOPE
SANITARY LANDFILL (TRENCH)	2-8%: MODERATE-TOO CLAYEY 8-15%: MODERATE-SLOPE, TOO CLAYEY 15+%: SEVERE-SLOPE
SANITARY LANDFILL (AREA)	2-8%: SLIGHT 8-15%: MODERATE-SLOPE 15+%: SEVERE-SLOPE
DAILY COVER FOR LANDFILL	2-15%: POOR-SMALL STONES 15+%: POOR-SMALL STONES, SLOPE

BUILDING SITE DEVELOPMENT

SHALLOW...	2-8%: MODERATE-TOO CLAYEY 8-15%: MODERATE-TOO CLAYEY, SLOPE

CONSTRUCTION MATERIAL

ROADFILL	2-15%: FAIR-SHRINK-SWELL 15-25%: FAIR-SHRINK-SWELL, SLOPE 25+%: POOR-SLOPE
SAND	IMPROBABLE-EXCESS FINES
GRAVEL	IMPROBABLE-EXCESS FINES
TOPSOIL	2-15%: POOR-SMALL STONES 15+%: POOR-SMALL STONES, SLOPE

WATER MANAGEMENT

POND RESERVOIR AREA	2-3%: MODERATE-SEEPAGE 3-8%: MODERATE-SEEPAGE, SLOPE 8+%: SEVERE-SLOPE
EMBANKMENTS	SEVERE-PIPING

NORTH COWLITZ ENVIRONMENTAL COUNCIL
BOX 12
SILVER LAKE, WA 98645

		DIKES AND LEVEES	
DWELLINGS WITHOUT BASEMENTS	0-8%: MODERATE-SHRINK-SWELL 8-15%: MODERATE-SHRINK-SWELL,SLOPE 15+%: SEVERE-SLOPE	EXCAVATED PONDS AQUIFER FED	SEVERE-NO WATER
DWELLINGS WITH BASEMENTS	0-8%: MODERATE-SHRINK-SWELL 8-15%: MODERATE-SLOPE,SHRINK-SWELL 15+%: SEVERE-SLOPE	DRAINAGE	DEEP TO WATER
SMALL COMMERCIAL BUILDINGS	0-4%: MODERATE-SHRINK-SWELL 4-8%: MODERATE-SHRINK-SWELL,SLOPE 8+%: SEVERE-SLOPE	IRRIGATION	0-3%: FAVORABLE 3+%: SLOPE
LOCAL ROADS AND STREETS	0-15%: SEVERE-LOW STRENGTH 15+%: SEVERE-LOW STRENGTH,SLOPE	TERRACES AND DIVERSIONS	0-8%: FAVORABLE 8+%: SLOPE
LAWNS, LANDSCAPING AND GOLF FAIRWAYS	0-8% CL,SICL,SIL: SLIGHT 8-15% CL,SICL,SIL: MODERATE-SLOPE 0-8% GR: MODERATE-SMALL STONES 8-15% GR: MODERATE-SMALL STONES,SLOPE 15+%: SEVERE-SLOPE	GRASSED WATERWAYS	0-8%: FAVORABLE 8+%: SLOPE

REGIONAL INTERPRETATIONS

WA0225 [redacted] SOIL INTERPRETATIONS RECORD (390)

AREA(S): 2
REV. BF, WF, 2-58
XERIC HAPLOHUMULTS, CLAYEY, MIXED, MESIC

OLYMPIC SERIES

OLYMPIC SERIES CONSISTS OF VERY DEEP WELL DRAINED SOILS ON UPLANDS FORMED IN RESIDUUM FROM BASIC IGNEOUS ROCKS. VEGETATION IS TREES. MAAT IS 52F. MAP IS 40 TO 70 IN. GS IS 150 TO 240 DAYS. TYPICALLY, OLYMPIC SOILS HAVE DARK BROWN AND DARK REDDISH BROWN SILTY CLAY LOAM SURFACE LAYER 13 INCHES THICK. THE UPPER SUBSOIL IS DARK REDDISH BROWN AND YELLOWISH RED SILTY CLAY LOAM AND SILTY CLAY 21 INCHES THICK. THE LOWER SUBSOIL IS YELLOWISH RED CLAY TO 100 INCHES. BELOW 100 INCHES IS BASALT BEDROCK. SLOPES ARE 0 TO 65 PERCENT.

NORTH COWLITZ ENVIRONMENTAL CO
BOX 12
SILVER LAKE, WA 98645
#2

ESTIMATED SOIL PROPERTIES

DEPTH (IN.)	USDA TEXTURE	UNIFIED	AASHTO	FRACT >3 IN (PCT)	PERCENT OF MATERIAL LESS THAN 3" PASSING SIEVE NO. 4	10	40	200	LIQUID LIMIT	PLASTICITY INDEX
0-6	ICL, SICL	ML, MH	A-7, A-5	0	100	100	90-100	70-95	45-60	5-15
0-6	SIL	ML, MH	A-5, A-7	0	100	100	90-100	75-95	45-60	5-15
0-6	GR-SIL	SM, ML, MH, GM	A-5, A-7	0-5	70-90	60-75	50-70	45-60	45-60	5-15
6-13	SIL, CL, SICL	ML, MH	A-6, A-7	0	100	100	90-100	70-95	45-60	5-15
13-53	SICL, SIC, C	ML, MH	A-7	0	95-100	95-100	90-100	70-95	35-55	10-20
53-60	SIC, C	ML, MH	A-7, A-5	0	95-100	95-100	90-100	70-95	45-70	10-25

DEPTH (IN.)	CLAY (PCT)	MOIST BULK DENSITY (G/CM3)	PERMEABILITY (IN/HR)	AVAILABLE WATER CAPACITY (IN/IN)	SOIL REACTION (PH)	SALINITY (MMHOS/CM)	SHRINK-SWELL POTENTIAL	EROSION FACTORS K	EROSION FACTORS T	WIND EROD. GROUP	ORGANIC MATTER (PCT)	CORROSIVITY STEEL	CORROSIVITY CONCRETE
0-6	27-35	1.05-1.30	0.6-2.0	0.19-0.21	4.5-6.5	-	MODERATE	.24	5	-	3-8	HIGH	HIGH
0-6	15-27	1.15-1.35	0.6-2.0	0.20-0.22	4.5-6.5	-	LOW	.32	5	-	3-9		
0-6	18-27	1.15-1.35	0.6-2.0	0.11-0.15	4.5-6.5	-	LOW	.24	5	-	3-8		
6-13	25-35	1.10-1.40	0.6-2.0	0.11-0.20	4.5-6.5	-	MODERATE	.24					
13-53	35-60	1.10-1.35	0.6-2.0	0.15-0.19	4.5-6.0	-	MODERATE	.20					
53-60	40-70	1.00-1.35	0.6-2.0	0.15-0.20	4.5-6.0	-	MODERATE	.20					

FLOODING FREQUENCY	FLOODING DURATION	FLOODING MONTHS	HIGH WATER TABLE DEPTH (FT)	HIGH WATER TABLE KIND	HIGH WATER TABLE MONTHS	CEMENTED PAN DEPTH (IN)	CEMENTED PAN HARDNESS	BEDROCK DEPTH (IN)	BEDROCK HARDNESS	SUBSIDENCE INIT. (IN)	SUBSIDENCE TOTAL (IN)	HYD GRP	POTENTIAL FROST ACTION
NONE			>6.0			-		>60		-	-	B	-

SANITARY FACILITIES

SEPTIC TANK ABSORPTION FIELDS	0-8%: MODERATE-PERCS SLOWLY 8-15%: MODERATE-PERCS SLOWLY, SLOPE 15+%: SEVERE-SLOPE
SEWAGE LAGOON AREAS	0-2%: MODERATE-SEEPAGE 2-7%: MODERATE-SEEPAGE, SLOPE 7+%: SEVERE-SLOPE
SANITARY LANDFILL (TRENCH)	0-15%: SEVERE-TOO CLAYEY 15+%: SEVERE-SLOPE, TOO CLAYEY
SANITARY LANDFILL (AREA)	0-8%: SLIGHT 8-15%: MODERATE-SLOPE 15+%: SEVERE-SLOPE
DAILY COVER FOR LANDFILL	0-15%: POOR-TOO CLAYEY, HARD TO PACK 15+%: POOR-TOO CLAYEY, HARD TO PACK, SLOPE

BUILDING SITE DEVELOPMENT

	0-8%: MODERATE-TOO CLAYEY

CONSTRUCTION MATERIAL

ROADFILL	0-25%: POOR-LOW STRENGTH 25+%: POOR-LOW STRENGTH, SLOPE
SAND	IMPROBABLE-EXCESS FINES
GRAVEL	IMPROBABLE-EXCESS FINES
TOPSOIL	0-15%: POOR-TOO CLAYEY 15+%: POOR-TOO CLAYEY, SLOPE

WATER MANAGEMENT

POND RESERVOIR AREAS	0-3%: MODERATE-SEEPAGE 3-8%: MODERATE-SEEPAGE, SLOPE 8+%: SEVERE-SLOPE
	SEVERE-HARD TO PACK

EXCAVATIONS	15+%: SEVERE-SLOPE	DIKES AND LEVEES	
DWELLINGS WITHOUT BASEMENTS	2-8%: MODERATE-SHRINK-SWELL 8-15%: MODERATE-SHRINK-SWELL,SLOPE 15+%: SEVERE-SLOPE	EXCAVATED PONDS AQUIFER FED	SEVERE-NO WATER
DWELLINGS WITH BASEMENTS	2-8%: MODERATE-SHRINK-SWELL 8-15%: MODERATE-SLOPE,SHRINK-SWELL 15+%: SEVERE-SLOPE	DRAINAGE	DEEP TO WATER
SMALL COMMERCIAL BUILDINGS	2-4%: MODERATE-SHRINK-SWELL 4-8%: MODERATE-SHRINK-SWELL,SLOPE 8+%: SEVERE-SLOPE	IRRIGATION	2-3%: FAVORABLE 3+%: SLOPE
LOCAL ROADS AND STREETS	2-8%: MODERATE-SHRINK-SWELL 8-15%: MODERATE-SHRINK-SWELL,SLOPE 15+%: SEVERE-SLOPE	TERRACES AND DIVERSIONS	2-8% GR: FAVORABLE 8+% GR: SLOPE 2-8% CB: LARGE STONES 8+% CB: SLOPE,LARGE STONES
LAWNS, LANDSCAPING AND GOLF FAIRWAYS	2-8% GR: MODERATE-SMALL STONES 8-15% GR: MODERATE-SMALL STONES,SLOPE 15+% GR: SEVERE-SLOPE 2-15% CB: SEVERE-LARGE STONES 15+% CB: SEVERE-LARGE STONES,SLOPE	GRASSED WATERWAYS	2-8% GR: FAVORABLE 8+% GR: SLOPE 2-8% CB: LARGE STONES 8+% CB: LARGE STONES,SLOPE

REGIONAL INTERPRETATIONS

RESPONSE TO LETTER NO. 59

Clara Wilkins, Chairman
North Cowlitz Environmental Council

See response to Letter No. 41, Comment 16.

9/11/92

D E S
(Proposed Weyco Dump / Hdqt Camp)
To
Cowlitz - Wah. Health District
15-16 Hudson St
Longview, WA., 98632
att: Mr Riggs

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Enclosed is the letter from D.O.E. (Roland Ugochukwu) Dated 2/7/92. I Marked alot of areas in question. Also enclosed is a letter from Mr. Ugochukwu saying on 2/27/92 that these questions/needs were discussed with Weyco + Emcon N.W Inc. + details would be provided in Part II of the permit application documents.

How can you do a F.E.I.S (even think of issuing a permit) without these questions answered for us, the public? How can we answer + ask questions on the D E S without full, complete information. It seems there is alot of flaws, assumptions, or thus

site (Hdqtrs Camp). We want this information now to evaluate not later. Your D E IS is a flawed document, I feel it should be withdrawn redone + more public hearings later on a revised D.E.I.S.

Clara Welbers Ch.
NCEC
2505 So. Silver Lake Rd
Castle Rock, WA. 98611

DEPARTMENT OF ECOLOGY

Cowlitz-Wahkiakum Counties
FEB 11 1992
Health District

February 7, 1992

Mr. David Riggs
Director
Environmental Health Division
1516 Hudson
P.O. Box 458
Longview, WA 98632-0046

Dear Mr. Riggs:

This letter provides comments on the Proposed Weyerhaeuser Southwest Washington Solid Waste Facility: Headquarters Road Site.

I. Solid Waste Permit Application Part 1: Site Characterization; dated June 12, 1991.

The above document has been viewed and reviewed primarily as the geotechnical assessment of the proposed facility (landfill). It is therefore expected to provide fundamental data and information regarding engineering properties of the site soil representative of the entire site, so to develop a landfill design that accommodates existing and expected site soil conditions. However, the essential parts of the required information; site settlement and stability analyses (page 10), seismic design, earthquake impact, soil balance estimate, have been referenced to Part 2 of the permit application which is yet to be submitted to the Department of Ecology. It is therefore not possible to make a final comment on the geotechnical assessment of the site.

The comments below should be considered in preparing the Part 2 of the permit application.

Pages 6 and 13, Site Geology/Seismicity.

It is stated on the reference page that "locally the (site) rocks contain fractures and minor fault structures..... and inactive landslides." It is also observed on page 13 that site "seismic design consideration will be addressed in Part 2 of the permit application."

Site specific investigation including geophysical methods and determination of the extent of the faults within the landfill footprint will be expected in Part 2 of the application.

Pages 8 and 9 Test Pits.

Refer to figure 3-1. It appears the 1989 test pits (TP) outside the landfill foot print are concentrated north-south compared to east-west. What is the rationale for not locationing test pits in an east-west trend?

Pages 8-10, Refer to table 3-1, "Proctor Data"

Only four (4) soil samples were used for proctor test and only two (2) samples out of the four are within the landfill footprint. The number of samples does not seem sufficient to fully characterize a 330-acre site.

From the scale on figure 3-1, the horizontal distance (east-west) of the landfill footprint is about 3,281 feet. However, the test pits TP-7, 9, 10, and 14, from which the soil samples were taken are located north and south, about a third of the horizontal distance from the east.

As the results of proctor test are essential to specify the degree of compaction, the number of soil sample points should be distributed to be representative of the soil conditions for the entire site.

Particular area(s) for soil liner borrow should be identified on the site map and this should be based on geologic exploration and soil test results.

As a quality assurance measure, in situ test(s) should be performed to support or verify laboratory soil test results. Such field test(s) may include in place density determination. Sand cone density method (ASTM D1556) or nuclear densiometer method (ASTM D2992) could be used.

Appendix B, Hydrogeologic Assessment

"This appendix is available.....upon request." All field data and laboratory readings or measurements relevant in characterizing and expecting site conditions, design and construction of the landfill should be included in the appendix for each manual or report, or referenced to a companion document, if the data had already been supplied elsewhere.

Appendix C, Test Pit Logs

10 out of the 22 test pits show refusal depths of about 9 feet on the average. Will the depth of excavation to bottom of the landfill exceed the average refusal depth? What will be the depth of excavation relative to the 250 feet "maximum waste depth" proposed for the landfill on page 2 of "Solid Waste Handling Facility Permit Application" dated August 13, 1990.

Reference to test method should identify the type of test or what parameter is being tested for; for example, ASTM D 2216 (water content), ASTM D 1586 (standard penetration test) instead of ASTM D 2216 or ASTM D 1586.

II. Solid Waste Handling Facility Permit Application, dated August 13, 1990

Page 20, Liner Design

Composite liner design has been proposed for this facility. Ecology recommends the inclusion of Leak Detection System, particularly, in the areas with hydraulic gradient control. This system will be more accurate in detecting if leachate leaks into the underdrain system and to ground water. Monitoring the water from the underdrain alone is unlikely to reveal the actual magnitude of contamination because of dilution.

Page 24, Construction Quality Assurance (CQA)

This section should also address quality control (QC) procedures for construction materials, including soil, by the contractor.

III. Geology and Hydrogeology, dated June 12, 1991

Under verbal agreement with the Cowlitz-Wahkiakum Health Department and the Weyerhaeuser Company, Kirk Cook has conducted a preliminary review of several reports which contain items necessary to fulfill the requirements of a hydrogeologic assessment under WAC 173-304-600. The purpose of this section is to provide the results of the review of the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991, the Weyerhaeuser Southwest Washington Solid Waste Facility Solid Waste Permit Application Part 1: Site Characterization (June 12, 1991) and the Weyerhaeuser Southwest Washington Solid Waste Disposal Facility Headquarters Site, Solid Waste Handling Facility Permit Application- August 13, 1990.

General Comments

The fact that items required under WAC 173-304-600(3)(b)(i) were contained in three separate documents greatly complicated the review. In the revision of the hydrogeologic assessment, I would like to see all relevant data and conclusion contained in one stand alone document.

Adequacy of Assessment

WAC 173-304-600(3)(b)(i)(A) and (B) **Local/Regional Geology and Hydrology Evaluation of Bedrock and Soil Types**

The major comment on this section of the assessment is that it is unnecessarily split between the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991, and the Weyerhaeuser Southwest Washington Solid Waste Facility Solid Waste Permit Application Part 1: Site Characterization (June 12, 1991). This complicates review of these portions of the assessment.

The two cross-sections contained in Figure 3-3 of the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991 carries the geological interpretation beyond the extent to which any of the piezometers or wells were drilled. The lack of data beyond relatively shallow depths makes site specific characterization of a deeper aquifer system impossible. This lack of data is of major concern given the presence of a fairly uniform layer of moderately weathered basalt and andesite across the site which appears to be encountered by both water supply wells currently used by the Headquarters Camp facility. Further investigation of this basalt/andesite layer should be under taken or additional information provided in order to determine its relationship with the shallow aquifer system.

WAC 173-304-600(3)(b)(i)(C) **Depths to Groundwater**

Section 4.3.3 of the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991 discusses seasonal fluctuations of the shallow aquifer system. The impact the of the noted fluctuations in modifications to the groundwater flow direction presented in Figure 4-1 of the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991 should be discussed. We recommend presenting at least one additional ground water contour map for the wet portion of the year. We suggest that this map be based on water level information collected in February or early March.

The interaction between precipitation and groundwater level fluctuations need to be investigated and results included in the hydrogeologic assessment. The results of this work will have significant bearing on both design of both the gradient control system and the leachate and storm water holding facilities.

WAC 173-304-600(3)(b)(i)(D) **Direction and Flow Rate of Local Groundwater**

This portion of the regulation requires that the facility proponent adequately characterize the direction and flow rate of local ground water. Generally this is accomplished through geotechnical and hydrogeologic testing to determine such properties as hydraulic conductivity, porosity, ground water flow velocity, and preferential flow paths. The testing and analysis conducted during the site characterization and presented in the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991 appears to be inadequate.

Groundwater Flow Rate

The hydraulic conductivity of the 330 acre site is based on four slug (rising head) tests. These type of tests have been shown to be of limited value in providing accurate hydrogeologic information over a large area. Because of this limitation, Ecology has required limited pump testing of aquifers underlying proposed facilities (LRI and WIDCO) as a method of verifying slug test results.

Flow velocities were calculated using results stemming from the analysis of four slug tests, assumptions on differences between vertical and horizontal conductivities, assumptions of both porosity and effective porosity, and gradients based on a single water level measurement taken in August 1990. Furthermore, it appears that consideration was not given to the effect existing drainage patterns may have on flow velocities. Without collection of further data to reduce or eliminate the number of assumptions included in the determination of ground water flow velocity, Ecology cannot consider this portion of the hydrogeologic assessment to be complete.

The calculation of hydraulic conductivity contained in Appendix E, is confusing and incomplete. After review of the 1951 paper by Hvorslev it is apparent that the author did not present all his assumptions nor did he present a complete calculation of hydraulic conductivities for wells MW-1, MW-2, BW-1, and P-6.

Groundwater Flow Direction

Figure 4-1 provides a water level contour map, based on measurements collected in August 1990. Water level elevations for each well are presented on the map. However, because depth to water data from this sampling round, and reference elevations of the sampling points on the casings are not included in the report, the accuracy of Figure 4-1 cannot be verified.

There does not appear to be analysis of the possibility of deeper aquifer systems underlying the facility. Furthermore the interaction, if any, the deeper system referenced on page 13, paragraph three has with the shallow groundwater has not been adequately addressed in any of the reports.

There is a statement contained on page 13, paragraph three regarding vertical flow and the classifying of this site as a recharge area. Supporting data for this statement is lacking in the report.

A revision of the report must include a table of the surveyed reference points on each casing from which the water level measurements are taken. Furthermore, depth to water data from the August sampling (on which Figure 4-1 is based) must be included in the report as should data from which any other contour map is based.

WAC 173-304-600(3)(b)(i)(E) **Direction of Regional Groundwater**

The assessment is confined to an analysis of the local aquifer system. The revision of the assessment should provide a determination of the regional groundwater vertical flow direction with supporting documentation for that determination. Sources cited in for the determination of horizontal flow direction are sufficient.

WAC 173-304-600(3)(b)(i)(F) and (G) **Private and Public Wells/Water Rights**

The Weyerhaeuser wells appear to be on the fringe of the two thousand radius for the facility. Therefore, we would suggest that the location and construction details as well as a tabulation of the associated water rights be included in the revision of the hydrogeologic assessment.

WAC 173-304-600(3)(b)(i)(H) **Identification and Description of Surface Water**

Page 14 of the Weyerhaeuser Southwest Washington Solid Waste Facility Solid Waste Permit Application Part 1: Site Characterization (June 12, 1991) contains a brief description of surface water features within one mile of the proposed facility. The description is inadequate in that it does not present data on the seasonal and mean annual flow for the identified features.

WAC 173-304-600(3)(b)(i)(I) **Background Ground and Surface Water Quality**

Background surface water quality data is presented in the Weyerhaeuser Southwest Washington Solid Waste Facility Solid Waste Permit Application Part 1: Site Characterization (June 12, 1991). However, there is no indication as to when these samples were taken or how many samples were taken between January and November 1990. Background groundwater quality data is presented in the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991 appears to be adequate.

WAC 173-304-600(3)(b)(i)(J) **Calculation of Site Water Balance**

The method utilized to calculate the site water balance is not cited in either the Geology and Hydrogeology of the Proposed Headquarters Solid Waste Facility Cowlitz County, Washington - June 12, 1991, or the Weyerhaeuser Southwest Washington Solid Waste Facility Solid Waste Permit Application Part 1: Site Characterization (June 12, 1991).

We have concerns regarding the use of discharge measurements from the southern tributary of Sucker Creek as a factor in the water balance. Use of surface water monitoring site S-4 to collect stream flows will provide greater runoff factors which should result in lowering both infiltration to shallow and deeper aquifer systems. Use of this number to base leakage model inputs could result in errorenous values for leachate volumes, hydraulic control system discharges, and landfill leakage concentrations found in a leakage detection system.

WAC 173-304-600(3)(b)(i)(K) **Conceptional Design of Ground and Surface Water Monitoring Systems**

The Weyerhaeuser Southwest Washington Solid Waste Disposal Facility Headquarters Site, Solid Waste Handling Facility Permit Application- August 13, 1990 proposes a ground water monitoring system consisting of one upgradient and three downgradient monitoring wells. BW-1 is designated as the upgradient well while wells MW-1 through MW-4 are the designated downgradient monitoring wells. Given the size of the facility and the variation of lithologic units in which the wells are installed, the proposed system is inadequate to provide for complete monitoring of the groundwater. Additionally, there appears to be a problem in using BW-1 as the statistical basis by which to compare the three downgradient wells. BW-1, consistently shows higher levels of ammonia, iron, sodium, and manganese than do the downgradient wells.

Need more wells - are you going to require them to do more?

WAC 173-304-600(3)(b)(i)(L) **Land Use in the Area**

In the three documents which were reviewed to determine adequacy of the hydrogeologic assessment, there did not exist a complete discussion of land use in the surrounding area. This section must be included in the revision of the assessment and must include a discussion of all nearby residences located west of the facility boundary.

DNR approved Tacoma Pulp Farm to Commercial 3 use. Does not agree w/ our Land Values unless Conservation Land owners?

WAC 173-304-600(3)(b)(i)(M) **Topography of the Site**

This requirement has been met in each of the reviewed documents.

U.S. Soil Conservation Said this is not a good site for a landfill why are you ignoring that?

Recommendations

In order to complete the hydrogeologic assessment such that it will meet the requirements outlined in WAC 173-304-600(3)(b)(i), the document must include the following data and revise the following sections:

Was this done?

* Further investigation of this basalt/andesite layer should be under taken to determine its relationship with the shallow aquifer system. If additional data currently exists to support the conclusions of the reports, it should be provided to Ecology;

Was this done?

* An additional ground water contour map for the period of February/March should be constructed to accompany Figure 4-1. Additionally, the interaction between precipitation and groundwater level fluctuations need to be investigated and results included in the hydrogeologic assessment;

Was this done?

* Ecology will required additional aquifer testing for the shallow aquifer system underlying proposed facility in order to verify slug test results. If additional support data exists to confirm the results of the slug testing, that data should be supplied to Ecology for evaluation. However, given the current level of investigation it is likely that at least four additional slug tests should be conducted. Based of the results of Ecology's evaluation of additional information, pump tests may be recommended for the proposed facility;

Was this done?

* Complete calculations using the methodology outlined in the 1951 paper by Hvorslev should be included. Furthermore, a complete list of assumptions on which the calculations were based should be presented;

Was this done?

* A revision of the report must include a table of the surveyed reference points on each casing from which the water level measurements are taken. Furthermore, depth to water data from the August sampling (on which Figure 4-1 is based) must be included in the report;

Was this done?

* The revision of the assessment should provide a determination of the regional groundwater vertical flow direction with supporting documentation for that determination;

W - this done?

* A presentation of the location and construction details as well as a tabulation of the associated water rights should be included in the revision of the hydrogeologic assessment;

Was this done?

* The seasonal discharge and well as the mean annual discharges for identified steams should be presented;

Was this done?

* An assessment should be made of the impact stream flow outside the facility area, but measured at S-4, has on the water balance calculation;

Was this Done?

* A revision of the assessment must include a discussion of all nearby residences located west and within two miles of the facility boundary in order to complete the land use portion of the report;

If you have further questions regarding these comments, please telephone me at (206) 753-0144 or Kirk Cook at (206) 586-6484.

Sincerely,

RO/wh

Roland O. Ugochuku, Ph.D.
Regional Engineer
Solid and Hazardous Waste Section

RU:dc(8/shwl)

Part 7 comments: DF&S

Notes by Clara Wilkens Ch. NC&C
9/11/92

RESPONSE TO LETTER NO. 59A

Clara Wilkins, Chairman
North Cowlitz Environmental Council

With regard to whether the issues raised in Ecology's letter of February 7, 1992 have been addressed, see response to Letter No. 8, Comment 1. Because your additional comments are in the margins of the Ecology letter, there was no room to place comment numbers. However, following are responses to the additional issues raised in your marginal notes.

1. *U.S. Soil Conservation Service soils mapping.* See response to Letter No. 41, Comment 16.

2. *Timing of construction of the hydraulic gradient control system.* This system would be constructed before the bottom liner is placed, as you suggest.

3. *Use of contractors and construction quality assurance.* A team of contractors would be retained to construct various landfill facilities. All work done by these contractors would be monitored and inspected by the engineer in charge of construction quality assurance (see response to Letter No. 9, Comment 20).

4. *Need to study deeper aquifer.* See response to Letter No. 8, Comment 1 and Letter No. 41, Comment 1.

5. *Number of tank cars required to transport leachate.* See response to Transcript No. 2, Comment 20.

6. *Taxes paid on tree farm.* See response to Letter No. 41, Comment 15.

7. *Property values.* See response to Letter No. 26, Comment 1.

LETTER NO. 60 Thom Scanlon

JSEC

WASHINGTON STATE JOB SERVICE EMPLOYERS COMMITTEE

Randee Harris

September 3, 1992

Cowlitz-Wahkiakum Coun

SEP 11 1992

Health District

Weyerhaeuser Company
Gary Healea
Vice President, Mill Manager
P.O. Box 188
Longview, Wa. 98632

Dear Gary:

On behalf of the Job Service Employer's Committee (JSEC), I would like to extend our support in the effort to gain approval from the Weyerhaeuser Company Board of Directors to go forward with the Pulp Mill modernization project.

Southwest Washington would experience a devastating economical impact should this project be eliminated from Weyerhaeuser's long-term renovation plans. It is certainly in the best interests of our community to extend all the support possible in the effort to get this project approved.

The JSEC committee is made up of representatives from all sectors of our business community. The committee exists to enhance the public/private partnership by providing the Employment Security Department and the Job Service Center with guidance and feedback regarding the type and level of services offered to the community.

It is our desire to encourage businesses both large and small to support our communities in mutual interest projects whenever possible.

Sincerely,

Judy O'Neill

for Judy O'Neill LL
Chairman
Job Service Employer's Committee

RESPONSE TO LETTER NO. 60

Judy O'Neill, Chairman
Job Service Employer's Committee

Your support for the proposed landfill is noted.

LETTER NO. 61

Friends of the Cowlitz

P.O. Box 721
Toledo, WA 98591

(206)864-6700

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

September 8, 1992

David Riggs, Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, Washington 98632

re: Draft Environmental Impact Statement, Headquarters Camp Solid Waste Disposal Facility.

Dear Mr. Riggs

Please accept this letter and accompanying material as response to your solicitation for public comment regarding the issues in the draft EIS for the Headquarters Solid Waste Disposal Facility. We wish to have this letter to also serve as an addition to the comments Friends of the Cowlitz made to the District on this proposed waste site in June of 1991. (copy included).

The Friends of the Cowlitz (FOC) have identified specific issues which need more focused review and discussion. Below is a list of the issues Friends of the Cowlitz wish to comment on and each issue is followed by our comment.

1. CONSISTENCY WITH COWLITZ-WAHKIAKUM COMPREHENSIVE SOLID WASTE MANAGEMENT PLAN

Unless the Cowlitz-Wahkiakum Comprehensive Solid Waste Plan is not in compliance with the Clean Water Act (CWA) this proposal is not consistent with the plan.

In compliance with the Clean Water Act (CWA) 404 (b)(1) Guidelines: some issues are in question

(1) **Alternatives Analysis [40 CFR Part 230.10(a)]**

Consistent with the guidelines, no dredged or fill material shall be placed in Waters of the U.S. if there is a less damaging practicable alternative available to achieve the basic project purpose. Where wetlands and other special aquatic sites (such as riffle-pool complexes) exist, the Guidelines establish the presumptions that (1) upland alternatives are available, and (2) that alternatives which do not involve waters of the U.S. are less damaging to the environment. This EIS does not sufficiently substantiate that there are no practicable alternatives available. FOC believes that the applicant could achieve the project's basic purpose at alternative sites, existing landfills, or through scaled down landfill size.

Example of alternative site;

Existing Landfill site - If an existing landfill is capable of handling the solid waste stream produced by Weyerhaeuser, is practicable to the applicant in terms of costs, logistics, and technology, and would cause less impact to aquatic resources, it is a viable alternative in accordance with the Guidelines.

(2) **Minimizing Potential Adverse Impacts [40CFR230.10 (d)]**

Landfill Capacity/size and Lifetime: The applicant's landfill proposal is planned for a 30 year/45 million cubic yard disposal capacity. The "Summary of Capacity Requirements" document shows the applicant assumes the following in establishing this targeted capacity:

(1) Waste will continue to be generated at current or greater rates;

(2) more stringent regulations may limit the amount of incineration that can be done and other environmental regulations for air and water could increase the amount of solid waste as opposed to decrease it;

(3) additional facilities may come on line for which solid waste disposal will be necessary; and

(4) the landfill needs to accommodate waste from all potential waste generators (Weyerhaeuser and non-Weyerhaeuser wood waste generators) within Cowlitz-Wahkaikum Counties and all other Weyerhaeuser facilities outside of these County areas.

These assumptions are used to estimate the amount of waste that would be generated and handled at the proposed landfill. They tend to be conservative on the high end of the scale. There is no assessment of the possibility for reduced capacity based on less solid waste generation or other disposal scenarios. Smaller or shorter-lived landfills were not addressed in terms of clearly being infeasible.

Alternative integrated waste management scenarios that assume some level of decrease in production, some increased levels of recycling, or which restrict waste generated from facilities other than Weyerhaeuser facilities in Cowlitz-Wahkiakum County's would all reduce the projected capacity needed and/or extend the landfill operation time-frame. Therefore, it is not clear why a smaller landfill is not feasible. A smaller facility would certainly provide greater incentive to reduce the amount of solid waste generated, which is one of Weyerhaeuser's goals stated in this draft EIS.

2. GROUNDWATER QUALITY / SURFACE WATER

(3) a. The study sited for determining that a chemical spill resulting from derailment would occur only once in 200 years does not reflect Weyerhaeuser's derailment/rail accident record. In the last year, Weyerhaeuser's rail system had eight (8)

accidents..this is 1600 years worth according to the study sited. Weyerhaeuser's accident record must be included in the EIS to give a more accurate estimate of frequency of an accident occurring on this particular railway. It should be noted that accidents have occurred since the upgrade of the rail system in 1991.

(4) b. Language, FOC respectfully asks that the EIS refrain from the phrase "remote and speculative" in its leachate leakage worst-case scenario. There is no sufficient evidence to prove it to be remote and speculative. It has been noted that the material used for the liner has only been used in the last 17 years or so. There is no study on the effects of an earthquake on this liner material. Therefore, FOC believes that a worst-case scenario is indeed likely and definitely not " remote and speculative. **(see news article enclosed stating that in case of earthquake the liner could leak.)**

(5) c. The EIS speaks only of water contamination in case of a spill, the effects of a spill on land needs to be addressed.

(6) d. The EIS needs to address the effects of earthquakes on the liner and the overall area of the proposal and its alternatives.

3. AQUATIC RESOURCES

(7) In addition to the direct losses of wetlands and 1-mile of stream which could be significant in terms of hydrologic modifications, secondary impacts to the portion of the Sucker Creek tributary that lies below the rail-road track will result. Hydrologic modification, sedimentation, and decreased water quality as a result of land clearing, earth moving and solid waste handling at the landfill will cause adverse impacts to aquatic resources below the landfill. Maintaining the integrity of headwater systems is critical to maintaining downstream hydrology, water quality and habitat hydrologic functions. Siting a landfill in headwaters that perform recharge and discharge functions could result in potential groundwater and surface water contamination.

(8) Part of the tributary system consists of riffle pool complexes. Although the streams and wetlands that would be filled have been degraded in terms of habitat quality due to past logging practices, by Weyerhaeuser, these areas are recovering. Both forested and scrub/shrub vegetation is reestablishing. In addition to providing habitat for resident cutthroat trout, these wetlands and creek systems may support coho salmon. Apparently, a culvert which was a barrier to fish passage has been removed since the fish survey was conducted ion January 1991. A resurvey of the stream is warranted to provide the EIS with a more complete picture of the impacts of this proposal and the alternatives.

4. WETLANDS

(9) The proposed project would result in the net loss of wetland acreage and function despite proposed mitigation.

(10) The proposed landfill site lies approximately 2 miles southeast of Silver Lake, within the Sucker Creek drainage. The site has been substantially altered by forest practices. The site is located entirely within a Weyerhaeuser Forest Management Area and consists of managed timberland in various age classes (predominately replanted stands of Douglas fir aged 0-10 years).

(11) Fisheries resources in the southern tributary (both within and downstream of the project boundary) and downstream in Sucker Creek were sampled in 1990 by beak Consultants. At that time, a culvert just downstream of the project boundary, presented a potential barrier to upstream movement of resident trout and an impediment to upstream movement of adult salmon or steelhead. This culvert was replaced in 1991 and may have resulted in an increase in fish use, both in numbers and species, in the area upstream within the project boundary. To accurately assess current fish usage above the replaced culvert, fish populations should be resampled.

(12) Wetlands onsite are associated with the drainages. riparian scrub/shrub wetlands form narrow corridors along these drainages. Emergent wetlands are primarily associated with the southern tributary, except for a small area (0.52acres) above the northern drainage. the emergent wetlands are typically upgradient from the drainages and provide wildlife habitat, surface water retention, ground water recharge and surface water biofiltration. the emergent wetlands provide cover for small mammals, amphibians and reptiles, and provide a varied food source from upland vegetative species. The riparian wetlands provide a wildlife habitat component that varies in vegetative structure and species composition from the upland forest types. Therefore, this habitat provides greater diversity and supports a greater diversity of wildlife species.

The proposed project would result in the diversion of all existing surface flows. This would result in the loss of all wetland and aquatic habitat within the project area. Increased sedimentation from surface disturbance could reduce water quality within the downstream drainages and adversely impact fish embryo survival and aquatic macroinvertebrate production.

5. AIR QUALITY AND ODOR

(13) There is no study here of effects of the odor and gases coming from this site will have on the resident wildlife surrounding the solid waste site. This issue needs to be addressed.

6. PLANTS, ANIMALS, AND FISHERIES / MITIGATION

(14) The proposed mitigation is inadequate with respect to replacement of lost acreage, function, and habitat value. the mitigation plan lacks a detailed design; replacement of certain habitat types in not adequate; limitations due to available space, topography, drainage patterns, and slope are not adequately addressed; the mitigation areas may be degraded by sediment loading from the adjacent landfill; and channel downcutting during storm events could lead to project failure.

(15) FOC does not believe that most of these mitigation plan inadequacies can be overcome and overall, we do not believe the channel relocation would succeed in replacing lost instream habitat and would have a high potential for failure due to insurmountable onsite constraints.

FOC believes that site complexities are likely to impair the feasibility of project success in design for the diversion channel. The design is limited by available space, topography, drainage patterns and slope.

The quantity of available water may not be sufficient to create the habitat features proposed. Water which currently enters the area through direct precipitation would be diverted through ditches and a a stormwater collection system to sedimentation basins downstream of the site and would not reenter the southern tributary until it is below the proposed landfill. The diversion channel would be fed solely from water in the upper watershed and a much smaller adjacent runoff area. Stream channels within the downgradient of the proposed project are currently recharged by shallow ground water discharge. this situation will be greatly altered with the reduction in acreage of emergent wetlands which currently provide groundwater recharge. Existing topography and lack of water limit the feasibility of creating additional emergent wetlands along this channel.

(16) The proposed channel would be engineered to accommodate a 25-year storm event. Lager storm events could cause severe erosion and limit establishment of the proposed channel. Vegetation is proposed as the longterm method for ensuring channel and bank stability. There is potential for storm events to cause severe downcutting in areas of steep topography and vegetation would not provide adequate protection. This is a significant limitation to the successful replacement of resource values associated with the southern tributary.

The EIS needs to evaluate the success of this project in the case of a 100-year storm, two of these types of storms have occurred locally in the last five years.

7. WETLANDS ASSOCIATED WITH DIVERSION CHANNEL

(17) The mitigation proposal does not adequately address the loss of groundwater recharge functions of existing wetlands. The result would be flashier discharge and less recharge of the stream system during summer low flows. FOC believes that the limitations on available space, topography, drainage patterns and slope make this an unacceptable mitigation proposal.

Mitigation:

(18) The proposal includes

(1) re-locating flows from three spring-fed streams into one channel (that is already a spring-fed stream in the lower portion);

(2) creating 0.4 acres open water, 1.6 acres of emergent, 1.5 acres of scrub/shrub, and enhancing 1.0 acre of scrub/shrub wetland;

(3) preserving a 48 acre scrub/shrub and forested wetland in the Sucker Creek drainage (mitigation area "A");

(4) enhancing approximately 4.0 acres of riparian corridor along Sucker Creek (Mitigation area "B");and

(5) enhancing approximately 7.0 acres of wetlands along a small drainage stream that had been cleared (wetland area "B").

(19) FOC is concerned with the adverse impacts that would result to aquatic resources if a landfill were located at this site. We consider the proposed mitigation to be insufficient to offset project impacts for the following reasons:

a. Although a lot of thought has gone into development of the mitigation plans goals, there is insufficient information to assure that any of the goals would be met. The wetlands enhancement and creation and stream re-location are strictly conceptual in nature.

(20) b. There has been no detailed topographical survey done of the area where stream flows would be diverted nor does there appear to have been any detailed assessment of the anticipated changes in hydroperiod (including seasonal fluctuation) at different phases of the landfill development. This information is essential to planning any kind of wetland or stream re-location project in determining any potential for success.

(21) c. The stream re-location will essentially divert all overland flows (not spring fed flows) from three areas and collect those flows in a channel that runs close to the existing dirt road on the southern end of the proposed landfill. Flows would be directed through existing spring fed wetlands and what appeared to be a seasonal spring fed stream on the western side of the land fill footprint. Because stream re-location and wetland creation/enhancement at this location is purely conceptual in nature, it is unclear what the trade-offs of existing wetland and spring-fed stream habitat will be relative to the mitigation work. The aerial extend, species composition, and functions of the existing wetlands on site have not been explicitly addressed in the conceptual Mitigation Plan (November 1991).

(22) d. We are concerned that diverting flows to this area would result in down-cutting, increased sedimentation and erosion because of the fairly steep grades and the potential for a "flashier" hydroperiod due to increased flows. No data on the existing hydroperiod of these systems has been provided. baseline data and ecological assessment of the existing wetland/spring fed creek is critical in assessing the merits of the proposal to divert additional flows, excavate ponds, and place variable structures (rocks, weirs, gravel, logs, root wads, etc) within existing aquatic resource areas. Any structures in these areas, event though associated with proposed compensatory

(23)

mitigation measures, should have been addressed as fill and potential impact areas under 404 of the Clean Water Act. This information was not included on the public notice provided for public review.

(24) The lack of specific information in the conceptual plan makes it impossible to conclude that the proposal would result in adequate compensation for aquatic resource impacts. It appears, rather, that in the process of constructing new stream bed through fairly elaborate engineering techniques, existing wetland habitat will be eliminated. Impacts to existing wetlands and the spring fed stream at this site, though proposed as part of mitigation, must be assessed as part of the overall impacts to aquatic resources on site.

(25) There are several elements lacking in the conceptual mitigation plan which should be included in the Final EIS and should be agreed upon by all authorative resouce agencies. FOC believes that all mitigation should be written and agreed upon BEFORE construction if the Solid Waste Site is given approval and certain guarantees should be in place. These are..

(1) detailed work plan, design specifications and a construction implementation schedule,

(2) a detailed monitoring plan which is tied into both specific quantitative and qualitative performance standards which must be met to demonstrate mitigation success,

(3) a performance bond for the projected costs of mitigation construction, monitoring and contingency measures during the monitoring period,

(4) a contingency plan and contingency bond in the event of mitigation failure,

(5) legal assurance for long term protection of all wetland mitigation areas in perpetuity (such as conservation easements and covenants on land deeds). These should specifically restrict logging and other activities within mitigation wetlands, streams and their buffers.

(6) an immediate halt of all waste dumping at the site should there be any mitigation noncompliance or failure to report any violations to accepted mitigation.

(26) FOC has numerous additional concerns with the potential for downstream water quality impacts to Sucker Creek and its tributaries.

FOC would like to see detailed design specifications for the 3 sedimentation and biofiltration basins proposed to manage stormwater run off, which have been approved by all authoritative resource agencies, in the Final EIS. The potential to alter water quality directly below the rail-road tracks is high. The quantity and frequency of discharge as well as water quality monitoring of sedimentation and stormwater discharges should be addressed in the EIS.

9. OTHER

(27) A. FOC wishes the Final EIS to reflect that the project proposed complies with the Clean Water Act 404 (b)(1) Guidelines.

(28) B. FOC believes the issues raised in these comments deserve to be in the Final Environmental Impact Statement and not referred to as further study and discussion in the ongoing 404 permit process.

(29) C. FOC hopes that the Final EIS will be easier to read, the Draft EIS had much of the information on these issues separated and this caused a lot of repetition and confusion in reading the Draft.

(30) D. If the writers of the Final EIS intend to use the language, "remote and speculative" in its worst-case scenario concerning leachate leakage...then the language must also be applied to any success expected in all of the compensatory mitigation Weyerhauser is proposing. FOC is requesting that the original language of the report of the worst case scenario be reinstated.

(31) E. Friends of the Cowlitz reserves its right to make further comments as deemed necessary when the Final EIS is issued.

(32) F. FOC would like to see all information in one volume or if the Final EIS is in 2 volumes, both volumes issued at the same time.

Respectfully Submitted

Cheri Cameron

Cheri Cameron
Secretary

enclosures (2)

JUNE 15, 1991

MR. DAVID RIGGS
DIRECTOR OF ENVIRONMENTAL HEALTH
P.O. BOX 458
LONGVIEW, WA 98632

DEAR MR. RIGGS:

I WOULD LIKE TO SUBMIT THE FOLLOWING CONCERNS REGARDING THE PROPOSED SOLID WASTE LANDFILL NEAR SILVER LAKE, WASHINGTON AS PROPOSED BY WEYERHAEUSER. I FEEL THAT THESE CONCERNS SHOULD BE ADDRESSED IN THE ENVIRONMENTAL IMPACT STATEMENT.

(33) 1. IN THE EVENT OF CONCENTRATIONS OF ANY RESTRICTED POLLUTANT IN EXCESS OF ALLOWABLE LIMITS, HOW WILL THE LEACHATE BE DIVERTED AND TREATED IN ORDER TO BRING SAID POLLUTANT WITHIN ALLOWABLE LIMITS?

(34) 2. WILL THE FACILITIES FOR DIVERTING/HOLDING LEACHATE UNDER THE CIRCUMSTANCES ADDRESSED IN ITEM 1. ABOVE HAVE SUFFICIENT CAPACITY TO COPE WITH THE RAINFALL EXPECTED DURING THE 100 YEAR FLOOD CONDITIONS FOR THE PROPOSED DRAINAGE?

(35) 3. HOW WILL A LEAK IN THE LINER OF THE LANDFILL BE DETECTED, ESPECIALLY WHEN CONSIDERING THE WIDELY VARYING AMOUNTS OF LOCAL RAINFALL?

(36) 4. WEYERHAEUSER HAS PROPOSED BRINGING WASTES FROM OTHER ENTITIES TO THIS FACILITY. HOW DO THEY PROPOSE TO ASCERTAIN THE POLLUTANTS IN THESE WASTES PRIOR TO DELIVERY SUCH THAT TOTAL COMPLIANCE WITH THEIR PERMITS IS ASSURED?

(37) 5. IF NON-PERMITTED WASTES WOULD BE DELIVERED TO THE FACILITY AND DISCOVERED AFTER THE FACT, WHAT PROVISIONS ARE PROPOSED TO ALLEVIATE THE PROBLEM?

(38) I AM SUBMITTING THESE CONCERNS AS A MEMBER OF THE BOARD OF DIRECTORS OF THE COWLITZ GAME AND ANGLERS CLUB, LONGVIEW WA; A MEMBER OF THE BOARD OF DIRECTORS OF THE FRIENDS OF THE COWLITZ, TOLEDO WA; AND AS A CONCERNED PRIVATE CITIZEN. AT THIS TIME, NEITHER I NOR EITHER ORGANIZATION I REPRESENT ARE ON RECORD AS PROPONENTS OR OPPONENTS OF THE PROPOSED FACILITY. WE RESERVE THE RIGHT TO TAKE EITHER STANCE AS CIRCUMSTANCES DEVELOP.

THANK YOU

J. M. HIBBO, JR.

3893 ROSE VALLEY ROAD
KELSO, WA 986264

dents want Weyco to dump proposed landfill

lsewhere.
residents
ight.
anything
ppened,"
plause of
ormation
y.
ys would
ld have a
ent con-
ver Lake
wo miles
nage. If a
would be
e control
logging
mised to
won't put
r Lake,"
Co. vice
of pulp
ler ash
y is con-
in which
which the
s of diox-
boratory
— rain-
a single

where the company's mill waste is now dumped, said Ken Johnson, Weyerhaeuser's local environmental manager.

Several people were concerned that the landfill would undermine attempts to solve the weed problem in Silver Lake, calling the lake an important recreational and cultural site.

Cal Palmer, Weyerhaeuser's manager of environmental projects, said the state Department of Ecology said the landfill would not jeopardize state funding for weed cleanup.

Still, the audience didn't want any part of the project.

"If it's up to Weyerhaeuser, I honestly don't trust them. I really don't think they care about the environment," one man said.

"How receptive is Weyerhaeuser to our input to stop this right now?" another member of the audience demanded.

Another man, noting that state agencies will help decide the fate of the project, said, "Aren't they all (Gov. Booth) Gardner's appointments? I suppose this will pass?" — a reference to the fact that the governor is an heir to the Weyerhaeuser family fortune.

Before the meeting, retired KATU-TV reporter and news director Pat Wilkins, who lives a mile from the proposed landfill site, said, "The history of dumps is very bad. 'State of the art' is a catchword to gain the confidence of people."

"I don't want a dump in my back yard. They have alternatives," such as continuing to use the Radakovich site, Wilkins said.

One woman asked why Weyerhaeuser doesn't locate the landfill in a more remote area.

Guthrie said the company considered 24 locations, but flat sites are limited, and the dump must be near the logging railroad to avoid the need for a

Protection from pollution questioned

By Andre Stepankowsky
The Daily News

Here are some of the questions the public raised about Weyerhaeuser Co.'s proposed mill waste landfill at a public meeting Monday, and the company's answers:

The state requires landfills to have plastic liners to prevent contaminated water from leaking into ground water and surface waters. But don't these plastic liners eventually break open and allow leakage?

The company would use a liner that has been tested with chemicals much more corrosive than those that would be present in the landfill, said Don Cordell of Sweet-Edwards/EMCON, the company's geological consultant on the project.

The material has been in use only 15 years, so it has no long-term history. A layer of clay would be put under it and a layer of dirt over it to prevent it from being pierced by sharp objects. Cordell did not rule out the possibility that earthquakes, however, could open a leak.

Eventually, the landfill would be covered with another layer of plastic to prevent rainwater from leaching into the waste. That should permanently cut off the flow of leachate — rainwater that seeps through the waste. This outer cap can be inspected for leaks.

What kind of containers would be used to haul mill waste by rail from Longview to the landfill?

Sealed containers.

Where would the leachate that would be collected by pipes underneath be treated?

An estimated 50,000 gallons would be hauled by rail tank car to Weyerhaeuser's waste water treatment plant in Longview, where it would be treated along with 50 million gallons of water the company treats now.

How toxic is the leachate?

It's hardly worth treating, notes Ken Johnson, company environmental manager in Longview. It contains some ammonia, but none of the toxic chemicals listed on the federal government's list of 120 priority pollutants. Johnson wasn't sure, however, if the water would injure fish if an accident spilled it into a creek.

Would there be any smell from the landfill?

No, and little methane gas would be generated by the waste.

What would the landfill's operating hours be?

Ten hours daily, so lights would be necessary part of the year.

Who would monitor for ground-water contamination around the dump?

Several wells would be drilled, and the company and an independent consultant would analyze water samples.

How would wildlife be protected in the area?

A creek on the landfill site would be diverted and a new wetland would be created to replace a

RESPONSE TO LETTER NO. 61

Cheri Cameron, Secretary
Friends of the Cowlitz

1. See response to Letter No. 49, Comment 5.

2. With regard to the applicability of 40 CFR Part 230 to this EIS, see response to Letter No. 43. With regard to the issue of capacity, see response to Letter No. 69, Comment 2. As described in Section I.B.1.e, Landfill Construction and Sequencing, the proposed landfill would be developed incrementally. Therefore, if the future waste stream is less than that estimated, development of new disposal areas would take place at a reduced rate and the site would have a longer life.

3. See responses to Letter No. 69, Comments 13 and 25.

4. See responses to Letter No. 9, Comments 2 and 20; Letter No. 18, Comment 3; Letter No. 62A, Comment 24; Letter No. 63, Comment 19; and Letter No. 69, Comments 4, 14, and 15.

5. If a leachate spill occurred on land, most of it would likely infiltrate into the soil, where it would be chemically altered. The Olympic soils on and near the site have an infiltration rate of 0.3 to 0.63 inches per hour (USDA, 1974). As leachate moves into the soil column, the soil's low pH (5.5) and buffering capacity would likely reduce the pH of the leachate (11.7) to non-toxic levels. If a spill occurred in an area of shallow groundwater, some leachate could infiltrate into the groundwater system, in which case the impacts would be similar to those calculated for a liner leak in Section II.A.1, Groundwater. As part of the spill response plan (see response to Letter No. 69, Comment 17), if a sufficient portion of the spill seeped into the ground to be of concern, the ground water would be tested to determine the extent of the impact, and corrective action taken as needed.

   If the leachate pools in the spill area, it would be contained, collected, and removed for treatment in an appropriate manner as part of the spill response plan (see response to Letter No. 69, Comment 17). Any contaminated soils would also be removed and disposed of in an approved manner, as deemed necessary by Ecology and the Health District. Measures would be taken to keep people and wildlife out of the spill area until remedial activities were completed. Once the soil was removed, there would be a low likelihood of leachate entering the groundwater.

   Assuming that the entire contents of a tank car (up to 20,000 gallons) spilled in a flat land area and covered it to a depth of 2 inches (either pooling or seeping into the soil), an area

of about 0.4 acres could be affected. (If the leachate seeped deeper into the ground or pooled to a greater depth, a smaller area would be affected). There could be some moderate short-term impacts, such as mortalities of plants or individual animals present in the immediate area at the time of the spill. Plant and animal mortalities, if any, would be due to the presence of chemical oxygen demand and ammonia in the leachate, as well as its high pH. Following a spill, after the leachate has spread out and infiltrated into the soil, the potential for impacts to plants and animals would be reduced due to soil buffering, volatilization of ammonia, and the increased surface area exposed to oxygen, which would reduce chemical oxygen demand.

Habitat loss could also occur as a result of the remedial activities. The area affected would be less than one acre, and would be reclaimed with habitat features similar to that lost. Therefore, no significant long-term impacts on plants and animals would be expected. The EIS text (Section II.A.5, Plants and Animals) has been revised to reflect this. Also, see related response in Letter No. 71, Comment 9.

6. See response to Letter No. 18, Comment 3.

7. Section II.A.3, Surface Water, evaluates the potential impacts of the proposed landfill on surface water hydrology and water quality. The existing surface water runon/runoff regime at the site would be modified. However, the proposed surface water management facilities would be designed to specifications intended to prevent significant adverse impacts on downstream hydrology and water quality (see Letter No. 18, Comment 6).

8. See response to Letter No. 10.

9. The conceptual mitigation plan presented in the Draft EIS has been revised based on consultation with resource agencies (see response to Letter No. 9, Comment 12). The currently proposed *Mitigation Plan* (see Appendix A of this EIS) would provide approximately 4 acres of wetland creation and 1 acre of wetland enhancement in the lower reach of the diversion channel, restoration of 0.2 acre of wetland and creation of 1.2 acres of wetland in the upper diversion channel, and the establishment of approximately 0.5 acre of emergent wetland in association with the off-channel ponds in the lower Southern Tributary drainage. In addition, approximately 50 acres of forested wetland and riparian habitat in the upper Sucker Creek watershed and along the lower section of the Southern Tributary would be preserved. The mitigation strategy focuses on replacing the instream, riparian, wildlife habitat, and hydrologic functions of the affected wetlands with created, enhanced, and preserved wetlands of equal or greater value.

Section II.A.6, Wetlands, has been revised to reflect the revised *Mitigation Plan.* Also, see response to Letter No. 62, Comment 14.

10. Comment noted. See response to Letter No. 9, Comment 17.

11. See response to Letter No. 10.

12. See response to Comment 9 above. The proposed series of wetland ponds and swales in the diversion channel would act as a filter to remove suspended sediments and nutrients from the water. Therefore, it is anticipated that the diverted water would be of better quality when it returns to the Southern Tributary than at the point of diversion. The wetland ponds would also serve to detain stormwater in much the same way as engineered detention basins. In addition, both temporary (for construction) and permanent erosion and sediment control features are incorporated in the project design (see Section I.B.1.d(5), Surface Water Management, and the response to Letter No. 18, Comment 6).

    Section II.A.5, Plants and Animals, addresses the effects of sedimentation during landfill construction activities on aquatic resources, including fish embryos and macroinvertebrates.

13. A gas and odor control system would be installed before off-site gas and odor concentrations reached levels that would cause significant adverse impacts on human health or the environment, or constitute a nuisance. See response to Letter No. 9, Comment 11.

14. See responses to Comment 9 above and 16 below; Letter No. 9, Comment 12; Letter No. 10; and Letter No. 69, Comment 9. The *Proposed Natural Resources Mitigation Plan* in Appendix A of this EIS takes into consideration all the limitations you refer to. Due to limitations on the area available on the project site for fisheries and wetlands mitigation, additional mitigation is proposed in the lower reaches of the Southern Tributary and upper Sucker Creek basin.

15. Section II.A.3, Surface Water, addresses the issues raised in this comment, including the impacts of the proposed landfill on groundwater recharge and stream base flow. Modified hydrologic conditions due to landfill development have been taken into consideration in the design of mitigation measures. Also, see responses to Comments 9, 12, and 14 above and Letter No. 49, Comment 4.

16. The revised *Mitigation Plan* emphasizes maintenance of hydrologic and water quality function along the proposed diversion channel. A series of berms and wetland ponds incorporated in the diversion channel would enhance detention and storage of peak flows in the headwaters of the Southern Tributary. The specific size and placement of berms and wetland ponds will be determined during final design. An important objective of the final design will be prevention of downcutting and channel erosion. Higher gradient sections of the channel would be armored with rocks of appropriate size, and banks would be protected during initial revegetation with biodegradable geotextiles. Some erosion and channel modification would likely occur during very large storm events such as a 100-year storm. However, with the enhanced detention and storage of runoff provided by the proposed wetland ponds, the diversion channel would be expected to handle peak flows

from a large storm with less disturbance than would occur in the existing natural channel during such an event.

17. See responses to Comments 14 and 15 above and 20 below.

18. Comment noted. This is an accurate list of some of the measures incorporated in the conceptual mitigation plan presented in the Draft EIS, except for item (1). The three drainages which comprise the upper water shed of the Southern Tributary are fed by both surface and groundwater sources. As noted in the responses to Letter No. 9, Comment 12, Letter No. 10, Comment 9 above, and Letter No. 69, Comment 9, the original mitigation plan has been revised (see *Proposed Natural Resources Mitigation Plan* in Appendix A of this EIS).

19. See responses to Letter No. 47, Comment 16 and Letter No. 69, Comment 9.

20. A detailed topographic survey (2-foot contours) would be conducted as part of the final design of the stream diversion. Adequate topographic detail is currently available to conclude that the proposed mitigation could be successfully engineered in the proposed channel alignment.

With regard to the need for a detailed assessment of the anticipated changes in hydroperiod at different phases of landfill development, the diversion channel would not contain or be affected by runoff from the landfill. Rather, it would contain runon from upgradient areas unaffected by the landfill that would be diverted around the landfill periphery. The final design of the diversion channel will require a detailed quantification of expected peak flows, and will comply with Washington Department of Fisheries criteria for the protection of stream channels and aquatic resources (see response to Letter No. 69, Comment 9). Also, see response to Comment 22 below.

21. Wherever possible, the proposed diversion channel and created wetlands would be developed outside of the existing natural channel and wetland habitat west of the landfill footprint. The revised *Mitigation Plan* (see Appendix A of this EIS) no longer includes placement of a rock-lined channel at this location. Instead, the diversion channel would be located adjacent to wetland areas created by excavating upland habitat immediately adjacent to the existing wetland habitat. Any potential loss of hydrologic or other functions of the existing drainage and associated wetlands will be identified and mitigated in the final plan.

Similarly, the off-channel ponds proposed along the lower reach of the Southern Tributary would also be placed in an area that predominantly supports wetland habitat. Over half of the four 0.25-acre ponds would support emergent wetland habitat. Several of the ponds would likely be located in existing wetland habitat dominated by velvet grass. Any impacts to the quality of wetland habitat that may result from establishing off-channel ponds in this area, could be offset by enhancement of portions of the existing wetland

habitat in the area. The need for this will be addressed during development of the final *Mitigation Plan.*

22. See responses to Comments 16 and 20 above. The hydrograph of the diversion channel is not expected to be "flashier" than that of the existing on-site channel of the Southern Tributary that would be removed by the project. In fact, the revised diversion channel design would provide enhanced detention and storage, and therefore would be expected to moderate the existing hydrograph. Further data on the surface water hydrology of the site is provided in a report included in Appendix H of the *Environmental Technical Report* (Beak, 1991a), which is available for review at the Health District office. A discussion of the existing systems that would be affected by the proposed landfill is included in the EIS (see Sections II.A.3, Surface Water; II.A.5, Plants and Animals; and II.A.6, Wetlands).

23. Comment noted.

24. See responses to Comment 21 above and Letter No. 69, Comments 9 and 16.

25. Comment noted. See response to Letter No. 69, Comment 9.

26. See responses to Letter No. 69, Comments 9 and 16.

27. See response to Letter No. 43.

28. Comment noted. See responses to Letter No. 69, Comments 9 and 16.

29. See response to Letter No. 9, Comment 27.

30. See responses to Letter No. 49, Comment 4 and Letter No. 69, Comment 14.

31. The SEPA Rules do not provide for a comment period on a Final EIS.

32. As noted in the Fact Sheet, the Final EIS consists of three volumes. A one-volume EIS would not be possible due to the large number of comment letters, as well as page limits specified in the SEPA Rules for the EIS text and bound-in appendices (see response to Letter No. 63, Comment 5). All volumes of the Final EIS are being issued at the same time and can be reviewed at locations listed in the notice of availability and Section N of the Fact Sheet. Also, as noted in Section O of the Fact Sheet, all volumes are available for purchase at the Health District office in Longview.

33. Section I.B.1.h(2), Surface Water/HGCS Monitoring, has been revised to provide further information on the diversion of hydraulic gradient control system flows to the leachate pond in the event a liner leak is detected. All leachate would be transported by rail to

the Longview mill wastewater treatment plant for treatment prior to discharge to the Columbia River (see Letter No. 49, Comment 9).

34. See response to Letter No. 9, Comment 10.

35. The analytical methods used in the groundwater and surface water/HGCS monitoring programs described in Section I.B.1.h, Landfill Monitoring Programs, would allow detection of leachate indicators at very low concentrations.

36. See response to Letter No. 17, Comment 1.

37. Provisions for handling non-permitted waste discovered after landfill disposal would be incorporated in the Plan of Operation for the facility (see response to Letter No. 9, Comment 3). Such waste would be isolated and removed as quickly as possible to an appropriate permitted site for disposal. With the proposed waste acceptance and inspection procedures (see response to Letter No. 17, Comment 1 and Letter No. 22, Comment 2), incidents such as the one you describe are expected to be very infrequent.

38. Comment noted.

LETTER NO. 62

Mr. and Mrs. S.C. Evans
120 Sunny Basin Road
Castle Rock, Washington 98611
274-7554

Cowlitz-Wahkiakum Counties September 10, 1992

David E. Riggs
Cowlitz-Wahkiakum Health District
Director of Environmental Health
1516 Hudson
P.O. Box 458
Longview, Washington 98632

SEP 11 1992

Health District

Re: The Environmental Impact Statement (EIS) for the proposed Weyerhaeuser Company Headquarters Site Solid Waste Disposal Facility. Comments on this Statement.

Dear Mr. Riggs,

(1) Upon review of this Environmental Impact Statement, we find that throughout, there are gross inconsistancies in data collection and research. We found it to be a voluminous book based and biased more on opinionated facts than statiscally founded facts. We question its validity as a viable EIS on the simple fact that the Company EMCON (Sweet/Edwards) hired by the Weyerhaeuser Company could have even co-authored this EIS. Being hired by Weyerhaeuser to design this project and provide information and research for them (Weyco), is enough validity in itself to provide elimination of co-authorship of this EIS. Why was not an unassociated source located and used to co-author such an important volume of information? This is blatant conflict of interest. We ask that this EIS be disqualified and re-written by another source totally independent of connection with the Weyerhaeuser Company. To be written in a non-partisan manner.

(2) We find that the section in Volume 2, Alternative Analysis, has no place whatsoever in an EIS. An EIS was derived solely for the purpose to provide information on impact to the environment. To be impartial in its statement, findings, research, facts and authorship. Never should it be allowed to be used (as this is) as a place for which a company can air persuasive pro arguments and econimic status reports

as a form of persuasion. To have used this EIS in this manner is an outrage. If an EIS is designed to be an impartial source of information upon which to base critical decisions, it carries in itself, a great deal of power and persuasion. Because prevailing attitudes suggest that if it's in the EIS, it is so, the authorship is bound legally, morally and ethically to provide impartial, non-partisan information. In regards to this EIS on Weyerhaeuser's Headquarters Camp Solid Waste Disposal Facility we say NOT SO. We again ask that this EIS be disqualified.

Due to a limited time factor, we will continue on to highlight only some of the most obvious areas of concern, though there are many more. We submit the following comments, observations and questions.

(3) In reference to page s-1, Weyerhaeuser claims to have ongoing waste reduction, recycling and volume minimaization programs. We ask, what regulations will be put in place and enforced and be imposed and by which specific agencies to regulate and limit the quantities of waste to a gradual minimal amount over a certain period of time? So that eventually all waste generated from this counties waste producers recycled completely and eliminated completely or to almost none.
What regulatory processes will be put in place to maximize reduction of waste being brought to this landfill? We ask that limitations of quantity on a weekly basis be enforced to ensure that waste reduction programs are being used as an ongoing process.

(4) What regulations will be put in place and enforced to control and limit the specific content of the waste generated from the other waste generators in this 2-county area? Specifically, what other waste generators will be allowed to contribute to this landfill? We ask that these generators be defined now.We ask that a special permitting process be put in place to allow them to use this landfill, and that regulations be enforced to allow regular inspection of their

waste. To ensure that no hazardous or contaminated waste is being delivered to the landfill. We also ask that no other waste generators outside this 2-county area ever be allowed to contribute waste. We also ask that no Municipal Waste ever be considered in this landfill. What limitations as to quantitiy will be imposed on generators of waste from this 2-county region? If none, we ask there shall be.

(5) We ask for a specific definiton of what is Miscellaneous Waste? We ask for a complete explaination of this waste.

(6) What is a definition of construction waste? No explaination of the impacts of either of these 2 wastes was given. These terms have been loosely used since the first announcement of this project. As a regular part of remodeling and recycling involves tearing down and replacement, construction waste is an area of great concern. Facilities and containers that have handled hazardous chemicals or prodects etc, have the capability to contain labeling of construction waste. Therefore the admittance of hazardous compounds into the landfill. Some construction materials themsleves could contain hazardous materials such as formeldehyde, asbestos, pentachlorophenal etc. What regualtions will be enforced to ensure that these compounds will not enter this landfill? They should not be allowed in this landfill.

(7) In reference to S-17, By what statistical research were the facts of "once in every 200 years" obtained? Concerning train derailments? This statement is ludicrous. Current reports alone show that Weyerhaeuser's derailments can and do occur more frequently than this. Will there be a limitation on cars per trainload? If not there should be.

(8) If derailment or truck load spills occur, what regualtions will be imposed to ensure clean-up and restoration of damages to private properties and public lands and bodies of water such as Silver Lake? In the worse case scenarios painted 1 car spills were used for example. If derailment occurs, the probability that much more than 1 car will create leakage. The impact level of damage to aquatic and other living things will be greatly magnified than these statistics show. How will then the Health Department deal

with this situation and the responsible parties? etc.

(9) Leakage of the liner: What levels of contamination are estimated should there be leakage over a long period of time or over many leakage spills. The scenario of dilution, especially in Silver Lake, as contaminates are known to settle and given Silver Lake's slow flushing abilities this does not seem to to be a professional view to solving this problem. But rather a disregard of the possibility and probability.

(10) What regulations for clean-up will be put in place before this scenario takes place.

(11) Where would the Solid Waste Transfer Station (SWTF) be located at the Longview mill site? On this 6 acre site what type of "liner" will be protecting the area and environment at this location of sorting and loading?

(12) What type of containers and materials will be used as sealed containers to transport waste and leachate? If by train and if by truck?

(13) Buffer area; What regulations will be imposed to ensure that the so called buffer area will remain and be retained? This is a farce as Weyerhaeuser has already logged almost all of any buffer that there was.

(14) With present knowledge of and ongoing insite into the important biological function of Wetlands, how can we today with limited knowledge of this ecosystem begin to assume that we aan replace one wetland ofr another let alone build a new one? and then call it better than what nature provided in the first place.

(15) How long after will leachate ponds and liners be monitored along with the Hydrolic Gradient system be monitored after closure of the landfill? We request indefinite monitoring and regulation, 30 years is not enough.

(16) What system of regulations will be put in place to update facility and construction materials (such as liner materials) as new technology is developed? Standards should be upgraded as time provides new standards.

(17) What type of back-up system will be put in place to monitor liner leakage should the primary system have failure?

(18) We request that all worst case scenarios be considered as the standard by which impacts are regarded and permits allowed. As they are possible scena rios, they are capable realities.

(19) What validation of facts were used to prdict a return of pre-spill conditions? What resultants are made for human error? What about Ground water? how do we guarentee return to pre-spill conditi ns there?

(20) In reference to Section 11 pg.38, Impact to and reference of resident animal habitat is grossly underestimated. What about smaller life forms that play a very important and significant role in the food chain circle? Such as various rodents, rabbits, coyotes, racoons, martins etc etc etc. No mention of wild cats, bear, wild horses. This doesn't enev take into consideration the millenium of insect life that could be adversely affected by fugitive dust from waste and leachate in both streams lakes and ponds as well as the holding ponds themselves. These are all significant players in the foood chain. What about the honey bees?

(21) In conclusion: Because of the fragility and multitude of problems that could impact Silver Lake and the surrounding areas we request that this site be eliminated from consideration. To locate a landfill above a lake is to create an adverse impact beyond human comprehension.
If Weyerhaeuser must balance their economic status with the creation of another landfill in this community then maybe it is time they do pull out and make room for another company. Their commitment to this community who has helped to make what they are is at best vague and sketchy. If they can't make firm committments then why should we compromise our sommunities enviroment? Trying to locate a landfill above Silver Lake is only further proof that they are not protectors of the environment as they claim.
Our Environment is not for sale at any compromise for economic purposes now or ever. We ask for complete elimination of this site.

Respectfully,
Clark and Marge Evans

RESPONSE TO LETTER NO. 62

Clark and Marya Evans

1. EMCON Northwest provided information on project design, geology and hydrogeology, a knowledge of which is essential to project design. However, the principal author of the Draft EIS was URS Consultants in association with the Health District. URS technical experts provided technical review of the work performed by EMCON Northwest and the other consultants listed in the Fact Sheet of the EIS. Furthermore, the Health District retained an expert in environmental review of solid waste projects, Jean Garber, to review the Draft EIS for SEPA compliance. In association with the Health District, Jean Garber also served as principal author of this Final EIS.

   It is also important to note that the SEPA Rules do not require that an EIS be prepared by an independent third party. EISs may be prepared by agency staff, an applicant or its agent, or by an outside consultant retained either by the applicant or the lead agency [WAC 197-11-420(2)]. Nevertheless, the lead agency is ultimately responsible for the contents of an EIS, and must ensure compliance with SEPA.

2. See responses to Letter No. 9, Comment 28 and Letter No. 11, Comment 5.

3. Your recommendations are noted. As discussed in Section I.A.3.b, Disposal Requirements, and Appendix M of this EIS, Weyerhaeuser indicates it is difficult to estimate annual waste volumes from its manufacturing facilities over a long period of time. On the one hand, there are uncertainties that could increase waste volumes, such as mill expansions, acquisitions, and new construction, as well as increasingly stringent air emissions standards that may make it impractical for Weyerhaeuser to continue to use incineration to reduce waste volumes. On the other hand, there are uncertainties that could decrease waste volumes, such as processing improvements and new recycling technologies. Given these uncertainties, it would not be reasonable to set arbitrary limits on future waste disposal. The response to Letter No. 63, Comment 15.26 is also relevant to the issue of recycling.

4. See responses to Comment 3 above; Letter No. 8, Comment 3; Letter No. 17, Comment 1; Letter No. 22, Comment 2; and Letter No. 69, Comment 2. The impact analyses in the Final EIS assume that up to 1,000,000 cubic yards per year of industrial solid waste would be accepted at the proposed landfill; that up to 225,000 cubic yards per year of this waste would be third-party or imported Weyerhaeuser-generated waste transported by truck to the Longview mill; and that no dangerous or hazardous waste and no household or commercial solid waste, as defined by federal or state regulations, would be accepted. Further detail on quantities, characteristics, and generators of each type of

waste would not change the conclusions of the EIS or improve the ability of decisionmakers to make a reasoned choice among alternatives.

The EIS (Section I.A.3.b, Disposal Requirements) recommends that a condition be attached to the solid waste permit requiring an evaluation of the need for additional SEPA review if the total waste volume increases significantly beyond the 1,000,000 cubic yard per year estimate in the EIS (for example, an increase of more than 10 percent). The Cowlitz-Wahkiakum Health District would monitor waste volumes through the annual report required under state law [WAC 173-304-405(4)].

5. Miscellaneous waste is generated primarily through various maintenance activities at the mill. It consists of materials such as old plumbing pipe or leftover ends of new pipe, pieces of wire, rolls that held wire or paper (although these are recycled whenever possible), and nonrecyclable parts from equipment repair. As shown in Table I-1 of the EIS, miscellaneous waste represents about 5 percent of the nonrecyclable solid waste generated at the Longview mill.

6. As noted in Table I-1 of the EIS, demolition and construction waste consist of non-recyclable debris from demolition or construction of buildings and pavement. This material would be expected to consist of concrete or aggregate, brick, bituminous concrete, wood and masonry, composition roofing and roofing paper, steel, and minor amounts of other metals like copper. Many of these materials are recyclable, and would be recovered from the waste stream at the solid waste transfer and recycling facility. For example, Weyerhaeuser currently uses wood as hog fuel in its boilers, and crushed concrete or aggregate in road maintenance and construction. However, nonrecyclable construction and demolition waste generated by Weyerhaeuser would be disposed at the proposed landfill. Weyerhaeuser would also accept such waste from third-party generators within Cowlitz and Wahkiakum counties to the extent an acceptable waste screening and certification process could be implemented with the generator (see response to Letter No 69, Comment 2).

   The amount of waste generated would be variable, depending on the amount of construction and demolition activity at any given time, which in turn is dependent on economic conditions. Weyerhaeuser estimates that construction and demolition waste would represent no more than 5-10 percent of the total volume of waste disposed at the landfill in years of high activity, and less than 1 percent of the total waste volume over the life of the landfill. Construction and demolition waste from third-party generators in Cowlitz-Wahkiakum counties would be expected to fall within the 150,000 cubic yards per year of non-Weyerhaeuser solid waste estimated in Table I-1. With regard to hazardous materials in the waste stream, see response to Letter No. 17, Comment 1.

7. There would be approximately 15 to 20 rail cars per train. Also, see responses to Letter No. 69, Comments 13 and 25.

8. See responses to Letter No. 61, Comment 5 and Letter No. 69, Comments 13 and 17.

9. Section II.A.2, Groundwater, concludes that concentrations of pollutants in the shallow groundwater would not violate Washington State groundwater criteria or proposed federal standards even after 5 years of a leaking liner. The liner leak analysis in Section II.A.3, Surface Water, assumes that the liner leaks continually at a rate considered the reasonable maximum leakage rate that could be experienced with the proposed liner. That section concludes that such a leak would not significantly affect water quality or cause violations of standards in the Southern Tributary even during lowest base flow conditions. Further downstream, at the confluence of the Southern Tributary and Sucker Creek, liner leak impacts to water quality would be negligible.

   Section II.A.3, Surface Water, discusses the rationale for concluding that a leachate spill into Sucker Creek would not significantly affect the water quality of Silver Lake. The response to Letter No. 62A, Comment 1 is also relevant to this issue. Leachate constituents are water-soluble and would rapidly disperse rather than settle in the lake. As discussed in the response to Letter No. 69, Comment 13, the probability of a leachate spill during rail transport is extremely low.

10. See response to Letter No. 69, Comment 17.

11. Most of the facilities comprising the SWRTF already exist, and are located in the central portion of the Longview mill complex near the existing log export facility. Section I.B.1.b, Solid Waste Recycling and Transfer Facility, has been revised to clarify the location of the SWRTF and additional facilities that may be required at this location in support of the proposed landfill. Existing facilities are currently used to transfer a portion of Weyerhaeuser's waste to rail cars for shipment to the Roosevelt Regional Landfill in Klickitat County. The waste sorting area is paved with asphalt. Also, see response to Letter No. 71, Comment 1.

12. See response to Letter No. 1, Comment 3. Trucks would only be used to haul solid waste or leachate only in the event of a rail shutdown in excess of 1 weeks and as a temporary emergency measure. If truck transport of solid waste were required during a temporary rail shutdown, the waste would be transported from the Longview mill to the landfill site using the same containers would be used for rail transport, or with the end-dump trucks currently used by Weyerhaeuser to transport waste to the Mt. Solo Landfill. Leachate would be stored in the holding pond on site as long as possible (see response to Letter No. 9, Comment 10). If it became necessary to remove some from the site, it would be transported in tank trucks.

13. Section I.B.1.d(1), Buffer Zone and Visual Screening, has been revised for clarification. The definition of buffer zone under the MFS [WAC 173-300-100(8)] is that part of the facility that lies between the active area and the property boundary. The MFS require a minimum distance of 250 feet from the active area to the property line of adjacent land

zoned residential at the time of the adoption of the county's comprehensive solid waste management plan. In the case of the proposed landfill, the minimum distance from the active area boundary to the nearest non-Weyerhaeuser-owned property is 1.25 miles, which greatly exceeds the state requirement.

Except for trees retained for visual screening, the buffer zone would continue to be managed for commercial timber production. Weyerhaeuser proposes to retain approximately 6.3 acres of trees northwest of the landfill footprint to screen views of landfill support facilities from the closest viewpoints along South Silver Lake Road (see revised Figure I-2 of the EIS). The types and growth stages of trees to be retained are discussed in the section referred to in the previous paragraph. Weyerhaeuser is amenable to a condition on the solid waste permit or variance that would reflect the retention of trees for visual screening.

14. See responses to Letter No. 9, Comment 12; Letter No. 47, Comment 16; Letter No. 49, Comment 4; Letter No. 56, Comments 3 and 4; Letter No. 61, Comment 9; and Letter No. 69, Comment 9. The wetlands that would be affected by the proposed landfill provide important functions to the local drainage area, but are not highly unique habitats. The plant communities found within these wetlands provide limited structural and species diversity, although they do provide a variation in habitat from the adjacent upland timberlands. As discussed in the response to Letter No. 49, Comment 4 and Section II.A.6, Wetlands, the probability of success of the proposed created wetlands is considered high. If forested wetland systems can be developed over time through the proposed mitigation, such systems would provide higher wildlife habitat value than the existing wetland systems found on the project site. The proposed protection of existing forested and riparian wetland systems from permitted harvest activities assures no alteration of these systems, and an increase in undisturbed wetland habitat within the local managed forest.

15. As noted in Section I.B.1.j, Post-Closure Maintenance, a minimum 30-year post-closure monitoring period is envisioned. At the end of that period, the regulatory agencies (including Ecology, the Health District, and the Southwest Pollution Control Agency) would review results of the various monitoring programs, and would have the option of continuing with whatever aspects of monitoring were deemed necessary.

16. The design of each new waste disposal cell would have to be reviewed by Ecology and the Health District, and appropriate new technology would be considered at that time. Also, the Health District must approve annual operating permits, which would incorporate the latest environmental standards.

17. As discussed in Section I.B.1.h(2), Surface Water/HGCS Monitoring, the EIS recommends frequent monitoring of the hydraulic gradient control system (HGCS) when it is flowing to provide early detection of a liner leak. If a leak is detected, the affected HGCS discharge would be diverted to the leachate holding pond. A description of the HGCS

is provided in Section I.B.1.d(3) of the EIS. There is no reason to expect failure of this system. The groundwater and surface water monitoring programs would also allow detection of liner leaks.

18. Comment noted. The SEPA Rules require that an EIS evaluate "probable" significant adverse impacts. Impacts that would result from remote or speculative events need not be evaluated (WAC 197-11-782). With regard to the extreme worst case liner leak scenario, see response to Letter No. 69, Comment 14.

19. The return of surface water quality to prespill conditions within several days was estimated based on the approximate residence or travel time of water in the stream (in other words, the time for contaminated water to be flushed out of the stream). Even under low flow conditions, the travel time of water in the stream would be on the order of 1 to 2 days. The travel time would be even less under typical average flows. In a spill situation, most of the spilled leachate would likely enter the surface water drainage system, and it is unlikely that groundwater would be significantly affected (see response to Letter No. 61, Comment 5).

20. As you indicate, all species of wildlife are important, and each serves an important role in a healthy, functioning ecosystem. While it may seem ideal to study all species in detail, such an approach is not practical. Furthermore, the SEPA Rules do not require that an EIS include such detail (see response to Letter No. 69, Comment 21). Typically, several groups judged to be good indicators for the types of impacts likely to occur are chosen for more detailed investigation. For this project, detailed studies were conducted of birds and big game at the Headquarters Site, with emphasis placed on evaluating habitat conditions to aid in assessing probable significant adverse impacts to all wildlife.

21. Your comments and opposition to the proposed landfill are noted.

LETTER NO. 62A

Stephen Willing
206 Lakeview Drive
Silver Lake, WA 98645
Sept. 3, 1992

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Mr. David Riggs
Cowlitz Wahkiakum Health District
1516 Hudson
Longview, WA

Dear Mr. Riggs,

Having read the draft Environmental Impact Statement concerning the proposed Weyerhaeuser Company Headquarters Site Solid Waste Disposal Facility, I feel that a number of serious concerns were not adequately addressed.

(1) 1. In recent years Silver Lake has been subject to rapid eutrophication, due in large part to Weyerhaeuser's logging activities. In May of 1992, at a cost of $1.7 million to the state and county, white amur weed-eating carp were introduced to Silver Lake to clean out the weeds and restore the purity of the lake. If the carp were killed, that money would be wasted and the effort to reverse the process of eutrophication would be defeated. A well-known university study has concluded that with no measures in place to reverse that process the lake would become a marsh within ten years. This should be mentioned in the draft EIS, and the following questions should be addressed.

(a) What will be the effect on the carp in the event of a derailment of several train cars carrying leachate if the leachate were to be carried into the lake via Sucker Creek or its Southern Tributary? (The draft EIS only covers the case of a single car derailing, and it does not mention the carp at all. On page 3-209 of Vol. 0 of the *Environmental Technical Report for the Proposed Weyerhaeuser S.W. Washington Solid Waste Facility*, it identifies the "worst-case scenario" as being "the entire contents of one rail car of leachate draining into the Southern Tributary. There have been several cases, however, of multiple cars derailing along the tracks that would be used for hauling the leachate.) With regard to any potential effect on the carp, specific data should be provided, as this species is considered to be more environmentally sensitive than the bass and other species that inhabit the lake.

(b) In the event of damage to the carp, will Weyerhaeuser pay for replacing them at full cost? If not, then who will?

(c) If the carp need to be replaced, how long will it take for Weyerhaeuser to replace them? Time will be critical.

(2) 2. A great deal of runoff could be expected from such a huge area stripped of trees and other vegetation, and rendered impermeable by a hard plastic liner. This runoff, and especially phosphorous and other nutrients, could stimulate plant growth in the lake and speed up eutrophication even further. An increase in temperature in the lake could also be expected to speed up the process of eutrophication. The following concerns should be addressed in the EIS.

(3) (a) The *Environmental Technical Report* deals only in passing with the question of lake nutrient enrichment, and quickly dismisses the issue on the grounds that preventative measures would prevent "large concentrations of suspended sediments and turbidity" from entering Silver Lake (Vol. 0, p. 3-71). On page 3-76, however, it states that "the expected reduction in soluble nutrients [as a result of the described preventative measures] has not been quantified." In addition, it states on page 3-163 that: "Temporary increases in suspended sediments associated with construction of the diversion canal, roads, transfer station, biofiltration/sedimentation basins leachate holding pond, parking areas, maintenance buildings and landfill cell number 1 are expected to occur downstream of the landfill." And on page 3-164 it states that "high flow events during the first winter coupled with the steep stream gradients would result in most of the sediment being transported downstream to Silver Lake." How will the quantities of sediment and nutrients entering the lake be monitored? If the quantities should exceed expectations, what measures is Weyerhaeuser prepared to take to counteract the effect on the process of eutrophication?

(4) (b) The EIS should provide more specific data with regard to the amount of rainfall that can be expected in years of exceptionally heavy rain (e.g., 100-year storm events), and how varying amounts of rainfall would affect runoff and erosion from a 5-acre exposed area.

(5) (c) The draft EIS states that Weyerhaeuser would keep all but 5 acres of the landfill covered during the rainy season. How would the rest be covered?

(6) (d) Even if it were possible to successfully cover such a massive area during periods of rain, what volume of water could be expected to run off of the covering (since it would not be absorbed into the ground) and how would it be prevented from eroding the soil downhill?

(7) (e) The *Environmental Technical Report* (Vol. I, page 133) states that "annual yield of sediment actually discharged downstream from the project area to the Southern Tributary could increase over existing conditions by up to 69 percent with year-round soil exposure, or actually decrease by 23.5 percent with exposure limited to the drier June-September period." What size of an area is this referring to? Does this include the five acres that would be left uncovered? Would all soil in fact actually be exposed only during the June-September period? If soil is to be exposed for longer periods, then this should be addressed in the EIS.

(8) (f) The *Environmental Technical Report* (Vol. 0, page 3-76) states that, due to the elimination of shade, "mid-summer mean daily temperatures... may increase by approximately 3°F over existing conditions in the Southern Tributary below the landfill site," but that the reestablishment of riparian vegetation along the diversion channel that would be expected to occur within five years would restore water temperatures to more or less current conditions. What effect would warmer water flowing into Silver Lake over a 5-year period have on the process of eutrophication?

(9) 3. The cover letter at the beginning of the draft EIS states that "importing wastes from other counties or states is not in compliance with the regional solid waste plan and is not considered in this document." Weyerhaeuser, however, has apparently requested an exemption from that rule, and their request has reportedly been favorably considered by the Cowlitz County Solid Waste Advisory Committee. If waste might be imported from outside the Cowlitz and Wahkiakum counties, then that should certainly be addressed in the EIS and not merely in a separate document.

(10) 4. The issue of possible negative effects on local property values and quality of life due to adverse public perceptions and potential odors from the landfill is not adequately addressed in the draft EIS. The prevailing wind in the area is from the south, i.e., directly from the proposed landfill area toward the residences across Silver Lake. In addition, locating a major dump near a residential and recreational area will inevitably give that area a negative public image. This should be mentioned in the draft EIS, and the following questions should be addressed.

(11) (a) The draft EIS (page II-32) states that "sustained" odor would not be present at property boundaries. How far from the landfill site might any odor (from methane, hydrogen sulfide and/or other constituents) be carried for less than "sustained" periods of time?

(12) (b) What would be the impact on property values for homes affected by either frequent or occasional odor?

(c) Considering the fact that the value of property around Silver Lake is highly correlated to the natural attractiveness of the area and the appeal of Silver Lake as a recreational area, what impact on area property values could be expected as a result of locating a large industrial landfill in the Silver Lake watershed?

(d) Will Weyerhaeuser compensate homeowners for a negative impact on property values? How will the impact be determined? Will Weyerhaeuser compensate for what would otherwise have been an appreciation in value in area homes were it not for their dump?

(13) (e) The draft EIS (page S-12) mentions some possible corrective measures that could be applied in the event that "problematic landfill odors" were detected. It does not, however, guarantee any commitment by Weyerhaeuser to apply any specific measures. In addition, the word "problematic" is quite vague. If area residents can smell the dump from their homes, that would certainly be "problematic" for them and for their property values, but not necessarily "problematic" from Weyerhaeuser's point of view. This section should be elaborated on and clarified in the EIS. At exactly what point does the odor become

"problematic"? Who will determine when and whether that point has been reached?

(14) 5. All of the questions related to odor (in point #5 above) apply to fugitive dust emissions as well.

(15) 6. The *Environmental Technical Report* (Vol. 0, pp. 3-40 to 3-42) states that roads would be frequently watered to control dust, and that the movement of soil at the landfill site would require that "control measures... also be continuous, or at least take place at frequent, regular intervals. The only method of controlling these emissions is to spray the area being worked at frequent intervals (every 30 minutes to 1 or 2 hours)." Given the current drought conditions in this area, the constant required use of such large quantities of water should be addressed in the EIS. Specifically, the following questions should be answered.

(a) What quantities of water would be needed to keep dust under control, particularly during the dry summer months when most of the construction would be taking place?
(b) What would be the source of that water? The draft EIS merely states that the water could be "sprayed from a mobile tower, a water truck, or from an agricultural spraying system." It should also specify whether the required large quantities of water would be drawn from the Cowlitz River, Silver Lake, or from other sources.

(16) 7. The stated distance of 2 1/2 miles from the nearest point of Silver Lake is questionable. According to local maps, the distance would be only 1 1/2 miles. The EIS should not merely accept Weyerhaeuser data. The proposed site should be independently surveyed, and the exact distance from the nearest point of the lake should be verified.

(17) 8. Weyerhaeuser's past record of waste management in this county should be discussed in the EIS. Even though Weyerhaeuser did not itself own the dump sites, it nevertheless failed to exercise responsibility with regard to the local impact of its dumping activities. The areas around Weyerhaeuser's mill and it's Mount Solo landfill have suffered significant environmental problems, and the draft EIS (pages II-30 and II-31) notes that the "Mt. Solo landfill contains material similar to that planned for disposal at the proposed landfill." The Mount Solo landfill comprises only 25 acres

and is not located next to a major standing body of water. The problems could well be compounded in the case of a massive landfill (330 acres) situated above the largest freshwater lake in southwestern Washington. The timeliness (or lack thereof) of Weyerhaeuser's responses to the environmental problems at the Mount Solo landfill should definitely be addressed in the EIS.

(18) 9. Weyerhaeuser's past record with regard to the handling of hazardous wastes should also be reported in the EIS, as it has a direct bearing on the possible environmental impact of a landfill containing at least low levels of such materials. The dump would contain toxic materials such as mercury, arsenic, pentachlorophenol, chlorides, cadmium and dioxin. Although Weyerhaeuser claims that these would be present only in small amounts, the dump would apparently not be monitored closely enough to prevent larger quantities from getting mixed in. In addition, some of these materials may be even more hazardous in combination. The following points should be addressed in the EIS.

(a) On July 25, 1991, the Longview *Daily News* reported that Weyerhaeuser Co.'s Longview pulp and paper mill had been fined about $124,000 for improper hazardous waste handling and air pollution violations. The fines were the result of a nine-day federal/state inspection in late February of that year. Although the mill received overall satisfactory marks for environmental regulations, it was found to be negligent with regard to the handling of hazardous wastes. It should be particularly noted that the mill received notice of the planned inspection on February 1, and the inspection was not carried out until February 19 through March 1. Therefore the violations could well have been worse if Weyerhaeuser had not been given ample time to prepare for the inspection. In any case, despite the long lead-time which Weyerhaeuser was given to prepare for the visit, a number of violations were found. The violations described below should all be noted in the EIS, as they have a direct bearing on the proposed landfill.

(b) The inspection found that hazardous waste was being stored in damaged containers. Six barrels containing solvents, or corrosive or flammable waste, were dented or oozing waste from filler caps.

(c) Incompatible hazardous wastes were not kept separated. This is important in light of the fact that the proposed landfill will incorporate at least low levels of potentially incompatible hazardous wastes.

(d) A container of waste contaminated with acetone and toluene was left open.

(e) Weyerhaeuser had neglected to even bother to determine whether two barrels of waste contained hazardous materials. This is important in light of the fact that Weyerhaeuser claims that hazardous wastes will be present in the landfill but only in small amounts. Unless there would be daily monitoring by an independent agency, it would be up to Weyerhaeuser to determine the amounts of hazardous or toxic materials being deposited in the landfill. Thus its history of negligance in this area is quite relevant to the proposed landfill and should be addressed in the EIS.

(f) Weyerhaeuser had placed 200 containers of waste too close together to allow quick response in cased of an emergency spill.

(e) The inspection found two undated containers of waste in a storage area. Waste must be dated to ensure that it is disposed of within 90 days. This and all of the violations mentioned above, as well as any other past cases relevant to the present proposal should be noted in the EIS.

(19) 10. On page I-10, of the draft EIS, the discussion concerning delaying implementation of the landfill does nothing more than provide a platform for Weyerhaeuser's usual implied threats to punish the county economically if it does not get exactly what it wants, and quickly. The possibility of contracting for temporary long-haul of all or part of it's waste is mentioned only in passing, while the report goes on at length regarding Weyerhaeuser's objections and its threats to refrain from expanding its facilities in the region. Because of its economic dominance in this region, Weyerhaeuser often resorts to what is, in effect, economic blackmail. Weyerhaeuser is entitled to (and does) make its economic case in other forums. Such threats are not appropriate in an Environmental Impact Statement, however, and should be deleted from the final version.

(20) 11. The draft EIS does not mention the fact that there have been eight documented derailments in the past five years along the railroad tracks that would be used to transport the waste and the leachate, including a significant accident just this winter (i.e., after Weyerhaeuser's "upgrading" of the tracks). This should be investigated and reported in the EIS, as it has a great bearing on the risk of a spill that could contaminate Silver Lake. In addition, the EIS only covers the possibility of a single car derailing and spilling its contents. In past accidents on the railroad line in question, however, several cars have derailed at a time. The EIS should take this into account.

(21) 12. In Appendix B of the *Environmental Technical Report* (Vol. I, p. 17), the potential impact of a hypothetical spill event from a rail car or truck accident is evaluated based on simulated peak concentrations of ammonia toxicity and dissolved oxygen. The following considerations should be addressed in the EIS.

(a) In the event of a leachate spill, would the only potential impact come with respect to ammonia and dissolved oxygen? If there is potential impact from other factors, then they should be considered too.

(b) On page 9 of the same source, it is stated that: "Estimated ammonia concentrations represent worst-case scenarios since the above flows correspond to low flow conditions." If these estimates are based on the assumption that only one rail car will spill, however, then they cannot be called "worst-case scenarios." The estimates should be calculated based on the possibility of a multiple-car spill.

(22) (c) There is no mention made of any possible effect of a spill on the white amur weed-eating fish. That should be taken into consideration in the EIS.

(23) (d) On page 19 of the same source, it says that "a potential spill into Silver Lake is expected to be diluted below WQC or WQS by mixing with approximately 0.003 of total lake volume. First of all, as noted above, this "potential spill" is not a worst-case scenario if it assumes only a single-car spill. In addition, a spill into a standing body of water stopped behind a dam cannot be expected to circulate and become evenly distributed. What

would be the potential effect on fish in the section of the lake closest to the spill in the event of a multiple-car spill?

(e) The draft EIS does not address the fact that Silver Lake is stopped behind a dam, and that there is no movement of water out of the lake for months at a time. If a spill were to occur during any of these periods, the damage to life in the lake would be much more severe than if the lake were able to flush the contaminants out. This should be noted in the EIS.

(24) 13. The *Environmental Technical Report* (Vol. 0, pp. 3-79 and 3-80) states that the landfill will have a base liner to "prevent leachate migration into underlying soils...." It further states that the liner design would exceed the minimum WAC 173-304-460 requirements. While this may be true, it has been publicly demonstrated that the liner can easily be punctured by a common ball-point pen. What assurance is there that the liner would not be punctured or damaged by the heavy equipment that would be operating over it, or by sharp or protruding objects from the demolition waste that would be dumped (and moved around by bulldozers) in the landfill?

(25) 14. On page I-16 of the draft EIS, it says that "a portion of existing tree stands to the north and northwest of the site would be retained to block or diminish the view of the project from Silver Lake and South Silver Lake Road."

(a) Exactly how much is a "portion"? This should be detailed and explicit.

(b) Who will monitor exactly how much of the existing tree stands are cut?

(c) Weyerhaeuser has not always respected existing standards regarding the cutting of trees near the edge of the lake. Will there be a penalty if Weyerhaeuser exceeds the specified amount? If so, then that should be stated. If there is to be no penalty for noncompliance, then that should also be stated.

(26) 15. The *Environmental Technical Report* (Vol. I, p. 41) states that: "Cost effective and standard methods for general particulate control, for VOC and particulate control during waste handling, and for landfill gas collection and treatment were recommended." Is

there any guarantee that such "recommendations" would be followed?

(27) 16. The draft EIS creates the impression that the proposed site is the only viable location, and that the three other sites "retained for further study" would be the only conceivable alternatives. Although it states on page I-2 that the EIS will not cover alternative sites, it does refer to a report entitled "Solid Waste Disposal Facility Site Selection Study" prepared for Weyerhaeuser (1990). Therefore I believe that comments on that study are appropriate in this context. In that study a number of potential alternative sites are briefly discussed and each is quickly dismissed on the basis of one or two complaints. It is obvious that Weyerhaeuser has not given serious consideration to any alternative sites. In many cases the reasons given for rejecting a potential site are much less serious than the reasons why the Headquarters site should be rejected.

(a) "Lack of Weyerhaeuser ownership" is frequently given as one reason for rejecting a potential site. Considering Weyerhaeuser's vast resources and existing landholdings, why would it be impossible to purchase the land required for a landfill? If necessary, in fact, why could the Headquarters land not be sold to pay for the purchase of land at a more suitable location?

(b) A size totalling anything less than 250 acres is frequently cited as another reason for rejecting a potential site. Considering that the landfill is to be developed incrementally over a period of 30 to 50 years in any case, why is it absolutely essential that the entire 250 acres be located at a single site? Why could not two potential alternative sites be combined to total the stipulated 250 acres? For example, Barlow Point (C-15) is described as being relatively flat and in close proximity to the Longview facilities. The only reasons given for rejection are the lack of Weyerhaeuser ownership and the size of 150 acres. Why could an area such as this not be purchased and combined with another suitable area of at least 100 acres? For example, the Coal Creek (S-9) site contains 160 acres and is also rejected only because of its size and lack of Weyerhaeuser ownership. Likewise the Mosquito Creek (S-13) site, which contains 160 acres, is rejected for identical reasons. Why not combine any of these with, for example, the Pleasant Hill (S-11) site which totals 177 acres, is 80% owned by Weyerhaeuser, and

has both road and rail access. In this case, the only reason stated for rejecting it is its size. Why could it not be combined with another site to meet the stipulated landfill size requirements?

(c) The Baird Creek (S-5) site is entirely owned by Weyerhaeuser and is sufficiently large (340 acres). The only reason given for its rejection is a lack of rail access. Why would it be impossible for Weyerhaeuser to put in rail access? Even if for some reason it is not possible with this particular site, why does Weyerhaeuser not consider that possibility for other sites which presently lack rail access?

(d) Several sites are described as inaccessible due in part to "very steep" road grades of 10%. According to the *Environmental Technical Report* (Vol. II, Appendix K, p. 5), however, Headquarters Road (the access road to the proposed site) is not much better, with a grade of over 8% for two miles. It is also reported to be "generally narrow, with unpaved shoulders."

(e) Several sites are rejected due to containing excessively steep slopes of over 20%. The proposed site, however is described in *Environmental Technical Report* (Vol. 0, p. 3-120) as "level to gently sloping" with slopes of "0 to 40%." Why is 40% regarded as "gently sloping" in the case of the proposed site while 20% is considered excessively steep for other potential sites?

(f) In particular, what exactly is the reason for rejecting the Collins Estate/Tenant Way site that has been suggested as a very feasible alternative and has been checked by Weyerhaeuser staff? It contains more than 300 acres, and is located only three miles from the Weyerhaeuser facilities, across from the Cowlitz municipal landfill. It meets all of the criteria stipulated by Weyerhaeuser with the exception of ownership, and it is available for purchase. Why has this site apparently not been seriously considered by Weyerhaeuser?

(28) In summary, I believe that the proposed Headquarters site above Silver Lake would be an extremely poor location for a major landfill, and that Weyerhaeuser has not, in good faith, given serious consideration to alternative sites. I would like to see

the above questions and concerns addressed in the final version of the Environmental Impact Statement for the proposed project.

Thank you very much.

Sincerely,

Stephen Willing

Stephen Willing

RESPONSE TO LETTER NO. 62A

Stephen Willing

1. With regard to whether a spill of leachate from one tank car constitutes a worst-case scenario, see response to Letter No. 69, Comment 13. If a leachate spill entered Silver Lake via Sucker Creek, it would depress dissolved oxygen levels and increase ammonia levels in the immediate area of the creek mouth. However, based on a comparison of leachate versus lake volume, the leachate would require dilution with only about 0.03 percent of the total lake volume to be diluted below levels that would be harmful to fish. Such dilution would occur rapidly within a short distance of the creek mouth (see Appendix B of the Beak (1991a) *Environmental Technical Report*). If relatively non-mobile juvenile fish were present at the creek mouth, some toxicity or mortality could potentially result. However, larger fish such as the amur carp would most likely avoid the area. Furthermore, mortalities of amur carp are unlikely, because scientific literature indicates that they have a high tolerance for low dissolved oxygen levels (Stanley 1978).

   Later in your letter (Comment 23), you express concern about impacts on fish if a leachate spill occurred during periods when there is no water moving out of the lake. The dilution process referred to above would occur regardless of whether there was movement of water out of the lake. The volume of water needed to reduce the leachate to non-toxic concentrations is so small that diffusion and convective mixing processes would ensure rapid dilution.

   The SEPA Rules require that an EIS evaluate only the "probable significant adverse impacts" of a project. Because no significant adverse impacts are expected on the aquatic resources of Silver Lake (see impacts discussion in Section II.A.5, Plants and Animals), a description of these resources is not included in the EIS. For the same reason, no mitigation measures (such as replacement of carp) are proposed.

2. See response to specific comments below.

3. Section II.A.3, Surface Water, has been revised to discuss additional erosion/sediment controls that would be implemented to minimize the quantities of sediments potentially transported to the Southern Tributary during initial construction activities. The surface water monitoring activities described in Section I.B.1.h(2), Surface Water/HGCS Monitoring, would provide information on the quantities of nutrients and sediments being transported from the site. Detailed sampling protocols, including the frequency of sampling and parameters tested for, will be determined as part of the solid waste permit process. The solid waste and NPDES permits, which would be issued by Ecology before landfill construction begins, would require a stormwater monitoring program and pollution control plan. The NPDES permit would also require that project facilities and procedures

be modified as needed to correct any observed violations of water quality standards or other conditions stipulated in the permit. Ecology would have the authority to stop construction until such modifications are implemented. Also, see responses to Comments 4 through 7 below and Letter No. 55, Comment 12.

4. The 5-acre exposed area referred to in the EIS is the active landfill area. Runoff from the active area would be collected and diverted to the leachate holding pond, where it would be temporarily detained pending transport to the Longview mill wastewater treatment plant. As described in Section I.B.1.d.(4)(c), Leachate Storage and Transfer, the capacity of the proposed leachate holding pond is approximately 5 million gallons. This is equivalent to about 36 inches of water over a 5-acre area, or more than half the average annual rainfall. The responses to Letter No. 9, Comment 10 and Letter No. 18, Comment 6 are also relevant.

5. During the rainy season, all non-active areas within the landfill footprint would be covered with either final cover or interim plastic cover. The proposed final cover system is discussed in Section I.B.1.d.(4)(d), Final Cover System. The use of interim plastic cover, and the type of material that would be used, are discussed in Sections I.B.1.e, Landfill Construction and Sequencing, and I.B.1.f(1), Landfilling of Waste. Also, see responses to Letter No. 9, Comment 8 and Letter No. 63, Comment 15.64.

6. Runoff from covered areas would be diverted to the proposed sedimentation/detention ponds. The design of the ponds would take into consideration volumes of stormwater runoff expected from covered areas of the landfill. Runoff would be released from the detention ponds at a peak rate no greater than the peak runoff rate under existing conditions, so there would be no significant increase in erosion downgradient of the landfill during storm events. See responses to Letter No. 18, Comment 6 and Letter No. 69, Comment 16.

7. The analysis in the *Environmental Technical Report* assumed a 40-acre area of exposed (uncovered) soil. At the time the analysis was done, landfill sequencing details were unavailable, so a conservatively high estimate of exposed soil (40 acres) was assumed based on discussions with project engineers. Since the original analysis, more specific information on the size and sequencing of exposed areas was developed. The sediment analysis in the Draft and Final EISs reflect this new information. Basic assumptions about exposed area at different times of year are listed in Section II.A.3, Surface Water. Further detail on year-to-year cell sequencing and month-to-month soil exposure is tabulated by year in Appendix F of the EIS. Also, see responses to Letter No. 9, Comment 8 and Letter No. 63, Comment 15.64.

8. The potential 3°F increase in water temperatures from the diversion channel during the vegetation reestablishment period would have no effect on the Silver Lake eutrophication process. Based on the relative flow contribution of the diversion channel to Silver Lake, a 3°F increase from the diversion channel during the reestablishment period would result

in less than a 0.3°F increase at the mouth of Sucker Creek, and no measurable temperature increase in Silver Lake.

9. See response to Letter No. 8, Comment 3.

10. See response to specific comments below.

11. Section II.A.4, Air Quality, and the Summary section you refer to have been revised for clarification. Worst-case meteorological conditions (low wind speed and high atmospheric stability) were assumed for the odor modeling in the EIS. Furthermore, the EPA model used assumes that the maximum instantaneous concentrations of odor-producing compounds would be maintained for an hour to produce the maximum one-hour "average" concentrations reported in the EIS. Even with these conservative assumptions, the predicted concentrations of odor-causing constituents at the western site boundary and nearest residence are well below the olfactory thresholds for the compounds. Therefore, it is unlikely that there would be any odor impacts at the site boundary, much less at off-site locations. The word "sustained" has been removed. Because rare meteorological events conducive to odor formation can occur in nature, the revised discussion indicates that there may be very short-term odors during such events at the site boundary or possibly beyond. The exact distance to which these odors might be detected cannot be calculated, but they would be rare and transitory.

12. See response to Letter No. 26, Comment 1.

13. Section 400-040(4) of the Southwest Washington Air Pollution Control Agency (SWAPCA) General Regulations for Air Pollution Sources specifies odor levels that, if exceeded, would be in violation of the law and clearly "problematic." Such odor levels are measured by a commercially available instrument called a scentometer. The Health District can also respond if landfill-related odors create a nuisance to nearby residents. Of course, regardless of the SWAPCA regulations or Health District enforcement, if odor levels were sufficient to generate complaints by neighbors, the odor would be considered to be at a problem level and corrective action would be taken. Possible corrective actions are indicated in Section I.B.1.h(3), Landfill Gas and Odor Monitoring, and the corresponding section of the EIS Summary. Also, see response to Letter No. 9, Comment 11.

14. Weyerhaeuser would be required by law to meet state and federal air quality standards at the site boundaries. Monitoring of TSP or PM_{10} concentrations would provide the mechanism for determining whether there is a "problematic" level of dust. Standards for these pollutants are health-based, and are more restrictive than what would be perceived as nuisance dust levels. Further information relevant to your comment is provided in the response to Letter No. 47, Comment 15.

15. Water for on-site operations, including water-spraying for dust control, would be provided by existing on-site wells and water storage reservoirs as required. Quantities of water needed would be calculated during final design (see response to Letter No. 47, Comment 15).

16. See response to Letter No. 9, Comment 17.

17. As stated in your comment, Weyerhaeuser did not develop or operate the Mt. Solo landfill. Standards for landfills when Mt. Solo was developed were not as protective of the environment as they are today under the MFS (WAC 173-304). The Headquarters Site landfill is proposed to be built to current design standards for municipal solid waste and limited purpose landfills to minimize the potential for environmental impacts. These standards include the requirement for a bottom liner. Also, see response to Letter No. 42, Comment 4.

18. Comment noted. See response to Letter No. 17, Comment 1.

19. See response to Letter No. 11, Comment 5.

20. See responses to Letter No. 69, Comments 13 and 25.

21. Ammonia and chemical oxygen demand, which reduces dissolved oxygen concentrations in water, are the only two leachate constituents present in high enough concentrations to be potentially harmful to aquatic resources (EPA, 1986b). Also, see response to Letter No. 69, Comment 13.

22. See responses to Letter No. 11, Comment 8 and Letter No. 62A, Comment 1.

23. See response to Comment 1 above and Letter No. 69, Comment 13.

24. As discussed in Section I.B.1.d(4)(b), Leachate Collection and Removal System, puncture of the liner during landfilling of demolition waste would be prevented by placing 2 feet of protective soil cover over the liner (one foot of granular drainage material in which the leachate collection pipes are embedded, and one foot of soil as an operations layer), and by requiring that the first 5 feet of landfilled waste be material with pieces smaller than 1 foot in any dimension. A comprehensive construction quality assurance program with full-time monitoring would be used to ensure that the landfill is constructed in accordance with the design intent (see response to Letter No. 9, Comment 20 and Letter No. 63, Comment 16.40).

25. See response to Letter No. 62, Comment 13.

26. See response to Letter No. 9, Comments 3, 11, and 20; and Letter No. 47, Comment 15.

27. See response to Letter No. 9, Comment 28.

28. Comments noted.

LETTER NO. 62B

Stephen Willing
206 Lakeview Drive
Silver Lake, WA 98645
Sept. 3, 1992

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

Mr. David Riggs
Cowlitz Wahkiakum Health District
1516 Hudson
Longview, WA

Dear Mr. Riggs,

(1) Weyerhaeuser should not be permitted to build a 300-acre dump above Silver Lake. The proposed landfill would have a very severe impact on the lake, the wetlands, and the surrounding community.

Silver Lake is not the only possible site in Cowlitz or Wahkiukum County for a landfill, and it is in fact one of the worst possible sites. Weyerhaeuser favors this location because it already has some buildings and railroad tracks installed and thus it would be a little cheaper than some alternative sites. There are other economically viable sites, however, and with its vast landholdings Weyerhaeuser has a number of possible alternatives. Aside from the land it already owns, Weyerhaeuser certainly has the means to purchase other land suitable for locating a dump. What follows are some general reasons why Silver Lake would be a poor site for a large-scale landfill. My accompanying letter contains specific comments on the draft Environmental Impact Statement for the proposed project.

(2) 1) Silver Lake is the largest freshwater lake in Southwest Washington. It is surrounded by homes on several sides, and is also a popular recreational area. In addition, it serves as a scenic backdrop to the Mount St. Helens Visitors Center. In recent years it has been subject to rather rapid eutrophication (due in large part to Weyerhaeuser's logging activities), and the state and county have allocated over two million dollars to clean it up and build a park for improved public access. As it is cleared of weeds it will also become an added attraction for the anticipated two million visitors per year passing by on their way to Mount St. Helens, and will have a positive impact on the local economic base.

(3) 2) Even aside from questions about containing leachate, it will be extremely difficult to contain erosion and runoff from such a huge

area cleared of trees and vegetation. There is no assurance at all that Weyerhaeuser's proposed storm-water control system will be adequate for the task. Increased erosion would wash phosphorous into the lake, thereby stimulating plant growth and defeating the attempts underway to reverse the process of eutrophication.

(4) 3) Besides the serious question of erosion and rainwater runoff, there is a potentially serious problem with leachate. These days major landfills are almost never located near standing bodies of water, due to the extreme difficulty of preventing leachate from reaching the water even when the most state-of-the-art methods are employed to attempt to contain it. In this case the problem is compounded by the fact that the leachate would be loaded into railroad cars above Sucker Creek, which flows directly into Silver Lake. Among other hazards, a spill could kill the weed-eating carp which have been introduced in the lake to control the eutrophication. In addition, the draft Environmental Impact Statement does not address the fact that there have been eight documented derailments in the past five years along the track that would be used for transporting the leachate. Although Weyerhaeuser claims to have completed an "upgrading" of the tracks, a significant accident occurred recently (after the "upgrading").

(5) 4) The dump would contain toxic materials such as mercury, arsenic, pentachlorophenol, chlorides, cadmium and dioxin. Although Weyerhaeuser claims that these would be present only in small amounts, the dump would apparently not be monitored closely enough to prevent larger quantities from getting mixed in. In addition, some of these materials may be even more hazardous in combination. The question of seepage into ground water has not yet been adequately addressed (notwithstanding the perfunctory treatment given in the draft E.I.S.), and in any case a dump containing such materials should in no way be located in the headwaters of a creek flowing into a major lake.

(6) 5) Weyerhaeuser's past record in managing landfills in this county is not good. It's Mount Solo landfill, which is currently being forced to close, has been plagued by numerous problems, even though it totals only 25 acres and is not located next to a major standing body of water. Even though Weyerhaeuser was not the owner of the landfill, it was the major dumper and was less than vigilant with regard to the effects of its actions. Among the many problems was a stench that caused illness to workers and area residents. (The draft EIS

notes on pages II-30 and II-31 that the "Mt. Solo landfill contains material similar to that planned for disposal at the proposed landfill"). The problems experienced at Mt. Solo would likely be multiplied many times over with a 300-acre landfill next to an environmentally sensitive lake.

(7) 6) Even aside from the danger of leaking or spilled leachate, the proposed project would cover and move approximately 6,000 feet of a creek which is a natural spawning ground for Coho salmon. It is considered to be extremely difficult, if not impossible, to replace such creeks artificially.

(8) 7) In addition, the landfill would destroy 12 acres of wetlands. It is also considered to be extremely difficult to replace natural wetlands with artificial ones, and the U.S. Environmental Protection Agency and the U.S. Fish and Wildlife Service are both on record as having expressed doubts that Weyerhaeuser could succeed in such an attempt.

(9) 8) With the great numbers of annual visitors that are anticipated with the opening of Spirit Lake Highway, and with the increasingly beneficial impact of tourism on the local economy, a clean Silver Lake will serve as an additional attraction to keep tourists in the area for longer. It can also be expected to become an increasingly popular residential and recreational area for Cowlitz County. Because Headquarters (i.e., Silver Lake) is Weyerhaeuser's preferred site for a landfill, they have given only a perfunctory glance at alternative sites and then quickly rejected them for reasons that are far less serious than the reasons for rejecting Silver Lake as an option. Before they are permitted to ruin an area that could otherwise be a great asset for the county, they should be required to take far closer look at alternatives. Please do not allow Weyerhaeuser to dump next to Silver Lake.

Thank you very much.

Very Respectfully Yours,

Stephen Willing

RESPONSE TO LETTER NO. 62B

Stephen Willing

1. See responses to Letter No. 11, Comment 8; Letter No 62A, Comment 1; Letter No. 62, Comment 14; and Letter No. 9, Comment 28.

2. Comment noted.

3. See responses to Letter No. 62A, Comments 3 through 7 and Letter No. 63, Comment 15.64.

4. See responses to Letter No. 62A, Comment 1.

5. See response to Letter No. 17, Comment 1.

6. See responses to Letter No. 62A, Comment 17 and Letter No. 42, Comment 4.

7. See response to Letter No. 10.

8. See response to Letter No. 62, Comment 14.

9. Your opposition to the proposed landfill is noted. With regard to alternative sites, see response to Letter No. 9, Comment 28.

LETTER NO. 63

JOHN S. KARPINSKI
Attorney at Law
2612 E. 20TH STREET
VANCOUVER, WA 98661
(206)690-4500
FAX (206)695-6016

Cowlitz-Wahkiakum Counties
SEP 11 1992
Health District

September 11, 1992

David E. Riggs
Responsible SEPA Official
Cowlitz-Wahkiakum Health District
1516 Hudson
P.O. Box 458
Longview, WA 98632

Re: Headquarters Camp Solid Waste Disposal Facility DEIS
Comments of John S. Karpinski for North Cowlitz
Environmental Council

Dear Responsible SEPA Official:

(1) I have been retained by the North Cowlitz Environmental Council to review the DEIS and attachments in regard to Weyerhauser's proposed Headquarters Camp Solid Waste Disposal Facility. In addition to being an attorney who specializes in environmental law and SEPA, I also have a Bachelor of Science degree in Biology and Environmental Studies, an advanced certificate in Natural Resources Law from the University of Oregon, and I am very experienced in reviewing Environmental Impact Statements. This DEIS is a horrible mishmash of assumption on assumption, baseless conclusions, ponderous redundancies, and myopic alternatives. In my professional opinion, the DEIS does not meet legal standards of SEPA and should be withdrawn and re-prepared following the Statutory and Administrative mandates of SEPA.

The problems with the DEIS are immense. For organizational purposes, I will present general comments followed by very detailed specific comments regarding the DEIS. Pursuant to SEPA, we request that each and every point raised in these comments be individually and fully responded to in the FEIS.

I. CONCEPTUAL PROBLEMS.

(2) The purpose of an Environmental Impact Statement is to fully and fairly discuss the environmental impacts of a proposal, present a detailed set of alternatives (including environmental pros and cons) to the proposal, and to provide a detailed set of proposed mitigations to attempt to cure the environmental problems caused by the proposal. The DEIS fails to adequately perform any of these functions.

(3) Even with all of its attachments, there is very little "beef" to support the "facts" alleged in the DEIS. Mitigation Plans are "conceptual", not actual, most "facts" are based on a multitude of assumptions, and as the Department of Ecology letter of May 22, 1992 indicates, many of the conclusions drawn are simply not (4) supported by the facts. Nor is the analysis of alternatives any

Printed on 100% Recycled Paper.

better; no off-site alternatives have been included in contradiction to WAC 197-11-440(5)(d), and the on-site alternatives are merely three different flavors of vanilla - with no real differences in the alternatives or mitigation presented. The choice is the Proposal, the Proposal, or the Proposal. Is it any wonder it recommends "the Proposal"? The EIS makes numerous references to other documents not provided in the record, and it is impossible to understand the proposal, the alternatives the impacts and the mitigation without reference to other documents. The DEIS is difficult to read and is exceptionally redundant, in violation of SEPA. In short, the DEIS wholly fails to satisfy the statutory and administrative requirements of SEPA. (5)

A. EIS UNCLEAR AND REDUNDANT.

(6) WAC 197-11-425(2) states: "Environmental Impact Statements shall be concise and written in plain language." Here, the DEIS sections are particularly redundant and difficult to understand. Certain phrases and concepts are repeated over and over again (i.e. 200 years) greatly increasing the length and decreasing the readability and public response to the DEIS. This factor, combined with the numerous references to other documents, (some of which are attached and some that are not), repeated references to information in other sections requiring constantly flipping back and forth, and elaborate use of jargon makes this one of the most difficult and non-readable EISs I have ever reviewed. Applicant should review the FEIS under one of numerous standard linguistic tests available on many popular computer programs to determine the "readability" of this document. The results of this test, combined with changes to eliminate redundancies and to make the contents more clear and readable, should be contained in the FEIS.

B. REPEATED BLIND REFERENCE TO OTHER DOCUMENTS VIOLATES SEPA.

(7) WAC 197-11-425(1) requires EISs to be: "readable reports, which allow the reader to understand the most significant and vital information concerning the proposed action, alternatives, and impacts, without turning to other documents..." (emphasis added). The DEIS' repeated references to important factual material contained in other documents, (many not appendixed to the DEIS), makes meaningful environmental review of the DEIS difficult, if not impossible. The FEIS should incorporate into appendixes all substantially relied on documents in the FEIS, and should also provide more "beef" in the FEIS regarding these studies and their methodologies, as well as their conclusions.

C. FACTS, NOT ASSUMPTIONS, NEEDED IN EIS.

(8) WAC 197-11-400(3) requires EISs to be: "supported by necessary environmental analysis" (emphasis added). Here, most of the "science" contained in the DEIS is layer upon layer of assumptions, and very little scientific study and analysis to support those assumptions. (See below Comments of WDOE, for example). WAC 197-11-080 requires that all reasonable information

be obtained and included in an EIS. Clearly, more "beef" is needed in the FEIS to support the assertions made in the DEIS.

D. MITIGATION PLANS NOT SUFFICIENTLY DETAILED.

(9) Under WAC 197-11-660(1)(c), mitigation measures must be "capable of being achieved". Here, the DEIS admits impacts on wetland and riverine habitat are significant, yet the mitigations to cure these significant impacts are only "conceptual". Again, more "beef" is needed. The purposes of the EIS is to provide detailed environmental analysis concerning the environmental impacts and their cure through mitigation, and only presenting mitigation in a "conceptual" form is a violation of SEPA. It is too late for "concepts", we need details and guarantees! This is particularly true where comments from affected agencies like the Washington Department of Wildlife indicates that they have substantial questions whether this mitigation can even be achieved.

E. COMPLIANCE WITH NON-SEPA REGULATIONS DOES NOT EQUATE WITH COMPLIANCE WITH SEPA.

(10) The DEIS repeatedly equates the "significance" of environmental impacts as whether or not they violate applicable state and federal law. The DEIS also equates "mitigation" as being achieved if no laws are violated. This tautological reasoning violates the clear language and intent of SEPA.

To accept these premises is to assert that all that is necessary to comply with SEPA is to not violate any other laws or ordinances. As SEPA has repeatedly been held by the Washington Supreme Court to be a substantive statute, and can force mitigation or even denial of projects even where all other laws are complied with, due to significant environmental impacts, these two attempts to circumvent true compliance with SEPA are clearly erroneous. SEPA's substantive provisions are so strong that, in the landmark case of Polygon v. City of Seattle, 90 Wn.2d 59 (1978), a unanimous Washington Supreme Court upheld the denial of an apartment complex on Queen Anne Hill in Seattle because of the shadow and other impacts of the proposal even though the proposal met all other applicable laws and regulations. SEPA is a powerful tool, and mitigation (or denial) under SEPA is not limited to compliance with other laws, nor is the "significance" of environmental impacts tied to other regulations. An impact is significant under SEPA if it would have "a reasonable likelihood of more than a moderate adverse impact on environmental quality". WAC 197-11-794. The DEIS' numerous attempts to equate other law compliance with SEPA compliance is fatally flawed and must be removed in the FEIS.

F. PROJECT SHOULD BE DENIED UNDER SUBSTANTIVE SEPA IF MITIGATION NOT GUARANTEED TO CURE SIGNIFICANT ENVIRONMENTAL IMPACTS.

(11) As mentioned above, the authority of the Health District to deny a project under Substantive SEPA is broad. WAC 197-11-660 spells out the Substantive authority and the procedures necessary

to deny a project under Substantive SEPA. Although the Washington Courts have been sticklers to compliance with these procedures, they have rarely, if ever, overturned a denial of a project where the basis for the denial was properly made in the record.

We urge the Health District to take a hard look at denying this project under Substantive SEPA. It is clear that this project will have a multitude of probable significant adverse environmental impacts. The impacts on the on-site streams and wetlands are the clearest, but not the only, examples. The "mitigation" presented to cure these problems is not adequate. Unless substantial proof is generated in the FEIS that the mitigation not only could but would cure the probable significant adverse environmental impacts of this proposal, this project should be denied under Substantive SEPA. To date, proponents have not their burden of proof that the mitigation proposed is adequate to do the job under SEPA.

II. SPECIFIC PROBLEMS.

(12) The following comments will specifically discuss the adequacy of the DEIS, its appendixes and other documents relied on. The following comments will be individually numbered, and we request their individual and detailed reply in the FEIS.

A. DEIS RELIES ON FAULTY DATA AND DOCUMENTS.

(13) The DEIS is based on documents, such as the Solid Waste Permit Application Part 1 dated June 12, 1991 and other technical documents. Yet the Department of Ecology in its February 7, 1992 letter clearly indicates that these supporting documents are inadequate. No data exists in the DEIS to prove these concerns have been adequately resolved. For example, the DOE letter of February 7, 1992 indicates:

Solid Waste Permit Application Part 7? - June 12, 1991

1. Insufficient geotechnical assessment of the site (Page 1).
2. Insufficient soil samples/proctor data (Page 2).
3. Fails to identify soil liner burrow on Site Map (Page 2).
4. Fails to site soil line burrow based on geological exploration and soil test results (Page 2).
5. In situ tests need to be performed to verify soil tests (Page 2).
6. Hydrogeologic information not provided to DOE (Page 2).
7. Test pit log fails to identify type of test or what parameters were being tested for (Page 3).

Solid Waste Handling Facility Permit Application - August 13, 1990

8. Leak detection system should be included, particularly in areas with hydraulic gradient control (Page 3).
9. Monitoring the underdrain alone is "unlikely to reveal the

actual magnitude of contamination" (Page 3).

10. Quality control procedures including soil, not provided (Page 3).

Geology and Hydrology - June 12, 1991 (3 documents)

11. Relevant environmental information unnecessarily split between "Geology and Hydrology study of June 12, 1991, and Permit Application part 1 June 12, 1991" (Page 4).

12. Geologic interpretation carried "beyond the extent to which any of the piezometers or wells were drilled" (Page 4).

13. "Lack of data" beyond relatively shallow depths "make site specific characterization of deep aquifer system impossible" (Page 4).

14. "Further investigation" of basalt/andesite layer should be undertaken (Page 4).

15. Incomplete information on "seasonal fluctuations" of groundwater (Page 4).

16. Additional groundwater contour map necessary (Page 4).

17. Additional water level information should have been collected in February/early March, 1992 (Page 4)

18. More investigation needed on the interaction between precipitation and groundwater fluctuations and results provided (Page 4).

19. The testing and analysis for direction and flow of local groundwater appears to be "inadequate" (Page 5)

20. Hydrologic conductivity tests performed of "limited value" (Page 5).

21. Flow velocities calculated based on four tests of limited values, two assumptions, and a single water level measurement (Page 5).

22. Flow velocities also appear to fail to take into consideration the effect of existing drainage patterns (Page 5).

23. Further data needed to "reduce or eliminate the number of assumptions" on groundwater velocity (Page 5)

24. Calculation of hydrologic conductivity is "confusing and incomplete" (Page 5).

25. Hydrologic conductivity based on incomplete 41 year old study (Page 5).

26. Groundwater flow direction "cannot be verified" (Page 5).

27. Deep aquifer analysis not provided (Page 5).

28. Interaction between shallow and deeper groundwater systems " has not been adequately addressed" (Page 5).

29. Statements regarding vertical flow/recharge area "lacking" "supporting data" (Page 5).

30. Water level measurement data needs "revision" (Page 5).

31. Depth to August water data "must be included" (Page 5).

32. Determination of regional groundwater vertical flow necessary, not provided (Page 6).

33. More details necessary concerning Weyerhauser wells and associated water rights (Page 6).

34. "Brief" description of surface water features within one mile "is inadequate" (Page 6).

35. Details on sampling of background surface water and

groundwater quality lacking (Page 6).

36. Methodology of calculation of "site water balance" not provided (Page 6).

37. Use of southern tributary of Sucker Creek as a discharge measurement for water balance inappropriate (Page 6).

38. Use of water monitor site S-4 recommended (Page 6).

39. Use of discharge measurements from southern tributary of Sucker Creek in leakage model inputs could "result in erroneous values for leachate volumes, hydraulic control system discharges, and landfill leakage concentrations found in a leakage detection system" (Page 6).

40. Design for ground and surface water monitoring system "is inadequate" (Page 7).

41. Use of well BW-1 as baseline water quality well is "a problem" (page 7).

42. Inadequate discussion of land use in surrounding areas (Page 7).

(14) The Washington Department of Wildlife also asks similar tough questions regarding the adequacy of the baseline technical documents. The Washington Department of Wildlife's May 19, 1992 letter to the Army Corps of Engineers regarding this project notes:

43. "The proposed mitigation plan for the stream impacts is only conceptual and does not include sufficient detail to allow a thorough assessment of the adequacy of mitigation measures" (Page 1).

44. "Without such detail, we cannot ascertain whether the mitigation measures will compensate for all losses of fish habitat" (Page 1).

45. "We believe that these three habitat components may not be able to be created in the proposed stream location... due to instability, incision erosion, and potential passage barriers to resident fish" (Page 2).

46. "The topography of the area where the stream channel will be constructed is quite steep and will require potentially extraordinary measures to create riffles, runs and pools" (Page 2).

47. "The Department questions whether the flows for the new channel will be sufficient for year round maintenance of fish habitat" (Page 2).

48. The conceptual wetland mitigation has "insufficient detail... to allow the Department to make a thorough assessment of the mitigation" (Page 2).

Washington Department of Wildlife recommends:

49. "We are also concerned that the constructive mitigation channel discussed above may have adversely affect the hydrology of existing wetlands on the west end of the landfill footprint" (Page 3).

50. The project proponent may create one type of habitat and adversely impact another (Page 3).

51. The Barnes Drive site "may be less environmentally damaging" (Page 3).

52. Recommends that: "further consideration be given to the Barnes Drive site and other sites that may be available that are less environmentally damaging" (Page 3).

53. More details on fish and fish habitat needed including specifics of design, plans, profiles, sections, materials, structure, construction methods and sequencing, etc. (Page 3).

54. "Complete protection of beaver pond complex in Area A" (Page 2).

55. 100 foot wide upland buffer around the forested wetlands (Page 2).

56. Creation of off-channel ponds in Area B (Page 2).

57. Complete protection of wetlands and upland components in Area C (Page 2).

58. Provision for linear contiguity of mitigation sites along Sucker Creek (Page 2).

59. Drainage and sediment controls in the existing forest road network (Page 2).

There does not appear to be any indication in the DEIS that any or all of these concerns by Washington Department of Wildlife have been resolved. We share many of these concerns. Any EIS that relies on defective "technical" studies is in and of itself defective. We ask that each of these issues be addressed individually and in detail in the response to the comments to this DEIS.

(15) **B. SECTION I ALTERNATIVES ANALYSIS INADEQUATE.**

1. What is the basis of the estimate of 15% non-Weyerhauser waste (I-1)?

2. If Weyerhauser wants to minimize environmental (Superfund) risk, why accept <u>any</u> third-party waste at all?

3. Would not long-haul transfer to a third-party landfill with substantial other "deep pockets" meet risk minimization standards by not only substantial environmental control, but cost spreading for risks?

4. If Weyerhauser intends to construct and operate a landfill to "the highest environmental standards" (Page I-1), how come it is asking for a <u>variance</u> from environmental standards?

5. Wouldn't a long-term hauling contract or other contractual provisions adequately meet Weyerhauser's goal of "assurance of adequate long-term disposal capacity"?

6. What relevance does Weyerhauser's "three basic objectives" have under SEPA anyway?

7. Please provide detailed proof for estimates of other sites' disposal costs.

8. Other sites should be given full alternatives analysis under SEPA.

9. <u>All</u> of the Solid Waste Disposal Facilities Site Selection Study and its addendum and its attachments should be attached to FEIS.

10. Site selection study fatally flawed.

a. No proven basis for limiting to 30 miles of Longview mill.

b. Interstate Commerce clause prohibits Oregon from banning Washington waste.

c. Clark and Lewis Counties improperly eliminated; if Cowlitz County Solid Waste Plan can be changed, so can Clark and Lewis County's (without proof to the contrary).

d. No proof that 15% slopes too great; better to analyze under the Division of Geology and Earth Resources of the Washington DNR's Potentially Unstable Slopes or Landslide Areas criteria.

e. No proof provided for economics of limiting on this criteria.

f. If floodplains were eliminated as "fatal flaw", why not streams or wetlands which require a variance?

g. Why limit to 1/2 mile of "recognized communities"? Why not more or less?

11. Why does Weyerhauser build a 1 million cubic yards disposal per year estimates, when last year's disposal in Mt. Solo landfill was only approximately 200,000 cubic yards? Isn't this being overbuilt for commercial purposes?

12. What would be projected footprint size if Weyerhauser only intended to dispose at current levels or below for 30 years (6 million cubic yards maximum)?

13. Are any other sites now more "feasible" in this Weyerhauser real disposal only scenario?

14. Barnes Drive site should be fully compared as alternative in FEIS.

15. Waste reduction section irrelevant if 70% reduction in waste ignored for waste projection purposes.

16. Please quantify basis for conclusions that "Weyerhauser believes it is uncertain whether current (recycling) programs will be able to continue" (I-7).

17. Won't modernization of plant necessarily involve substantially less waste than currently generated? If not, why not?

18. Why does Weyerhauser intend to accept other waste at this landfill if they are having a hard time getting an adequately large site?

19. Who exactly does Weyerhauser intend to accept "similar industrial wastes" from? Please provide a list in FEIS.

20. Precisely what volumes of what kind of wastes would be accepted from each non-Weyerhauser generators? Please provide a list in FEIS.

21. What income is anticipated to be generated from non-Weyerhauser generators' disposal at this site? Cost is used by Weyerhauser to justify the project, so we are entitled to see the books.

22. What quality controls will be instituted to make sure that the non-Weyerhauser generators will not substantially contaminate the site?

23. Why not eliminate non-Weyerhauser disposal entirely? Profit?

24. Isn't the Cowlitz-Wahkiakum Regional Solid Waste Management Plan being amended to allow additional exporting of out two county waste? That information, and the environmental impacts therefrom, should be included to in FEIS.

Printed on 100% Recycled Paper.

25. What is the anticipated volume of construction/demolition waste, and where will it come from? Why has this not been quantified in the DEIS?

26. How can proposal appear to be consistent with Solid Waste Management priorities of RCW 70.95, when it on its face eliminates approximately 600,000 cubic yards of current recycling of waste per year?

27. No environmental disadvantages to delay a possible approval noted.

28. Economic disadvantages of "delay" could be solved by long-term contracts, etc.

29. Has Cowlitz County made any threats to limit Weyerhauser's waste disposal at the County landfill? What are Weyerhauser's costs of disposal there and at Mt. Solo?

30. Does Cowlitz County have any present or future expansion plans for its solid waste landfill? Is expansion possible?

31. Other site alternatives should be analyzed pursuant to WAC 197-11-440(5)(d). That section indicates that "alternatives section may be evaluated if other locations for the type of proposed use have not been included or considered in existing planning or zoning documents. No existing planning or zoning documents contain that information. The mere leaving of the siting process to private industry, does not abdicate the SEPA responsibility to adequately evaluate the environmental pros and cons of the siting decision under SEPA. See Barrie v. Kitsap Co., 93 Wn.2d 843 (1980).

32. On site alternatives should include smaller footprint that does not affect wetlands or streams.

33. On site alternatives should include a variety of additional proposed mitigation measures; mitigation is essentially the same for all three alternatives.

34. Three reports referenced on I-13 unclear as to which documents are being referred to.

35. What recyclable materials will be removed at SWRTF and how will they be removed?

36. What "waste acceptance criteria" will be used (I-14)?

37. What is the basis for the "anticipated" off site waste volumes of 150,000 cubic yards and approximate truck traffic at 10 to 12 trucks per day at I-14?

38. Is there any minimum waste volumes necessary to make this project economically feasible? If so, what volumes?

39. What prevents Weyerhauser from logging the "existing tree stands" to the north and northwest of the site, claimed as visual mitigation on I-16?

40. How would Weyerhauser guarantee that the landfill bottom grading plan would meet its "general intention" to parallel the groundwater contours?

41. What kind of granular soils would be imported? Where from?

42. How does the existing soils on site meet all of the different criteria needed for this project?

43. Wouldn't other sites provide a greater fill depth than 9 feet, particularly in eastern Washington?

44. Wouldn't the extra capacity of dryer sites overcome the

transportation costs?

45. Why does DEIS make reference to maximum fill depth of 50 feet, and DOE letter make reference to maximum fill depth of 250 feet?

46. Please state, in detail, the basis for the "highest expected groundwater levels".

47. What is the basis for the DEIS' conclusion that "most of the flows of these swales would be diverted by the diversion channel" at I-17?

48. What is the anticipated percentage of flow to be diverted, and minimum/maximum anticipated?

49. What is the design failure rate for the 60 mil high density HDPE flexible membrane liner? Have these liners ever failed? Please provide all applicable design specifications and failure rates details in FEIS.

50. Doesn't U.S. E.P.A. conclude that all liners will inevitably leak? This well-known E.P.A. conclusion should be put into FEIS, together with the comments that the liner will inevitably leak.

51. Does all of the existing soil on site meet the permeability of less than 1 x 10 to the -6 centimeters? If not, where will this material be obtained and how will its quality be assured?

52. What is the expected percentage effectiveness of the wells? What is the minimum/maximum effectiveness? What "minimum testing frequencies" are referred to in I-21? Please provide details.

53. What is the basis for the conclusion that leachate head build up would average less than a few inches?

54. How would leachate collection system guarantee no more than 1 foot build up of leachate head?

55. What is the tensile strength of the bottom 60 mil membrane? What maximum pounds per square inch pressure could the heavy equipment place on the membrane? Isn't it conceivable that only a 1 foot "protective soil layer" would be insufficient to prevent heavy equipment from tearing or puncturing the liner? Has this ever occurred at any site?

56. What if 5 feet of homogenous waste material such as ash or clarifier solids is not available to initially line the bottom of the cell? What size a double liner would be placed in the sumps? Please provide details in FEIS.

57. On what percentage slope is the leachate holding pond proposed to be built on?

58. Would the disposal of leachate require a change in the NPDES permit for the WWTP?

59. Section on leachate storage and transfer should also use highest known annual rainfall for determining leachate capacity, and not merely "average" rainfall.

60. What are the "best management practices" proposed to minimize erosion, etc. on I-26?

61. What native species of plants would be planted and what wildlife habitat values compensated for? What non-native species and what habitat values are uncompensated for (I-27)?

62. Wouldn't the new channel have gradients in excess of 10%?

63. Run off facilities should be designed to cleanse and hold a 100 year storm event.

64. Details as to which erosion control measures would be used and their effectiveness necessary under SEPA; merely indicating that "sediment impacts to water quality can be controlled..." using DOE's Stormwater Management Manual for Puget Sound insufficient.

65. More details necessary in regard to sedimentation/ detention basin and the mitigations required by WDF Stormwater Management Guidelines.

66. Due to uncertainty in waste stream, gas control systems should be implemented immediately.

67. Why does I-30 indicate maximum waste thickness would be 250 feet, when other parts of DEIS indicate 50 feet?

68. What kind of soils are available in the "additional burrow area" have these been tested and analyzed?

69. Please state the anticipated and minimum/maximum effectiveness of "interim plastic" as water quality and dust control mitigation.

70. Isn't wood waste organic and thus needing daily cover at the landfill? What is the basis that it isn't?

71. Fugitive dust emissions mitigation at I 35 does nothing. Saying "standard measures will be followed to the extent feasible" does not guarantee any fugitive dust mitigation will be done.

72. Limiting wetland mitigation in EIS to "general concepts" insufficient.

73. Why shrub cover on landfill limited to 15%?

74. What part of landfill slated for mixed forest cover? What kind of "engineering" is necessary to accommodate deeper rooted plants? Why not do more?

75. Additional details on groundwater monitoring necessary.

76. Groundwater needs to be tested much more often than four times a year.

77. What is the basis of the "background concentrations" referred to at I-39.

78. Mitigation based on "visual estimates" unreliable.

79. Landfill gas and odors should be measured on site, as well as around the perimeter of the project.

80. Results of monitoring should be provided within 24 hours of receipt by Weyerhauser, not one week.

81. How could "immediate" (I-41) steps be taken to protect health and safety from dangerous gas concentrations if no remediation plan is currently in place?

82. How would the site be "routinely monitored for odors"?

83. All monitoring should be done by an independent agency.

84. Monitoring elements for wetlands should require 100% success rate.

85. Greater than 3 year monitoring is needed to ensure wetlands mitigation success.

86. Monitoring of more than twice a year is necessary for vegetative mitigation success.

87. What would be the basis of the "population estimates" used to determine the success of fish population mitigation in I-43?

Printed on 100% Recycled Paper.

88. More details regarding "sampling" are necessary (I-43).
89. Can Weyerhauser "reclaim" pursuant to the FPA a site to non-forest use?
90. No action alternative should be analyzed in comparable scope to preferred option, and include more detailed analysis of other disposal options.

(16) **C. SECTION II, IMPACTS AND MITIGATION ANALYSIS INSUFFICIENT.**

1. Geologic data is limited.
2. EIS should include new geologic data indicates Cascades have higher earthquake risk Uniform building code in the process of being amended to compensate for this risk.
3. Why and how is the Weyerhauser soil classification different from the SCS evaluation? EIS should analyze under <u>both</u>.
4. What effect does the acidity of the soil have on the components of the liner, leachate system, etc.
5. What is the basis for geologic conclusions contained in the last paragraph of II-3?
6. Slope stability analysis should be preformed <u>now</u>.
7. Groundwater section does not contain enough "beef", relies on flawed study.
8. What is the water budget calculations referred to at II-7, and what are the basis for this calculations?
9. More detail needed on background data on groundwater quality.
10. How is "careful placement of homogenous waste material" guaranteed using heavy equipment?
11. How can "extreme worst case leakage rate" be 18 gallons per day per acre, where one inch of rainfall would generate 3,630 gallons per acre of leachate?
12. Extreme worst case value must assume larger hole size than one square inch, greater hole density than 10 per acre, assume problems with the permeability of the clay liner, and cannot presume good condition of the geomembrane soil interface. An extreme worst case is not an extreme best case scenario.
13. Analogy between Mt. Solo leachate and the anticipated leachate from Weyerhauser landfill <u>totally unsubstantiated</u> and must be disregarded absent substantial additional proof.
14. Estimates peak flows on II-14 insufficient; these should be determined by comprehensive study and measurement.
15. Detention should also reduce 25 and 100 year peak flow, and not increase 100 year peak flow.
16. 60% reduction of flows appears to be substantial environmental impact (II-19).
17. Maximum sedimentation concentration from a 100 year event should be calculated.
18. No analysis of fertilizer impacts in "nutrient" section II-21.
19. Temperature increases significant.
20. "Other contaminant" section (II-22) improperly assumes 100% efficiency in spill clean ups.
21. Nation-wide data on releases of hazardous material in rail accidents inappropriate criteria for determining spill

potential: better data is track record since 1987 on this site; average becomes more than 1 spill per year, not 1 in 200 years.

22. Insufficient analysis of variations in rainfall .

23. Impacts of freezing/thawing, and high winds not adequately presented.

24. PSD pollution increments should be analyzed in FEIS under SEPA as indication for "significance" of air impacts.

25. Mt. Solo data also improper to determine <u>air</u> quality impacts.

26. Habitat loss can be significant even if it is not "rare or unique".

27. Conclusion that wildlife disturbances would be equal from logging or landfill unsupported.

28. What is the numerical probability of success for creation of cutthroat trout habitat?

29. What is the basis for the conclusion that fine sediment deposits will be flushed downstream in a high flow event?

30. New wetland study indicating less wetlands on same data appears contrived.

31. Wetland mitigation should fully comply with <u>all</u> provisions of DOE Model Ordinance.

32. Wetlands on site should <u>not</u> be considered isolated as they are considered as they are hydrologically connected.

33. Monitoring is not proven effective wetland mitigation.

34. Indicating a different wetland will not be destroyed as a result of destroying this wetland is not "mitigation".

35. Wetland mitigation horribly inadequate.

36. Noise impacts substantial.

37. Washington Noise Regulations should be analyzed under SEPA regardless of whether legal counsel for Weyerhauser considers them requirements of this project or not.

38. <u>Peak</u> noise level analysis is necessary.

39. Why different time averages (2 - 5 minutes v. 1 or 5 hours) for locations and 1 & 3. Doesn't this skew the results for 1 & 3 DOWN?

40. Noise measurements should be made along rail line in Longview.

41. Is noise standard met at location 3 or not?

42. 15 to 20 DBA noise difference substantial.

43. Is noise level at location 3 in compliance with FRA? Why was it "corrected".

44. How can DEIS indicate "gas control is a key element in the design of landfills" yet no gas control elements are incorporated here?

45. More detailed population information in land use section (II-67) needed, as are estimated number of recreational users per year of Silver Lake.

46. Landfill use of this site appears inconsistent with Cowlitz County Comprehensive Plan.

47. Recreation section should include references to Silver Lake.

48. Pollution Control Hearing Board PCHB's "Findings" on compliance with comprehensive land designation dicta as Findings indicate plan compliance was not argued or properly presented

Printed on 100% Recycled Paper.

before them.

49. More than three "representative views" are necessary for aesthetics (6 identified on II-71).

50. Aesthetic mitigation not certain of being achieved due to the possibility of cutting down tree buffers, and the time lag in new plantings for vegetative cover.

51. Aesthetic impacts severe.

52. Six derailments on C&C/Woods line since 1987 best indications of future spill potential.

53. Traffic Level of service E unacceptable to any civilized jurisdiction.

54. No action alternatives discussion of life expectancy of Cowlitz County Landfill does not adequately include exporting option.

D. SECTION III DISTRIBUTION LIST INADEQUATE.

(17) 1. Distribution list should include Northwest Power Planning Council and National Marine Fisheries Service due to fisheries impacts.

(18) **E. APPENDIX A MITIGATION PLAN INADEQUATE.**

1. Detailed original wetlands evaluation should be included in FEIS.

2. Basis for conclusion of existing wetland functions should be quantified in FEIS.

3. Basis for conclusions as to existing stream habitat should be included in FEIS.

4. "Cursory observations" inadequate scientific basis to determine whether or not mitigation is necessary.

5. Environmental protections should be equal criteria to "maximization of site capacity" in establishing conceptual footprint (3-3).

6. More details needed on exactly how the soil erosion and sedimentation control will be achieved at 3-10.

7. Construction should be limited to July through September.

8. All permanent haul roads should be paved.

9. "Strategic ditching" inadequate temporary erosion control measure.

10. Pumping surface water from "depression formed on the surface of the exposed soil" inadequate sedimentation control measure.

11. Silt fences should be installed on <u>every</u> down gradient end of exposed soils.

12. Drainage control will be necessary throughout active construction area, not just as needed.

13. How will graveling the contractor staging area work? Won't these areas later be dug up? Won't the gravel in this soil interfere with the soil permeability?

14. What is the average and minimum/maximum effectiveness of "shingling and/or taping" plastic to shed water, anchoring into berms or trenches, and weighing down with used tires or sandbags in diverting storm runoff? What is the basis for your conclusion?

15. Why is locating a leachate system in a substantial amount of wetland habitat "required" (page 4-1)?

16. What is the basis for the assumptions for underlying mitigation found on 4-1, and what scientific studies supports those assumptions?

17. Dead and downed woody materials should be provided at a rate greater than 2 per acre.

18. Snags in and about the site should be left to provide habitat.

19. The details involving nest boxes and raptor perches should be provided, with scientific basis for their success rate.

20. How will the "contour of final topography" of the landfill provide hiding cover for wildlife?

21. Why are no measures taken to keep birds, etc. from drinking from contaminated leachate ponds? Additional mitigation needed.

22. Spill response program needs to be specified in detail.

23. Gradients over 10% in the root channel for the mitigation stream should be eliminated.

24. Please quantify the effectiveness of wetland mitigation on wildlife due to the comment: "species diversity is relatively hard to establish for constructed wetlands" (4-17).

25. Entire new stream channel should be designed to Type 3 classifications.

26. 100 foot riparian buffer should be developed on both sides of new channel.

27. How is the "buffer zone" guaranteed to be protected from timber harvest or road construction activities?

28. Since DEIS focuses on "adaptation" as a "crucial element" of mitigation design and construction, how does the DEIS guarantee adequate mitigation will be actually accomplished?

29. All wildlife mitigation should be in place and functional for a period of one year before any construction begins on the landfill.

30. How long will it take for a "live vegetative community" to be established and compare the species number and diversity pre and post construction for each relevant timeframe.

31. What is the success rate of transplanting wetland vegetation.

32. What is the success rate of transplanting fish and other aquatic habitat?

33. What is being done to transplant benthic organisms?

34. Four wetland alternatives not described with sufficient detail (4-30) to make meaningful comparison. More beef needed.

35. Riparian buffer zones should exceed proposed or anticipated State Forest Practices Act requirements.

36. Keeping other wetlands from being raped is not mitigation for destroying these wetlands (4-37).

37. What is the track record of each of the consultants involved in creating viable stream and wetland habitat replacement? Please describe each contractor's experience and the success rate for each project for each like project for each contractor.

38. What will be the impact of the proposal on Sucker Creek drainage's beaver dams?

39. More beef needed on wildlife mitigation monitoring.
40. How will "population estimate" determine mitigation success (5-1)?
41. Better baseline study needed of current fish and other wildlife populations.
42. What criteria will be used to determine whether the mitigation is "successful" during monitoring?
43. What kind of surface water monitoring will be done? Continuous, peak and (not and/or) low flow monitoring should be done.
44. More monitoring sites necessary.
45. Sampling frequency and location should be part of Mitigation Plan attached to FEIS.
46. Visual monitoring surface water quality found on V-3 inadequate. "Walking on an annual basis" is not mitigation.
47. Successful planting criteria should be 100% survivorship, not 75%.
48. Occasional "visual analysis" of wetland riparian area inadequate monitoring.
49. Wildlife monitoring particularly pathetic.
50. Describe in detail how "surface water data will be analyzed to assess soil colloid movement"? What "preproject samples" will provide the baseline for success of this mitigation for surface water quality/soils.
51. Why is monitoring limited to turbidity, soluble iron, or soluble phosphate?

(19) **F. APPENDIX B, LEAKAGE ANALYSIS INSUFFICIENT.**

1. Why weren't other methods of estimating leakage, such as laboratory testing and monitoring of field installations used?
2. As stated earlier, estimates on hole size and frequency, liquid head over liner, permeability of soils, and condition of geomembranes/soil far from "extreme worst case". Extreme worst case is not 1/2 of 1% of 1 inch per day landfill leaking through liner. Extreme worst case should be total systems failure or all leachate generated leaking.

(20) **G. APPENDIX C, ALTERNATIVES ANALYSIS, INADEQUATE.**

1. Why is the primary author an attorney?
2. How can proposal "comply with applicable federal, state and local requirements" when a variance is necessary?
3. Other comments in Alternatives section (Section IIB above) also applicable here.
4. Why does alternatives indicate 10% non-Weyerhauser waste, where DEIS says 15%?
5. What guaranteed maximum is there for non-Weyerhauser waste?
6. Please provide details and basis of all waste cost disposal options, including continuing use of Mt. Solo until closed, Cowlitz County Landfill, and a variety of long haul options.
7. Please provide detailed basis for $9.00 per cubic yard

disposal cost for this site. Proof needed.

8. Argument that third party landfill will increase waste disposal costs a red herring. Hauling contracts could be set at a low enough volume to not discourage waste minimization. However, Weyerhauser's proposed landfill has minimum infrastructure needs and costs and would require a minimum volume to be economically viable. What minimum disposal per year is needed for project to be economically viable? Please provide data in FEIS.

9. What is the transportation and disposal costs of shipping this waste to the Klickitat County Regional Landfill for disposal by rail?

10. If Weyerhauser wishes to be "in control" of its waste stream, why would "transportation most likely would be provided by contractors" in Alternatives Analysis Page 5?

11. At current disposal rates of 200,000 cubic yards per year, even assuming $22.00 per cubic yard, difference in cost per year only $2.6 million, a tiny fraction of production cost per ton.

12. Why does Alternative Analysis point out the dangers of rail transportation in regard to long haul, when the DEIS repeatedly indicates an accident would occur only once every 200 years?

13. Does Weyerhauser really believe that the state of Oregon could ban Weyerhauser from disposing Weyerhauser waste in a Weyerhauser-owned landfill in Oregon?

14. What proof that slopes greater than 15% are unsuitable for landfills?

15. Shouldn't siting criteria have included meeting DOE standards without a variance?

16. Information on hydrological impacts of Barnes Drive site need to be provided in greater detail.

17. Information on economic costs of replacement water to potentially affected Barnes Drive area residents needs to be provided in detail.

18. Couldn't Weyerhauser's ostensively infallible mitigation cure air quality impacts from Barnes Drive site?

19. Attachment map should include what sites were possible with all exclusions: populated areas, floodplains, access, slope, and jurisdictional.

20. Entire Exclusion section horribly contrived. If you let me chose the criteria, I can dictate the result. That obviously happened here.

(21) **H. APPENDIX E, SHALLOW AQUIFER ANALYSIS, INADEQUATE.**

1. Why was a "simplified methodology" used for this complicated issue?

2. Have more "complex methods" been used? Why?

3. Study based on numerous assumptions that are simply not proven to be true (garbage in, garbage out).

(22) **I. APPENDIX I, 1992 WETLAND ADDENDUM, INADEQUATE.**

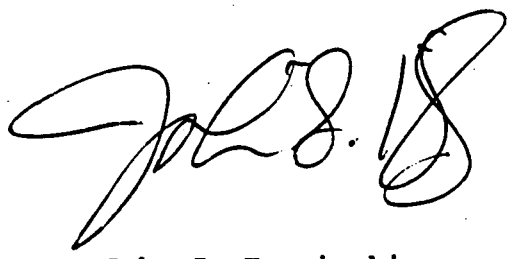
1. Wetland survey information (transects, etc.) should be provided.

2. 1990 Wetland Determination should be provided, in detail.
3. I have seen more detailed wetland evaluations for small subdivisions in Clark County, than provided for this massive operation. More beef is needed.
4. New conclusions indicating almost 20% less wetlands suspicious at best.

III. CONCLUSION.

(23) In my opinion, the DEIS for this project is woefully inadequate. There is not enough scientific study to support the conclusions reached, there is insufficient detail as to how the clear environmental problems of this proposal would be cured, and the DEIS is presented in a confusing, redundant, and disorganized fashion. Much of the "facts" presented appear to be contrived and placed there expressly to reach the conclusion Weyerhauser wants - the Headquarters Camp site. Ideally, this DEIS should be withdrawn for its numerous failures. Absent that, a complete overhaul of this document should be prepared, with detailed additional scientific study done. Those studies, combined with detailed answers to our statements and questions, and more "beef" regarding both impacts, alternatives, and mitigation, could result in a legally prepared FEIS. Proponents clearly have their work cut out for them. Thank you for the opportunity to comment on this proposal.

Sincerely yours,



John S. Karpinski

JSK/dmk

cc: Clients

comments.wey

RESPONSE TO LETTER NO. 63

John S. Karpinski

1. Comments noted. The Health District is confident that the EIS complies with the SEPA Rules. This Final EIS provides responses to all issues raised in comment letters and public hearing testimony that are relevant to the purpose and content of the EIS. The SEPA Rules do not require that the lead agency respond to each comment individually. The lead agency may respond to a group of comments, cross-reference comments and corresponding changes in the EIS, or use other reasonable means to indicate an appropriate response to comments [WAC 197-11-560(3)].

2. It is not clear what source you are citing for the purpose of an EIS. The SEPA Rules state that an EIS shall provide impartial discussion of significant environmental impacts and shall inform decisionmakers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts [WAC 197-11-400 (2)]. This EIS provides the required information.

   With regard to the appropriate level of detail in an EIS, the SEPA Rules state that, "The purpose of an EIS is best served by short documents containing summaries of, or reference to, technical data and by avoiding excessively detailed and overly technical information." [WAC 197-110400(3)] The responses to Letter No. 69, Comments 9 and 16 are also relevant to this issue.

3. Comment noted. It is assumed that you are referring to the Ecology letter of February 7, 1992 rather than the Ecology letter of May 22, 1992, which was supportive of the proposed landfill. See response to Letter No. 8, Comment 1.

4. See responses to Letter No. 9, Comment 28 and Letter No 11, Comment 3. The EIS makes no recommendation as to a preferred alternative. As stated in Section I.B, Description of Alternatives Evaluated in this EIS, Weyerhaeuser's currently preferred alternative is Alternative Site Plan A.

5. The SEPA Rules encourage documents to be incorporated by reference, with the relevant content briefly described in the EIS (WAC 197-11-635). Furthermore, SEPA limits the amount of supporting information bound in with the EIS to 25 pages [(WAC 197-11-425(4)], and encourages reference to (rather than inclusion of) technical data (see response to Comment 2 above and Letter No. 9, Comment 1). Therefore, although the SEPA Rules require that the most significant and vital information concerning the proposed action, alternatives, and impacts be included in the EIS text, the Rules clearly allow and even encourage reference to other documents for technical detail. Section N of the Fact Sheet lists the documents providing the primary background data for the EIS, and indicates that

they are available for review at the Health District office in Longview. Also, see response to Letter No. 9, Comment 27.

6. Comments noted. See response to Letter No. 9, Comment 27.

7. See response to Comment 5 above.

8. Where assumptions are made in the EIS, they are selected such as to overestimate the impacts that could potentially occur as a result of the proposed landfill.

   The Health District does not interpret WAC 197-11-080 as requiring that all reasonable information be obtained and included in the EIS text itself. As noted above, SEPA encourages detailed technical information to be included in an EIS through "incorporation by reference".

9. See response to Letter No. 69, Comment 9.

10. Revisions in the SEPA Rules since the 1978 decision in *Polygon v. City of Seattle* have narrowed an agency's "substantive authority," that is, the authority under SEPA to deny a permit or to condition it to mitigate identified adverse impacts. The SEPA Rules now require that mitigation measures or permit denials be based on policies, plans, rules, or regulations formally designated by the agency (or appropriate legislative body, in the case of local government) as a basis for the exercise of substantive authority and in effect when the Draft EIS is issued (WAC-197-11-660). Section 7.2, Part 4 of Resolution 90-13 of the Cowlitz-Wahkiakum Health District (October 25, 1990) lists the policies and regulations that the Health District may use as the basis for its exercise of substantive authority under SEPA.

    Compliance with laws and regulations is one measure for determining the significance of environmental impacts. SEPA requires that "before requiring mitigation measures, agencies shall consider whether local, state, or federal requirements and enforcement would mitigate an identified significant impact." [WAC 197-11-660 (1)(e)].

11. See response to Comment 10 above and Letter No. 69, Comment 9.

12. See response to Comment 1 above.

13. See response to Letter No. 8, Comment 1.

14. With regard to the Washington Department of Wildlife (WDW) letter in response to the Corps of Engineers public notice, see second paragraph of response to Letter No. 30A. The responses to Letter No. 69, Comment 9 and Letter No. 9, Comment 28 are relevant to the key issues raised by WDW.

15.1. The estimate of 15 percent non-Weyerhaeuser waste is based on Weyerhaeuser's knowledge of other industries in Cowlitz and Wahkiakum counties that generate industrial solid waste similar to that generated by Weyerhaeuser and would likely use the proposed landfill. Weyerhaeuser, if it wished, could limit non-Weyerhaeuser waste to no more than that amount. The response to Letter No. 62, Comment 4 is also relevant.

15.2. See response to Letter No. 69, Comment 2.

15.3. See response to Letter No. 9, Comment 28 and Letter No. 11, Comment 5.

15.4. See response to Letter No. 38, Comment 6. The proposal incorporates measures to mitigate impacts to wetlands.

15.5. See response to Letter No. 9, Comment 28 and Letter No. 11, Comment 5.

15.6. The SEPA Rules require that the objectives of a proposal and the purpose and need to which it is responding be specified in an EIS [WAC 197-11-440(4) and (5)]. The objectives of a proposal are those of the proponent, whether it is a public agency or a private entity such as Weyerhaeuser. The term "reasonable alternative" is defined under SEPA as an action that could feasibly attain or approximate the objectives of the proposal, but at a lower environmental cost or decreased level of environmental degradation. Therefore, a clear statement of objectives is needed to define the range of reasonable alternatives evaluated in an EIS.

15.7 -
15.10. See response to Letter No. 9, Comment 28.

15.11. The discussion in Section I.A.3.b, Disposal Requirements has been revised to clarify the basis for Weyerhaeuser's waste stream projections. Also, further information on waste import, expected waste quantities and the determination of landfill capacity is included in Appendix M of this Final EIS. The responses to Comment 15.26 below, Letter No. 62, Comments 3 and 4, and Letter No. 69, Comment 2 are also relevant to the issue of landfill capacity.

15.12. See response to Comment 15.11 above.

15.13-
15.14. See response to Letter No. 9, Comment 28.

15.15-
15.17. See response to Comment 15.11 above.

15.18. See response to Letter No. 69, Comment 2.

15.19-
15.20. See response to Letter No. 62, Comment 4.

15.21. See response to Letter No. 11, Comment 5.

15.22. See response to Letter No. 17, Comment 1.

15.23. See response to Letter No. 69, Comment 2.

15.24. See response to Letter No. 8, Comment 3.

15.25. See responses to Letter No. 62, Comments 4 and 6.

15.26. The proposal does not eliminate any current recycling programs. Weyerhaeuser has indicated that the proposal is one element of its integrated solid waste management plan. Waste reduction and recycling are also part of that plan. However, as discussed in Section I.A.3.b, Disposal Requirements, there is a real possibility that Weyerhaeuser will not be able to continue incineration of waste due to increasingly stringent air emissions standards and other factors. As noted in Section I.A.3.a, Waste Reduction, Recycling, and Volume Minimization, the reduction of Weyerhaeuser's waste stream from 750,000 cubic yards per year in 1981 to 220,000 cubic yards per year in 1991 was primarily achieved through incineration. Incineration is not considered waste reduction or recycling under RCW 70.95. In fact, incineration as a solid waste management option has the same priority under RCW 70.95 as landfill disposal (see Section I.A.4, Consistency with Comprehensive Solid Waste Management Plan and RCW 70.95).

15.27 -
15.28. See response to Letter No. 8, Comment 2. The reduction in the site life of the Cowlitz County Landfill if Weyerhaeuser industrial solid waste is disposed at that facility is considered a potential environmental disadvantage of a delay in possible approval, since public services and utilities are an element of the environment under SEPA.

15.29 -
15.30. Cowlitz County has not indicated that it would limit Weyerhaeuser's waste disposal at the County Landfill, although the Preliminary Draft of the 1992 Cowlitz County Comprehensive Solid Waste Plan recommends that the County discourage the use of its landfill as a disposal facility for forest products waste. The costs of disposal there and at the Mt. Solo Landfill are not relevant to this EIS (see responses to Letter No. 9, Comment 28 and Letter No. 11, Comment 5.) The possibility of expansion of the Cowlitz County Landfill is also not relevant. Even if an expansion were possible, it would not change the key conclusion of the EIS with respect to Weyerhaeuser's use of that facility under the No-Action Alternative. The capacity of the landfill for disposal of the County's mixed municipal waste would still be significantly reduced.

15.31. See response to Letter No. 9, Comment 28. Unlike the proposal considered in this EIS, the proposal in *Barrie v. Kitsap Co.* included a rezone. The limitation of alternatives to the no-action alternative and other means of achieving the proposal's objective on the same site does not apply when a proposal includes a rezone [WAC 197-11-440(5)(d)].

15.32. Due to the central location of the wetlands and streams on the Headquarters Site, it is not feasible to design a landfill footprint that completely avoids these resources.

15.33. See response to Letter No. 11, Comment 3. Because the nature of the impacts for all three on-site alternatives is similar, it is appropriate that the proposed mitigation be similar.

15.34. There was a typographical error in one of the three references on page I-13 of the Draft EIS. The reference to Sweet Edwards/EMCON (1991e) should be (1991d). All references in the EIS are listed in Section IV, References. Two of the three references of interest are part of the solid waste permit application. As noted in Section N of the Fact Sheet, these documents are incorporated by reference in this EIS and available for review at the Health District office in Longview. The third reference summarizes Weyerhaeuser's considerations in determining needed landfill capacity, and is included in Appendix M of this Final EIS.

15.35. As discussed in Section I.B.1.b, Solid Waste Recycling and Transfer Facility, recyclables may include concrete aggregate, wood, and metal from construction and demolition debris; paper; or wood waste. Recyclables would be removed with existing mechanical sorting equipment. Additional mechanical sorting capabilities could be added in the future if needed.

15.36. See response to Letter No. 17, Comment 1.

15.37. See response to Comment 15.1 above. Average daily truck traffic resulting from truck transport of solid waste to the Longview mill was calculated based on a 300-day work year, 9-hour work day, and average truck/trailer capacity of 40 cubic yards. Section II.B.1, Noise, and II.B.6, Transportation, have been revised to reflect waste import. It is estimated that approximately 225,000 cubic yards per year of solid waste would be transported by truck to the Longview mill (approximately 150,000 cubic yards of third-party waste from within Cowlitz and Wahkiakum Counties, and 75,000 cubic yards of imported waste from Weyerhaeuser operations outside the two-county area). This would require about 19 truck/trailers (38 one-way trips) per day, or up to 3 truck trailers (6 one-way trips) per hour.

15.38. See response to Letter No. 11, Comment 5.

15.39. See response to Letter No. 62, Comment 13.

15.40. See response to Letter No. 9, Comments 7 and 19.

15.41 -
15.42. Final design specifications, including those for soil materials, will be developed and approved as part of the solid waste permitting process. See response to Letter No. 69, Comment 16. The source of the needed soil materials is not relevant to an evaluation of the probable significant adverse impacts of the proposed landfill.

15.43 -
15.44. See response to Letter No. 9, Comment 28.

15.45. The 50-foot maximum fill depth referred to in Section I.B.1.d(2), Bottom Grading Plan, is the maximum depth of soil required for construction of a perimeter berm. The 250-foot maximum fill depth referred to in the Ecology letter is the maximum depth of landfilled waste (see Section I.b.1.d(7), Final Grading Plan).

15.46. The highest expected groundwater levels are based on the correlation of 2½ years of groundwater level measurements with precipitation events during that period.

15.47 -
15.48. All (that is, 100 percent) of the runon to the landfill from upgradient areas would be diverted around the landfill via the diversion channel. Therefore, all stormwater runoff contribution to the flow in the swales would be diverted. The groundwater contribution to flow in these swales would continue to be discharged to the same general area through the hydraulic gradient control system. Also, see response to Letter No. 69, Comment 39.

15.49-
15.50. See responses to Comment 19 below; Letter No. 69, Comment 14; Letter No. 9, Comments 2 and 20; and Letter No. 62A, Comment 24.

15.51. See response to Comment 15.41 above and Letter No. 9, Comment 20.

15.52. It is not clear what wells you are referring to and what you mean by the "effectiveness" of the wells. The page of the EIS to which you refer has no reference to wells. The term "minimum testing frequency" refers to the recommended testing frequency for soil and membrane liner construction used throughout the industry. This information will be detailed in the construction quality assurance program to be submitted to Ecology with Part 2 of the solid waste permit application. See response to Letter No. 9, Comment 20.

15.53 -
15.54. The MFS require that the leachate head buildup over the liner be no more than 2 feet. However, the design criterion selected for the proposed landfill is a maximum leachate head buildup of 1 foot. Because of the conservative nature of the design process, the engineering controls are typically over-designed. Therefore, the actual leachate head

during landfill operation is expected to average less than a few inches. The design criterion is met by specifying the permeability of the granular drainage material, the slope of the bottom grade, and the spacing of the network of perforated leachate collection pipes.

15.55. See response to Letter No. 62A, Comment 24. The proposed protective soil cover is a standard operating procedure for protecting FML liners, and has proven to be effective in preventing tears and punctures. Also, see response to Comment 16.10 below.

15.56. Waste material with pieces smaller than 1 foot in any dimension, such as ash and clarifier solids, are produced on a continual basis at the Longview mill. Therefore, their availability as a protective cover for the liner material is not a concern. A detailed design has not yet been developed for the leachate collection sumps. However, the liner system would be similar to that shown for the leachate pond sumps in Figure I-7 of the EIS.

15.57. The subgrade for the leachate pond will be graded to a 1 to 2 percent slope.

15.58. See response to Letter No. 49, Comment 9.

15.59. See response to Letter No. 9, Comment 10.

15.60. You are referring to the introduction of Section I.B.1.d(5), Surface Water Management, which briefly summarizes the subjects to be covered in the section. Section I.B.1.d(5)(d), Erosion and Sedimentation Controls, provides further information on the methods that would be used to control erosion. Also, see response to Comment 15.64 below and Letter No. 69, Comment 16.

15.61. Wetland and riparian vegetation along the diversion channel would be selected to compensate for the loss of aquatic habitat, emergent wetland habitat, scrub/shrub wetland habitat and adjacent upland habitat used by wildlife as a source of food, cover and water. Important components such as vegetation layering, habitat interspersion, diverse native plantings, downed logs, snags, and cobble habitat, among others, will be provided to meet habitat requirements of as many species of wildlife as is possible, with emphasis on wetland/riparian associated wildlife. See Section I.B.1.g, Proposed Natural Resources Mitigation Plan, and the revised *Mitigation Plan* in Appendix A of the EIS.

The exact species of plants selected to provide maximum wildlife habitat value would be determined through continued coordination with resource agencies (see response to Letter No. 69, Comment 9). Native species would be used wherever possible, if not exclusively.

15.62. A few short sections of the diversion channel would have gradients in excess of 10 percent. See response to Letter No. 61, Comment 16.

15.63. See response to Letter No. 18, Comment 6.

15.64. The project would utilize ten general types of erosion and sedimentation control measures or strategies: (1) confining construction to the dry season (approximately June through September), (2) contour grading, (3) intermediate drainages to reduce overland flow, (4) grass-lined swales, (5) silt fences, (6) interim plastic covering, (7) hydroseeding, (8) paving of permanent haul roads, (9) sedimentation basins, and (10) biofiltration swales.

To assess potential sedimentation impacts, assumptions were made regarding the effectiveness of these control measures (see discussion in Section II.A.3, Surface Water). The delivery of eroded soils from exposed on-site areas was assumed to be 25 percent; that is, 25 percent of eroded soils would actually move all the way overland and via drainages to the sedimentation ponds and biofiltration swales. The settling efficiency was assumed to be 40 percent; that is, 40 percent of eroded soil delivered to the sedimentation ponds and biofiltration swales would be settled out prior to further downstream discharge.

The 25 percent delivery ratio was estimated from USDA (1983) based on drainage area, and takes into consideration some additional retention by on-site erosion control measures such as silt fences, contouring, and grass-lined swales. The 40 percent settling efficiency was based on trapping of the 15 micron or larger fraction of the grain size composition of on-site soils. Also, see responses to Letter No. 69, Comments 16 and 41.

15.65. See response to Letter No. 69, Comment 16.

15.66. See response to Letter No. 9, Comment 11.

15.67. See response to Comment 15.45 above.

15.68. Further design work on the proposed landfill has indicated that the additional borrow area shown in Figures I-9 and I-10 would not be needed. Therefore, it is no longer proposed. The EIS text and figures have been revised accordingly.

15.69. Interim plastic would be expected to be almost 100 percent efficient in preventing the infiltration of rainfall and surface water runoff into the waste. It would also likely be close to 100 percent efficient for dust control. However, for purposes of the air quality analysis in the EIS, it was assumed to be 70 percent efficient for dust control so as not to underestimate impacts (see Section II.A.4, Air Quality). Note that the analysis in that section concludes that TSP and PM_{10} levels would be well below applicable standards at the site boundary even with no dust control, including no plastic covering.

15.70. Although the woodwaste component of the waste stream is organic, the waste stream as a whole is low in organics compared to municipal solid waste. It does not need daily cover, because it does not contain food or putrescible material that would attract vectors, is not odorous, and is not subject to dispersion by wind. In fact, many of the waste stream components are used as daily cover at municipal waste landfills.

15.71. See response to Letter No. 47, Comment 15.

15.72. See response to Letter No. 69, Comment 9.

15.73. The value of 15 percent for shrub cover is not a limit, but rather an estimate of what would be an appropriate cover mix for reclamation. The final cover reclamation plan, including areas to be planted with shrubs and trees, will be developed in detail in later stages of the solid waste permit process, and reevaluated as part of closure of each landfill phase. See Letter No. 69, Comment 9.

15.74. See response to Comment 15.73 above. As discussed in Section I.B.1.i, On-Site Forest Management and Landfill Reclamation, trees would be planted in limited areas where topsoil is deep enough to ensure the integrity of the final cover system (probably 5 to 10 feet). The cover system in these areas would have to be reinforced so that it is strong enough to bear the weight of the additional topsoil. Larger areas of tree planting are not proposed because it complicates the design of the final cover system, and makes it difficult to access the cover system for future maintenance, if required. Furthermore, there is insufficient on-site topsoil to provide a 5- to 10-foot layer over large areas of the landfill surface. Topsoil for this purpose would have to be imported, and provision of such large quantities would require significant disturbance to an off-site borrow area.

15.75 -
15.76. See response to Letter No. 9, Comment 3.

15.77. It is not clear what you mean by this comment. If you are referring to the basis for the groundwater monitoring protocol, including the need to establish background concentrations, this protocol is specified in the MFS (WAC 173-340-490).

15.78. Visual inspection of the diversion channel for stream scour, sediment accumulation, and damage caused by peak runoff events, would be only one component of the surface water monitoring program.

15.79. See responses to Letter No. 9, Comments 3 and 11 and Letter No. 62A, Comments 11 and 13.

15.80. Weyerhaeuser would follow monitoring and reporting protocol established in the solid waste and NPDES permits. See responses to Letter No. 9, Comment 3 and Letter No. 62A, Comment 3.

15.81. Contingency plans for responding to discharges of concentrated gases will be developed in the Plan of Operation as part of the solid waste permit process. Also see responses to Letter No. 9, Comments 3 and 11.

15.82. See responses to Letter No. 62A, Comments 11 and 13.

15.83. See response to Letter No. 16, Comment 4.

15.84 -
15.86. The wetlands monitoring time frame has been increased to a 5-year period, at which time an evaluation will be made as to the need for additional monitoring. Typically, plantings need to be monitored twice yearly during the first year after planting, with annual monitoring required during years 2 to 5. Eighty percent survival of planted trees, shrubs, and emergent cover is typically required by review agencies. All survival rates for wetlands mitigation plantings have been adjusted to 80 percent survivorship. Minimum canopy cover for shrub and tree plantings expected after 3 years will also be included in the final mitigation plan. See response to Letter No. 69, Comment 9.

15.87. Due to the change in emphasis for the diversion channel (i.e., focusing on wetland enhancement rather than fish habitat enhancement) monitoring of fish populations in the diversion channel will no longer be required. However, monitoring of the Southern Tributary downstream from the project will occur. The same population estimation technique used to estimate the number of cutthroat trout and sculpin in sections of the Southern Tributary prior to development (the 3-pass removal method) would be used to compare post-project numbers of fish.

15.88. See response to Letter No. 9, Comment 3.

15.89. See response to Letter No. 41, Comment 15.

15.90. Section I.B.4, No-Action Alternative, describes the No-Action Alternative and provides the rationale for how it is evaluated in the EIS. The on-site environmental impacts of the No-Action Alternative are evaluated under each element of the environment. Because there is a range of possible disposal options under this alternative, particularly over the long term, and because Weyerhaeuser may select one or a combination of these options, any evaluation of the off-site impacts of the No-Action Alternative would be speculative. Weyerhaeuser has indicated that, under the No-Action Alternative, its preferred option would be to dispose of some or all of its industrial solid waste at the Cowlitz County Landfill. Therefore, the EIS evaluates the resulting effect on the site life of that facility if this occurs. The response to Comment 15.30 above is also relevant.

16.1. See response to specific comments below.

16.2. See Letter No. 18, Comment 3.

16.3 See response to Letter No. 41, Comment 16.

16.4. The proposed polyethylene membrane material is chemical-resistant and would not be affected by soil or leachate constituents. See response to Letter No. 9, Comment 2.

16.5. Geologic conclusions are based on field reconnaissance, literature surveys, test borings, and test pits, the results of which are discussed in a geology/hydrology report submitted in support of Part 1 of the solid waste permit application (Sweet Edwards/EMCON, 1991c and d).

16.6. As noted on page II-3 of the Draft EIS, the on-site geology was mapped and field-checked, and there are no indications of site instability or poor foundation conditions. The slope stability study referred to on that same page would be conducted to determine the final design specifications for the landfill. It is not needed to evaluate the probable significant adverse impacts of the proposed landfill. The response to Letter No. 69, Comment 16 is relevant to this issue.

16.7. See responses to Comment 2 above and Letter No. 8, Comment 1.

16.8. The water budget for the site was estimated by Beak (1991a) based on the methods of Dunne and Leopold (1978). The water budget quantifies the balance between the inflow of water from precipitation and the outflow of water by evapotranspiration, groundwater infiltration, and streamflow. Further detail is provided in Appendix E of the *Environmental Technical Report* (see Section N of EIS Fact Sheet).

16.9. See response to Comment 2 above. More detail on background data on groundwater quality is not necessary to the evaluation of the probable significant adverse impacts of the proposal and alternatives.

16.10. There are a number of standard operational techniques available to place the initial layer of homogeneous waste material in a manner that avoids damage to the liner system. For example, a ramp of deeper protective soil can be built up to allow equipment access to the active landfill area. The initial layer of waste can be placed ahead of the operating equipment, so the equipment is always operating either on the ramp or on top of the protective layer of waste.

16.11 -
16.12. See responses to Letter No. 69, Comments 14 and 15.

16.13. See response to Letter No. 47, Comment 4.

16.14. As noted in the section you refer to, peak flows were estimated using standard methodology developed by the U.S. Soil Conservation Service. These estimates are adequate to allow an evaluation of the probable significant adverse impacts of the proposed landfill. More detailed peak flow modeling will be conducted in support of

final design and permitting of stormwater management facilities. See response to Letter No. 69, Comment 16.

16.15. See response to Letter No. 18, Comment 6.

16.16. The stream sections affected by a 60 percent flow reduction will be between the landfill boundary and the discharge outlets from the sedimentation/detention basins. Flows in these sections would consist only of groundwater base flows that emerge from under the landfill. The affected sections are relatively short and are located in small channels that support a small amount of riparian vegetation. The impact from flow reductions in these sections is discussed in terms of lost aquatic habitat and wetland values in Section II.A.5, Plants and Animals and II.A.6, Wetlands. The channels are expected to maintain riparian vegetation under the estimated flow reduction. Section I.B.1.g, Proposed Natural Resources Plan, and the revised *Mitigation Plan* in Appendix A describe proposed measures to replace and enhance lost aquatic habitats.

16.17. Calculation of maximum sediment concentration during a 100-year storm event is not necessary to evaluate the probable significant adverse impacts of the proposed landfill. On-site data for smaller, more-frequent peak flows collected by Beak in 1990 and by researchers on similar streams indicates that existing maximum sediment concentrations often exceed 1000 mg/L. During large peak flow events, it is probable that the bed of the stream itself undergoes extensive suspension and movement. Under such conditions, maximum sediment concentrations under either existing or post-project conditions would be extremely high.

16.18. The U.S. Soil Conservation Service provides guidance on how to select and manage fertilizers to protect the environment, and these would be followed for maintenance of plantings at the landfill. Fertilizers would be selected that produce nutrients in the specific forms needed for the specific plants, and would be applied in amounts that are no more than would be consumed by plant uptake.

16.19. Potential temperature increases in the diversion reach would be temporary and are not expected to cause a significant unavoidable adverse impact. With regard to Silver Lake, see response to Letter No. 62A, Comment 8.

16.20. The section referenced by this comment did not make an assumption regarding "percent efficiency". Rather, the section states that any spills, should they occur, would be contained and cleaned up in accordance with spill prevention and cleanup plans that will be required for the project.

16.21. See response to Letter No. 69, Comment 13.

16.22. A more conservative rainfall distribution was used in runoff calculations than the distribution indicated by available site-specific data. Also, see the first paragraph of the response to Letter No. 9, Comment 2, and the response to Letter No. 9, Comment 10.

16.23. Landfill construction would take place during the time of year when there is minimal potential for freezing/thawing and high winds, and landfill operations would not be significantly affected by these conditions. The proposed waste stream does not have the litter potential associated with municipal solid waste.

16.24. As explained in Section II.A.4, Air Quality, PSD pollutant increments are not applicable, since the proposed landfill would not be a major stationary source of such pollutants (40 CFR 52.21).

16.25. The Mt. Solo Landfill has received the same types of waste that would be disposed at the proposed landfill. Therefore, the composition of landfill gas would be expected to be very similar. Modeling results indicate that even with no mitigation (that is, no combustion of gas in flares), concentrations of landfill gas constituents would be well below applicable health-based standards and olfactory thresholds at the nearest site boundary and residence. See Section II.A.4, Air Quality, and the response to Letter No. 9, Comment 11.

16.26. The abundance, both regionally and locally, of managed forest communities of the types that occur on the Headquarters Site lessens the impact on wildlife resulting from loss or alteration of the approximately 380 acres in question. Weyerhaeuser itself owns approximately 330,000 acres of forest land in Cowlitz County, and other private, commercial, and federal forest lands abound. The loss or alteration of this 380 acres is not considered to represent more than a moderate adverse impact on wildlife (in other words, it is not considered a significant adverse impact).

Unique habitat features and botanical value have been altered through intensive forest management for a single species (Douglas-fir). The cycle of clearcut harvest on about a 50-year rotation, site scarification, site burning, high stocking levels of Douglas-fir, periodic control of competing vegetation with herbicides or by manual clearing, precommercial thinning, and commercial thinning has produced a silvicultural landscape of early seral Douglas-fir forest stands (that is, conifer plantations). Also, see response to Comment 16.27 below.

16.27. The DEIS concludes that declines in wildlife abundance associated with incremental construction of landfill cells are expected to differ little from that resulting from commercial logging of the site. This conclusion is based on the fact that the 380-acre site in question would be clearcut in an incremental fashion over the evaluation period regardless of whether the landfill is constructed or commercial forestry continues.

The impact to wildlife due to forest removal would be similar under either scenario. All vegetation (and thus wildlife habitat) would be temporarily eliminated; and wildlife that occupy this habitat would either perish or be displaced to adjacent habitat. The timing and pattern of vegetation removal would differ between the two scenarios (the landfill would result in clearing of smaller patches at 3-year intervals, while timber harvest would occur on larger habitat patches at less regular intervals). However, the end result with respect to wildlife would be similar.

16.28 There is no need to calculate the probability of success for creation of cutthroat trout habitat, since the revised *Mitigation Plan* focuses on use of the diversion channel for wetland enhancement rather than cutthroat trout habitat (see response to Letter No. 69, Comment 9).

16.29. It is well established that the typical annual high flow events in western Washington streams create flows with sufficient velocity to move fine sediments in a downstream direction. These are often referred to as "flushing flows" since they flush the system of accumulated fine inorganic and organic particles. High suspended sediment concentrations have been measured during peak flow events in the Southern Tributary and Sucker Creek (Appendix E of the Environmental Technical Report) and in other regional streams (Paustian and Beschta, 1979). Sediment deposition becomes a problem when there is a continual source of input from year to year. Settling basins and biofiltration swales are incorporated into the landfill design. These facilities would remove fine sediments from water leaving the project site and therefore prevent long-term sedimentation problems downstream.

16.30 -
16.35 See responses to Letter No. 56, Comments 3 and 4. The wetlands mitigation does follow the guidelines of Ecology's Model Wetlands Protection Ordinance, although preservation of forested timberlands is not specifically addressed in the Ordinance and will need to be negotiated with the agencies. Under the new Forest Practice Board Rules, which became effective on August 1, 1992, harvesting of forested wetlands is a legal, permitted activity with certain operational restrictions specified. A detailed layout of preservation areas will be included in the final *Mitigation Plan.*

Monitoring of the wetland areas between the northern landfill boundary and the railroad grade is not proposed as mitigation. Rather, it is proposed as a measure to determine if the hydrology in these areas is altered by landfill construction and operation. The contingency plan will include alternative means to mitigate any impacts noted in these wetland areas. Also, see responses to Letter No. 69, Comments 9 and 12.

16.36. See response to Letter No. 22, Comment 3 and Letter No. 26, Comment 5.

16.37. Weyerhaeuser's legal counsel was not the only source leading to the conclusion that the C&C and Woods rail lines are exempt from state noise regulations. As noted in

Section II.B.1, Noise, that conclusion is consistent with the fact that both lines are regulated by the Federal Railroad Administration (FRA) and subject to FRA noise emissions standards specified in 49 CFR 210.29. See letters to and from FRA in Appendix J.

16.38. The appropriate noise descriptor must be used for each noise standard, regulation, or guideline being applied to assess noise levels and noise impacts. Peak noise is not the appropriate noise value to be used except for very sharp, impulsive sources of noise. Maximum (not peak) as well as statistically averaged noise levels are used to determine compliance with state noise regulations. Average noise levels are used to evaluate conformance with the requirements of federal noise impact and noise limit guidelines.

16.39. Different lengths of time averaging are used when, in the opinion of the noise analyst, the character of the time-varying noise environment can be fairly represented in a given length of time. Hourly averaged measurements are not necessary if any 5-minute interval, say, is similar to any other 5-minute interval in terms of the number of passing vehicles or other noise events.

The average noise levels reported in Table II-12 at Locations 1 and 3 were intended to represent the average noise level due to the noise sources identified in the last column of the table. These noise sources were typical for daytime activities in the vicinity of the measurement site. For example, at Location 1, the results were not skewed downward when compared with any other hour in which daytime traffic is present. In fact, the noise level of 63 dBA reported in the table is much higher (more than 20 Db higher) than the noise level measured later in the evening.

16.40. As discussed in Section II.B.1, Noise, noise increases along the portion of the rail line through the City of Longview would be less than those along Headquarters Road, because the existing noise levels in the City would be higher. Therefore, since there would be no significant adverse impacts to residences along Headquarters Road due to increased train traffic (see response to Letter No. 26, Comment 5), the same conclusion would also apply to residences along the portion of the rail line through Longview.

16.41. No aspect of the proposed landfill operations was found to violate any applicable noise standard at any location (see Section II.B.1, Noise).

16.42. The 15 to 20 dB increase refers to the increase in the one-hour average noise level. The applicable EPA guideline for evaluating the impact of increases in community noise levels is the 24-hour average or L_{dn}. Also, see response to Letter No. 26, Comment 5.

16.43. The measured noise level was corrected in order to determine whether the rail operation complies with FRA regulations (49 CFR 210.29). These regulations are very specific about the distance and duration of the measurement. For purposes of the EIS analysis, measurements of rail noise were made at a different distance than that required by FRA

noise regulations. Therefore, the noise measurements had to be corrected to account for this difference in order to properly evaluate compliance. Based on the corrected noise level, the emitted noise level of the rail engines appears to comply with FRA regulations. FRA will monitor noise emissions as part of its regular inspection of rail operations, and will require modifications of locomotive or rail car design or operations, if necessary, to meet noise emissions standards.

16.44. See responses to Comment 16.25 above and Letter No. 9, Comment 11.

16.45. Since the proposal would not be expected to have any probable significant adverse impacts on population or recreational use of Silver Lake, there is no need to include further information on these issues in the EIS.

16.46. The discussion of consistency with the Cowlitz County Comprehensive Plan in Section II.B.3, Land Use, has been revised to clarify this issue. That section concludes that the proposed landfill appears to be consistent with the intent of the Plan.

16.47. See response to Comment 16.45 above.

16.48. The Draft EIS erred in referring to the PCHB's determination regarding compliance with the Cowlitz County Comprehensive Plan as a "finding." It was, in fact, a "conclusion of law". Reference to the PCHB's conclusion is not included in the revised discussion of consistency with the Cowlitz County Comprehensive Plan.

16.49. The three "representative views" you refer to are from two South Silver Lake Road residences, the Mt. St. Helens Visitors Center, and the Spirit Lake Highway. These viewpoints were selected for computer simulation and inclusion in the EIS from an initial set of 16 viewpoints. The views represent three distinct levels of project visibility, cultural importance, and public accessibility, and represent the range of potential view impacts from the proposed landfill.

Other sites that were studied include locations along Spirit Lake Highway and South Silver Lake Road, some residences on Goat Island and the south-facing hills north of Silver Lake, and a few sites around the Mt. St. Helens Visitors Center. All of the potential viewpoints were analyzed using topography map studies, and on-site visual inspection. Section II.B.4, Aesthetics, has been revised to provide more information on the selection of viewpoints for detailed analysis.

16.50. With regard to site buffers, see response to Letter No. 62, Comment 13. It is true that a time lag would be experienced in revegetating the landfill. Native grasses and other shallow-rooting plants would take from 6 to 8 months to become established. However, the landfill would be constructed, filled, closed, and revegetated in a sequence of cells (see Section I.B.1.e, Landfill Construction and Sequencing). As each cell is filled with waste material, it would be covered and revegetated. Revegetation of each individual cell

would diminish the visual contrast of the overall landfill by breaking it up into smaller, less dominant, pieces.

16.51. See response to Letter No. 47, Comment 28.

16.52. See response to Letter No. 69, Comment 13.

16.53. Cowlitz County has not adopted level-of-service (LOS) standards for roadway intersections. Lacking any local LOS guidelines, the EIS refers to the Transportation Research Board's LOS standards for both signalized and unsignalized intersections (Transportation Research Board, 1985 - see EIS References section). As stated in Section II.B.6, Transportation, these standards are LOS D for signalized intersections and LOS E for unsignalized intersections.

It is important to note that the standard for intersection LOS is not relevant to the impacts of the proposed landfill. The EIS concludes that even if all solid waste were transported from the Longview mill to the Headquarters Site by truck instead of rail, all signalized intersections along the truck haul route would operate at LOS C or better during both the a.m. and p.m. peak hour periods; and all unsignalized intersections at LOS A during the a.m. and p.m. peak hour when ambient travel is typically highest. These conclusions reflect ambient traffic conditions (existing auto and truck traffic), plus truck trips generated by transport of solid waste.

16.54. See response to Comment 15.90 above.

17. The Northwest Power Planning Council and National Marine Fisheries Service have been added to the EIS Distribution List.

18.1. As indicated in Section N of the Fact Sheet, the original wetlands report is included as Appendix H of the Beak *Environmental Technical Report*, which is incorporated by reference in this EIS and available for review at the Health District office in Longview.

18.2. The function and values of the existing wetland systems are based on direct field observations and best professional judgement of fisheries, wildlife, and wetland biologists. Further information on wetland functions and values is included in the revised *Mitigation Plan* in Appendix A of this EIS. Also, see response to Letter No. 69, Comment 9.

18.3. Surveys conducted to characterize stream habitat are summarized in the introduction to Section II.A.5, Plants and Animals, and described in detail in the fisheries report in Appendix J of the *Environmental Technical Report* (see Section N of EIS Fact Sheet).

18.4. It is not clear what page of the previous *Mitigation Plan* this comment refers to. The plan has been revised extensively since the Draft EIS, and no longer uses the term "cursory observations". See response to Letter No. 9, Comment 12.

18.5. Alternative site plans A and B were developed to reduce the impacts of the proposed landfill on wetlands and to improve the alignment of the diversion channel. As discussed in Section I.B, Description of Alternatives Evaluated in this EIS, Alternative Site Plan A is now Weyerhaeuser's preferred alternative.

18.6. See response to Comment 15.64 above.

18.7. Construction would be timed in accordance with conditions of the solid waste, NPDES, and Section 404 permits, and hydraulic project approval.

18.8. See response to Letter No. 47, Comment 15.

18.9 -
18.12. See response to Comment 15.64 above.

18.13. See response to Letter No. 9, Comment 20.

18.14. See response to Comment 15.69 above. Interim plastic covering weighted down with tires has been found effective in performing its intended functions at numerous other landfills.

18.15. Landfill development requires starting construction at the low point so that gravity carries the leachate to an accessible location for removal. Other methods of development are less environmentally sound due to poor sequencing of the liner system construction. Also, see response to Letter No. 69, Comment 8.

18.16. The assumptions that optimal habitat conditions can be identified for a given species, and that a given habitat can be improved to achieve these optimal conditions, are basic principles of wildlife management. The basic requirements for wildlife survival are a food source, cover from predators, and reproductive success. The objective of the fisheries and wetland mitigation is to provide as many of these elements for as many wildlife groups as possible. For example, the proposed off-channel ponds would be designed to provide rearing, cover, and forage habitat for resident fish and juvenile anadromous fish; and the structural and species composition of the plant community would be varied to provide as many forage, cover and rearing/nesting areas for wildlife as possible.

18.17. The provision of 2 downed logs per acre is consistent with current Washington Forest Practices rules and regulations.

18.18. A snag management plan is proposed within wetland and streamside buffer zones to provide snags for wildlife. The nature of landfill construction and operation precludes retaining snags within the landfill footprint. Snag creation may be possible within the

pockets of forest stands to be developed on the closed landfill, but this could not occur until after closure and mature tree development.

18.19. The level of detail on nest boxes and perch posts presented in Appendix A is considered appropriate for this stage of project evaluation (see response to Letter No. 69, Comment 9). The value of nest boxes and perch posts is well documented and accepted by natural resource agencies.

18.20. The north face of the landfill would contain a central draw that breaks the uniform topography. Wildlife could use this draw to avoid visual detection from the east and west sides of the landfill. Terrain-provided cover is often referred to as topographic cover, and represents a type of hiding cover that can provide security for wildlife.

18-21. See response to Letter No. 47, Comment 25.

18.22. See response to Letter No. 69, Comment 17.

18.23. Your recommendation is noted. Under the revised *Mitigation Plan*, the diversion channel is no longer used to compensate for lost fish habitat. See response to Comment 18.25 below.

18.24. It is difficult to predict the number and type of plant species that will naturally invade a disturbed area. Therefore, when constructing wetlands with nursery cuttings and container plants, it is also good practice to provide plugs of native vegetation of the type that grows in the immediate area, because the soil in these plugs carries seeds for that vegetation. The proposed mitigation would be expected to provide satisfactory wildlife mitigation for the following reasons:

1. The created wetland immediately west of the landfill project area would provide wetland communities with a tree and shrub canopy layer, as well as an emergent component, that would not be altered with a rotating timber harvest schedule.

2. The created wetlands would be a broader, more contiguous system than the narrow linear structure of most of the wetlands found on the project site.

3. The preservation of mature forested wetland and riparian systems within the upper watershed of Sucker Creek would provide a permanent forested component to these communities.

18.25. The revised *Mitigation Plan* compensates for lost fish habitat through enhancement of rearing conditions downstream from the project and the creation of off-channel ponds for coho salmon rearing. This approach is being coordinated with an agency Technical Advisory Committee (see response to Letter No. 9, Comment 12) and is consistent with the requirements for hydraulic project approval. Also, see response to Letter 10.

18.26. Riparian buffer width on both sides of the diversion channel will be established during the final design phase of the mitigation plan development. This will be done in consultation with the agency Technical Advisory Committee. Your recommendation for a 100-foot riparian buffer is noted.

18.27. See response to Letter No. 62, Comment 13.

18.28. See response to Letter No. 69, Comment 12.

18.29. Mitigation proposed within the landfill footprint cannot be initiated until a cell is closed. However, wildlife mitigation to be provided by wetland creation, enhancement, and preservation would be implemented simultaneously with construction of the first landfill cell. This mitigation would be established well in advance of the majority of landfill construction.

18.30. Herbaceous cover should be established on closed cells within 1 to 2 years, with good functioning shrub cover in 5 years. Also, see responses to Comments 15.61 and 16.27 above, and the response to Letter No. 69, Comment 9.

18.31. The success rate of transplanted materials is dependent on species, distance of transplant, handling, length of time transplanted material may need to be stockpiled, etc. The specific requirements for transplanting materials will be included in the detailed designs of the final Mitigation Plan. One of the most important benefits of transplanting material is the seed source contained in the soils attached to the transplants.

18.32. The success rate for transplanting fish and other aquatic habitat is highly variable. Care would be taken in determining the habitat requirements of any plants, fish, or animals that would be transplanted as part of the *Mitigation Plan.* In addition, procedures for transplanting would be developed in coordination with the Washington Department of Wildlife. With the change in emphasis of the diversion channel from fish habitat to wetland creation, transplanting of fish and other aquatic organisms would not be as important an issue.

18.33. No transplanting of benthic organisms would be required with the revised *Mitigation Plan* (see responses to Comment 18.25 above and Letter 10, and Appendix A, *Proposed Natural Resources Mitigation Plan*).

18.34. The design for the created wetland systems has been revised. See revised *Mitigation Plan* in Appendix A.

18.35. Your recommendation is noted.

18.36. See response to Letter No. 62, Comment 14.

18.37. It is not known at this time which contractors would be selected to implement the proposed natural resources mitigation, nor is this information necessary to a reasoned choice among the alternatives evaluated in this EIS. The effectiveness of the types of mitigation proposed, based on experience with similar mitigation at other locations, is discussed in the revised *Mitigation Plan* in Appendix A of this EIS and in the appropriate sections of the Final EIS (Sections II.A.5, Plants and Animals; and II.A.6, Wetlands). The response to Letter No. 69, Comment 9 is also relevant.

18.38. No significant impact to beaver dams within the Sucker Creek drainage is expected. Substantial beaver activity has been noted within the mainstem of Sucker Creek above its junction with the Southern Tributary. A lower level of activity is noted in Sucker Creek below its junction with the Southern Tributary, and in the lower reach of the Southern Tributary. No project-related impact is expected on beaver within this area. In 1990, beaver activity was noted in the area where the proposed coho holding ponds would be constructed. Beaver have since moved out of this area. Minor impacts could occur if beaver return prior to construction of the coho holding ponds.

18.39. See response to Letter No. 69, Comment 9.

18.40. See response to Comment 15.87 above.

18.41. Wildlife and fish surveys conducted to date, including the recent electrofishing study of the Southern Tributary (see response to Letter No. 10) are considered more than adequate to allow an evaluation of the probable significant adverse impacts of the proposed landfill. Also, see response to Letter No. 69, Comment 21.

18.42. Criteria that would be used to determine the success of the mitigation program are described in the revised *Mitigation Plan* in Appendix A. Also, see response to Letter No. 69, Comment 9.

18.43. The surface water monitoring activities described in the *Mitigation Plan* are intended to evaluate the success of proposed natural resource mitigation measures. For surface water monitoring related specifically to construction and operation of landfill facilities, details of the monitoring program will be developed as part of the NPDES permit process. See response to Letter No. 62A, Comment 3.

18.44 -
18.45. See response to Letter No. 69, Comment 9.

18.46. You are greatly oversimplifying the proposed monitoring program for natural resources mitigation (see *Proposed Natural Resources Mitigation Plan* in Appendix A).

18.47. Survivorship criteria of 100 percent are unrealistic. Survivorship standards of 75 to 80 percent are consistent with accepted industry standards. Planting schemes are developed in anticipation that some losses will occur. See response to Comment 15.86 above.

18.48. See response to Comment 18.46 above.

18.49. See response to Letter No. 69, Comment 9.

18.50. Changes in soil colloid (fine suspended soils) movement would be determined by measuring the turbidity of water samples taken before and after project construction. See responses to Letter No. 62A, Comment 3 and Letter No. 69, Comment 9.

18.51. Turbidity, soluble iron, and soluble phosphate are all indicators of the presence of soil colloids. Area soils are high in iron, and phosphate is attached to the iron.

19. The EPA-recommended methodology used to evaluate liner leaks was based on testing with laboratory models that simulate field conditions (Giroud and Bonaparte, 1989), as well as actual field testing of liners at 30 landfill and surface impoundment facilities (Bonaparte and Gross, 1990). Also, see responses to Letter No. 69, Comments 14 and 15.

20. See response to Letter No. 9, Comment 28.

21. The simplified methodology uses assumptions that overestimate the impacts that would be expected during actual landfill operation. Since no significant adverse impacts were identified using this methodology, there was no need to use a more complex methodology that would predict decreased impacts.

22. Further detail on the original wetland survey is provided in Appendix H of the *Environmental Technical Report* (see Section N of EIS Fact Sheet). Also, see response to Letter No. 56, Comment 3, for a detailed discussion of the wetland acreage determination.

23. Comment noted.

LETTER NO. 64

PAMSCO CLEANING SUPPLIES AND EQUIPMENT

COWLITZ-WAHKIAKUM COUNTIES

SEP 11 1992

HEALTH DISTRICT

September 8, 1992

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs,

With reference to the proposed Headquarters Camp disposal facility, I wish to make the following comments:

I. Environmentally
   A. The site location is the best solution for a facility that large with regard to the proximity of people and visability by people.

   B. The fact that the site can be serviced by a private railroad is a difinite plus from an energy consumption and a safety standpoint.

   C. The design and monitoring plans guarantee that the facility could be safely run with no threat to people or the environment.

II. Economic Impact
   A. Assuming that the landfill is a necessary facility with regard to Weyerhaeuser's plan to rebuild their pulp mill, the lack of approval raises serious economic conditions for private business and government agencies.

   B. As a small business, (we employ 17 people full-time) I would be forced to downsize my company drastically, and with the loss of volume that Weyerhaeuser's business represents my company could no longer buy efficiently and therefore could not be as competitive as we are at the present time.

   C. The tax impact to the county and cities of Longview and Kelso would radically change the amount and quality of the basic services that are required for our communities if we expect them to be as livable as possible.

1064 Twelfth Avenue • P.O. Box 309 • Longview, WA 98632 • (206)423-3500 • 1-800-562-6012

To summarize, I think that the Headquarters Landfill proposal is sound and the best solution for everyone involved. The negative impact from loss of business revenues and government taxes would severally damage our communities and the people that live in them. I urge you to give a speedy approval to Weyerhaeuser so that the next stages of the planning process can get underway.

Respectfully,

Harry M. Browne
President

HB:sd

RESPONSE TO LETTER NO. 64

Harry M. Browne, President
PAMSCO Cleaning Supplies and Equipment

Your support for the proposed landfill is noted.

LETTER NO. 65

COWLITZ-WAHKIAKUM COUNTIES

SEP 11 1992

HEALTH DISTRICT

September 10, 1992

David Riggs
Cowlitz Wahkiakum Health Dept
1516 Hudson
Longview Wa.

Re; EIS Draft and its development for the WEYCO Dump

David Riggs;

I note in the August 20, 1992 letter to you from URS,(the company developing the Environmental Impact Statement for the WEYCO proposed dump,) Grant Bailey, Vice President of Environmental Services for URS writes:

(1) "Another change was referenced to the worst case liner leak, which had been developed jointly by Sweet Edwards, Herrera and Tom Abbott. The final language change; to refer to it as "remote and speculative" essentially removes the conclusion from consideration because SEPA states that remote and speculative impacts should not be considered."

May we have specific data on how such a leak was classified "remote and speculative". Will you include historical background of other places where this liner is used, preferably for the period planned for this liner.. Will you also quote guarantees by the company supplying the liner material and guarantees of the company sealing it, and their historical data on the use of this liner..

(2) Also; I want further information on the statement on page I-3. of the draft EIS, which reads: Floodplain: Areas located in a 100 year floodplain were excluded as being impractical for landfill development for legal, engineering and environmental reasons. " I would like to know the legal , engineering and environmental reasons given, and want to know what sites were in the 100 year floodplain. What site does this refer to?

Thanks for the opportunity to reply. My more lengthy questions were given in writing at the public hearings, but I would like these two additional questions answered.

Don Belding

Don Belding
225 Lakeview Drive
Silver Lake ,Wa. 98645

RESPONSE TO LETTER NO. 65

Don Belding

1. See responses to Letter No. 69, Comments and 14 and 15; and Letter No. 9, Comment 2. It is not known which company would supply or install the bottom liner. However, liner manufacturers typically warrant the liner to be free from defects in materials and to withstand normal weathering and use for a period of 20 years from the date of installation or sale. Like any warranty, this does not imply that the warranted item (in this case, the bottom liner material) will cease to perform beyond the warranty period. Liner installation is typically warranted for a period of a year, which is sufficient time for the types of defects that can occur during installation to be detected and repaired. Installation defects can be prevented (or detected and repaired prior to waste disposal) through a rigorous CQA program such as that proposed (see response to Letter No. 9, Comment 20).

2. See response to Letter No. 9, Comment 28.

LETTER NO. 66

LONE STAR NORTHWEST

LONGVIEW DIVISION
1100 3RD AVENUE
LONGVIEW, WASHINGTON 98632
(206) 423-8112

COWLITZ-WAHKIAKUM COUNTIES

SEP 11 1992

HEALTH DISTRICT

September 4, 1992

Mr. David Riggs
Director Of Environmental Health
Cowlitz-Wahkiakum Health Dist.
1516 Hudson
Longview, Wa. 98632

Dear Mr. Riggs,

This letter is in reference to the support of the Headquarters Camp Landfill Project proposed by the Weyerhaeuser Company. This project impacts not only Weyerhaeusers future, but the economic health of the region.

The Weyerhaeuser people have given a great deal of thought as to how to manage its solid waste in an environmentally safe manner. This is why more than one group was used in site determination, and independently concluded that Headquarters Camp was best suited for a waste disposal site.

The facility as designed meets or exceeds all current requirements for a facility of this kind, and will be monitored by both the state government and corporate officials over its life span.

It should also be pointed out that Weyerhauser is going to use this for the materials it cannot reuse or recyle in its normal operations. The project is really a total waste management system.



LONE STAR NORTHWEST

LONGVIEW DIVISION
1100 3RD AVENUE
LONGVIEW, WASHINGTON 98632
(206) 423-8112

There is also an economic impact. The employment base, taxes paid and other contributions Weyerhauser makes to the region is of paramonunt importance not only in good economic times but especially during periods of recession. Jobs are what makes our community flourish.

I request you approve this project on its merits and importance to the area it will support.

Sincerely,

Ted Hutchinson
General Manager

RESPONSE TO LETTER NO. 66

Ted Hutchinson, General Manager
Lone Star Northwest

Your support for the proposed landfill is noted.

LETTER NO. 67

LAKESIDE INDUSTRIES

P.O. BOX 1379 BELLEVUE, WA 98009 (206) 883-1661 FAX (206) 869-2249

September 2, 1992

COWLITZ-WAHKIAKUM COUNTIES

SEP 11 1992

HEALTH DISTRICT

David Riggs
Director of Environmental Health
Cowliltz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Mr. Riggs:

The EIS has been released by the Health District for public review. In this age of environmental concern, these experts findings show that Weyerhaeuser has met and even exceeded all environmental issues.

Example: Other existing and operating solid waste sites do not have protective liners and do meet present day environmental standards. Weyerhaeusers present management, under the leadership of Gary Healy, are extremely environmentally concerned and decided to line this new site so as not to create any problems in the future.

Inspections will be made to insure all material reported at this site is non-toxic and non-hazardous. The EIS shows that there is no significant impact to air quality and traffic.

In our dealings with Weyerhaeuser throughout the years past, their standard philosophy is to meet head on three key issues. They are in order; Safety, Environment, and Economics.

For Weyerhaeuser, safety is a given. The EIS proves these issues have been met or exceeded, and the economics have to be addressed.

This proposed waste site is of great importance to Weyerhaeuser plans to upgrade and modernize the Longview facility. If this does not happen, the economic effect for this community will be detramental.

The tax base loss for our school system alone is enough to cause concern. The loss of jobs and revenue that help create a healthy and thriving community would have the greatest long term effect.

If all the environmental issues required by the Health District are met, then we need Weyerhaeuser to survive and if their survival means the construction of this new waste site, then I strongly advise you as I will to give them full support.

Thank you.

Randy E. Dec
Sales Manager

AN EQUAL OPPORTUNITY EMPLOYER
WA. ST. CONT. REG. NO. 223-01 LA-KE-SI-•274JD

RESPONSE TO LETTER NO. 67

Randy E. Dec, Sales Manager
Lakeside Industries

Your support for the proposed landfill is noted.

J.H. KELLY, INC.

September 10, 1992

Cowlitz-Wahkiakum Counties

SEP 14 1992

Health District

Mr. David Riggs
Director of Environmental Health
COWLITZ-WAHKIAKUM HEALTH DISTRICT
1516 Hudson
Longview, WA 98632

Mr. Riggs:

Re: Weyerhaeuser's Headquarters Camp Disposal Facility
Support for Issuance of Solid Waste Permit

As a long time local resident and business owner, I've followed with interest Weyerhaeuser's approach to solving its long term need to be responsible for its own solid waste. I've also followed with interest Weyerhaeuser's decision-making process regarding its future in Longview. The long term economic benefits to the community are obvious if they proceed with their plans to modernize their pulp mill. I firmly believe that gaining control of and responsibility for their solid waste is a key element in Weyerhaeuser's decision on whether or not to proceed with the modernization. Therefore, the long term economic benefits of granting a Solid Waste Permit are also obvious to me.

Throughout their process to find the best possible location for a disposal facility, I've been impressed with Weyerhaeuser's determination to find the most environmentally sound site that's possible. I'm not surprised, therefore, that the Draft Environmental Impact Statement concludes that Weyerhaeuser's plan to develop the Headquarters Camp site is an environmentally sound one.

I fully support the issuance of a Solid Waste Permit for the Headquarters Camp site.

Sincerely,

J.H. KELLY, INC.

By _____
Dan Evans, President and CEO

DE/lc

Evans\CWHDWeyr.ltr

821 3RD. AVENUE • BOX 2038 • LONGVIEW, WA 98632 (206) 423-5510 • FAX (206) 423-9170
CONTRACTOR NO. JHKELI *188PD WE ARE AN EQUAL OPPORTUNITY EMPLOYER

RESPONSE TO LETTER NO. 68

Dan Evans, President and CEO
J.H. Kelly, Inc.

Your support for the proposed landfill is noted.

LETTER NO. 69

CURT SMITCH
Director

STATE OF WASHINGTON
DEPARTMENT OF WILDLIFE

Cowlitz-Wahkiakum Counties
SEP 14 1992
Health District

September 14, 1992

David Riggs, Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

SUBJECT: Draft Environmental Impact Statement (DEIS), Headquarters Camp Solid Waste Disposal Facility, July, 1992

(1A) We are in receipt of the above referenced document and commend the project proponent, the Health District, and the consultant (URS Consultants) for the quality of the DEIS.

The Department of Wildlife (the department) will be the single agency issuing a Hydraulics Project Approval (HPA) for any proposed work at the Headquarters site within the waters of the state. Also, herein, the tributary of Sucker Creek that flows through the landfill footprint, referred to in the DEIS as Southern Tributary, shall be referred to as South Fork Sucker Creek, or the South Fork.

The department, is concerned that numerous key factors have not been adequately addressed, have been overlooked, or need further review and clarification. These include: oversizing of the landfill and waste importation, lack of specific details in the mitigation plan (without which the HPA cannot be issued), lack of detail in the erosion and sediment control plan, fisheries and water quality impacts from tank car derailments and frequency of such events, impacts to wildlife species along with the lack of specific information on wildlife species use and occurrence at the site, and lack of a performance bond to ensure mitigation plan implementation success.

Our specific comments follow:

(1) 1. page i, para. 3 - The Fact Sheet indicates that waste will only be accepted from the counties of Cowlitz and Wahkiakum. Previous information from the proponent has indicated that this facility will be used for the importation of waste from all Weyerhaeuser facilities in western Washington, including mills in Cosmopolis and Snoqualmie. Additionally, construction and demolition debris was also going to be imported from outside the two county area. (Please see also item 2 below.)

(2) 2. page S-2, Section 3., para. 1 - The amount of waste generated by Weyerhaeuser Company in Cowlitz County is stated as 220,000 cubic yards (cy) per year. Yet, the landfill is proposed to accept 742,000 cy of Weyerhaeuser waste per year. This is 3.37 times the current waste production for the Longview facility. The DEIS explains this discrepancy thus, "the waste stream may be overestimated..., this may be offset by the fact that the estimated waste stream also does not reflect increases in waste

disposal requirements due to planned facility expansions and construction of new facilities."

Previously, the document stated that the amount of waste landfilled has been reduced from 750,000 cy per year (1981) to 220,000 cy per year (1992). This reduction has taken place in spite of the construction of Norpac's Number 3 Paper Machine and a de-inking facility in the last several years. It seems apparent from this fact and in light of item 1. above, that the company fully intends to oversize the landfill to accept imported waste from other Weyerhaeuser Company facilities and, potentially other landowners, throughout the region.

If the company has no plans to import waste from outside the two county area, the landfill is exceedingly oversized and the footprint should be reduced accordingly. We estimated that with even a doubling of the current waste generation, a 100% increase from the Longview facilities (up to 440,000 cy), the landfill footprint could be reduced from 312 acres (Alternative Site Plan A), to approximately 206 acres. This would further reduce all impacts associated with the development of the landfill and impact less than the 236 acres proposed for Alternative Site Plan B.

However, if the company plans to import waste, the Cowlitz-Wahkiakum Comprehensive Solid Waste Management Plan notwithstanding, the impacts of this waste importation must be addressed in the FEIS. Failure to do so would be inconsistent with State Environmental Policy Act (SEPA) review.

Please address the following question: Is the landfill oversized to allow for future waste importation from other Weyerhaeuser facilities, other facilities, and other projects around the state? If so, please address this issue in the FEIS.

(3) 3. page S-7, Section d.(1), para. 1 - A portion of existing tree stands has been proposed for a visual buffer of the site. No information has been supplied as to the nature and extent of these buffers. Acreage figures, locations, and seral stages/ timber types in these buffers are important components in our overall review of the wildlife (terrestrial and avian) impacts at the site.

(4) 4. page S-8, section d.(3), para. 2 - The HGCS would act as an underdrain for the landfill in the event of high groundwater levels. We are concerned that these high groundwater levels may occur concomitant with a possible significant leachate or liner leak during a peak rainfall event. The control of a leachate leak is the primary purpose for the HGCS. Should these events occur simultaneously, high groundwater flows would mix with high leachate flows and lead to a contamination scenario that was not assessed. Please address these concerns in the FEIS.

(5) 5. page S-8, section d.(4)(c), para. 1 - The DEIS refers to leak detection systems in the leachate collection sumps and leachate holding pond. Please supply specifics of this system, as none was provided.

(6) 6. page S-9, section d.(4)(d), para. 1 - The final cover of the landfill will, by design, be impermeable to inflow. Consequently, all rainfall and runoff will need to be diverted into sedimentation and holding ponds. Please discuss how the sedimentation and holding ponds will be adequately sized to receive and discharge high magnitude storm events running off the final cover in perpetuity, and how this will alter the hydrology and flow regimes in the South Fork.

(7) 7. page S-9, section d.(5), para. 2 - We believe that the sedimentation/detention basins are underdesigned to receive peak flows. The region has received several 100 year events in the last three years, and our concern is that should the pattern continue, we will witness, as stated "increase (of discharge to South Fork) for larger storms. We recommend that the sedimentation/detention ponds be sized to receive at least the 50 year event, and preferably sized to receive 100 year events. We agree that the design of the ponds should follow recommendations set forth in the stormwater management guidelines published by the Washington Department of Fisheries (WDF). This should alleviate some of the concern expressed in item 6 above.

(8) 8. page S-10, section e., para. 1 - The landfill construction will "generally proceed from west to east." We are concerned, and have expressed this concern at several meetings with the proponent and the consultants, that this will lead to immediate impacts to the South Fork and its tributaries. Our mitigation policy, POL-3000, specifies that the department requires mitigation when issuing permits (in this case, the HPA for instream work), and that mitigation is defined as avoiding, minimizing, restoring, reducing impacts over time, and/or replacing lost habitat values as a result of project impacts.

One of the key components of mitigation is avoiding impacts altogether, or reducing those impacts over time. We commend the proponent for the steps that have been taken to reduce the waste stream, and alter the landfill footprint to avoid wetlands. We are still concerned that one of the **primary and immediate** impacts of the project construction will be to divert the South Fork, and fill the existing channel with construction of Cell #1. We continue to recommend that the landfill construction proceed from east to west, in order to delay the impacts to the South Fork for as long as possible.

(9) 9. page S-11, section g., para. 1 - The department is uncomfortable reviewing the scope of impacts and the mitigation measures proposed, since these measures are still in a state of flux and being developed by the consultants (Beak) and a Technical Advisory Committee of agency specialists, including the department. We would have much preferred to review a complete package

with specific details and design features of all mitigation measures. The mitigation plan, as presented in Appendix A is still extremely broad in scope, conceptual in design, and providing few details and specifics of the plans.

(10) 10. page S-11, section g., para. 3 - "Flood banks" are referred to as a means to create wetlands for mitigation. We are unfamiliar with this term. Please clarify.

(11) 11. page S-11, section h.(1), para. 1 - Corrective actions for leachate leakage include waste removal and liner repair "if the waste is not too deep..." Please provide threshold levels for leakage quantities that would lead to waste removal and liner repair and what constitutes waste that is "too deep."

(12) 12. page S-12, section h.(4), para. 1 - Monitoring of wetland creation, revegetation efforts, and fish habitat utilization of the South Fork is proposed; however, no contingencies for failure have been provided. Given the scope of impacts and potential for failure of at least some of the mitigation efforts, we recommend that contingency plans be an integral part of the monitoring plan and be addressed in the FEIS.

(13) 13. page S-14, Section C., para. 4 - The discussion of significant unavoidable adverse impacts refers to the derailment of a **single tank car** into Sucker or Ostrander Creeks or the Cowlitz River. The likelihood of occurrence has been predicted to be once in 200 years. Our concerns center around, A. the data and analysis used in this prediction (source, applicability, scope, etc.), B. the fact that up to ten tank cars per day will be hauling leachate over the creeks and river, C. that the likelihood of just a single tank car derailing appears to be low, and D. based on the Department of Natural Resources (DNR) water type maps, there are over forty stream crossings, either bridge or culvert, on the rail line from the landfill leachate collection facility to the wastewater treatment plant at the millsite in Longview. These 41 stream crossings are categorized as follows:

a. Five are on Type 1 or 1+ waters (Shorelines of the State or Shorelines of State-wide Significance)

b. Four are on Type 3 fish-bearing waters including Sucker Creek, an unnamed tributary to the Cowlitz and two Type 3 ditches in Longview

c. 14 are on Type 4 waters, with six immediately adjacent to Type 1, 1+, or 3 fish-bearing waters, and seven proximal (within 1/4 mile) to Type 1, 1+, or 3 fish-bearing waters

d. 18 are on Type 5 waters, with 5 immediately adjacent to Type 1, 1+, or 3 fish-bearing waters. Many of these Type 5 waters are seasonal in nature and may flow only during storm events. However, should a derailment occur into even

a non-flowing drainage, the leachate would still likely flow to the fish-bearing portions of the streams.

Additionally, the rail line parallels and is immediately adjacent to Type 1 Ostrander Creek for approximately two miles.

Given the high frequency of rail accidents on this line, the high number (20) of sensitive stream crossings, and the length of rail line parallel and adjacent to Type 1 waters, please provide

i. A detailed analysis of the likelihood of a catastrophic derailment

ii. Specific data and factors used in this derailment frequency modeling

iii. An assessment of the likelihood of more than one car derailing (e.g. how many times on this line has only one car derailed, how many times has >1 car derailed, how many times have derailments on this line occurred proximal to creeks, nationwide data on single/multiple car derailments, etc.)

(14) 14. page S-15, section D.1., para. 1 - The probability of a liner leak is considered to be "low." Information in Appendix B indicates that the liner condition is assumed to be "good or better" for purposes of the analysis. Yet the "extreme worst-case" scenario (18 gallons per acre per day (gpad) of leachate leakage) is evaluating the leak with a "good or better" liner condition. We recommend that an extreme worst-case liner leak analysis be conducted which would evaluate a "poor" liner installation with numerous holes in the liner.

(15) 15. page S-15, section D.1., para. 2 - The liner leakage scenarios presented here describe a "reasonable maximum discharge rate (0.3 gpad)" and an "extreme worst-case leakage rate (18 gpad)." Our analysis of the data presented in Appendix D - Leachate Production Estimate, indicate that these discharge rates constitute only between 0.03% and 0.18% of total leachate production from the facility, with about 10,000 gpad of leachate production. We believe that this figure has been underestimated.

(16) 16. page S-16, section 2.a., para. 1 - Erosion control measures are listed, including "etc.", but are not described as to size, location, or design. In order to adequately assess the potential impacts from erosion and the mitigation provided by these erosion control measures, we need to have a detailed erosion and sedimentation plan for review. Please provide this information with the FEIS.

(17) 17. page S-17, section 2.b., para. 1 - The discussion of leachate spills as a result of a tank car derailment has been addressed in item 13. above. Additional concerns are raised by the

statement that" water quality would likely return to prespill conditions within several days" (emphasis added). Again no specific data or criteria used in this assessment are provided and no contingencies for spill response, restoration, or mitigation are described. Please supply this information in the FEIS.

(18) 18. page S-17, section 3.a., para. 1 - A "hypothetical" spill of leachate would not significantly impair water quality in the creeks, an actual spill would. We recommend that the word "hypothetical" be removed. Additionally, we request that the leachate spill analysis provide detail as to the numbers, species, age classes, and sizes of fish, numbers and species of wildlife (including terrestrial, avian, amphibian, and reptile), and numbers and species of invertebrates that would be killed by a leachate spill in each of the creeks that might reasonably be expected to impacted. This analysis must take into account anadromous fish run timing, spawning, hatching, and fry emergence, as well as reproductive timing and movements of wildlife species.

(19) 19. page S-18, section 3.b., para. 3 - The DEIS states that the mitigation plan is "conceptual at this time." In fact, the mitigation plan is still in flux and appears to be heading away from providing fisheries mitigation in the diversion reach. The department is currently reviewing new mitigation proposals, and upon receipt of a formalized and specific mitigation proposal, will determine its adequacy in mitigating fisheries and wildlife impacts of the landfill construction.

(20) 20. page S-19, section 4., para. 1 - Additional wetland functions include nutrient production, fish habitat enhancement, and surface water (run-off) biofiltration.

(21) 21. page S-24, Table S-1, Plants, Animals, and Fisheries - The table states that "Due to the abundance of managed forest land and associated wildlife in area, no SUAI (significant unavoidable adverse impacts) on plants and animals." This perpetuates the misconception that animals will simply move elsewhere as the habitat is converted to non-habitat. Merker (1985) says,

> Whenever habitat is destroyed, wildlife cannot simply "move elsewhere" and survive. The "elsewhere" habitat is probably already at a stage of carrying capacity with resident animals. Wildlife, of course, will not simply stand by as their habitat is destroyed or altered, but will move out of the way. To the untrained eye, it appears as if they simply went elsewhere to live. This may be true in the short term. However, reproductive rates in wildlife, as well as other factors (i.e. predation, stress, disease) are usually inversely related to density. The additional numbers of displaced animals become a burden to the habitat and the resident animals. As a result, reproductive rates decline and so does recruitment. In the end, there are lesser amounts of animals.

We recommend that the effects of the conversion of this habitat not be dismissed so casually, and that an analysis of impacts be conducted to determine numbers and types of species lost, and shifts in species diversity and richness that will occur.

(22) 22. page I-3, section 2., para. 6 - The DEIS states that the least aquatic impacts would be realized if the landfill were located at the Barnes Drive site. This statement is extremely important as it relates to the Section 404(b)(1) guidelines of the Clean Water Act which specifies that a site with less wetland impact must be considered in the alternatives analysis for the 404 permit.

(23) 23. page I-7, section 3.b., para. 1 - The discussion of waste generation and landfill capacity is here reiterated, and our comments of items 1 and 2 above apply,

(24) 24. page I-8, section 4., para. 2 - Again, the waste importation issue is discussed, with the strong implication that waste will be imported from outside the two county region after the regional plan is amended. If this is the case, the regional plan notwithstanding, this extremely significant fact must be reviewed under the FEIS for this project, in order to meet the intent of the SEPA review process.

(25) 25. page I-14, section B.1.c., para. 2 - The DEIS states that the Woods railroad was "upgraded in 1991 to meet Federal Class II rail standards." We are concerned with the work in the vicinity of the creek crossings and the parallel and adjacent section of the rail line next to Ostrander Creek. Please provide documentation of specific work done in the vicinity of the 41 stream crossings to repair, replace, upgrade, and otherwise stabilize the railroad in these extremely sensitive areas. Also, address the following: Were the bridges inspected by qualified engineers, were stress and shear tests conducted, were pilings repaired/replaced, and were ties, rails, etc., repaired and replaced on these bridges?

Also, we recommend that a spill contingency plan be adopted prior to issuance of any permits that will provide for the deployment of HAZMAT teams, booming, and other aggressive measures, as well as the construction of isolating dikes and berms in the vicinity of the creek crossings and along Ostrander Creek.

(26) 26. page I-26, section 1.d.(5), para. 1 - The discussion of run-off states that "best management practices" will be used to address erosion and other concerns. Please provide specific details of the methods, devices, locations, sizes, and capacities.

(27) 27. page I-26, section 1.d.(5)(a), para. 1 - As described previously, the mitigation planning is still in flux and a final mitigation design and plan have yet to be presented.

(28) 28. page I-27, section 1.d.(5)(a), para. 2 - The riparian buffers along the new diversion channel should be a minimum of 100 feet on each side to maintain terrestrial and aquatic habitat values, shade for water temperature moderation, nutrient/ litterfall input, etc.

(29) 29. page I-28, section 1.d.(5)(d), para. 1 - The sedimentation basins will "settle out 15 micron particles in a 25 year event." What is the size of typical clay particles, and what size of particles and what percentage of total fines will be settled out in the 25, 50, and 100 year events?

(30) 30. page I-35, section 1.f. para. 3 - In order to control dust, watering of both paved and unpaved roads is proposed. Where will the water come from and what provisions for its treatment are provided?

(31) 31. page I-36, section 1.g.(1), para. 1 - As discussed previously, the wetland mitigation plan is still conceptual. We are unable at this time to make substantive comment on the adequacy of the mitigation plans until a firm mitigation proposal has been made. We expect to receive further information from the consultants, and will address the final mitigation plan when it has been provided.

(32) 32. page I-37, section 1.g.(3), para. 1 - Measures have been proposed to mitigate impacts of the landfill construction on wildlife. We find it difficult, however, to address the adequacy of the mitigation efforts considering the paucity of information presented on wildlife use of the area on page II-36.

(33) 33. page I-39, section 1.h.(1), para. 2 - Again we raise the question of how deep is "too deep?" Please see item 11 above.

(34) 34. page I-39, section 1.h.(2), para. 3 - We recommend that water quality sampling occur in the diversion reach as well as the South Fork.

(35) 35. page I-42, section 1.h.(4), para. 3 - We recommend that annual monitoring of the created wetlands continue for the life of the project, and that no sunset clause be included for monitoring requirements to cease.

(36) 36. page I-42, section 1.h.(5), para. 6 - All wildlife mortalities associated with the project construction and operation shall be reported to the Regional Habitat Program Manager, Washington Department of Wildlife, 5405 NE Hazel Dell Ave. Vancouver, WA 98663.

(37) 37. page I-43, section 1.h.(6), para. 2 - Please supply specific sampling techniques that will be used for assessing benthic macroinvertebrates, "substrate suitability," and sediment accumulations.

(38) 38. page I-44, section 2., para. 2 - The department recommends no more than a one (1) foot drop between hydraulic control structures.

(39) 39. page II-18, section 3.b.(1)(a), para. 2 - The DEIS states that the "Flow in the rerouted stream would be less than the existing flow because some of the drainage area is on the landfill footprint." Information presented at the Technical Advisory Committee meeting in Olympia, September 3, 1992, indicated that flow in the diversion channel would <u>increase</u> due to the inflow of groundwater that would be intercepted by the new channel and the loss of water in the existing creek between the 1600 road and the railroad grade due to soil permeability. Please clarify with specific data which of these two conditions will exist upon completion of the new diversion channel.

(40) 40. page II-19, section 3.b.(1)(a), para. 3 - Again, information presented here indicates that base flows in the South Fork would decrease by 30%, while the Beak hydrologist presented data at the above referenced meeting depicting that the flows would increase. This is a matter of some concern to the department, as low flow conditions are often the limiting factor in maintaining fisheries habitat.

(41) 41. page II-20, section 3.b.(1)(c), para. 1 - Regarding erosion control, an "intense rainfall" is described as a "2-year event." We believe that a more appropriate analysis would focus on sediment transport and delivery rates, and the impacts of this sediment delivery for a truly intense event, perhaps the 25, 50, or 100 year event.

Additionally, assumptions made regarding control indicate that only "40% of delivered sediments would be settled out within basins and swales." Thus, 60% of all sediments and all of the < 15 micron sediment from the site would be delivered to the South Fork. We believe that this represents a <u>significant adverse impact</u> to the South Fork, with respect to water quality and fisheries habitat. Please address this concern in the FEIS.

(42) 42. page II-21, section 3.b.(1)(c), para. 2 - "Borrow and stockpile areas: average of 7 acres during June and July, tapering down to zero by October, 1 acre during rest of year." Will there be one acre or zero acres of stockpile and borrow areas during the winter? The statement is unclear.

(43) 43. page II-22, section 3.b.(1)(e), para. 2 - We need to review modeling methods and data used for evaluation of the impacts of increased temperature on the creeks as a result of the sedimentation basins. None has yet been provided, nor has the issue arisen at any of the meetings in which we have been involved.

(44) 44. page II-22, section 3.b.(1)(f), para. 2 - Will there be any liners or measures other than "containment walls" designed into, around, or under the rail siding, to address potential leachate spills?

(45) 45. page II-23, section 3.b.(1)(f), para. 2 - We again express our concern with the quality and depth of the potential spill analysis, especially when the DEIS uses terminology such as "likely return to prespill conditions within several days of the incident." Please see item 17 above.

(46) 46. page II-35, section 5.a.(2)(a), para. 1, et.seq. - Each of the cover types listed has been categorized with respect to its value as wildlife habitat. The ratings include the terms "poor," "fair," and "good." These terms are extremely subjective, and have no basis in the literature. Additionally, no discussion of these habitats in relation to the larger ecosystem in the vicinity of the project area or the Sucker Creek watershed is presented. Please provide the criteria used for assessing the quality of wildlife habitat on the site, with a breakdown of seral stages present by acres. Please also see the comments in item 47 below.

(47) 47. page II-36, section 5.a.(2)(b), para. 2 - This section is completely devoid of any data that pertain to species numbers, richness, abundance, seasonal trends, or other important factors relating to wildlife use of an area. Of particular concern is the fact that only seven avian species were observed using the site. Also, the DEIS presents no information from any field work that indicates whether the birds present were breeding individuals defending territories, or visitors to the stands.

Data from similar stands, presented by Field and Manuwal (1973), Base (in press), and Bruce, (1985), indicate that clearcut/seedling and early seral shrub habitats contain territories of between 10 and 19 avian species with as many as 15 other species of birds visiting the stands. Please provide specific survey methods used, dates and times of surveys, number of territories per hectare, visitors to the area, and an explanation of the discrepancy in data between this work and the literature.

(48) 48. page II-36, section 5.a.(2)(b), para. 3 - Again, no data is presented that describes or quantifies numbers of big game that will be impacted by the project. We expect that these data would include herd composition counts, cow:calf ratios, bull:cow and buck:doe ratios, information from pellet group transects, and other accepted wildlife surveys techniques. Also, the DEIS states that "surveys indicated that deer and elk populations within the study area are resident; no indication of significant migration into or through the site was evident."

Please present the methods used for surveys, dates and times of the work, and criteria used to evaluate "significant migration."

Additionally, reference is made to a 60:40 forage/cover ratio as providing the most productive habitat for deer and elk, and gives references to Beak, 1991b, and Appendix I. Neither of these references pertain to big game use of the area. Please provide the specific information used to assess the impacts to big game species in the vicinity of the landfill, including a discussion of cover/forage ratios in the watershed, and distances/dimensions of cover and forage patches,

(49) 49. page II-36, section 5.a.(2)(b), para. 4 - The discussion of amphibian species present in the project area includes the phrase "likely occurring." We infer from this that no surveys were conducted. Please provide rationale for why no amphibian or reptile surveys of species and populations was conducted to assess impacts to these species in the project area. We expect that at least eight species of amphibians and two species of reptiles are present in the landfill footprint.

(50) 50. page II-37, section 5.a.(3)(a), para. 1 - Coho salmon have also been found in the South Fork, during electroshocking surveys in July and August of 1992. Paragraph three states that it "was not possible to determine whether the juvenile coho captured in lower Sucker Creek were naturally spawned or were stocked in 1990 by WDF." The last stocking of coho in Sucker Creek occurred in 1990 (Johnson, 1992). Therefore, based on the life history of coho salmon, the juveniles located this year are the result of natural production in Sucker Creek and/or the South Fork. The coho were located past the culvert on the 1300 Road.

It is important to note that passage barriers to anadromous fish were only recently (1990-1991) removed, and the new culverts under the 1330, the 1300, and the 1310 Roads now allow free access for upstream migrating coho salmon and steelhead trout. We expect that within a short time, juvenile coho and potentially steelhead may be found as far upstream as the culvert under the C&C/Woods railroad. Please address this concern, in light of the most recent data regarding juvenile coho less than one mile downstream of the diversion channel outlet.

(51) 51. page II-38, section 5.b.(1)(b), para. 1 - We agree that the loss of habitat would reduce the abundance and diversity of wildlife on the site. The following paragraph indicates that basically, the wildlife will "move or die." Yet, no mitigation for these losses is proposed nor has any assessment of the species or numbers displaced, disrupted, or killed, been provided. Please also refer to a discussion of this topic in item 21 above.

(52) 52. page II-39, section 5.b.(1)(c), para. 1 - As discussed previously, the fisheries mitigation package is changing from that presented in the DEIS. Final mitigation plans must be approved by the department before the HPA for the work that affects the streams, may be issued. The final mitigation negotiations and package must be a component of the FEIS.

(53) 53. page II-40, section 5.b.(1)(c), para. 4 - The discussion of sediment impacts seems to be inconsistent with the impacts described in item 41 above, i.e., only "40% of delivered sediments would be settled out within basins and swales." Thus, 60% of all sediments and all of the < 15 micron sediment from the site would be delivered to the South Fork.

We believe that this may represent a significant adverse impact, exceeding that which is described in the DEIS as "maintaining sediment and nutrient concentrations in the South Fork within 10% of existing levels." Please address this analysis and concern in the FEIS.

(54) 54. page II-42, section 5.b.(3)(c), para. 1 - We disagree that fish species composition and density would remain similar to existing conditions under the No-Action Alternative. As discussed in item 50 above, we believe that coho salmon may, within a short time, move as far upstream as the culvert under the C&C/Woods railroad, and potentially beyond.

(55) 55. page II-43, section 5.c.(2), para. 1 - We believe that the proposed mitigation for wildlife impacts of the proposal are based on faulty and incomplete data. We also believe that the proposed mitigation is inadequate to address the conversion of nearly 400 acres of habitat into an essentially sterile environment.

(56) 56. Appendix A - We are currently reviewing the newest proposals for wetland and fisheries mitigation as presented at the September 3, 1992 meeting with the consultants, the project proponent, and the Technical Advisory Committee, including the department. We will address our comments on the mitigation plan upon receipt of the next iteration of the package. We recommend that a final mitigation plan be agreed to by all resource agencies before any permits are issued and be included in the FEIS.

(57) 57. Appendix B, page 3, para. 2 - Please see the discussion of the liner leak scenarios and the appropriateness of the analysis in item 14 above.

(58) 58. Appendix D, page 3, items 3, 4, and 5 - Representative landfill cross sections are presented as "40 feet" thick. However, the DEIS states that waste will be up to 250 feet thick and about 170 feet over the existing ground elevation. Please describe how the leachate production estimates are appropriate, in light

of the fact that waste will be up to six times deeper than the representative depth of waste used in the analysis.

(59) 59. Appendix F, page 1, para. 3 - The calculations for sediment yield are based on a "57-year project life." However, the landfill is expected to operate for 30-50 years with a 30 year post active monitoring program. Please address this discrepancy and provide sediment yields based on the project life as described in the DEIS. Also, please supply the estimated tonnage of sediment that will be delivered to the South Fork during the 25, 50, and 100 year storm events.

(60) 60. Appendix F, page 2, para. 3 - Page II-20 of the DEIS (discussed in item 53 above) describes that sediment levels should be "within 10% of existing levels," and yet this section of the appendix indicates that sediment yields to the creek will actually decrease. Our confusion stems from the fact that sediment yield will "decrease", or remain within "10% of existing levels", while all particles <15 microns and 60% of all fines will be discharged to the stream, from an extremely disturbed site. Please clarify these apparently conflicting statements.

(61) 61. Appendix G, Tables 1, 2, and 3 - Concentrations of mercury, selenium, thallium, phenols, and pentachlorophenol were assumed to be zero, while other compounds, which were not detected were assumed to exist at 1/2 their detection limit. Please address the following two questions: 1. Why were the concentrations of these elements, or compounds assumed to be zero, and 2. If the concentrations of these compounds in the baseflow were assumed to be at 1/2 the detection limit, would their presence in the baseflow, added to the leachate concentrations, lead to an exceedence of EPA standards?

(62) 62. Appendix H, page 1, para. 5 - Arsenic concentrations in the Cowlitz River after a single railcar spill would increase approximately 20%. Arsenic levels in the Cowlitz River currently exceed Federal AWQC standards by 100%. The implication in this paragraph is that since the arsenic levels in the river already exceed AWQC standards by 100%, a little bit more won't matter. Please respond.

(63) 63. Appendix H, page 4, para. 4 - Attachment D, Results of the 96 Hour Fish Bioassay, were not included in the documents we received. Please provide a copy of this attachment.

We look forward to reviewing the FEIS for this project. Please direct all correspondence to Robert J. Bicknell, Area Habitat Biologist, 908 Smith Road, Toutle, WA 98649. Thank you for the opportunity to provide these comments.

Sincerely,

Bryan Cowan
Regional Habitat Program Manager

cc: Bill Leonard, DOE
Judy Lantor, USFWS, Olympia
Linda Storm, EPA
Valerie Elliot, NMFS
Jonathan Smith, US Army COE
Rick Thiel, EMCON
Cal Palmer, Weyerhaeuser Company
Paul Whitney, Beak Consultants
URS Consultants
Ken Mohoric, WDF
Gene Tillett
Gordy Zillges, Olympia
Steve Manlow
Bob Bicknell

BIBLIOGRAPHY

Base, D.L. in press. Breeding Bird Census #??. Three Year Old Clearcut and Douglas Fir Plantation I. J. Field Ornithol. Vol. 64, No.1 (Supplement). p. ??

Bruce, A.M. 1985. Occurrence of Birds in Streamside and Upland Habitat of a Managed Forest in Western Washington. Weyerhaeuser Technical Report 046-3304/01. Centralia, WA. 18 pp.

Field, N. and D. Manuwal. 1973. Breeding Bird Census #96. American Birds. 27(6):1003-4.

Johnson, G. 1992. Toutle River ACOE Mitigation Final Report, July 1, 1987 - December 31, 1991. Project No. 0030. Washington Department of Fisheries. Olympia, WA. 24 pp.

Merker, C. 1985. Proposed wildlife habitat mitigation plan for WPPSS at Hanford Energy Reservation, Washington. Unpublished report. Washington Department of Game. Yakima, WA. 17 pp.

RESPONSE TO LETTER NO. 69

Bryan Cowan, Habitat Manager
Washington Department of Wildlife

1A. The Fact Sheet of the EIS has been revised to indicate that the Department of Wildlife is the single issuing agency for hydraulic project approval. With regard to your general comments on the EIS, see the response to specific comments below.

1. See response to Letter No. 8, Comment 3.

2. With regard to waste import, see response to Letter No. 8, Comment 3. The proposed landfill is sized to accommodate the estimated volume of nonrecyclable industrial waste generated by existing and planned Weyerhaeuser facilities in southwestern Washington over the next 30 years. Further information on waste quantities has been added to Section I.A.3.b, Disposal Requirements. As noted in that section, Weyerhaeuser's first priority is to provide for disposal of its own industrial solid waste. The company's lowest priority is to provide for disposal of third party industrial solid waste, and it proposes to accept such waste only from within Cowlitz and Wahkiakum counties, and only to the extent that an acceptable waste screening and certification process can be implemented with the generator. Acceptance of third-party waste is intended as a service to Cowlitz County, to preserve the capacity of the County Landfill for municipal solid waste.

3. See response to Letter No. 62, Comment 13.

4. Even under the extreme worst-case liner leak scenario evaluated in the EIS, which is considered remote and speculative, leachate flows through the leaking liner could hardly be considered "high". As discussed in Section II.A.3, Surface Water, leachate flows under this scenario would potentially cause exceedances of the EPA ammonia standard for chronic effects of freshwater biota only during lowest base flow conditions in the Southern Tributary. Chronic effects would be unlikely to occur, however, because the contaminated hydraulic gradient control system discharge would be diverted to the leachate pond as soon as the liner leak was detected through the monitoring program (see response to Letter No. 71, Comment 15).

   At higher flow conditions such as would occur in your hypothetical scenario, or under the reasonable maximum leakage rate, a liner leak would not significantly affect water quality or cause violations of water quality standards. Also, see response to Letter No. 9, Comment 10.

5. Your comment is on the Summary of the EIS, which is of necessity very brief. The text of the EIS (Section I.B.1.d(4)(c), Leachate Storage and Transfer) includes the information

you request. The basic concept of leak detection systems is to construct a secondary liner to provide the ability to monitor between the two liners. Facilities such as sumps and ponds that can develop hydrostatic pressure are typically constructed with a leak detection system. Figure I-7 illustrates the design concept for the leachate pond leak detection system. The final design of the leak detection systems will be submitted with Part 2 of the solid waste permit application.

6. Again, your comment is on the Summary of the EIS. The text of the EIS (Section I.B.1.d(5)(d), Erosion and Sedimentation Controls; and Section II.A.3, Surface Water) provides the information you request for the 25-year storm. With regard to storms of greater magnitude, see response to Letter No. 18, Comment 6.

7. See response to Letter No. 18, Comment 6.

8. Phasing landfill construction from east to west is not considered a reasonable alternative due to topographic considerations in landfill design, as well as logistics considerations during landfill operation. First, the east end of the site is located about 5,000 feet from the rail transfer facility and leachate holding pond. If the initial cell were constructed at the east end, 5,000 feet of road and pipe would have to be constructed immediately to connect it to the transfer facility and pond. This would result in much higher initial construction costs, as well as higher operations and maintenance costs over the life of the landfill. Under the proposed west-to-east landfill sequencing, the road and leachate collection pipe would be developed incrementally.

   Secondly, construction from east to west would involve beginning solid waste disposal on a side slope with no lateral support. This would not conform to best engineering practices and could result in an unstable fill.

   Finally, under the proposed west-to-east (lower elevation to higher elevation) sequencing, soil for the bottom liner and final cover for each cell would be excavated from adjacent higher elevation areas. Therefore, most soil would be used soon after it is excavated, minimizing the need to maintain soil stockpiles for long periods of time. Maximum excavation depths would occur in the central and eastern portions of the site. If the initial landfill cells were constructed at the east end, excess soil would have to be stored in stockpiles, possibly for decades, until the soil is used to construct cells in the lower elevation western portion of the site. This would add costs and increase the potential for sedimentation into local streams.

9. As discussed in the response to Letter No. 9, Comment 12, the mitigation plan in Appendix A of the Draft EIS has been revised to reflect recommendations of the Technical Advisory Committee, which includes the Department of Wildlife (see *Proposed Natural Resources Mitigation Plan* in Appendix A of this Final EIS). The *Mitigation Plan* includes a monitoring program, and contingency plans in the event monitoring

indicates that corrective actions need to be taken. The SEPA Rules state that monitoring is an acceptable mitigation measure [WAC 198-11-660(1)(b) and WAC 197-11-768(6)]. The proposed mitigation, monitoring, and contingency plans will be refined during the solid waste permit, hydraulic project approval, and Section 404 permit processes. Clearly, these permits will not be issued unless the permitting agencies are satisfied that adequate mitigation and monitoring will be implemented.

10. The term "flood banks" refers to areas within the channel and immediately adjacent to the channel which would flood during high flow events. The EIS text has been revised for clarification.

11. Corrective actions are selected based on an analysis of the specific problem that arises, and the technical and economic feasibility of alternative solutions. A "rule of thumb" approach is not possible.

12. The *Proposed Natural Resources Mitigation Plan* in Appendix A of this EIS discusses possible contingency plans in the event monitoring indicates failure of some of the mitigation efforts. Further detail on contingency plans will be developed in coordination with state and federal resource agencies (see response to Comment 9 above.)

13. Section II.B.6, Transportation, has been revised to provide additional information related to the likelihood of a spill from one and more than one leachate tank car, and to clarify the basis for the "once in 200 years" estimate. Further documentation related to this issue is provided in Appendix J of this EIS.

    It is important to note that the "once in 200 years" estimate is not the likelihood of derailment of a single tank car as you suggest, but rather the likelihood of a derailment resulting in sufficient damage to a tank car to cause a leachate spill. As discussed in the referenced section, nationwide statistics indicate that although there are numerous incidents of derailments of rail cars carrying hazardous materials, most derailments do not result in actual releases of these materials.

    As discussed in Section I.B.1.c, Waste Transportation and Rail Loading/Unloading Facilities, Weyerhaeuser proposes to use so-called "105" tank cars (cars meeting the performance requirements of 49 CFR 179.105) for rail transport of leachate. These tank cars are designed to provide safe transportation of chlorine gas and other hazardous materials, and are the best tank cars available in the general tank car fleet (Federal Railroad Administration (FRA), 1992).

    According to rail safety experts consulted for purposes of this Final EIS, the probability of a rupture of a "105" tank car in a derailment at the proposed speeds of 10 to 12 mph is "remote" (FRA, 1992) and "would require a combination of improbable events" (Washington Utilities and Transportation Commission (WUTC), 1992). In fact, the probability of occurrence would be below the "once in 200 years" estimate derived from

national statistics, since those statistics include rail cars not designed to the stringent standards of the "105" tank car, traveling at speeds up to 25 mph.

In response to public concern about this issue, the EIS evaluates the impacts of a leachate spill from a single tank car. The spill scenario assumes that a 20,000-gallon leachate tank car derails, ruptures, and spills its entire contents into Sucker or Ostrander Creeks at low flow. Based on the information discussed above, the probability of occurrence of such an event is so low that the potential for significant adverse impacts on water quality or aquatic resources could be considered remote and speculative. The EIS has been revised to reflect this conclusion (see Sections II.A.3, Surface Water, and II.A.5, Plants and Animals).

FRA and WUTC rail safety experts have stated that they can recall no derailment incident resulting in a spill from more than one tank car, and that the probability of such an incident is "extremely remote". Therefore, a scenario involving spills from multiple cars is considered remote and speculative and is not evaluated in this EIS.

14. You are mistaken in your interpretation of the information in Appendix B of this EIS. For purposes of both the reasonable maximum and extreme worst-case liner leak scenarios, the condition of the geomembrane/soil interface was assumed to be "poor" during and right after construction. This is a conservative assumption. Actually, with the proposed rigorous construction quality assurance program, the geomembrane/soil interface would be expected to be "good" or better. With regard to your comment about evaluating a scenario with numerous holes in the liner, the extreme worst-case scenario does assume numerous holes, as evident in Table II-3 of the EIS. Such a liner condition would require gross negligence during construction, and is not the type of "probable significant adverse impact" that SEPA requires be evaluated in an EIS (in other words, it is considered remote and speculative).

    Further documentation related to the liner leak scenarios evaluated in the EIS is included in Appendix B of this EIS. Also, see response to Comment 4 above and Letter No. 63, Comment 19.

15. There is no relationship between the total leachate production from the landfill and the amount of leakage that could reasonably occur due to imperfections in the liner. As discussed in Appendix B of this EIS, leakage rate is primarily a function of the depth of leachate (leachate head) over the assumed holes in the liner. Both liner leak scenarios evaluated in the EIS substantially overestimate the leachate head that would occur under actual operating conditions. As described in Section I.B.1.d(4)(b), Leachate Collection and Removal System, the leachate head buildup during landfill operation would be expected to average no more than a few inches. Virtually all leachate generated by the proposed landfill would be collected and directed to a holding pond, from which it would be pumped into tank cars for transport to the wastewater treatment plant at the Longview mill.

16. Section I.B.1.d(5)(d), Erosion and Sedimentation Controls, provides further description of proposed erosion and sedimentation control measures and the performance standards to which they would be designed. SEPA does not require that detailed project plans and specifications be included in an EIS. In fact, agencies are required to provide applicants with the opportunity for environmental review before requiring them to submit detailed project plans and specifications [WAC 197-11-055(4)(a)].

More detailed designs for all aspects of the proposed landfill, including erosion and sedimentation control facilities, would be submitted to Ecology with Part 2 of the solid waste permit application, and would have to be approved by Ecology prior to issuance of that permit. Similarly, those aspects of the final design related to hydraulic project approval would have to be reviewed and approved by the Department of Wildlife before issuing such approval. In addition, Ecology would require best available erosion and sediment control measures as part of the stormwater pollution control plan required under the NPDES permit program. The responses to Letter No. 18, Comment 6 and Letter No. 63, Comment 15.64 are also relevant.

17. See response to Letter No. 62, Comment 19. The primary source document for the evaluation of water quality impacts from a leachate spill in a small creek is Appendix B of the Beak *Environmental Technical Report* (see response to Comment 21 below).

With regard to a spill response plan, Weyerhaeuser is required to develop such a plan as part of the Plan of Operation for the landfill. The Plan of Operation will be submitted to Ecology with Part 2 of the solid waste permit application, and will have to be approved by Ecology prior to issuance of the permit. A new section has been added to the EIS to describe the key elements of a spill response plan [see Section I.B.1.f(4)].

18. The word "hypothetical" has been removed. With regard to the detailed information you request, the Health District does not believe that such information is essential to a reasoned choice among alternatives given the extremely low probability of a spill from a leachate tank car (see response to Comment 13 above). The SEPA Rules require that an EIS succinctly describe the principal features of the environment that would be affected, and specify that inventories of species should be avoided [WAC 197-11-440(6)(c)(i)].

The spill response plan discussed in the response to Comment 17 above would include the requirement for a damage assessment and measures to ensure recovery of the affected stream.

19. See response to Comment 9 above.

20. Comment noted. The EIS text in both the Summary and Section II.A.6, Wetlands, has been revised to include nutrient production and to indicate that the biofiltration function applies to filtering of surface water runoff. Fish habitat enhancement is implied in the

reference to stream cover and shading, which help control water temperature and provide cover for fish (both shade from overhanging vegetation and instream cover from roots).

21. The wording of the conclusion on significant unavoidable adverse impacts in Table S-1 and Section II.A.5, Plants and Animals, has been revised to better reflect the factors considered in determining that the proposed landfill would have no significant unavoidable adverse impacts on wildlife. In addition to the abundance of managed forest habitat in the region, which is an appropriate consideration in determining the significance of impacts, factors considered include an evaluation of the differences between the impacts of the proposal and the impacts of commercial logging, the absence of threatened or endangered species on the site, and the substantial wildlife mitigation incorporated into the project (see *Proposed Natural Resources Mitigation Plan* in Appendix A of the EIS). The response to Letter No. 63, Comment 16.27 is also relevant.

As evident in the impacts analysis in Section II.A.5, Plants and Animals, the conclusion that impacts on wildlife would not be "significant" does not mean that individuals of species would not perish or that shifts in species richness and diversity would not occur. Designation of an impact as "significant" or "not significant" for purposes of SEPA compliance inevitably involves some judgment on the part of the wildlife expert performing the analysis.

With regard to your request for additional technical detail, such detail is provided in the Wildlife Technical Report (Appendix I of the Beak *Environmental Technical Report),* which documents the extensive wildlife studies conducted in support of the EIS; and in Section 3.6.1 of the *Environmental Technical Report* itself, which summarizes existing conditions, assesses impacts in detail, and outlines appropriate mitigation measures. As noted in Section N of the Fact Sheet, the *Environmental Technical Report* and its appendices are incorporated by reference in this EIS and available for review at the Health District offices.

A copy of the *Environmental Technical Report* and relevant appendices has been provided to the Department of Wildlife. The Health District believes that the information in these background documents, combined with the analysis in the EIS, is more than sufficient to make a reasoned choice among alternatives. In accordance with the SEPA Rules, an effort was made to avoid excessive detail and overly technical analysis in the EIS text itself. The SEPA Rules particularly discourage inventories of species [WAC 197-11-440(6)(c)(i)].

22. See response to Letter No. 9, Comment 28 and Letter No. 43.

23. See response to Comment 2 above.

24. See response to Letter No. 8, Comment 3.

25. Following the completion of rail improvements discussed in Section II.B.6, Transportation, Weyerhaeuser retained a rail safety expert to inspect the Woods rail line. The expert found it to be fully in compliance with Class 2 rail standards. The proposed rail operations fall well within those permitted by Class 2 standards. In fact, whereas those standards permit maximum speeds of 25 mph, the speed limit for trains carrying solid waste or leachate would be 12 mph. Hazardous materials are routinely transported on Class 2 railroads throughout the country. Nationwide data on releases of hazardous materials transported on Class 2 railroads was used to estimate the likelihood of a rail accident resulting in a leachate spill (see response to Comment 13 above).

    The Federal Railroad Administration has indicated that it will conduct a full inspection of the Woods line at least 30 days in advance of the date on which transport of solid waste or leachate is planned to begin, and will require Weyerhaeuser to make any changes necessary to bring the track and/or operations up to Class 2 standards.

26. See response to Comment 16 above.

27. See response to Comment 9 above.

28. Comment noted. Weyerhaeuser will coordinate with the Department of Wildlife in the design of the diversion channel.

29. In large storm events, approximately 40 percent of the sediment delivered to the sedimentation basins would settle out. The remaining 60 percent would be passed because the particle size is less than 15 microns, which is approximately the boundary between silt and clay particles. This is the reason that the emphasis of the proposed sediment control program is on erosion control measures to minimize the amount of sediment delivered to the sedimentation/detention ponds. See responses to Letter No. 63, Comment 15.64 and Comment 16 above.

30. See response to Letter No. 62A, Comment 15. Any runoff due to use of water for dust control would be routed through the sedimentation/detention ponds.

31. Comment noted. See response to Comment 9 above.

32. See last paragraph of response to Comment 21 above.

33. See response to Comment 11 above.

34. Water quality sampling would be conducted in the diversion reach as described in the proposed *Mitigation Plan* in Appendix A of the EIS. Also, see response to Letter No. 62A, Comment 3.

35. It is proposed that monitoring of the created wetland systems be limited to the time period necessary to determine that the systems have been successfully established. This would require the monitoring period to be extended from 3 years to at least 5 years, but should not require monitoring for the life of the project. After an initial 5-year monitoring period, it may be interesting, from a research perspective, to return to the created wetland systems on a 3- to 5-year interval to document the existing conditions of the systems. However, interesting research opportunities would not be reasonable mitigation requirements. If annual monitoring is required, it is proposed that it be limited to confirming that no encroachment has occurred on the mitigation areas from landfill or timber management activities.

36. Wildlife mortalities would be reported as requested.

37. The proposed aquatic monitoring program has been revised to reflect changes in the proposed *Mitigation Plan*, and no longer includes monitoring for macroinvertebrates or substrate suitability in the diversion channel. See responses to Letter No. 9, Comment 12 and Letter No. 10. Also, see revised *Mitigation Plan* in Appendix A of this EIS.

38. See response to Comment 28 above.

39. The effect of the project on <u>average</u> streamflow was initially approximated based on differences in contributing drainage area with and without the project. With the project, the drainage area that would contribute to the downstream end of the diversion channel would be 278 acres. By comparison, the existing drainage area that contributes to the equivalent distance downstream in the Southern Tributary is 407 acres. Therefore, based on equidistant downstream points, the diversion channel would have about 30 percent less contributing drainage area, and perhaps about the same percent less flow <u>on average</u>. However, the same procedure indicates that the average streamflows in the upper end of the diversion channel would not be reduced from existing conditions. Flows in the upper end would be derived from upgradient drainage area contributions, which would not be altered by the project.

    In addition to evaluating the effect of the proposed landfill on average flows, it is important to differentiate between its effect on the two components of streamflow: stormwater runoff and base flow. *Stormwater runoff* is defined as the relatively large, short-term rises (peaks) in streamflow that result directly and quickly from rainfall. During storm events, the proposed landfill would be expected to reduce peak flows in the lower end of the diversion channel, as indicated above.

    Base flow is defined as the relatively small and constant streamflow between rainfall and storm runoff events that occurs largely from slow drainage of water through the soil. During the summer dry season, there is a net loss of base flow in the existing Southern Tributary on the Headquarters Site, while during the winter/spring wet seasons, there is a net gain. During summer, the proposed diversion channel is expected to retain as much

and perhaps more base flow than exists in the Southern Tributary for two primary reasons. First, the bottom of the new diversion channel would include a compacted soil-clay layer so that little, if any, seepage loss of base flow would occur. Second, even during summer, a net gain in base flow occurs in the lower part of the swale through which the diversion channel would pass, resulting in additional base flow in the channel itself.

During the wet season, the proposed landfill would be expected to reduce base flows in the lower end of the diversion channel for the same reason discussed in the first paragraph of this response. However, this is not a significant concern, because base flows during the wet season are much greater than during the dry season.

40. See response to Comment 39 above.

41. Your comment refers to the analysis of erosion from initial construction activities at the site prior to construction and operation of sedimentation ponds and biofiltration swales. These initial construction activities would all occur from approximately June through September of the first year. The 2-year event was felt to represent the most probable storm intensity during the relatively short time frame of initial construction activities.

Assumptions regarding erosion control are discussed in the response to Letter No. 63, Comment 15.64. The proposed erosion control measures would be expected to prevent 85 percent of eroded soil from being discharged to the streams below the landfill. In other words, the discharged sediments would represent about 15 percent of the potential eroded soil from disturbed, undisturbed, and reclaimed areas of the landfill site. By contrast, under existing conditions (the No-Action Alternative), a much greater percent of eroded soil could be discharged downstream, because there are currently no constructed erosion controls and sediment retention on site.

42. Section II.A.3, Surface Water, has been revised to clarify the key soil exposure assumptions used in the sediment analysis. Further detail on the year-to-year cell sequencing and month-to-month soil exposure assumed in the sediment analysis is provided in Appendix F of the EIS.

43. Further information on the thermal modeling analysis is included in the Surface Water Hydrology Technical Report (Appendix E of the Beak *Environmental Technical Report* referred to in the response to Comment 21 above).

Water temperature modeling of sedimentation basins has not been performed, since the specific design of sedimentation basins has not yet been developed (see response to Comment 16 above). However, the sedimentation ponds would be designed to Washington Department of Fisheries criteria established to prevent hydrologic and water quality changes, such as significant temperature increases, that may adversely affect aquatic life (see response to Letter No. 18, Comment 6).

44. The final design of the containment system for the rail siding has not yet been developed. It will be submitted to Ecology with Part 2 of the solid waste permit application (see response to Comment 16 above).

45. See response to Comment 17 above.

46. Wildlife habitat ratings are based on intensive on-site surveys. Wildlife surveys were conducted over a period of a year to collect information on wildlife use of the site (see response to Comment 21 above). Following completion of these surveys, a systematic evaluation of each habitat class was conducted. Information was collected on vegetative species diversity, vegetative structure (that is, herbaceous shrub and tree development), presence of important habitat components (for example, snags, downed logs), size of habitat classes, juxtaposition with other habitat classes and level of human activity, among others. Survey results were integrated with information from the literature and input from natural resource managers as to what constitutes good habitat for different types of wildlife. Then each habitat class was assigned a qualitative rating indicating its overall value to wildlife.

    Acreage of individual habitat classes is not provided in the EIS, because of the continually changing forest composition that results from logging and rapid seral progression of the young stands. However, acreage of the various seral stages present at the time of study, and future predictions of habitat class acreages are provided in Section 3.4.1 of the *Environmental Technical Report.*

47. Information of the type you are requesting, including a discussion of differences between findings of the on-site surveys and information reported in the literature, is provided in the Wildlife Technical Report referred to in the response to Comment 21 above.

48. Information of the type you are requesting is provided in the Wildlife Technical Report referred to in the response to Comment 21 above. The source of the 60:40 cover-to-forage ratio was incorrectly cited in the Draft EIS. The EIS has been revised to provide the correct reference (Witmer et al., 1985). The complete Witmer reference is now provided in Section IV, References.

49. See response to Letter No. 62, Comment 20. Although no systematic surveys for reptiles and amphibians were conducted on the Headquarters Site, incidental information was collected during fish and wildlife field surveys.

50. See response to Letter No. 10.

51. See response to Comment 21 above. As indicated in the response to Letter No. 63, Comment 16.27, impacts to wildlife resulting from landfill construction are expected to differ little from those which would result from continued commercial forest management of the Headquarters Site (the No-Action Alternative). With the clearing required for

either the landfill or No-Action Alternative, wildlife would be displaced or perish. Existing on-site habitats include an abundance of relatively young seral stands undergoing rapid habitat transformations. Because the potential carrying capacity of these areas has likely not yet been achieved, fewer wildlife might be affected than if the habitat were stable and more mature. Nevertheless, some wildlife would perish whether or not the landfill is constructed.

Although the impacts of the landfill on wildlife are not expected to be significant, a comprehensive wildlife mitigation package is proposed (see *Proposed Natural Resources Mitigation Plan* in Appendix A of this EIS).

52. See response to Comment 9 above.

53. The EIS text has been revised to indicate that sediment and nutrient concentrations in the Southern Tributary would likely be less than existing conditions. See response to Comment 41 above.

54. See response to Letter No. 10. The section you refer to has been revised to indicate that an upstream extension of coho distribution to the C&C/Woods rail crossing is possible under the No-Action Alternative, and would also be possible under the Proposal and alternative site plans.

55. Substantial on-site data were collected to evaluate existing wildlife habitat conditions and determine use of the site by wildlife. These data were used to evaluate potential adverse impacts to wildlife and develop an adequate mitigation plan to compensate for these impacts. See responses to Comments 21, 46, and 51 above.

The conclusion that the landfill site would be converted into a "sterile environment" that is unusable by wildlife is inaccurate. The site would be reclaimed to a mixed grassland/scrub shrub habitat type. Wildlife of the Cascade foothills which typically occur within these habitat types can be expected to occur on the reclaimed site. Additional habitat features included within the footprint as part of the proposed *Mitigation Plan* (for example, downed logs, tree patches, perch poles, etc.) would be expected to increase habitat structure and diversity, further improving the value of the reclaimed site for wildlife.

56. See response to Comment 9 above.

57. See response to Comment 14 above.

58. Additional depth of waste reduces leachate flow rate due to the additional liquid storage capacity of the waste. Therefore, a thinner layer of waste was assumed rather the maximum expected waste thickness to ensure that leachate flows were not underestimated.

59. The EIS has been revised to indicate that the project life could range from approximately 30 to 60 years, depending on the waste generation rate. The 57-year "project life" used in the erosion calculations would be the approximate project life if Weyerhaeuser waste generation remained at existing levels. However, if a 30-year project life were assumed rather than a 57-year life, the basic conclusions of the sediment analysis would not change. The sequencing of cells would be more compressed over a 30-year life, so there would be many more years in which new cells are under construction. However, with the proposed erosion control methods, particularly use of interim plastic, maximum year-to-year amounts of exposed soil and the month-to-month sequence of exposure would be the same regardless of the project life. Therefore, a shorter project life would result in no more annual sediment yield, and less cumulative yield, than a 57-year project life.

Regarding the request to provide a quantification of the sediment that will be delivered to the Southern Tributary during 25-, 50-, and 100-year storm events, see the response to Letter 63, Comment 16.17. Also, see response to Comment 53 above.

60. See response to Comment 41 above.

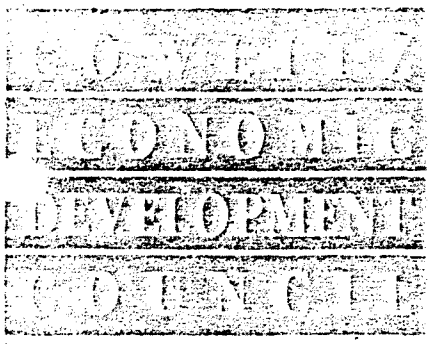
61. The concentration of the compounds you refer to was assumed to be zero in on-site surface waters under existing conditions, because these substances are usually only found where chemical pollution has occurred or from the weathering of certain minerals that do not occur in this region. On-site surface waters were not tested for these compounds, so no specific detection limits have been established. In any event, it is highly unlikely that there could be violations of standards for selenium, thallium, phenols, and pentachlorophenol, since the assumed leachate concentrations themselves are below both acute and chronic standards and the leachate would be diluted upon entering the surface water. Because the chronic standard for mercury is so low, exceedances of this standard would be possible if background concentrations of mercury were detected. However, there is no reason to expect detectable levels of mercury in these waters.

62. The EPA-established water quality criteria that were originally used in Appendix H are applicable to water and fish ingestion. The intake assumptions used to derive these criteria assume that an individual consumes 2 liters of water and 6.5 grams of edible aquatic products per day for a period of 70 years (that is, a lifetime exposure). The model used for the evaluation in Appendix H assumes that spilled leachate would be released over a short period of time and would be completely mixed with river water. Therefore, the EPA criteria for water and fish ingestion are not applicable to the scenario evaluated and have been deleted from the tables in Appendix H.

According to EPA (1986b), freshwater aquatic organisms should not be affected unacceptably if the 4-day average concentration of arsenic (III) and arsenic (V) does not exceed 190 micrograms per liter (µg/L) and 850 µg/L, respectively, more than once every three years on the average; and if the 1-hour average does not exceed 360 µg/L and 48 µg/L, respectively, more than once every three years on the average. The

concentration of arsenic in the leachate from the proposed landfill would be expected to be less than these EPA-established water quality criteria for the protection of aquatic organisms (acute and chronic), as well as below the state and federal maximum contaminant levels (50 µg/L). These comparisons have been added to the table in Appendix H.

63. The results of the 96-hour fish bioassay are included in Attachment D of the revised Appendix H.



COWLITZ-WAHKIAKUM
COUNTIES

SEP 14 1992

HEALTH DISTRICT

September 9, 1992

David Riggs
Director of Environmental Health
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

The Cowlitz Economic Development Council is a private non-profit membership organization whose goals include improving the local economy and attracting new industry.

An additional solid waste facility is needed in Cowlitz County. Our ability to attract new industry to our area where unemployment is currently 11.6 percent is directly dependent upon our having disposal facilities that can accommodate industry. In addition the Weyerhaeuser Corporation is examining the feasibility of modernizing its pulp and paper facility in Longview. One of the factors that will determine their cost/benefit ratio analysis is most certainly the cost of solid waste disposal. Should the Weyerhaeuser Company go ahead with the modernization we would retain 1,300 direct jobs and 400 million dollars would be spent on the modernization project. Should Weyerhaeuser decide to not modernize the facility (and then close it down) the loss of direct jobs would impact our community severely as well as the many small companies who sell there products or services to Weyerhaeuser.

I have met with Weyerhaeuser and discussed their proposal for dealing with the 11.8 acres of wetlands at the proposed Headquarters Site and in my view the proposed 3 - 1 mitigation will improve the wetlands picture from what it is today. In other words (leaving economic considerations out of the picture for the moment) the environment will be better off if the permit is granted.

The CEDC works to help companies put together international trade deals. Working with small businesses in this arena has made it clear to me that we are dealing in a global economy. The United States has the toughest environmental regulations in the world and we look forward to the day when other countries can match our

(206) 423-9921
FAX (206) 423-1923
1452 Hudson Street
U.S. Bank Building, Suite 208
P.O. Box 1278
Longview, Washington 98632

standards. Permits for environmentally sound projects such as the proposed solid waste facility by Weyerhaeuser should be granted with the least possible delay. Considering that our local and environmental situation will improve when the permit is granted, we look forward to its issuance at the earliest opportunity.

Sincerely,

John C. Thompson
President

JCT/hb

RESPONSE TO LETTER NO. 70

John C. Thompson, President
Cowlitz Economic Development Council

Your support for the proposed landfill is noted.

LETTER NO. 71

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

COWLITZ-WAHKIAKUM
COUNTIES
SEP 15 1992
HEALTH DISTRICT

September 10, 1992

Mr. David Riggs
Cowlitz-Wahkiakum Health District
1516 Hudson
Longview, WA 98632

Dear Mr. Riggs:

Thank you for the opportunity to comment on the draft environmental impact statement for the Headquarters Camp Solid Waste Disposal Facility. We reviewed the draft EIS and have the following concerns.

(1) 1. Although the project includes a sort yard, tipping facility and rail transfer station, the draft EIS has little discussion regarding these aspects of the project. Additional discussion should address all of the potential environmental impacts of these facilities.

(2) 2. Leachate from the landfill is to be hauled back to the mill wastewater plant for treatment. Discussion is needed regarding the adequacy of the treatment plant, leachate handling practices at the plant, and what impact this additional waste loading will have on the operation.

(3) 3. Portions of the landfill liner will be installed over earth fill areas. Precaution to be taken during earth fill construction activities to assure minimum settlement and thereby protect liner integrity should be discussed.

(4) 4. Due to the location and life of the landfill, water management facilities should be designed to handle greater than a 25 year storm. Consideration should be made for a 100 year storm design.

(5) 5. There is confusion in the draft EIS as to whether a gas control system will be provided. Design should include a gas management system, to include flaring if found necessary. Specific criteria should be established as part of the landfill operation plan as to when flaring becomes necessary.

(6) 6. Closure and post-closure maintenance and monitoring discussions should include a financial assurance mechanism to assure finance will be available for such activities.

(7) 7. Reference is made in the EIS to nationwide derailment incidents rates for release of hazardous materials in rail accidents. This should be related to the incidents of recent derailments on the C&C/Woods rail line and how such derailments will be prevented.

(8) 8. Much of the discussion regarding rail line operation and maintenance has equated compliance with Federal standards to adequate safety and minimum adverse impact on the environment. If you are to rely on Federal standards for protection, then a discussion of the adequacy of the standards is needed.

(9) 9. Potential impacts to surface water by the release of leachate during potential rail accidents are discussed in the draft EIS. Impacts on other aspects of the environment and potential release of solid waste materials during a derailment should also be discussed.

(10) 10. Little information is provided regarding containerization of wastes during shipment. Will there be potential spillage, odor, etc., during transport?

(11) 11. Reference is made to human health impacts to those in the surrounding area. Discussion should also include impacts to those working at the transfer station, landfill, leachate collection pond, etc.

(12) 12. The current wetland mitigation plan is inadequate to assess whether wetland impacts will be adequately mitigated. Prior to issuance of State Water Quality Certification for this project, the applicant will need to provide a detailed mitigation plan. Ecology staff would be glad to meet with the applicant and their consultants to discuss the wetland mitigation further.

(13) 13. Four small unnamed tributaries to Sucker Creek flow from the proposed landfill site. It appears that the intent is to divert these tributaries to the hydraulic gradient control system (HGCS). All water collected through the HGCs must be returned to the water's natural drainage channel at the down gradient edge of the landfill. Withdrawal of any amount of surface water, from the normal water course, will require a water right permit from the Department of Ecology.

(14) 14. The final technical report states that Sucker Creek provides approximately 13 percent of the actual surface water inflow to Silver Lake, and the Southern Tributary provides about 1.7 percent of the surface water inflow on an annual basis. Given the relatively high percentage of water contributed by these creeks to Silver Lake, any contamination of the surface waters by leachate could pose serious problems for water users of Silver Lake, and the Lake itself. Although the EIS states that if leachate contamination of surface water is detected "...the problem would be corrected", a method of notification to water users, or affected resource agencies is not addressed.

(15) 15. If contamination of the surface water is detected, it is proposed to divert this water to the leachate pond. If water is diverted from either Sucker Creek or the Southern Tributary, a water right permit is required prior to any diversion. Because these creeks contribute a significant amount of water to Silver Lake, mitigation for any withdrawals may be necessary. Provisions should be made to size the leachate pond appropriately in the event diversion of surface water is necessary.

Sincerely,

M F Palko

M.F. Palko, Section Supervisor
Environmental Review Section

92-4833

RESPONSE TO LETTER NO. 71

M.F. Palko, Section Supervisor
Environmental Review Section
Washington Department of Ecology

1. Most facilities needed to accomplish the proposed waste sorting and transfer operations at the Longview mill site already exist and are currently being used to transfer a portion of Weyerhaeuser's waste to rail cars for shipment to the Roosevelt Regional Landfill in Klickitat County. Proposed operations would not result in any different types of impacts, or increase the minor impacts of existing facilities to the point where they would be considered probable significant adverse impacts. If there is an unforeseen need in the future for new construction to supplement existing facilities, the need for environmental review under SEPA would be evaluated at that time.

   The text in Section I.B.1.b, Solid Waste Recycling and Transfer Facility, has been revised to reflect this response.

2. See response to Letter No. 49, Comment 9.

3. As discussed in Section I.B.1.d(2), Bottom Grading Plan, all fill would be placed in 8-inch lifts, moisture conditioned, compacted, and tested as part of the construction quality assurance program (see response to Letter No. 9, Comment 20).

4. The hydraulic capacity needed to accommodate runoff from the 100-year storm is being considered in the design of landfill facilities. See responses to Letter No. 9, Comment 10 and Letter No. 18, Comment 6.

5. See responses to Letter No. 9, Comment 11 and Letter No. 63, Comment 16.25.

6. See response to Letter No. 47, Comment 18.

7. See response to Letter No. 69, Comment 13.

8. See response to Letter No. 69, Comment 25.

9. Section II.B.6, Transportation, has been revised to discusses the expected frequency of solid waste and leachate spills. Due to differences in the types of containers used to transport solid waste and leachate (see response to Letter No. 1, Comment 3), spills of solid waste would be expected more frequently than leachate spills. It would not be out of the question to experience one or more solid waste spills during the life of the landfill.

All of the different types of waste that would be disposed at the proposed landfill have been characterized to ensure that they meet the definition of solid waste, and are not dangerous or hazardous under state or federal regulations (see response to Letter No. 17, Comment 1). Waste characterization included fish bioassays, as well as oral toxicity tests on rats. Bioassays followed Ecology testing methods, and no fish or rat kills occurred. Weyerhaeuser conducted a comprehensive series of such tests, and Ecology performed the same analyses independently.

These results indicate that a spill of solid waste along the rail route from Longview to the Headquarters Site would not likely kill fish or wildlife in the area of the spill. Long-term or chronic impacts would also not be likely, because most of the solid waste could be retrieved with conventional heavy equipment in accessible areas or by more labor intensive means in less accessible areas. Section II.A.5, Plants and Animals, has been revised to reflect this. Also, see related response to Letter No. 61, Comment 5.

10. Information on the type of containers that would be used for rail transport of solid waste to the proposed landfill has been added to Section I.B.1.c, Waste Transportation and Rail Loading/Unloading Facilities. With regard to spills of solid waste, see response to Comment 9 above. With regard to odor potential during waste transport, see response to Letter No. 1, Comment 3.

11. See response to Letter No. 36, Comment 2.

12. Comment noted. See response to Letter No. 69, Comment 9.

13. No water would be withdrawn from the normal water course by the hydraulic gradient control system (HGCS). Surface water runon from upgradient areas, which currently flows in the small tributaries to Sucker Creek, would be diverted around the western perimeter of the landfill in an open channel and back into the Southern Tributary (see Section I.B.1.d(5)(a), Southern Tributary Diversion Channel). Any groundwater collected in the HGCS would discharge to approximately the same portion of the Southern Tributary that it would discharge to under existing conditions.

14. Section II.A.3, Surface Water, concludes that even under the extreme worst-case liner leak scenario, which is considered remote and speculative, there would be no significant adverse impact to the water quality of Silver Lake. The same conclusion is drawn with regard to the spill of a leachate tank car into Sucker Creek. Also, see responses to Letter No. 62A, Comment 1 and Letter No. 69, Comment 4. As discussed in the response to Letter No. 1, Comment 1, the spill response plan would include notification of resource agencies and all potentially affected parties. A similar notification process would be followed in the event landfill monitoring programs indicated any violation of standards that may affect water users. Section I.B.1.h, Landfill Monitoring Programs, has been revised to indicate this.

15. If leachate contamination were detected in discharge from the HGCS, the discharge line of the HGCS outlet discharging contaminated water would be extended, a sump and pump would be installed in the line, and the discharge would be pumped to the leachate holding pond. If more than one HGCS outlet were discharging contaminated water, the outlets would be connected with a common header pipe.

Following diversion of the contaminated HGCS discharge, options for treatment and discharge would be evaluated. The water would likely be hauled to the Longview mill in rail tank cars as proposed for landfill leachate. It is understood that a water right permit from Ecology might be needed for this option. Alternatively, if on-site treatment and discharge were determined to be feasible, application could be made for a waste discharge permit pursuant to WAC 173-216.

As discussed in the response to Comment 13 above, no surface water runon to the landfill would be diverted to the HGCS. HGCS flows would consist only of groundwater, and would be expected to be minimal much of the year. The relatively small amount of HGCS flow that would have to be diverted to the leachate pond in a liner leak situation would not significantly affect the volume of water in Silver Lake. With regard to the capacity of the leachate ponds, it would be more than sufficient to handle the maximum expected flow from the HGCS in addition to regular leachate flows. See response to Letter No. 9, Comment 10.

Responses to Public Hearing Testimony

Headquarters Camp
Solid Waste Disposal Facility

TRANSCRIPT NO. 1

COWLITZ-WAHKIAKUM HEALTH DISTRICT

PUBLIC HEARING

on

WEYERHAEUSER SOLID WASTE FACILITY PROPOSAL

August 25, 1992
7:00 p.m.

Candy Zreliak
CSR #: ZR-EL-IC-A538LM
Official Court Reporter
Hall of Justice
312 South First West
Kelso, Washington 98626
(206) 577-3071

INDEX OF SPEAKERS
August 25, 1992

NAME	PAGE
Mike Palco	3
David Riggs	5
Harry Browne	8
Chet Gardner	8
Jeff Wilson	10
Steve Hanson	12
Ted Hutchinson	14
John McKenzie	15
Gary Healey	17
Martha Belding	22
Sid Roberts	24
Marvin Cole	27
Don Belding	28
Randy Deck	33
John Walkush	35
Clara Wilkins	38
Patrick Wilkins	41
Ruth Deery	44
James Bopst	44
Karen Jones	45
Dan Evans	47
George Raiter	48
John Dzwilewski	49
Ray Crayne	50
Allen Jackson Cox, III	51

COWLITZ-WAHKIAKUM HEALTH DISTRICT
PUBLIC HEARING
on
WEYERHAEUSER SOLID WASTE FACILITY PROPOSAL

BE IT REMEMBERED that a public hearing was held at the Cowlitz County Administration Building, General Meeting Room, Kelso, Washington, on August 25, 1992 at 7:00 p.m. by the Cowlitz-Wahkiakum Health District.

Presiding over the public hearing for purposes of receiving comments and testimony was MIKE PALCO, Hearing Officer, Department of Ecology, Olympia, Washington;

Present and introducing MIKE PALKO was DAVID E. RIGGS, R.S., M.S., Director of Environmental Health Division, Cowlitz-Wahkiakum Health District, Longview, Washington.

UPON which the following occurred, to-wit:

7:00 p.m.; August 25, 1992.

(The following introductions, comments and testimony were given:)

HEARING OFFICER: Good evening. My name is Mike Palco.

We are here to hear your comments and testimony on a draft Environmental Impact Statement produced by the Cowlitz-Wahkiakum Health District on a proposal by Weyerhaeuser to establish a solid waste disposal facility.

I have two primary purposes tonight, one, to hear everybody who wants to provide testimony, and, two, get a clear record of that testimony.

Part of that clear record is the matter of each individual that wants to speak, because we are recording it via recorders and the court reporter here, you have to tell me who you are, because when we get all this information back to respond to comments, to confirm, that we need to know who made the comment.

While I will ask you that each and every time you make a presentation or a statement that you indicate who you are, because it's pretty tough to tell by listening to tapes who the people are.

Let the record show that it is August 25, 7:10. We are in the Cowlitz County building here, and we are here

to hear your testimony; that another part of hearing your testimony is getting written testimony from you all, and when you submit your written testimony we are going to number it to keep track of it, so if you would give it to me we will take it and start a numbering system to tie the testimony with your written comments.

We have numerous people here tonight that wish to speak. I would ask you to limit your presentation to about five minutes so we can get out of here at a reasonable hour. It would be nice if you could summarize your issues, and if you have written testimony that would be nice, also.

Another point of order is that this hearing is not a matter of cross-examination or questioning. One of the techniques that I find very useful is that if you have a question, turn it into a statement so we can deal with that rather than have it just linger there, and there are people here from the Health District and other staff people here from the Department of Ecology if there might be opportunities to talk to them after the hearing or you can talk to them in their places of business.

The record will be open until September 11th, and at that time the record will be closed and the process of producing the final EIS will begin.

With that, I would like to turn the podium back over to David Riggs who will present a description of the proposal, and then we will start taking the testimony of the people that have signed up to testify.

If there are other people that want to testify, we will take theirs after the people who have signed up.

MR. RIGGS: Thank you. My name is David Riggs. I am the Director of Environmental Health for the Cowlitz-Wahkiakum Health District, and additionally I am also the responsible official for this SEPA process on the review for the proposal of the Solid Waste Disposal Facility proposed by Weyerhaeuser Company.

What I am going to do is give you a brief description of the proposed project to start this off.

Weyerhaeuser Company proposes to construct and operate a solid waste landfill on approximately three hundred eighty acres of Weyerhaeuser-owned land south of Silver Lake in Cowlitz County, Washington.

The landfill itself would occupy approximately three hundred thirty acres. Current site topography ranges from eight hundred forty-five feet to one thousand eighty feet. The maximum final landfill elevation will be approximately one thousand, two hundred fifty feet.

The operational life of the landfill is estimated to be thirty to sixty years.

The landfill would except non-hazardous demolition, construction and other solid waste with the exception of municipal solid waste generated at the Weyerhaeuser Longview Mill Complex.

The waste would include the following: log sort yard debris, effluent treatment solids, boiler ash, line wastes, de-inking reject fiber, sawmill waste and construction/demolition debris.

Weyerhaeuser may also accept the same type of waste as is proposed from other generators within Cowlitz and Wahkiakum Counties for disposal at the proposed Solid Waste Facility.

The facility would not be open to the general public.

Weyerhaeuser may request that the proposed Solid Waste Facility import waste of the same type from outside Cowlitz and Wahkiakum Counties in the future. The current solid waste plan for this facility does not allow service outside Cowlitz and Wahkiakum Counties.

Therefore, this EIS, or the draft EIS, does not discuss the impact of that option. A plan amendment or a revised solid waste plan would be needed for Weyerhaeuser to import waste.

Either of those documents would be subject to a separate SEPA, or State Environmental Policy Act, process, including opportunities for public involvement.

Waste would be collected at the Longview Mill Complex and transported to the landfill by an existing rail line. The trains would make one or two round trips per day, six days a week and consist of twenty-five to fifty cars.

The entire project includes materials handling at the Mill Complex, hauling of waste and leachate on an existing rail line, and construction, operation and closure of the landfill.

More details are provided in the summary and in the body of the draft environmental statement.

MR. PALCO: Again, I would like to summarize what I need you to do.

To make sure that we have an accurate presentation from you and a record, I would ask you to come to the podium and to speak. If you have written presentations please provide it to me, and to try to keep your comments less than or right at about five minutes, and I will call the names of the people that have signed up to testify.

The first person is Harry Brawny to be followed by Chet Gardner of Silver Lake.

MR. BROWNE: My name is Harry Browne. I am the President of PAMSCO and owner of PAMSCO, a company in Longview, Washington.

(1) I addressed both issues, the environmental part of it and the economic part of it, and I will take the economic part first.

I think if we agreed that a landfill would help make a decision for Weyerhaeuser Company to do their modifications, it's extremely important not only to my small business but to probably hundreds of small businesses that it happen.

Secondly, on the environmental issue, if we agree that a landfill has to be provided someplace, it appears to me that no one has done more research and tried to prevent a negative impact from happening than I have seen proposed here.

That's all I have to say.

MR. GARDNER: My name is Chet Gardner. I am Master of the Silver Lake Grange of Silver Lake, Washington, and I want to invite you out tomorrow night. Don't be afraid just because of a little meeting here tonight.

I guess we are here to comment on the Weyerhaeuser SEPA report.

Did it contain all the elements that are required?

Did it consider all the problems that the people have raised?

Now, they asked us to address questions in the past, and have those concerns been answered?

The answer is no.

(2) Within the SEPA report, which is one of the requirements of law, as the last speaker addressed his economics, what does it effect, we the people in Cowlitz County?

The state law requires the inclusion of economics. Nothing included in the project describes the total size of the project in dollars, the economics, the total budget, the economic impact of the project upon the community, the impact of the burden of increased highway repair, the loss of revenue to the federal government by the sale of tax-free revenue bonds by the Port of Longview, economic loss of sportsmen by the already closure of the area, economic loss to the highway users by the increased weight, the already overcrowded rail crossings by additional rail usage, economic cost to monitor this dump and water waste and surrounding lands, loss of three hundred sixty or more acres of vibrant, young growing forest, economic loss to other property owners by the very presence of the dump in the Silver Lake/Toutle area.

What will be the economic loss or the problems of the Toutle Lake/Castle Rock/Kelso school systems by the additional school children?

(3) The public health issue has not been addressed within the EIS so far as the lingering health effect from the volcano and the dump's effects upon mental health. That's included in the March 1986 Supplement of Public Health.

(4) There is no report or study on the existence of deep water aqueducts.

I want to thank you very much for allowing us to be here tonight.

MR. PALCO: Thank you very much.

The next two people are Jeff Wilson followed by Steve Hanson.

(5) MR. WILSON: My name is Jeff Wilson, and I am President of the CCS Cowlitz Cleansweep.

I have my professional and personal statement I would like to read.

Like all businesses, we have to reduce our generated waste rates and waste reduction consolidation with continuous recycling efforts.

However, there will always be a need for wastes that are non-hazardous to be disposed or handled in some

manner, as presented to you by Weyerhaeuser Company.

By allowing Weyerhaeuser to operate its own site facility, we will be a more self-supporting community based upon the following points: first, Weyerhaeuser will only place non-hazardous materials on their site, allowing easier responsible management of such waste streams locally as opposed to a facility outside our community.

Second, by monitoring and operating stipulations, Weyerhaeuser would be managing their own non-hazardous material site, which could be a private landfill for such needs as compared to other landfills that take many other generated waste streams and mix such waste streams together.

The Weyerhaeuser site could be managed more efficiently as having only one source and/or generator.

Third, the draft EIS supports that this landfill would meet or exceed landfill requirements for that such as municipal landfills, even though these standards are well above the required wood waste sites.

Also, the EIS addresses worse-case scenarios, none of which would have significant impact on the environment or surrounding habitats.

Their landfill would be on private lands with several buffer zones that would again reduce the

aesthetic impact that other landfills such as municipal sites simply cannot offer.

Finally, by allowing Weyerhaeuser to operate their private facility, this will service the financial responsibility the owner must provide at their expense for such requirements that protect the environment and related habitats without any burdens to the local taxpayers.

I, myself, live next to a closed landfill that did not have the minimum functional standards such as imposed on sites today, as well as others in the county.

Weyerhaeuser's proposed wood waste facility cannot be compared to other landfills, especially the one I live next to, as this site would be a step in the right direction for proper waste management practices.

Thank you.

(6) MR. HANSON: I am Steve Hanson, and I am not here at the request of Weyerhaeuser or anyone from Weyerhaeuser. I am here this evening at the behest of both the Longview and Kelso Chambers of Commerce.

I am the immediate past president of the Longview Chamber of Commerce, which represents some seven hundred small and large businesses and professions. I am also the past president of the Kelso Chamber and am here to represent their two hundred and seventy members.

As the spokesperson for the Chambers, we would like it known that we are in strong support of the Weyerhaeuser Company's proposed Headquarters Camp Solid Waste Disposal Facility.

We have reviewed the draft Environmental Impact Statement and find that it is an environmentally and economically sound solution to the solid waste needs of the company.

The conclusions of the statement are that the majority of significant impacts can successfully be avoided, reduced or compensated for by the mitigation measures proposed as part of the project.

As the facility would be part of the company's overall modernization, we are in further support of the project for two additional reasons: first, Weyerhaeuser has proven, over the years in our community, to be a good corporate citizen. The company has unselfishly given millions of dollars to numerous community projects and facilities in Longview/Kelso.

Thousands of local area citizens have benefitted from their generosity through the programs they have supported. The list is long. Weyerhaeuser has greatly impacted our environment by making this a better place to live.

Not only has the company been a good corporate

citizen, but a major employer in the area whose taxes they pay contributes substantially to the overall economic well-being of our community.

Where would we be without Weyerhaeuser, without their corporate good citizenship, without the taxes they pay? How many of our services, programs and facilities would be cut from our local budgets? Without the job base they provide, how many of our local businesses would we lose?

Talk about an environmental impact.

Yes, the proposed waste management system is of great importance to Weyerhaeuser's plans to upgrade and modernize mill facilities in Longview and the region.

And it is important, too, both environmentally and economically to the business, professional and industrial community.

I am here representing tonight as spokesperson for both the Longview and Kelso Chambers of Commerce.

Thank you very much.

MR. PALCO: The next two speakers are Ted Hutchinson and John McKenzie.

(7) MR. HUTCHINSON: My name is Ted Hutchinson, and I am general manager of the Lone Star Northwest here in Longview.

I think the other people before me have addressed

both the economic and environmental impact of what Weyerhaeuser is trying to do.

I personally have lived in an area where we have landfills in close proximity. Some were handled well and some were handled improperly.

In reviewing the documents that Weyerhaeuser has submitted, we feel, I personally feel that they have done an extremely good job.

From an economic standpoint, I think it's very important to all of us to understand what Weyerhaeuser does primarily for this community and the impact it would have if they were no longer involved in the community.

So, in reviewing your situation here, I strongly support what Weyerhaeuser is trying to do.

(8) MR. McKENZIE: My name is John McKenzie, and I have lived in Longview for over twenty years and moved here from Portland. I am general manager for Valley Rental for that twenty years, and I am also President of the Lower Columbia Contractors Association, and I would like to comment on the project from a business and personal point of view.

I have been to four of the meetings Tom Scandland has presented and one open forum at R.A. Long. I feel I have gotten some good information on the project, a

good handle of what's going on.

I feel Weyerhaeuser has spent the time and engineering to develop a responsible solution to their waste problem. It's just not an open pit, but something that is designed to hold and treat any waste which might leach out.

I feel in today's business world we all need to look at means of handling our own wastes and being responsible to manage it, locally if possible. There can only be so many landfills in eastern Washington and Oregon.

The time is here when we, as a community, have to stand up. I recognize we have to deal with our own waste problem, whether it be our own home or our business.

There is also the factor of jobs. I am concerned if Weyerhaeuser doesn't -- if Weyerhaeuser closes its plant, where are the new jobs to come from? We need to think about our towns' future and the future of our kids if they want to live here and raise their families here.

If we really analyze what the growth potential will be if Weyerhaeuser stays in town to modernize and expand the jobs created will mean a big boost for our town and the surrounding areas.

You don't have to look very far back to see what

happened to the steel industry, the automobile and logging right here in town. It can happen here. It could happen to the paper industry.

We all want a clean environment to live in, but we also need an economy to provide us with a good standard of living.

I, for one, think this landfill is a big step in the right direction.

MR. PALCO: The next two speakers, Gary Healey followed by Martha Belding.

(9) MR. HEALEY: My name is Gary Healey, and I am vice-president and manager for pulp paper and chemical operations here in Longview.

First of all, I would like to thank you for the opportunity to provide public comment, and, secondly, I would like to thank everybody for coming tonight and participating in the public process.

Our message is pretty simple and straightforward.

Our proposal provides a solution to the community industrial waste problem. We bring it forward as a responsible citizen with the resources and capabilities to address this critical issue. It is for the benefit of the community as well as the company.

Let me tell you why. Weyerhaeuser at Longview is at a critical junction in its sixty-plus year history in

the community. In fact, at no other time have we been faced with the challenges we see today. These challenges are directly related to the dramatic and rapid changes in the world that we live in.

A good example is the global marketplace that we operate in today. Three or four decades ago, the U.S. set the rules in the marketplace to do collective participation of business, labor and government. The customers were secondary.

Today customers are the primary focus. They make the rules, and they make them at the world level. U.S. labor, business and government have not adjusted well to the required changes. America is losing the economic war. It is a war that we cannot afford to lose.

I subscribe to the theory that the cornerstone to a strong country is a strong economy that supports a social, educational, military and other systems.

At the community level, a strong business environment provides an opportunity for the quality of life that we all desire.

Past practices and ways of doing business will not be successful in the future. We must design our business systems, including landfills, for the needs of tomorrow if we are to remain a viable business and employer and contribute to the community.

That is why we are here tonight proposing the Headquarters landfill. Fortunately, we do have a past here at Longview to make ourselves a competitive facility that provides a strong economic base for our community.

Our plans call for massive change and major investments. Major highlights, which I won't go into detail tonight, are pulp mill modernization, customer-focus, building quality assurance in all of our process and improving our work systems and, of course, our proposed Headquarters landfill.

I often get asked why is Weyerhaeuser investing in a landfill. It's not one of our core businesses, and the answer is very simple. It supports our competitive capabilities in a very competitive marketplace where our competition comes from the southern United States and Scandinavia. It allows us to manage our destiny that benefits our community and the company.

Community sensitivities of the landfills no longer allow somebody from Weyerhaeuser Longview, with over one billion dollars invested on the Longview site, to put the fate in the hands of independent landfill owners as we did in the past.

Additionally, the project is critical from several perspectives. First of all, it is important to

understand that disposal capabilities for industrial solid waste has reached a critical point in this county. A solution is needed now. Our proposal provides that solution.

Secondly, we consider the landfill as part of the carefully planned and executed, integrated waste management program, which includes waste reduction, recycling, reused and incineration with energy recovery. Weyerhaeuser management at this facility helps us with that total process.

I am proud of our employees' efforts to reduce solid waste. We have reduced it over seventy percent over the last decade. Even with these reductions and the recycling process, we do need a landfill, and that's why Headquarters is so critical to us.

Recognizing that we will always have waste material that requires disposal, we are committed to managing this disposal of this waste in order to safeguard the environment and be a responsible citizen in this community.

As I previously mentioned, perhaps the most important reason the facility is so critical to the future of Weyerhaeuser of Longview is that it helps give us control of our destiny. Engaging longer-term control and responsibility of our waste, we can maximize our

environmental protection and create long-term disposal capacity while controlling cost and liability, a major benefit to the community as well as the company and all employees.

Let me close by citing several factors that give us confidence that the project will be environmentally sound. The facility will receive only forest products manufacturing waste and minor amounts of construction and demolition debris; no hazardous, no dangerous waste.

Extensive siting studies have determined that Headquarters camp is the best site when all environmental issues are collectively evaluated. The facility is designed as a state-of-the-art that far exceeds the standards of handling wood waste, and the facility will be operated to conservative and environmental standards.

We will carry out environmental monitoring during the operation and at closure with close scrutiny by the regulatory agencies.

As a company and individual employee, we will take great care to develop an environmentally sound integrated waste management plan.

Headquarters camp is a critical part of the plan and a key element to the plans of Longview. I believe every one of our employees, community and local

understand that disposal capabilities for industrial solid waste has reached a critical point in this county. A solution is needed now. Our proposal provides that solution.

Secondly, we consider the landfill as part of the carefully planned and executed, integrated waste management program, which includes waste reduction, recycling, reused and incineration with energy recovery. Weyerhaeuser management at this facility helps us with that total process.

I am proud of our employees' efforts to reduce solid waste. We have reduced it over seventy percent over the last decade. Even with these reductions and the recycling process, we do need a landfill, and that's why Headquarters is so critical to us.

Recognizing that we will always have waste material that requires disposal, we are committed to managing this disposal of this waste in order to safeguard the environment and be a responsible citizen in this community.

As I previously mentioned, perhaps the most important reason the facility is so critical to the future of Weyerhaeuser of Longview is that it helps give us control of our destiny. Engaging longer-term control and responsibility of our waste, we can maximize our

environmental protection and create long-term disposal capacity while controlling cost and liability, a major benefit to the community as well as the company and all employees.

Let me close by citing several factors that give us confidence that the project will be environmentally sound. The facility will receive only forest products manufacturing waste and minor amounts of construction and demolition debris; no hazardous, no dangerous waste.

Extensive siting studies have determined that Headquarters camp is the best site when all environmental issues are collectively evaluated. The facility is designed as a state-of-the-art that far exceeds the standards of handling wood waste, and the facility will be operated to conservative and environmental standards.

We will carry out environmental monitoring during the operation and at closure with close scrutiny by the regulatory agencies.

As a company and individual employee, we will take great care to develop an environmentally sound integrated waste management plan.

Headquarters camp is a critical part of the plan and a key element to the plans of Longview. I believe every one of our employees, community and local

I would like to read one little bit from DOE to Jolene Unsoeld regarding the Radcovich dump, which we know it's the same thing coming up there.

This is hazardous waste we are disposing.

DOE says regarding the Weyerhaeuser waste at the Radcovich dump "Further testing of the untreated, clarified solids, boiler ash, lime dredges and grits was conducted by the Department of Ecology and Weyerhaeuser. Results of the analysis indicated some toxic organic compounds in the clarifier solids and increased levels of biological activity occurring within the material. More of these materials were designated dangerous or hazardous waste and therefore not appropriate for disposal at a solid waste facility."

You people who work for Weyerhaeuser know exactly what we are talking about.

Thank you very much. Do you want this?

MR. PALCO: Yes, please.

Ethel Wanamaker, you have a question mark by "do you wish to testify".

MS. WANAMAKER: No.

MR. PALCO: Sid Roberts, followed by Marv Cole.

MR. ROBERTS: I am Sid Roberts, owner of M & R Paint, Incorporated, Longview,

Washington; resident of Cowlitz County, Kelso, Washington.

(12) We are all here this evening for the purposes of expressing our concerns really over the overall welfare of Cowlitz County and Cowlitz County residents and the total community.

With growing concerns over the environment and protectionistic-type attitudes that have been developed over the last few years, particularly the last seven or eight years, it has become more important, very -- extremely important that residents of this community look at all of industry and the industrial landfills and the methods of disposals of all these solid waste-type products with equal bearing.

Weyerhaeuser has done a couple of different things, and one of the major things they have done is they have researched in fact the entire area. They have scanned over several proposed sites.

From these sites, they have chosen one particular site for several reasons.

The biggest reason is the Headquarters site has a particular type of clay soil which holds back the leachate so it can be properly disposed of.

The responsibility of waste materials for Weyerhaeuser and anyone else, as you know, is critical

to grave. This means that by-products or the waste is the responsibility of the creator forever until that material has either been totally disposed of by incineration or proper neutralization.

When anyone disposes of material anyplace, whether it be our local municipal landfill or whether it be Arlington or a place like Arlington, they become a part-owner of that facility forever.

It is with this in mind that Weyerhaeuser Company is acting with sound judgment with regard to establishing their own, Solid Waste Disposal Facility, because for once they need to be in control.

The overall controls in monitoring of this facility would be done in the same manner as all other waste disposal sites with one major difference, and that is the total liability for this facility rests with Weyerhaeuser and will be monitored by government agencies, particularly the Environmental Protection Agency.

The disposal site at Headquarters is to be constructed with the newest and best construction material known to date, as well as using the best monitoring system they can possibly use.

I have reviewed the impact statement, and it is my opinion that as a worse-case document it has covered all

pertinent areas, even all remote possibilities.

With this in mind, I still believe that only a few unavoidable impacts that were found would not be addressed by monitoring and control systems which have been proposed by Weyerhaeuser.

The traffic impact would actually be significantly lessened as over-the-road hauling would be diminished. This would be carried on in the recently revamped railroad system done in 1991, between the Longview sites and the Headquarters camp area, thereby cutting back the possibility of accidental spills, wrecks on our public roads.

The approval of the facility would increase the longevity of our own municipal waste facilities for the use of our residents and local people who live here.

It is therefore my belief that the approval of this site would benefit the entire community with only minor impacts to a few.

MR. COLE: I am Marvin Cole of Marvin Cole General Contractors. I have lived in the Longview/Kelso area since 1945, '46 area.

I have a letter here.

(13) I feel that the impact of the proposed Weyerhaeuser Solid Waste Facility on Headquarters Road is a necessary and economically progressive community action.

After reviewing the Environmental Impact Statement, I applaud Weyerhaeuser's efforts in developing this plan in the best interest of both the economy and the environment.

As proposed, this type of modern facility will help resolve our critical shortage of disposal sites, while maintaining an environmental control.

I urge you to accept Weyerhaeuser's proposal and to issue the permits as applied for.

Thank you.

MR. PALCO: The next two people, Don Belding and then Randy Deck.

MR. BELDING: My name is Don Belding. I am the President of the Friends of Silver Lake.

(14) I am enthused over Weyerhaeuser's building anything they want to in Cowlitz County in the area, as long as it's not a dump on Silver Lake.

I spent eight years, a very tough eight years getting some help from the ecology, and we finally got that, and we were looking forward to better Silver Lake.

I read the Environmental Impact Statement, a draft of it. There were several things that came to my mind. One of them is the Cowlitz Railroad.

Now, this is a wholly-owned subsidiary of

Weyerhaeuser, and their tracks run from the Longview Mill Site to Green Mountain Mill.

In Volume I of Draft EIS on page S-20 and 21, it is noted that two trains per day would cause delays of three to four minutes and would occur four times between six a.m. and six-thirty p.m.

Each train would pull eighteen cars of pulp sludge in waste containers.

As the special pulp sludge dump train leaves the Weyerhaeuser mill on the Columbia River at Longview, the first well-travelled street it crosses is Industrial Way. See Exhibit 1.

It is a map, three little maps on the back side of this that show the crossings that I am talking about.

The second street is Washington Way, another well-used street.

The tracks cross No. 2 drainage ditch just before it crosses the third main street, Ocean Beach Highway; then crosses Tori Lane; then crosses another branch of No. 2 drainage ditch; then 32nd Avenue.

The tracks here are less than twenty yards from the retail buildings, which includes the Fred Meyer complex.

The next street crossing is Olympia Way; then 30th Avenue. Again, the tracks are twenty yards from the 30th Avenue shopping center which has a big Safeway

three-quarter miles, one and three-quarter miles of very close access to the Cowlitz River and Kelso and Longview water plants.

Exhibit No. 2 shows the track crossing from Nevada Drive then crossing to the Ostrander Road area.

As the tracks leave Rocky Point, it crosses the Northern Pacific Railroad, Interstate-5, Nicholson Road, Evergreen Road, Holcomb Acres Road and Guffer Road.

On Exhibit 3, the tracks enter the Ostrander Creek canyon, where it crosses Ostrander Road, Lenora Lane and Headquarters Road. The tracks cross Ostrander Creek numerous times as it winds its way up to the Headquarters site.

Ostrander Creek drains into the Cowlitz River about two miles from the water plants of Longview and Kelso.

It is estimated that the Headquarters site has a distance factor of forty-three miles round-trip. None of this distance is out of the Cowlitz River drainage.

Most of the railroads in Washington have replaced their rails with one-quarter mile rails. That means no rail joints for a quarter mile. The Columbia/Cowlitz Railroad has not done this.

In the Draft EIS, Volume I, page I-14, it states that the rail line was upgraded in 1991 to meet federal Class II rail standards. The improvements they claim

were new ballast, road beds; new rails; improved drainage and other modifications.

In July of '92, a seven-car wreck or derailment dumped wood chips only a few yards from the Cowlitz River. Last October 3rd, three or four miles beyond the Headquarters site, a seven-car derailment dumped lumber, hog fuel, and so forth, on top of the fill located over Hemlock Creek.

In the Draft EIS, Volume I, on page S-14, someone has estimated a derailment would happen every two hundred years.

With the October '91 and July '92 derailments only ten months apart, that is four hundred years' of wrecks. In the last four years, there has been at least four derailments with cars tipped over. That is eight hundred years' of derailments.

That makes a man wonder, doesn't it?

What criteria was used for the two hundred year wreck?

Thank you for your time.

MR. DECK: My name is Randy Deck, and I represent Lakeside Industries doing business in Longview, Washington.

(15) In this age of waste reduction or recycling efforts, one problem still remains with us, and that is

the need for environmentally sound pulp sites for non-hazardous material.

Weyerhaeuser is no exception, and even though they have reduced their waste by seventy percent, the need for this disposal site still exists. This process consists of numerous studies, proceedings, site locations, public hearings, and most important of all is the Environmental Impact Statement.

I have read the Draft EIS that's been released by the Health District for public review, and these experts, and I do emphasize these experts, finally show that Weyerhaeuser met all and even exceeded some environmental issues.

For example, there are other like existing operated solid waste sites in Western Washington who do not have protective liners and do meet present-day environmental standards. Weyerhaeuser's present management under the leadership of Gary Healey, who are extremely environmentally concerned, have decided to line the new site as to not create any problems in the future.

Inspections will be made to make sure that all material reported to the site are non-toxic and non-hazardous.

The EIS shows there is no significant impact on air quality and traffic.

In our dealings with Weyerhaeuser throughout the years past, the standard philosophy is to meet head-on three key issues, and these are safety, environment and economic.

For Weyerhaeuser, safety is a given, and I believe that the EIS proves that the issues have been met or exceeded to the environmental, and I would like to address the economic part briefly here.

The proposed waste site is of great importance to Weyerhaeuser. Weyerhaeuser plans to upgrade and modernize the Longview facility. If this does not happen, the economic effect on this community will be detrimental. The tax base loss for our school system alone is enough to cause concern, and a loss of job and revenue that help create a healthy and thriving community would have the greatest long-term effect upon them.

I have lived here for thirteen years, and I have worked here for seventeen, and I really plan to retire here, so, in closing, I would just like all of you to support the construction of this new facility as I will.

Thank you.

MR. PALCO: Next, John Walkush, followed by Clara Wilkins.

MR. WALKUSH: I am John Walkush,

Vice-President and Mill Manager of North Pacific Paper Company.

(16) NorPac is a jointly-owned company with Weyerhaeuser Company and Jujo Paper of Japan.

Thank you for allowing me to represent NorPac's position on the Headquarters landfill.

Briefly, NorPac is a world competitor in the newsprint industry. We compete with not only the Americans, Canadians and the Japanese and the Scandanavians, our critical requirement is to have quality product at competitive cost.

NorPac is proud to be part of the solution in the solid waste crisis this region in the country faces. Every day NorPac produces recycling newsprint using six hundred tons a day of old newspaper. Six hundred tons of old newspaper is equivalent to one semi load every hour, twenty-four hours a day, three hundred sixty days a year.

Also, another translation is it's equivalent to all newspapers typically read in a day in the State of Washington, Oregon and Idaho.

It's important to understand, however, as part of the solution in our manufacturing process, we also have a byproduct. For every six hundred tons of newspaper that we use every day, there is approximately one

hundred tons of fiber that is not usable for making newspaper a second time.

After we have done everything we can to minimize the waste material, including recycling, reuse and incineration, there is a waste material, a non-hazardous waste material that needs to be disposed of in an environmentally secure landfill.

The material is as hazardous as the newspaper you and I read every day.

It is also critical to understand that a disposal facility which provides us with economic stable long-term disposal capability is what is vital to NorPac's future. NorPac represents five hundred jobs in Cowlitz County, and some eight hundred million dollars in tax base, which translates to approximately fifteen percent of the Cowlitz County taxes.

NorPac, like Weyerhaeuser, has been faced with dramatically increasing costs of doing business over the last years.

You have read about the spotted owl and the raw materials. You are hearing about salmon and energy costs, and to be able to continue to make a low cost product we have to have a way of using recycled materials.

Without this comprehensive strategy for handling

solid waste that allows us to keep those costs under control and remain competitive in the world market, we would not be able to assure the continued competitiveness of NorPac.

We strongly support Weyerhaeuser's efforts to site at Headquarters Camp Disposal Facility. We believe that not only is a critical part of NorPac's future, but it is also an environmentally sound project.

The non-hazardous nature of the waste, the intense site selection process that has been undertaken, the state of art design which surpasses many landfills operating in the region, we feel that the operational techniques and methods designed for the on-going operation will prove to be an environmentally sound operation.

We believe further there is no credible alternative that would be more environmentally sensitive economically strengthening to our region.

NorPac looks forward to the speedy review of this proposal by the Health District and the Department of Ecology.

Thank you for allowing me to comment on NorPac's views.

C. WILKINS: I am Clara Wilkins, Chairman of the North Cowlitz Council Environmental

Health Council.

I am going to make a comment on the Draft Environmental Impact Statement on the Headquarters Camp Solid Waste Disposal Facility.

To us it's still called the dump.

(17) Last June, 1991, there was a public hearing that the Health Department had, and those comments were supposed to be in this Draft Environmental Impact Statement.

Yesterday, I copied nearly one hundred letters opposed to the landfill. I am going to offer them to see areas that are not covered with the draft, and I have found numerous ones that have not been covered such as Silver Lake. That is a lake of state-wide significance, and the Department of Ecology said earlier that that would be part of the draft, and it is not.

We also have on file a petition of five thousand signatures opposed to this landfill.

There were seven areas of controversy that was in the Draft Environmental Impact Statement, but those seven areas only covered five pages of that one hundred fifty-paged draft.

I would like to take the alternatives. When we had the meeting last year, the alternatives were two on Taylor Road, and I brought evidence in so that the

Health Department could Barnes Drive in.

The draft came out, and I have to ask the question to the Health Department: What happened to those alternatives? Those alternatives turned into a, the same site as the Headquarters site, the larger landfill. It's only fourteen acres smaller, only one million cubic yards less.

Do you call that an alternative?

Now comes alternative b, the same site again. Although it is ninety acres less, twelve million cubic yards less of waste, but it's the same site. I don't call those alternatives.

Although the last alternative is a no-action alternative, that one I think we could agree on.

I received the state SEPA listings. Klickatat landfill is expanding to seven hundred forty acres more, and it would accept exactly the same waste that Weyerhaeuser wants to put in this dump up here.

Weyerhaeuser says it's too expensive to take it over there; can't compete on the market. Well, I feel Weyerhaeuser can compete on the market, because they own their timber land, paid six dollars an acre years ago.

Their competition has to buy the land and timber at today's market price, which is a lot higher.

If Weyerhaeuser must use economics and things such

as well, we can't afford to put the mill in and upgrade it if we don't have the dump, why doesn't the Health Department and the Department of Ecology ask Weyerhaeuser for their records and see if this is a legitimate issue, or are they using this as a pressure tool?

If Longview and Kelso thinks the dump is so great, why was there so much pressure put on closing the one that was so close to Weyerhaeuser's mill? Why don't we leave the mess down here? Why make two messes?

Why not settle the economic question; why not do an independent study for sites?

Are you here today to protect the people, or are you here today to cave in to big business interests?

All I want to say to the Department of Ecology and to the Cowlitz County Health Department, obey the laws of this county, this state and this country. Protect our health.

No dump at Headquarters Camp. No permit.

MR. PALCO: Next, Pat Wilkins followed by Ruth Deery.

P. WILKINS: My name is Patrick Wilkins. I am a board member of the North Cowlitz Environmental Council. I am in rural Castle Rock.

(18) I suppose there are some in this audience here

tonight that think I would like to come up here and paraphrase Antony to the effect that: Friends, Cowlitz County residents, countrymen, lend me your ears. I come not to praise Weyerhaeuser, but to bury Weyerhaeuser, but, obviously, Weyerhaeuser is not dead, and I don't wish that Weyerhaeuser was dead.

Weyerhaeuser is a vital part of this community, and perhaps is this community, but Weyerhaeuser is dead wrong in their selection of the Headquarters site at the Silver Lake watershed on Sucker Creek for this dump site.

(19) Now that I have stated an opinion such as many have before me, I will try to address myself to a specific in the EIS that I would like to put forth here. That is the fisheries portion of the Draft Environmental Statement is deficient in that it downplays the importance of Sucker Creek as the spawning area for Coho salmon.

The people who did the elctrofishing in June, 1990, and January, 1991, to guess the total numbers of each species of fish in the creek, point to the presence of juvenile steelhead trout, indicating successful spawning.

The DEIS also states Coho salmon may also spawn in Sucker Creek, but that it was not possible at the time

to determine whether the juvenile salmon caught via electrofishing were naturally spawned or were the plants put in the stream by the Washington Department of Fisheries in May of 1990.

Well, of course, those Coho are long gone and surviving adults should be on their spawning run back from the Pacific this fall and winter.

But, by golly, there are juvenile Coho salmon in Sucker Creek right now today.

Electrofishing done by a Department of Wildlife representative just last week turned them up in far greater numbers than did the consultant scientists two years ago, and he can't either determine whether they are natural spawn or plants.

We can't find anyone who planted them. They may be planted, but we can't find them.

The Department of Fisheries in Olympia has no record that there have been any new stockings of Coho in Sucker Creek, and a fisheries biologist says it is likely these new Coho are the result of natural spawn produced by last year's heavy run of Coho in the Toutle.

The point is, here is another outstanding reason not to muck around with Sucker Creek, and, of course, I am referring to the proposed chanelling of Sucker Creek around the proposed dump site.

I am submitting the total raw footage photograph of these electrofishing as a picture record of these Coho.

MS. DEERY: I am Ruth Deery of the local chapter of the Audubon Society.

(20) I, we, have a concern which I did not see addressed in either this three-paged summary or in the statements that were made earlier this evening, and that concern is this: In this era of deregulations and hostile takeovers and bankruptcy of convenience, and that sort of thing, in the event of changed circumstances or changed ownerships, we need information about how the monitoring for eighty years on this landfill is to be funded and enforced.

It is something on which information has not been presented at least so that I am aware of it.

Thank you.

MR. PALCO: Next James Bopst.

You will have to bear with me on names. I am not real good at this.

And, then Ronald Morris didn't indicate whether he wanted to talk, or not.

The next person to speak is Karen Jones.

MR. BOPST: Thank you. My name is James Bopst.

(21) My comments are brief, as I intended on following

up with written comments.

It appears to me that almost daily people take risks without totally thinking through the consequences of those risks.

On the other hand, we have the Weyerhaeuser Company that has thoroughly investigated and recognized the consequences of taking risks of putting in this proposed landfill.

This consideration was done under strict compliance with government agencies and regulations.

I, personally, as a recreational user of Silver Lake, I feel confident that Weyerhaeuser has taken responsibile measures to prevent any negative impacts to the surrounding environment, and because of the necessity to Weyerhaeuser's expansion and modification project, in addition to the negative impacts that Weyerhaeuser's withdrawal of pulp and paper operations would have on our community, I recommend approval and acceptance of the proposed project.

Thank you.

MS. JONES: I am Karen Jones from Lower Columbia College speaking on behalf of Vernon R. Pete Pickett, President of the college. He sends his regrets.

(22) "As an educator and college president, I am aware

of the benefits to a community of the presence of a strong industrial base. Weyerhaeuser Company has provided a foundation for economic strength in Southwest Washington for many years. Its continued presence as a healthy and competitive industry is critical, not only to the economic vitality of our community but also to its overall quality of life.

"I recognize that the development of the sanitary landfill is linked to the modernization of the pulp plant, which, in turn, is linked to the long-term welfare of our community. That this modernization go forward is even more important to us now that Trojan will be closed in 1996. Resolution of the landfill issues in a prompt, constructive manner also is essential.

"I am encouraged by the Environmental Impact Statement prepared by the Cowlitz-Wahkiakum Health District and its consultant. It seems to me that the issues have been thoughtfully and carefully addressed.

"I encourage the health district to give timely and favorable consideration to the request before it for the solid waste permit."

Thank you.

MR. PALCO: Dan Eben. I can't really --

MR. EVANS: It's Evans.

MR. PALCO: Followed by George Raiter.

(23) MR. EVANS: I will make my comment brief. I will also follow it up with a more detailed letter later, but as a long-time local resident and business owner, I followed with interest Weyerhaeuser's approach to solving this long-term need to be responsible, number one, for its own solid waste.

I have also followed with interest Weyerhaeuser's decision making process regarding its future in Longview.

The long-term economic benefits to the future are obvious. If they proceed with their plans to modernize the pulp mill, I further believe that gaining control and responsibility for their own solid waste is a key element in Weyerhaeuser's decision whether or not to proceed with the modernization.

Therefore, the long-term economic benefits of granting a solid waste site are also obvious to all of us.

The second one has to do with -- my statement has to do with the process of -- what they went through to select a site. Throughout their process to find the best possible location for a disposal facility, I have

been impressed with Weyerhaeuser's determination to find the most environmentally sound site that's possible.

I am not surprised therefore that the Draft Environmental Impact Statement concludes that Weyerhaeuser's plan to develop the Headquarters camp as a site is an environmentally sound one.

I fully support the issues of a solid waste disposal site.

Thank you.

MR. RAITER: My name is George Raiter. I am President of the Industrial Pond Services here in Longview.

(24) In the past twelve months my company has travelled to numerous communities in six different western states helping both private industry and governmental bodies resolving their environmental problems.

Two things that I have realized, one was that I was reminded of what a fabulous place we have to live here in the Cowlitz valley and the quality of life, the environment. The quality of life we have is also connected with our economic quality of life, and there are a lot of very nice places in the Pacific Northwest now where there are not jobs, and the quality of life is not good because of that. Economic provisions are very appropriately considered.

The other thing I have seen, I am familiar with the construction and design standards for the Headquarters landfill. This landfill far exceeds many of those I have seen and worked with in the past twelve months.

I would request that the Department of Health and Ecology hold Weyerhaeuser management's feet to the fire with strict interpretation of all environmental laws and regulations. I think when you do that you will find that those are met and exceeded, and you will have to approve this application. We have no choice. Then we can bring people from outside this area to see this landfill that will be a landfill that will be a model for other communities.

Thank you.

MR. PALCO: That concludes the people that have signed up to testify.

One gentleman is interested in testifying. Is there anybody else?

MR. DZWILEWSKI: Thank you. My name is John Dzwilewski. I am a safety environmental specialist with Interox America here in Longview.

(25) I would like to echo some of the many comments that were made tonight concerning the Weyerhaeuser Paper Company's position in this community.

We are a neighbor to the Weyerhaeuser Paper

Company, and I have found them to be an excellent corporate citizen. I have had the opportunity to personally work with the staff of the safety and environmental staff at the Weyerhaeuser Paper Company, and I have found them to be some of the most professional members of our community that I have dealt with.

I have had the opportunity to review the Draft Environmental Impact Statement, and I have also taken the opportunity to review the laws and the regulations that will be imposed upon Weyerhaeuser.

Weyerhaeuser does not simply meet this regulations but far exceeds them. They are proving themselves truly to be the environmental leaders of our community.

I would urge the health district to approve their application.

Thank you.

MR. CRAYNE: My name is Ray Crayne, and I am President of Local 681, one of the three locals (26) on the Weyerhaeuser plant site, and I would just like to echo a lot of the testimony I heard today that this community, Weyerhaeuser and other industries in this area do need this dump, and the folks in my local would represent we need this dump in Cowlitz County, so I hope you guys allow them to have it.

Thank you.

MR. PALCO: Yes, sir. You wish to testify?

MR. COX: My name is Allen Jackson Cox, III. I am the President of Local 580, the Association of Western Pulp and Paper Workers in Longview.

(27) I have had a chance to go over the Environmental Impact Statement, and it looks like to me that Weyerhaeuser has done more homework than I have seen them do in a long time. I would like them to get to do that much homework when I get to the bargaining table with them. No offense, Gary.

But, the end result is they have done their homework, and it looks to me like it's one of the best plans I have ever seen and judging from the other people that I talked to that have travelled to other landfills.

I am biased. I work for Weyerhaeuser, and I have a lot of people that jobs depend on that landfill, and I guess the point I'm at right now we, as the locals in Longview, have done our share, and they have met the requirements that I understand through Cowlitz County, and I am also asking you to approve the landfill, and I also live in Castle Rock, and I use Silver Lake as a boating and fishing lake.

I don't want to see it messed up at all, and I don't believe it will be.

MR. PALCO: Anyone else who desires to present testimony?

(No response.)

MR. PALCO: Well, again, the record will be open until September 11.

Your written comments should be submitted to Richard Jones, Cowlitz-Wahkiakum Health District, 1516 Hudson, Longview, Washington, 98632.

With that, I would like to thank everybody for their testimony. The hearing is closed.

(The hearing concluded at this time, 8:20 p.m., August 25, 1992.)

CERTIFICATE OF OFFICIAL COURT REPORTER

STATE OF WASHINGTON)
) ss.
County of Cowlitz)

This is to certify that I, CANDY ZRELIAK, am one of the duly appointed and qualified official court reporters in and for the Superior Court of the State of Washington for Cowlitz County;

That as such reporter I made machine shorthand notes of the oral proceedings had in the foregoing public hearing held on August 25, 1992 at the Cowlitz County Administration Building in Kelso, Washington;

That the within and foregoing transcript, consisting of 52 pages, is a full, true and correct copy of the stenographic notes of the Verbatim Report of Proceedings, so taken and transcribed as aforesaid.

IN WITNESS WHEREOF, I have set my hand on this 7th day of September, 1992.

CANDY ZRELIAK, CSR #: ZR-EL-IC-A538LM
Official Court Reporter
Notary Public in and for the State of Washington, residing at Kelso.
My commission expires: Dec 28, 1994

RESPONSE TO TRANSCRIPT NO. 1

Harry Browne

1. Comment noted.

Chet Gardner, Master
Silver Lake Grange

2. See response to Letter No. 11, Comment 5.

3. See response to Letter No. 18, Comment 7.

4. See response to Letter No. 41, Comment 1.

Jeff Wilson, President
Cowlitz Clean Sweep

5. Your support for the proposed landfill is noted.

Steve Hanson
Longview and Kelso Chambers of Commerce

6. Your support for the proposed landfill is noted.

Ted Hutchinson, General Manager
Lone Star Northwest

7. Your support for the proposed landfill is noted.

John McKenzie, General Manager
Valley Rental

8. Your support for the proposed landfill is noted.

Gary Healey, Manager
Weyerhaeuser Longview Mill

9. Comments noted.

Martha Belding, Secretary
Friends of Silver Lake

10. See response to Letter No. 9, Comment 28 and Letter No. 11, Comment 5.

11. See response to Letter No. 17, Comment 1.

Sid Roberts, Owner
M & R Paint, Inc.

12. Your support for the proposed landfill is noted.

Marvin Cole
Cole General Contractor, Inc.

13. Your support for the proposed landfill is noted.

Don Belding, President
Friends of Silver Lake

14. The comments in your oral testimony are the same as those in Letter No. 12. See responses to that letter.

Randy Dec
Lakeside Industries

15. Your support for the proposed landfill is noted.

John Walkush, Vice-President
NORPAC

16. Your support for the proposed landfill is noted.

Clara Wilkins, Chairman
North Cowlitz Environmental Council

17. The comments in your oral testimony are the same as those in Letter No. 11. See responses to that letter.

Pat Wilkins, Board Member
North Cowlitz Environmental Council

18. Comment noted.

19. See response to Letter No. 10.

Ruth Deery
Audubon Society

20. See response to Letter No. 47, Comment 18.

James Bopst

21. Your support for the proposed landfill is noted.

Karen Jones
Lower Columbia College

22. Comments noted.

Dan Evans

23. Your support for the proposed landfill is noted.

George Raiter, President
Industrial Pond Services

24. Your support for the proposed landfill is noted.

John Dzwilewski
Interox America

25. Your support for the proposed landfill is noted.

Ray Crayne, President
Local 681

26. Your support for the proposed landfill is noted.

Allen Jackson Cox, III, President
Local 580

27. Your support for the proposed landfill is noted.

TRANSCRIPT NO. 2

COWLITZ-WAHKIAKUM HEALTH DISTRICT

PUBLIC HEARING

on

WEYERHAEUSER SOLID WASTE FACILITY PROPOSAL

August 26, 1992
7:00 p.m.

Candy Zreliak
CSR #: ZR-EL-IC-A538LM
Official Court Reporter
Hall of Justice
312 South First West
Kelso, Washington 98626
(206) 577-3071

INDEX OF SPEAKERS
August 26, 1992

NAME	PAGE
Mike Palco	3
David Riggs	4
Jerry Collison	7
Clara Wilkins	10
Melton S. Roberts	13
Dale Henderson	16
Chet Gardner	19
John Robinson	24
Patrick C. Wilkins	30
Martha Belding	37
Don Belding	42
Patsy Meyers	51
Ted Rogers	56
Raymond Morris	57

COWLITZ-WAHKIAKUM HEALTH DISTRICT
PUBLIC HEARING
on
WEYERHAEUSER SOLID WASTE FACILITY PROPOSAL

BE IT REMEMBERED that a public hearing was held at the Silver Lake Grange, Silver Lake, Washington, on August 26, 1992 at 7:00 p.m. by the Cowlitz-Wahkiakum Health District.

Presiding over the public hearing for purposes of receiving comments and testimony was MIKE PALCO, Hearing Officer, Department of Ecology, Olympia, Washington;

Present and introducing MIKE PALKO was DAVID E. RIGGS, R.S., M.S., Director of Environmental Health Division, Cowlitz-Wahkiakum Health District, Longview, Washington.

UPON which the following occurred, to-wit:

7:00 p.m.; August 26, 1992.

(The following introductions, comments and testimony were given:)

MR. RIGGS: I want to introduce Mike Palco, professional hearings officer, and he will be conducting tonight's meeting, and I will turn it over to you, Mike.

MR. PALCO: Good evening. My name, again, is Mike Palco. I am here on behalf of the Cowlitz-Wahkiakum Health District.

Let the record show that it is August 26th, and that we are here at the Silver Lake Grange to take testimony on the Draft EIS. That's this document Headquarters Camp Solid Waste Disposal Facility that was published in July.

The comment period will end on September 11.

The purpose of tonight's hearing is two-fold: It is to take and make sure everybody that has information or testimony to provide on this Draft EIS has an opportunity to present that to me so I can get it on the record so we can move on to a final EIS.

The second purpose of the hearing is also so I can get that information in a concise form and have it be utilized. Consequently, there are some ground rules that need to be followed.

One is I need to know who you are when you speak, and if you have written testimony I would like you to submit that. It makes the translation a lot easier.

Thirdly, I would like the testimony presented within about five minutes, so if you can summarize your points, relate them to the draft document, it would make the task and the purpose of this hearing run much more smoothly.

The public notice for this hearing was published in the Longview Daily News.

The Draft EIS is available in libraries, and it was mailed to a number of people on mailing lists. Copies of this are available from the health district at their office. There is a small charge for it, so if you haven't reviewed it and need a copy or want another copy that's how you obtain it.

With that, I think I would like to introduce David Riggs who will present a description of the proposal.

MR. RIGGS: My name is David Riggs. I am the director of environmental health for the Cowlitz-Wahkiakum Health District, and for the purposes of this SEPA process and for the purposes of this Draft Environmental Impact Statement and throughout the draft or the Environmental Impact Statement.

I am also the responsible official, but what I

would like to give you right now is a very brief overview description of the proposal that the Environmental Impact Statement is addressing.

Weyerhaeuser proposes to construct and operate a solid waste landfill on approximately three hundred eighty acres of Weyerhaeuser-owned land south of Silver Lake, Cowlitz County, Washington. The landfill itself would also occupy approximately three hundred thirty acres.

Current site topography ranges from eight hundred forty-five feet to one thousand eighty feet. The maximum final landfill elevation will be approximately one thousand two hundred fifty feet. The operational life of the landfill is estimated to be between thirty to sixty years.

The landfill would accept non-hazardous demolition, construction and other solid wastes except municipal waste generated by the Weyerhaeuser Longview Mill complex.

The waste would include log sort log debris, effluent treatment solids, boiler ash, lime wastes, de-inking reject fiber, saw mill waste, and construction and demolition debris.

Weyerhaeuser may also accept the same types of waste from other generators within Cowlitz and Wahkiakum

counties for disposal at the proposed solid waste facility. The facility would not be open to the general public.

Weyerhaeuser may request that the proposed solid waste facility import wastes of the same type from outside Cowlitz and Wahkiakum counties in the future.

The current solid waste plan for this facility does not allow service outside Cowlitz and Wahkiakum counties. Therefore, the Draft Environmental Impact Statement will not discuss the impacts of that option.

A plan amendment or a revised plan would be needed for Weyerhaeuser to import wastes. Either process would be subject to a separate SEPA process, including opportunities for public involvement.

Waste would be collected in the Longview Mill complex and transported to the landfill by the existing rail line. The trains would make one or two round trips per day, six days a week and consist of less than fifty cars. The figure we are looking at presently is between seventeen and twenty-five cars.

The entire project includes materials handling at the mill complex, hauling of waste and leachate on an existing rail line, and construction, operation and closure of the landfill.

More details about the project are specified in the

Draft Environmental Impact Statement.

Thank you.

MR. PALCO: Now, again, I would like to summarize that I will call your name and ask you to come up and present your testimony. For those people that have checked indicating a desire to speak, when I get finished I will ask if there is anybody else that has views or statements to make, and we also had a hearing last night on this same subject. I noticed that there are a number of people that spoke last night that wish to speak again tonight.

If you want to make additional points, it would help us in the recording if you would say that these are additional information that you want to give us. You can say the same thing, but we want to make sure that if it doesn't show up last night and you wanted to make a special point to add that to the record, it would help us if we knew that.

Are there any questions about how we propose to run this?

(No response.)

I promise to do better with names tonight.

The first person is Jerry Collison, followed by Clara Wilkins.

MR. COLLISON: My name is Jerry

Collison. I represent myself. I live on Lakeview Drive in Silver Lake.

I am here to voice my concerns and opinions about establishing this dump where it is and about the process with which it's been accomplished.

(1) The process of looking at eagles' habitats on the south shore of Silver Lake is of a great concern to me, in that the disturbances allowed by heavy industry as well as other disturbances on Silver Lake is of my utmost concern.

The cumulative effect is one that no one can really know what it's going to do. Eagles don't like to have themselves disturbed, and I am concerned that the eagles will not return to our area because they go and they come back on a migration, and I know we have worked with a lot of eagle habitat folks in this Environmental Impact Statement process to determine the legitimacy about eagle habitat on the south shore.

One years' time, two years' time is not a long enough process. We are talking about habitat that takes a long time to determine the inputs, the effects that such an activity would have upon their habitat.

(2) I am also concerned about the effect that putting the dump on Sucker Creek would have. Those of us who live here know there are salmon and steelhead and

cutthroat trout as well as other creatures in that creek, and it is a year-round viable stream. We are very concerned about losing that.

It doesn't make sense to me that we should hastily consider this location for the site of this dump and jeopardize these two different habitats that I have mentioned.

(3) I have spoken with a lot of Indian people. Native Americans are very concerned and they are watching what's happening here, people in all the entire western Washington area. They are quietly waiting back because this is not a new issue. These things have gone on for decades and hundreds of years, and to us it's just one more of these incidences.

It can be said by Weyerhaeuser Timber Company that that is their tree farm; that they own the land, but the process in which the land was obtained is in some people's opinion illegal.

So, I cannot speak for the Cowlitz tribe and do not speak for any other tribe of western Washington, but they are very concerned about this issue.

I would caution Cowlitz-Wahkiakum Health District and the people who make the decision on this that if we err in one direction or the other let it be that we don't err in wiping out fish runs and eagle habitats.

Can we take the the time it takes to determine whether or not we are making the right decision here?

I say we are not.

Thank you very much.

C. WILKINS: I am Clara Wilkins, North Cowlitz Environmental Council, and I have been a resident of Cowlitz County most of my life, most of the time since 1935.

It's kind of hard to follow Jerry Collison. He loves this area very much, and I do, too.

(4) The Draft Environmental Impact Statement. The fact sheet of the Draft Environmental Impact Statement, the second paragraph, the proposed landfill would have the capacity of approximately forty-five point eight cubic yards of in-place waste.

We hold you to that figure: forty-five point eight cubic yards.

The fact sheet also states on the third paragraph: The landfill would accept only forest products, manufacturing waste, and construction and demolition waste from Weyerhaeuser operations in Cowlitz-Wahkiakum counties, as well as similar waste from other generators in the two-county area.

No hazardous, no dangerous or municipal waste would be accepted.

We will hold you to that, also.

And, who will be monitoring this waste besides Weyerhaeuser? Who will be monitoring the noise?

I now hear logging practice tooting eight to ten miles away. Who decides if this noise to my ears is negligible; Weyerhaeuser Company or me?

Stability. I sent a lot of material on Mt. St. Helens, the earthquake fault nearby, information on earthquakes in the northwest, but the Draft Environmental Impact Statement just skimmed over stability of that site. Yet, it sits five hundred above Silver Lake, a lake made by Mt. St. Helens.

Now, the railroad. Will it last another thirty to fifty years? It's been in there about seven years in bad shape. Even though the federal government mandated upgrading the rail line, they are still having wrecks.

I have lived most of my life five hundred feet from that railroad line. I know when that train runs. I know when they have wrecks. As usual, Weyerhaeuser is not giving out the true facts.

What kind of cars are they going to use? The California spill last fall used double-liner tent cars which punctured. Disaster. Leachate could go into Ostrander Creek, Sucker Creek, Cowlitz River.

What kind of rail cars to bring the different

wastes up to the Headquarters proposed dump?

Weyerhaeuser now takes de-inking sludge to Roosevelt Landfill, and you guessed it, only a tarp over the waste. I have seen it with my own eyes.

And we are to believe Weyerhaeuser, the Health Department and Department of Ecology who went over this draft before publication? These questions have been asked before and have never been answered.

The gas monitoring system would not be put into operation until it becomes dangerous, says the draft.

In fact, it sounds like it would not be there at all until the problem started.

Does not the Resource Conservation and Recovery Act, RCRA, cover that? Who will monitor that methane gas? Who will say it's over or under five percent volume at the property boundary?

Also, who will monitor the oxygen?

The support facilities up there at Headquarters, there is a complaint filed at the Department of Ecology, we are told, on the PcB's at Headquarters Camp. That has to be checked into, also.

You, sir, said to us last night, told us not to ask questions.

We have to keep asking questions, because Weyerhaeuser Company has never put in a dump before.

They don't know the answers, so we will continue to ask questions over and over and over again.

But the main question is: Why did the Cowlitz-Wahkiakum Health District and the Department of Ecology approve such a deficient Draft Environmental Impact Statement?

I spoke last night, too.

MR. PALCO: Thank you.

Sid Roberts, followed by Bob -- I'm sorry, Bob. I can't read this: Schwinn?

MR. ROBERTS: My name is Melton S. Roberts, commonly known as Sid. I live in Kelso, Cowlitz County.

(5) I have come this evening to express my concern over the solid waste facility.

No matter where the site choice would be, there will always be someone, or those who will find they will be unhappy with the choice, no matter where that would be.

I believe that if everyone would honestly review the entire Environmental Impact Study, along with the environmental controls and the monitoring that's been addressed by Weyerhaeuser, we will all come to the same conclusion that Weyerhaeuser will do everything possible to limit impacts to this regional area, as well as to

the area in connection with the rail system.

It is my understanding after having spoken with Weyerhaeuser representatives that waste materials to be deposited at the Headquarters waste facility will be checked and sorted out at the recycling center located at the main Weyerhaeuser plant prior to being shipped on to any rail system.

This procedure will be able to be checked out at any time by appropriate agencies.

This over the road, over the shoulder-type inspection service will insure the compliance with the appropriate government guidelines.

The responsibilities of waste materials is expressed as from cradle to grave. This means that all by-products or waste is the responsibility of the creator forever, or until, through proper disposal methods, this material has been rendered totally harmless.

When anyone disposes of material in the municipal landfill, the overall liability for this site rests on the citizens of the area. Any type of clean up which might be deemed necessary would be their responsibility.

However, with this facility, that total responsibility rests with Weyerhaeuser on their shoulders, and their shoulders alone, enforced by

appropriate EPA agencies.

It is my opinion, after having reviewed the worst-case document, which is in this fact study, that it has covered most pertinent areas, even all remote possibilities. With this in mind, I still believe only a few unavoidable impacts were found that would not be addressed by monitoring the control systems which have been proposed by Weyerhaeuser.

Use of the rail system as the main transport method is done on purpose primarily to hold down traffic on over the road hauling rigs and on road systems that are already overcrowded, thereby reducing many possible liability problems.

I am very concerned about this area. I have spent most of my life in this area since 1949. I have fished; spent many a good day on Silver Lake. I have fished most of the streams here. I spend probably two hundred hours every season on the lake fishing, as do my children.

I want to see and do not want to see my favorite pleasure lake or the streams impacted in any way. I, like you, desire to be able to enjoy the fruits of this area for as long as I live.

I honestly believe with proper Weyerhaeuser management and overseeing by the proper agencies that

the valuable resources that we have in this area will be enhanced and not taken away in the long run.

No one wants to see any kind of problem in this area, most especially Weyerhaeuser Company.

I, therefore, am requesting that you accept this permit and approve this site.

MR. SCHEINER: I would like to pass my time, please.

MR. PALCO: Dale Henderson followed by Chet Gardner.

MR. HENDERSON: My name is Dale Henderson, 124 Shenandoah Drive, Silver Lake.

(6) What really concerns me is how this landfill is going to affect me personally and how it's going to affect me economically. What will it do to the value of my home?

(7) Quoting page S-2, the total amount of solid waste expected to be dumped under current proposal is eight hundred ninety-two thousand cubic yards per year.

Page S-5 states that the landfill would operate six days a week, seven a.m. to seven p.m. That means that two thousand eight hundred forty-nine point eight cubic yards would be deposited daily, or two hundred thirty-seven point four cubic yards an hour, or two point nine cubic yards per minute.

(8) Regardless of what the permit will state, I am sure that it is only a matter of time when variances will be granted and the operation will be twenty-four hours a day.

The result: light pollution. This EIS seems to be quite silent on this subject.

On a twelve-hour day, lights will be required at least three days -- three hours a day in the winter months, and even when not in operation boundary and security lights will flood the area.

If one drives east on Spirit Lake Highway at night while there is a football game in progress at Toutle Lake High School, one is under the impression that a whole new town has appeared. Those field lights are on only for a few hours and a few days a year.

I will soon be looking across the lake at even more of a glare, and it will be every night of the year.

(9) Noise pollution: After reading page 2, section 2, 50 to 60, I can come to only one conclusion. I am going to hear the operation from my home.

Nowhere in the ten pages is Weyerhaeuser required to do anything to mitigate the noise that would be generated.

Part of the mitigation statement reads, quote: "Therefore it is recommended that the number of train

trips be kept to a minimum necessary for efficient landfill operation and that trains be scheduled during daytime hours to the maximum extent possible."

That sums up the total mitigation requirements.

When logging takes place across the lake from me, I hear the log trucks and the donkey whistles.

At night, I hear people frogging on the other side of the lake.

Tell me I won't hear the machinery being used in the operation of the landfill.

(10) Air quality and odor: I take little comfort in the statement on landfill gas and odor, page S-12. "If problem levels of gas are found..." Now, this phrase can really frighten me. What is a problem level and who shall make the determination?

Just because Kelso/Longview stink most of the time doesn't mean that Silver Lake must, also.

On page S-19 to 20, it quotes: "If sufficient landfill gas is produced, a gas collection and combustion system would be installed."

(11) Who is to decide what is sufficient and why isn't the word it, or why isn't it "must" or "shall"?

I was always taught that shall is mandatory; not would, instead of would be installed.

Of course, that is the language of this entire EIS.

Nowhere can I find that Weyerhaeuser is required to do anything if and when problems arise. Nowhere are the words "must" or "shall" used.

(12) Weyerhaeuser will determine if there is a problem and then take collective measures. That is somewhat hard to believe.

As a former schoolteacher, I give this report, this EIS an A plus for double talk, an F minus for protection of the environment.

MR. GARDNER: My name is Chet Gardner. I reside at 3148 Spirit Lake Highway, and I did testify last night, but this is a new topic I want to take up.

(13) Last night I talked on economics, and believe you me I got my eyes opened when the Weyerhaeuser fellows got up and started pleading poverty.

I think you heard at the Democratic convention where poor old George was born with a silver foot in his mouth. Well, I kind of feel that way about Weyerhaeuser.

If we are considering it from -- this dump from a standpoint of economics, we should look at the total make-up of the company.

Here we have a board of directors, I think there are eight of them, are getting about one million dollars

a year. When they retire they will get a retirement of about a million dollars a year.

They seem to have in their financial statement several million dollars invested in government securities.

They have been able to hoodwink the unions. They have hoodwinked the chambers of commerce into believing that and believing or pleading poverty. It's far from that.

In fact, they even come down to the Port of Longview and talked them into giving the revenue-free bonds at a time when our nation is really hurting for revenue. Half of the income goes for just the interest on the national debt.

And, in 1990, the company loaned, I believe, fifty million dollars for a real estate development in King County for some three thousand six hundred homes, which that's for the land ownership, the development of the streets and the sewer and the water and the new homes. They financed it all for their land department.

And, then if you look not, not in our local paper but if you look in the papers outside the area, you will see that the first quarter earnings of Weyerhaeuser Corporation are greatest ever, some eighty-six million dollars, I believe, in the first quarter.

So, economics can be played two ways.

(14) What I really want to talk to you about, though, is some of the things in the EIS, and I am sorry to say I did take the signs down out here, because I was told that we didn't want to be non-partisan -- or we wanted to be non-partisan.

This grange is not non-partisan on this issue. We were one of the first ones to pass a resolution. We think it's a mistake, and we passed several resolutions being opposed to this dump, and those resolutions were not made in jest, and we considered the reply made by those resolutions by the Washington State Department of Ecology the same as a binding contract.

On June 21, 1990, the Washington State Department of Ecology did promise major environmental and public health issues that must be addressed by Weyerhaeuser are: protection of the water quality at Silver Lake. There is nothing in this about the water quality of Silver Lake.

Protection of existing wetlands on and near the project, protection of the transportation issue, protection of the dump water that conforms to the solid waste plan which they will do, conform to Chapter 7095. Then, in reply to a Silver Lake Grange resolution of March 28, 1991, the Washington State Department of

Ecology did state on July 1, 1991 in a letter to Patrick and Clara Wilkins -- mind you, our resolution was sent the last part of March, 1991, but it took the ecology department until June 1, 1991 to gain an answer to the people of Silver Lake.

Anyway, ecology did say: Concerned voices by citizens and governmental agencies will be thoroughly considered during the solid waste permit and SEPA process.

Now, to these letters, and these letters are the same as a contract to us. They were accepted in good faith. We believed that these concerns that were expressed would be considered, and they were not.

We see nothing in the SEPA process that takes into account the other studies that have been done upon the condition of the water in Silver Lake. This is a promise to our grange that this would be done.

I also have a third letter from the Washington State Department of Ecology. This letter states that during the course of this SEPA review, both agencies, the Department of Ecology and the Health Department, hope to address all concerns regarding the project that have been brought to light over the last few months.

Now, we considered this as a binding contract with the State of Washington. We consider this contract as

binding upon Washington State Department of Ecology. To proceed is a breach of contract.

Many other items have been raised regarding this dump that have not been addressed.

We urge your consideration now.

There are other problems that have been not addressed in the SEPA report.

What will the consistency of this fill material, once the cells are filled that will be some two hundred feet deep, a wet and slushy substance, how will it stand a 6.0 earthquake on the Richter scale? It's right up there in the craig, and how can Weyerhaeuser Company be allowed to work in the watershed when we know it has Coho fish in it, and where is the aquifer study that we requested, and we want that to include and follow up.

Now, the SEPA report talks about a twenty-year storm. Why did it not also address a fifty-year storm and one hundred-year flood? Where does the excess water go in this case?

If all that water was pumped that may run down through the open cell, say of five to thirty acres, as the report says the company intended to do five to thirty acres, what will a twenty-year storm do? What will a fifty-year or one hundred-year?

How many train tank cars will be taken from a fifty

or a one hundred year-storm, and the EIS does not address the psychological problems left from the mountain.

Last but not least, it was used over and over and over again, and I think I know why the word is of utmost importance in this SEPA review and why it's used so often: mitigate.

According to the American Heritage Dictionary, mitigate is to moderate a quality or condition, enforce or intensity, to alleviate, to become milder, gentle and mild. We know the words, to let off the hook.

Perhaps it would be well for the Cowlitz-Wahkiakum Health District and the Washington State Department of Ecology to review the Clean Water Act of 1987, Public Law 100-4 by the United States Congress. Look to see what can be discharged into the now waters of the United States.

I really don't understand how this application has got this far.

Thank you very much.

MR. PALCO: Now John Robinson and then Pat Wilkins.

MR. ROBINSON: I am John Robinson. I am now in my twentieth year living at 635 Hall Road.

(15) Aside from my professional interest I have had in

the plants and the animals around the lake, we have a crucial interest in these things. We garden. We raise fruit, and a lot of our enjoyment is watching the bird life and the animals, not counting the scaled animals in the water.

We are very much concerned about Silver Lake.

Now, like many people here tonight, we have expressed our opinions on many facets of this proposed landfill. Because of illness, I had only a couple of hours today to look at the Environmental Impact Statement, and hoping not to repeat what has been said or some of the things we have complained about in the past, I picked out a few items. I have listed these by page number.

(16) First of all, it's on page Roman numeral I, the fact sheet, under the nature and location, the third paragraph it states: No hazardous waste will be accepted.

Does this mean that there is a mistake in one of the tables that follows later in this EIS listing mercury? Is mercury not a hazardous waste?

What about dioxin? Dioxin is not listed, but it's certainly present in all of the chlorine process paper pulp mills in the waste material there.

Also, I noticed that pentachlorophenol is listed.

Dioxin is there as well. In dioxin, while it is being discussed in scientific circles these days trying to access just how deadly it is, there still is universal, nearly universal agreement among scientists that it certainly is to many animals the most dangerous chemical man has yet devised.

(17) On page S-1 under purpose and need, the second paragraph, one, it states that there will be up to fifteen percent of the waste imported from non-Weyerhaeuser sources. From Table I-1 in the back more than six -- fifteen percent, more than sixteen percent, one hundred fifty thousand cubic yards is listed.

(18) On page S-17, paragraph 3a, the effect of leachate spill, quoting, ta, ta, ta, ta, "spill of leachate from a rail tank car."

Who said that there will only be one tank car on the train when it is wrecked, and I have been hearing for more than twenty years about the numerous wrecks on that line. In fact, one was just recently written up, one aspect of it by one of our own members here recently.

How about several cars? What about the effect of leachate spilled from several cars; not just one? Who are we trying to kid here?

(19) Quote, "expected to occur once in two hundred

years."

Whose guess is that? What kind of a scientific guesstimate is that?

(20) On page 123, maybe this is I-23, it states, it goes on to talk about the ten rail cars' sixteen thousand gallon capacity, and somehow through some kind of new thinking it seems to arrive at the fact, the purported fact that those ten cars will be adequate.

If you consult the 1974 Soil Survey Report on Cowlitz County, and that's the only thing I had at my disposal on the spur of the moment, I find that in the City of Longview, which has the six stations quoted, is the lowest annual precipitation, over one twenty-four hour period -- now this is not an extended rain as we often get over two or three days, but only one twenty-four hour period, once in that twenty-nine years there was two point nine inches of rain.

Now, that's essentially three inches. Now, let's, just for round figures, see what we get when we have a three-inch rain on thirty acres. I understand that there might be thirty acres dealt with in some stage of development at one time. That is equal to nine hundred seventy-nine plus cubic feet or nine hundred seventy-nine thousand.

That is equal to seven million three hundred forty-

three thousand plus gallons. That's seven million.

Now, as the worst-case scenario, as I understood it, they were using five million. Five million would be caught in some kind of a pond cachement basin there after it leaked down through the barriers which -- well, if you would watch a ball point pen being pushed through that, you can just imagine what logs, debris and perhaps heavy equipment will do with it.

So now let's see what -- how many cars this is. This should be of interest to the people in Longview who will get to have the pleasure of counting cars, tank cars as they go by hauling leachate to the mill.

If we had this three-inch rain on the thirty acres we would have four hundred fifty, sixteen thousand gallon tank cars to carry it. Now, that might take more than one train, four hundred fifty tank cars.

Now if you should say we should be looking at only five acres, because there are only five acres that would be the most active, that's still seventy-five tank cars. That's a far cry from ten tank cars.

(21) On page Roman numeral II-11, I thought this was very interesting. It's stated, quote; that the leachate is expected to be similar to Mt. Solo's leachate. Now anybody who has read the paper knows that they have written very interesting stories about the Mt. Solo

leachate, the least of which was more than once people getting sick just being near it.

(22) On Roman numeral II-63, Table Roman numeral II-13, quote; surface water concentration. Here it speaks of mercury and pentachlorophenol, which I alluded to earlier, which means also we are talking about dioxin. I think that one of the things that -- to note is that while the figures they show in that table are less than the standards for clean water, there is no mention of the fact that both mercury and dioxin are biomagnifiers; that is they will be increased on each step of the food chain as they go as they are consumed, so that fish, as it is in many other places, including Lake Erie where -- and Lake Michigan where now, according to independent lab results, there is a formula on how many pounds of fish you dare eat a year because of that contamination, and I would hate to see that in Silver Lake.

(23) Finally, I don't want to talk too long here, I know that I got one glance at the paper tonight. I didn't have time to read it before I left, and I noted that several people were talking in favor of this from Longview. I would say in my judgment either -- they stand to make a little money. There are going to be millions if this thing goes through, according to what Weyerhaeuser says, and you rub your hands together, but

what will you say to your children and your grandchildren; I made some bucks on that, or will you say I tried to protect it for you.

And, I like that logo on the stationery of the Department of -- or the County Department of Health. It says: Protecting your health and environment. I hope you will live up to that and always feel that health and the healthy environment are not for sale at any price.

Err on the side of caution.

MR. P. WILKINS: My name is Patrick C. Wilkins. I did testify at the last hearing, and I am (24) happy to report that I do have some additional information on the report that I made last night in regard to the Coho juvenile salmon that are in Sucker Creek.

I have been assured by people who should know in the Department of Fisheries that those fish do represent an actual spawn, most probably from the straights, if you will, and the overflow of the heavy runs at Toutle last year. I am assured that is so; that they were not planted, at least there is no record that they were.

(25) Now, I was interested at last night's hearing also that proponents of Weyerhaeuser proposed Headquarters camp dump were profuse in their praise of the company at that Draft Environmental Impact Statement hearing which

was held last night in Longview.

Now, I hope that opponents, such as I, tonight will be granted the same latitude; that is, I mean they strayed from addressing the Draft Environmental Statement, and you allowed that to happen, Mr. Hearings Officer, so I am going to stray here a little bit, too, not too far. I hope I will come back to it.

Proponents say they believe Weyerhaeuser "has really done its homework" on this dump planning and that there will be no significant, that they believe there will be no significant environmental harm from its being placed in the Silver Lake watershed.

They say in effect that they trust Weyerhaeuser.

In fact, some said bluntly that they trust Weyerhaeuser; that Weyerhaeuser is a good corporate citizen; we believe them; they have done their homework; we trust them.

Well, it's time somebody pointed this out. Everybody has avoided it. I wish I could, but I can't. This company in which these people have placed their trust recently was called the worst polluter in the state and the second worst in the nation by the Environmental Protection Agency.

This was over a specific incident in another part of the state, but nonetheless the EPA stated that both

ways.

This is also the company that in 1991 narrowly escaped felony prosecution in connection with the dumping of paint into the Chehalis River. Plea bargaining reduced the charges to five misdemeanors. This was plea bargaining by the U.S. Justice Department, the U.S. attorney up there, but even at the misdemeanor level the fine was half a million dollars.

Now, that obviously was only a slap on the wrist to Weyerhaeuser, and they were congratulated for taking over the issue and cleaning it up.

The plea bargaining was done because the justice department, through a meeting that I was at with Mr. McKay, was that Weyerhaeuser had become aware of the problem and was already on it before the whistle was blown on them. Now, that's something that you can take and believe or you can not believe, but that was the plea bargaining that was done to reduce the charges to misdemeanors which resulted in the half million dollar fine.

As I say, at the misdemeanor level this was quite a whooping fine at half a million dollars.

Now closer to this project we are talking about, the North Cowlitz Environmental Council proposed a video documentary in the spring of 1990, expressing concern

about Weyerhaeuser's environmental track record; culverts on Sucker Creek that locked fish passage, and ineffective but open debris dump at the company's Green Mountain Mill, a tire dump in the old rock quarry near the proposed landfill, the company's contribution to Longview's polluted drainage ditch problem, and Weyerhaeuser's contribution to the pollution problems of Silver Lake.

Now, these are not guesses. These are facts, and they are backed up by record keepers and scientists.

Weyerhaeuser responded to that criticism that was in that video. A new water level culvert was installed on the south fork of Sucker Creek, another on the main stream of the stream was removed. The dump at Green Mountain mill was capped with several feet of sand.

That's commendable; commendable, but why must it be up to the public to point out such environmental wrongs before they are made right? Weyerhaeuser could find these things out for themselves, and I believe they know about them and ignore them.

I think that's much of the problem with why Sucker Creek cannot now be reached as not really a valuable, in essence, fish-spawning stream is because of those barriers to the fish passage.

Right today the fish are in there. The barriers,

some of the barriers have been taken away. They are in there. It's in that video I submitted last night. I hope you go through all of it.

Also, it appears the effluent situation of Longview has not improved, and Weyerhaeuser has not attributed to the betterment of Silver Lake, and were it not for the fire closure of the area I could, today or tomorrow when we could see, lead you to another long-forgotten tire dump, an active rock quarry operation on the very banks of the south fork of Sucker Creek another culvert that is a barrier to fish passage, a waste debris dump in a rock pit where the waste was simply bulldozed up the banks; not removed but bulldozed up the banks when the pit was reopened for rock production, and, of course, the clear cut of the very headwater of Sucker Creek which occurred last summer.

In the dump site itself there have been things to set off questions about the appearance of fair play, and when I posed this in the simple conversation with some of the DOE staff, that was a real thigh slapper for them, and it was referred to by one of the DOE staffers jokingly and facetiously, I think, that we were referring to the Chuck Clark conspiracy theory, and we joined right along with that, but here's what I want to pose to you: Weyerhaeuser environmental chief who chair

the Cowlitz-Wahkiakum Solid Waste Advisory Committee at a time when the company had filed its first application for the dump and who suggested Weyerhaeuser could supply the language for any needed amendment to the solid waste plans; the current head of the Department of Ecology, the agency which has embraced Weyerhaeuser in production of the dump who obviously and previously was the head of the State Department of Community Development at the time when that agency approved ninety million dollars worth of tax-free port development bonds for Weyerhaeuser projects, including the dump; the current project manager for the Headquarters landfill who was previously employed by the Department of Ecology -- now don't misread me. I am not suggesting for a moment that these individuals have been or are doing anything wrong.

In fact, for my part, I think they simply moved on to new jobs, but I hope they will be as sensitive to the appearance of conflict of interest as they would be if I were to stand up here and say they ought to be in jail, and they should not be surprised if such appearance of conflict of interest gives rise to the appearance of suspicion and setting off questions about the appearance of fair play among dump opponents.

Are we getting fair play?

In February of 1990, when Weyerhaeuser first

announced its plan it also wanted to ban recording of that meeting, the very first meeting when they announced the plan for the dump, yet the company claims it wants an open dialogue about the proposal.

It's claimed that all along.

I can cite meeting after meeting in which there has been an attempt to put a clamp on these things, meetings in which we are told we cannot attend, which they are public agencies. I think Washington has an open meetings law in which that cannot be so. If the public agencies are there, it is an open meeting.

I don't want to have to run around with the law in my hands and say, "Hey, wait a minute. This is an open meeting. You can't exclude me or others interested in this."

In August of 1992, that's this year, at the initial meeting of a citizen's committee to study the Silver Lake watershed, the Weyerhaeuser representative demanded a ban on recordings, including video tape photography. I wasn't there. Others were, but yet had I been there I would have raised the same objections, yet the company claims it wants an open dialogue about its proposal.

In the first week of September of 1992 -- now, that's about a week away -- a meeting is scheduled in Olympia, and I believe this because it came up through

the grapevine between Weyerhaeuser, various agencies and the company that specializes in the type of planning and work it would take to rechannel the south fork of Sucker Creek, which I presume is part of the mitigation effort.

Now here's a great chance for open dialogue, but not one citizen opponent that I know of has been invited to that meeting.

In short, I don't think Weyerhaeuser really cares about the people who really care about Sucker Creek and Silver Lake, and I think the Draft Environmental Impact Statement, rather than pointing to a safe dump operation, details the proposal for potential environmental disaster.

Thank you.

MR. PALCO: I have one more speaker scheduled to speak; Martha Belding.

M. BELDING: All of those are hard acts to follow. I think from last night I have eighty-five questions. I read the Environmental Impact Statement cover to cover, which last night I asked the audience, most of whom were business people who had been contacted by Weyerhaeuser to speak, how many had read them, and we didn't have, I don't think, five of them so I will give you these things that I have said that I have, but I would like to say a little bit more about

what Pat says about the -- I am going to be frank here, about what we call the hanky panky of all that's been going on.

(26) Right. We don't feel we have a fair shake by the Department of Ecology.

We did have until February, the last of February. The Department of Ecology wrote to the health department on January 8, I think it was, and the February 28th one, Kirk Cook from the Corps of Engineers, they had fourteen pages of things they considered needed to be addressed at this particular dump.

One of those was digging a well. They hadn't considered the -- I know they hadn't considered the deeper aquifer. There were many. We have had a very good relationship with the Department of Ecology until, frankly, a new director came on and immediately things changed.

We got a copy of a letter that came immediately after that that said all of those -- this was in -- it's right in front of me, the date on it, but it was May, I think.

All of those concerns have been addressed, and they were addressed by a letter from Weyerhaeuser and a meeting with Weyerhaeuser. All those things, including the deeper aquifer, all those things, so we wrote to the

Department of Ecology and said we would like a copy of that letter and we would like a copy of those minutes of that meeting, and we got a letter back saying they would be sending it.

We haven't heard one word, and we don't expect to hear anything from them.

We don't feel we have had a fair shake from the Department of Ecology the last month, or so.

(27) I will briefly go through some of the other things. Site selection was not supposed to be a part of this, as I understand, because you could not ask for any alternative other than no action on this particular site, and yet it's listed in the EIS, and we think in the EIS in the site selection study should also be there, because we don't feel there was a viable site even considered.

Most of the sites are much too small.

There were sites eliminated. One was eliminated because it had a stream in it, and we think that Weyerhaeuser did not give a fair shake there, and it said it would be held for -- Weyerhaeuser -- I'm nervous -- that the Headquarters site would be held for further study, and it never was. There has never been another part of that.

Testing, and I have the page numbers of all of

these, testing is to be at Weyerhaeuser with three month intervals with reports to the health department. The testing of this seems to be exactly what was done with the Radcovich dump, and we know exactly what happened down there.

Nothing appeared until citizens down there complained on that.

Supposition, suppose all the variances will be given. EPA has said they do not approve this. It doesn't comply with the Clean Water Act.

The Department of Interior Fish and Wildlife has suggested to the Corps of Engineers it not give a permit.

This scope only addresses the two counties, but we have been to SWAC meetings, and we know there is definitely going to be all of the other counties, so we do appreciate the fact that you will ask for SEPA when other county waste will be brought in. We know this has been recommended.

Hazardous waste; I wrote to Joan -- well, with our senator, our congressman, and described the waste at Radcovich as hazardous, and we are getting the same waste here so we know it will be hazardous. This waste is considered hazardous in the mills in Port Angeles and Boise-Cascade, and all those companies warned their

companies against it.

We are talking about the waste from the clarifiers, and all that.

We want to know where the silt will be deposited after it's taken out of these places that they are putting them in.

Transfer locations; two and a half years ago we attended uninvited a meeting with Weyerhaeuser. They were going to mitigate this two and a half years ago already, and a map was put on the wall and we pointed out to them that the transfer station is in the worst place. It's the most likely to have an accident, directly above on a steep bank above Sucker Creek, and they are going to have problems with it, and would you please do something with that.

That still has not -- we mentioned that several times, and it's not addressed in the EIS at all.

Threats; in the EIS Weyerhaeuser says or the EIS says "Weyerhaeuser indicated this delay of approving Headquarters site could affect the company's consideration of a facility expansion or commitment to new facilities in the region."

That is not an environmental statement. It should not be in the Environmental Impact Statement. Weyerhaeuser's financial condition has been already

discussed here, but, as I said last night, I suggested you should all read the June 24th Wall Street Journal which tells you what good shape they are in and how they expect to make seven hundred million dollars profit in 1995, and they expect to do most of this in the paper mills and from paper, pulp and lumber, it says, with paper put in first.

So, they are not in that bad shape, and it says -- I'm here to speak for my grandchildren and my great-grandchildren.

We have enjoyed Silver Lake for the last thirty years and they are not able to speak for themselves, and you and I, nobody in this room knows what's going to happen ten, twenty, thirty years from now, but they are going to be living with it, so I am asking you to consider that, and I would like to repeat what John Robinson said at a meeting here a while back.

The health department and the Department of Ecology have been created to protect the environment. You were created to protect us from these things and the environment that would harm us, and that cannot be bought, that trust cannot be bought.

We ask you to remember that.

Thank you.

D. BELDING: I got here late and

didn't sign up, but he knew I was going to say something.

(28) From what I said last night, my speech was about trains and derailments, and what have you, and how many crossings they have.

Well, tonight's Daily News, Andre Stepankowsky came up with seven, seven train wrecks that happened in the last five years. At the rate that the Environmental Impact Statement shot out at two hundred years per wreck, like John says I pointed that out, but seven accidents in five years if fourteen hundred years of accidents in seven years, and apparently yesterday they had another one.

It wasn't that bad, but the locie (sic) went off the track and banged up the whole front end because they have ropes and stuff on it today. They won't let you climb on it.

Pete, did that happen?

PETE: I don't know. I never heard that. It's possible.

D. BELDING: I saw the locie. Something happened, and I asked a couple of questions, and it was derailed and it banged up the front of it pretty bad.

So now we are talking about eight wrecks in five

years. That's sixteen hundred years of wrecks, believe that or not, and that's sixteen hundred years of wrecks in five years.

(29) Anyway, tonight I want to talk about chemicals. John got into it pretty good. I am going to give you a copy of material and substances list that comes from Boise-Cascade in St. Helens and ITT Rayonier in Port Angeles. It's quite a little folder that lists all the chemicals that they have.

Seventy percent of them are hazardous. I am still trying to get through my little head what's going on down here that an outfit as big as Weyerhaeuser does not have hazardous materials.

John mentioned dioxin. It took seven years -- seven months to get people from Weyerhaeuser, mainly Cal Palmer and Ken Johnson, to admit they had dioxin. I don't know why they thought we wouldn't know that it was there.

Anyway, attached to this is a two-fold report plans list and also a letter from Linda Smith. This is not senator Linda Smith. This is Mrs. Steve Smith who live up here in Silver Lake. She wrote a letter to the editor of the Daily News and there is a copy of that in there.

There is also a picture of a tank truck that rolled

over at the approach to the Harry Morgan bridge in April 10, 1991.

There is a letter from NorPac communications meeting and a port dock meeting June of '91.

Weyerhaeuser's environmental list, Ken Johnson and Cal Palmer denied this absolutely there was any hazardous materials in the pulp sludge, whatever they named it, there was no -- so I kept asking, how did you get rid of it? How did you get rid of it? They have no answers to that.

Boise Cascade identified several hazardous liquids and substances that are used in paper making. I might not pronounce these right, but some of them included hydrogen sulfide, sulfer dioxide, chlorine, chlorine dioxide solution, green liquor, white liquor, black liquor, nitric acid, filming amrines, muriatic acid, sufuric acid, caustic soda, dioxin and mercury.

Anybody that starts to say that stuff is not hazardous, they do not know what's going on.

The Cowlitz-Wahkiakum health people have agreed with Weyerhaeuser; non-hazardous.

I guess the Washington Department of Ecology has agreed; non-hazardous. You figure it out.

ITT Rayonier book also identifies hazardous properties and liquids in their pulp methods.

Now, whatever this substance is, I don't know what it is, but it's called adhesive 944, TLV 100 PPM, adhesive 1222, adhesive rollend PR-500, ammonia and NH4OH TLV, whatever that is, ammonia base SSL, and I guess that is called spent sulfite liquor, antifreeze, TLV 50 PPM, 125 -- TLV 50 PPM may be 125 mg/m3, something we don't know what they are talking about; hydrogen peroxide, hydrogen sulfide, mercury, nitric acid and dioxin.

That covers the two folders on them.

And Linda Smith's letter refers to a situation how will the waste and sludge in the Longview mill site be identified and removed before being shipped to Headquarters dump site.

We have asked this for two years, every meeting we have ever had, and we have no answers yet. Maybe there is some method of removing the hazardous stuff from that stuff coming up there. We haven't found it out, and I don't think Weyerhaeuser knows, either.

From her letter, her description of the material that is hazardous. With phenal 2, 3, 4, 6 tetrachloride. Persistent halogenated hydrocarbon is extremely hazardous. She knew that this material was also in Weyerhaeuser's pulp sludge.

The picture of the tanker turned over, which I have

a copy here, at the approach to the Cowlitz River bridge spilled about two thousand gallons of liquid chlorate, a highly explosive substance when dry, and also a smaller amount of sodium dichromate, a known cancer-causing material.

This cargo was headed to Weyerhaeuser which uses this chemical to make paper.

The crews that were sent to clean it up wore asbestos suits and gloves and oxygen tanks on their backs so they wouldn't have to breathe the fumes, and somebody says I suppose this is non-hazardous also.

The NorPac communications letter proves that dioxin is in the sludge from the chlorine bleach plants.

At the meeting they wanted to know what was going to happen when the NorPac machine went on the line that takes the newsprint and was using all newsprint for the material and in this process there is more dioxin that comes out of that, and that proved it.

The port dock meeting in January of 1991, was for the purpose of identifying hazardous materials from anywhere.

Hazardous wastes can come from a multitude of conditions and places. For example, solvents, degreasers, cleaning fluids, laboratory chemicals, preservatives, used oil, pesticides acids, compounds of

heavy metals and a broad range of industrial chemicals.

All these liquids or solids are included but not limited to being hazardous material.

With all the above-mentioned hazardous materials, what happens when it begins to trickle or run full boar down in a heavy rainstorm, what happens in the overflow for all leachate that they are going to have?

Sucker Creek is about a mile and a half long from Silver Lake to the proposed dump site.

From the middle of May to the middle of November there is no water that runs out of Silver Lake. We have eleven, twelve years of records showing that water stops going over the weir on an average about May 16th, May 18th, on an average.

It starts going over the weir again about November 12th to 14th.

The weir was put in in 1971 for that purpose, to keep the water in the lake.

Any kind of a leachate accident, anything at all in the Draft EIS said that one tank car accident in Sucker Creek would kill everything in Sucker Creek from the dump to Silver Lake. Same thing applies to Ostrander Creek, one tank car would wipe out every single living thing.

Now, going down the Ostrander Creek canyon, I don't

know how many houses are in there, and they all have wells coming out of the ground. That's going to be real neat up there.

All leachate that will enter Silver Lake will lay in the bottom, or it would be suspended in the water from the middle of May until the middle of November. Any dead fish that happened to find out that they can't stand that stuff will float on the surface.

We have quite a few bald eagles here that will eat them. We have golden eagles here that will eat them. We have osprey here that will eat them. We have blue heron that will eat them. They will die, also.

There isn't any way that leachate is not going to enter Silver Lake.

They are talking about liners that last forever. I have said it before and I will say it again: There are two things that are forever, and that's death and taxes, and I believe that the liner is not going to last long enough to help anybody anyplace, and when the fireworks start we are going to have dead birds. We are going to have no bugs, no bees, no furry animals, no fish, no nothing in Sucker Creek, and as it comes into Silver Lake the same thing is going to happen.

After an eight-year battle, COWSLIP, and most people have heard of COWSLIP is Clean Out Weeds Silver

Lake Is Possible, got the support of the county and ecology; got a grant, 2.6 million dollars for putting the grass-eating carp in the lake. This is going to help the lake in many ways make the water quality better. There is no known failure of the fish anywhere in the United States.

You are not going to cure the erosion silt that's coming from the logging practices on the lake. They are not going to have water quality like they had thirty or forty years ago.

The county is going to -- part of that program was the county is going to put in a access to the lake, picnic areas, camping areas, boat ramps, restrooms. It will be a beautiful, beautiful park, and it will be turned over to Seaquest to operate as a satellite park. That's all written in writing; all going to go.

So now we are finally getting something done to Silver Lake, and we are finally getting something done to have it ruined all before we even get it done. That sounds unique.

Like my wife said, the Cowlitz-Wahkiakum health board and ecology are to protect us in this type of destruction.

I sat here and I listened to them speak, and I see some of the ecology people in the back snickering at

what's being said. Sure is funny, that's right. We are laughing all the way down here, and all the way home.

Thank you.

MR. PALCO: Anyone else wish to speak at this time?

MS. MEYERS: My name is Patsy Meyers, and we are residents of Silver Lake.

(30) I will be very, very honest. I have company from out of state, and I was going to write a letter to you instead of coming tonight, but I read just a little part of what was in the paper tonight, and I didn't even finish reading it because I was so mad that I left them all home and came down here.

I question the tactics that Weyerhaeuser has used during this whole process.

I also question the representation that the people of this community have had by our public officials, and I say this because I have called Washington, D.C.; I have called Seattle; I have called the university; I have called all over, and for some reason or another whenever we have one of these meetings or this problem is brought up, there is never any representative for us. They never show up.

Jolene Unsoeld, who I have always -- I put her sign in my yard last time, and she got a big honor and she

was sent to the Environmental Council, and yet she won't say a word to us here, and all the things that they talk about and everything are being violated right here, right now.

Not only that, but the people that we have elected to represent us have done an awfully poor job. There will be no Jolene Unsoeld sign in my yard. The only one that will be in my yard is a Weyerhaeuser dump site.

I am talking about both sides. I am independent. I don't vote for any party, and I vote for who I think will represent us in the best way, and so far I haven't found any.

I get sick and tired of the -- I read books, and cartoons on the TV, everything is environment, protect the environment, protect the animals, and I have gone through law books that say you cannot divert a migratory stream.

They have passed laws that you can't -- the yew wood, for instance. Okay. You want to talk about Weyerhaeuser's credentials? They have been killing this type of stuff and burning it in slash burns for years. They are still doing it.

In fact, they have applied for a permit to spray again. They kill all that vegetation except the evergreen, and how are we ever going to keep the

environment clean if we are going to kill everything; same way with the animals.

I question the mental capacity of some of the people that represent us that really and truly think the spotted owl has anything to do with this at all.

If you disrupt this chain, food chain, you take something out of it, the rest is going to fall apart sooner or later, and that's just what is happening now, and then if the law says that you cannot divert a stream because of migratory fish -- and these laws are set up. We have laws for the environment that are supposed to be stricter now than ever.

All right. If these laws were set up, they were set up for a reason, and I don't think that reason was that it was for this little guy to do it and this big guy -- or this little guy can't do it and the big guy can.

I want to know why that the laws that are set up that I have to go by only mean me and does not mean someone like Weyerhaeuser.

(31) I'm sorry, but you talk about a spill, it's like they said one spill is all it's going to take. All right.

The railroad crosses the back of our property. This year, this is just this year -- we have seen a lot

of them -- they had the derailment. Weyerhaeuser didn't have anything to clean it up; no equipment; all of it is gone, nothing to clean it up with.

I wonder how long we would have to wait for them to go out and hire individuals that would have the proper equipment to clean up such a thing.

We were lucky that some individuals up here had some equipment that they could pick up some lumber, but it took them a month to clean it up. The paper said it was a small thing. I had nothing -- nothing to be concerned about.

Well there was, I don't know how many feet it was, but it took them several months to fix the tracks.

(32) Then I think about Weyerhaeuser's concern for us. This culvert that's up above our property the railroad track's going across, and the debris that comes down Hemlock Creek -- we live on Hemlock Creek, and this debris stacked up for several years to where it got to where it was backing water up during the wintertime quite a ways.

So, finally after several years, they got somebody to come in and clean it out. When they did, all that dirt and all that silt has come down the creek; filled up all the holes.

We finally got the fish to come back to migrate

again back here. Now all the holes are all filled up, again.

They don't -- they are not concerned with that effect.

(33) The law should -- the only time the law should be set aside if it's in the public interest, I believe is the way it says. I don't see where this is justified in the name of public interest.

It's for private interest and it's for profit, and if the people that are so upset that Weyerhaeuser has threatened to move out of this area if they don't get what they want, then my feeling is that could be the best thing that ever happened to this area.

Now when talking about the health department, and I don't understand why these laws -- this is the part I can't -- and I wish somebody would help drum it through my head, because I cannot understand why laws are made to protect us. They are laws that we are supposed to abide by, and yet when Weyerhaeuser decides to do something like this, disrupt wetlands, destroy a natural flowing stream -- we got -- finally got public funds, monies sent up here to clean up this lake. It makes a lot of sense to come in here and tear that up by putting a hazardous dump site on it.

(34) When I say hazardous, I believe I will never forget

they said it was non-hazardous, and if it is, I want to see them drink a glass of it.

Now, I think what we got in for the definition of what is hazardous and what is non-hazardous should be defined a little bit clearer, but when we get back to the way these laws are set up, why in the world can someone come in like that and destroy the laws that are written for the wetlands, all these environmental laws, the laws that are supposed to be for the public and that are supposed to protect us, and yet we have all these meetings and we go through all this because -- to just break the law.

Weyerhaeuser has been breaking the law for years, and they didn't go through all this rigmarole.

I'm going to tell you this right now: If they get this dump site, I have lost all faith in my government and agencies like the public health department.

MR. PALCO: Would anybody else like to provide testimony?

Yes, sir.

MR. ROGERS: I am Ted Rogers. I live at 488 Hall Road, Silver Lake.

(35) I have heard a lot of the pros and cons here, you know, but I have got three things to say. I lived there for twenty-some years. I have got four kids.

I expect the environmental people and you people to protect my rights.

I expect you to be liable, if you don't, and that's all I've got to say.

Thank you.

MR. PALCO: Does anybody else want to say anything?

MR. MORRIS: I am so damned mad I probably can't say it.

I came out here from Wyoming --

MR. PALCO: Sir, could you speak into the microphone and turn --

MR. MORRIS: My name is Raymond Morris. I --

MR. PALCO: Thank you.

(36) MR. MORRIS: -- came out here from Wyoming, and I bought a piece of land of Silver Lake to pass on to my grandchildren, and I might as well write and tell them it ain't there because it's going to be just as ugly as Wyoming if you let these people do what they want to do.

MR. PALCO: All right. If there is no other testimony, I will remind you again that we will take written testimony until September 11.

It's to be submitted to the Cowlitz-Wahkiakum

Health District in Longview. The address is 1516 Hudson, Longview, 98632.

Additional copies of this are available there.

What will happen at the close of that comment period is that the comments that you people have made now orally and in writing will be responded to, and the production of a final EIS will commence.

I thank you very much for your interest, patience and participation.

(The hearing adjourned at this time, 8:36 p.m., August 26, 1992.)

CERTIFICATE OF OFFICIAL COURT REPORTER

STATE OF WASHINGTON)
) ss.
County of Cowlitz)

This is to certify that I, CANDY ZRELIAK, am one of the duly appointed and qualified official court reporters in and for the Superior Court of the State of Washington for Cowlitz County;

That as such reporter I made machine shorthand notes of the oral proceedings had in the foregoing public hearing held on August 26, 1992 at the Silver Lake Grange, Silver Lake, Washington;

That the within and foregoing transcript, consisting of 58 pages, is a full, true and correct copy of the stenographic notes of the Verbatim Report of Proceedings, so taken and transcribed as aforesaid.

IN WITNESS WHEREOF, I have set my hand on this 7th day of September, 1992.

CANDY ZRELIAK, CSR #: ZR-EL-IC-A538LM
Official Court Reporter
Notary Public in and for the State of Washington, residing at Kelso.
My commission expires: 11/28/94.

RESPONSE TO TRANSCRIPT NO. 2

Jerry Collison

1. Comment noted. As you point out, nesting bald eagles are sensitive to disturbance in the nest vicinity. Regulatory agencies have established guidelines limiting activities in the vicinity of active nest sites during the nesting period (January 1 to August 15). For example, during the nesting season, the U.S. Fish and Wildlife Service usually prohibits activities within 400 meters (0.25 mile) of a nest, and between 400 and 800 meters (0.25 to 0.5 mile) if line-of-sight exists between the nest and activity. The proposed landfill activities are about 2.5 miles south of the nearest nest on Silver Lake, well beyond critical disturbance distances. These activities are not expected to be detrimental to nesting eagles on Silver Lake.

   The approximately one-year wildlife study was sufficient to conclude that habitat conditions on the Headquarters Site are not conducive to use of the site by eagles for nesting, foraging, or roosting. It is highly unlikely that additional study efforts would change this conclusion.

2. Section I.A.5, Plants and Animals, evaluates the impacts of the proposal on fisheries resources of Sucker Creek and Silver Lake. The responses to Comment 1 above, Letter No. 10, and Letter No. 9, Comment 28 are also relevant to your concerns.

3. Comments noted.

Clara Wilkins, Chairman
North Cowlitz Environmental Council

4. The comments in your oral testimony are the same as in Letter No. 22. See responses to that letter.

Melton S. (Sid) Roberts

5. Your support for the proposed landfill is noted.

Dale Henderson

6. See responses to Letter No. 11, Comment 5 and Letter No. 26, Comment 1.

7. See response to Letter No. 9, Comment 15.

8. See response to Letter No. 47, Comment 27.

9. See responses to Letter No. 22, Comment 3 and Letter No. 26, Comments 5 and 6.

10. See response to Letter No. 9, Comment 11 and Letter No. 63, Comment 16.25.

11. See response to Letter No. 9, Comment 18. The words "must" or "shall" will be used by agencies in the conditions of the solid waste permit, variance, and other permits required for the project. The conditions of these permits will be legally binding and will reflect the mitigation measures discussed in this EIS.

12. Comment noted.

Chet Gardner

13. See response to Letter No. 11, Comment 5.

14. The comments in your oral testimony are the same as those in Letter No. 18. See responses to that letter.

John Robinson

15. Comment noted.

16. See response to Letter No. 17, Comment 1.

17. The Draft EIS was in error. See responses to Letter No. 9, Comment 15, and revised Table I-1 in the EIS.

18. See response to Letter No. 69, Comment 13.

19. See response to Letter No. 69, Comment 13.

20. Your figures are incorrect for two reasons. First, the active area of the landfill would be limited to 5 acres, not 30 acres. Second, there appears to be an error in your calculations. Even if the active area were 30 acres, 3 inches of rain over 30 acres is about 2.4 million gallons (30 acres x 43,560 square ft per acre x 0.25 ft of rain x 7.48 gal/cubic ft = 2.4 million gallons). This is well within the 5 million gallon storage capacity of the leachate holding pond. Also, see responses to Letter No. 9, Comment 10 and Letter No. 62A, Comment 4.

21. See response to Letter No. 42, Comment 4.

22. See response to Letter No. 17, Comment 1.

23. Comment noted. The Health District has transferred its authority to issue the solid waste permit and variance to the Department of Ecology. See response to Letter No. 8, Comment 1.

Patrick Wilkins

24. See response to Letter No. 10.

25. Comment noted. The state Open Meetings Act applies to meetings of legislative bodies, not meetings of applicants with agency staff.

Martha Belding

26. See responses to Letter No. 8, Comment 1 and Letter No. 41, Comment 1.

27. The comments in your oral testimony are the same as those in Letter No. 16. See responses to that letter.

Don Belding

28. See response to Letter No. 69, Comment 13.

29. With regard to the nature of the waste to be disposed at the landfill and the life of the liner, see responses to Letter No. 17, Comment 1 and Letter No. 9, Comment 2. With regard to the water quality of Silver Lake, see Letter No. 62, Comment 9; Letter No. 62A, Comment 1; and Letter No. 63, Comment 15.64.

Patsy Meyers

30. Comment noted.

31. See response to Letter No. 69, Comment 13.

32. Comment noted.

33. Comment noted. The proposed landfill would not accept dangerous, hazardous, or municipal waste. See response to Letter No. 17, Comment 1.

34. See response to Letter No. 17, Comment 1.

Ted Rogers

35. Comment noted.

Raymond Morris

36. Comment noted.

Index to Responses

Headquarters Camp
Solid Waste Disposal Facility

Index to Responses

The purpose of this index is to serve as a guide to responses to the most frequently asked questions in comment letters and public testimony on the Draft EIS. It does not list every subject area covered by the comment letters and testimony, nor does it indicate every response applicable to a given subject area. The letter "L" refers to the letter number, "C" to the comment number, and "T" to the transcript number.

Aesthetics L47C28, L63C16.49, L63C16.50
Alternative sites L9C28
Alternative site plans A and B L11C3

Bald eagles T2C1
Borrow area
    Backup area L63C15.68
    Erosion control L9C8
Buffer retention L62C13

Capacity of landfill L69C2, L63C15.26
Coho in Southern Tributary L10
Compliance with Clean Water Act L43
Compliance with MFS L38C6
Containers for rail transport L1C3
Construction quality assurance plan L9C20

Design detail L69C16
Detail in EIS L63C2, L63C5
Dioxins in waste L17C1
Distance to Silver Lake L9C17
Diversion channel L47C10, L61C16

East-to-west sequencing of landfill L69C8
Ecology, Department of
    Issuing solid waste permit L8C1
    Letters on hydrogeology L8C1
Economics L11C5
EIS format
    Level of detail L63C2, L63C5
    Repetition L9C27
    Use of "would" L9C18, T2C11
Environmental assessment of Headquarters Camp L44C2
Erosion/sediment control L63C15.64, L69C41

Financial assurance L47C18
Fishery mitigation L10
Fugitive dust L47C15, L62AC14

Groundwater
Levels L63C15.46
Quality (aquifer analysis) L41C1
Recharge L41C10

Hazardous constituents in waste stream L17C1
Hydraulic gradient control system (HGCS)
Distance above groundwater L9C7, L9C19
Diversion in event of liner leak L71C15
Human health L39C4, L47C26, L49C8

Independent testing L16C4
Inspection of incoming waste L22C2

Landfill gas control L9C11, L63C16.25
Leachate
Constituents L47C4
Production and pond capacity L9C10, L62AC4, T2C20
Spills (see Spills below)
Use of ponds by wildlife L47C25
Lighting of landfill L47C27
Liner, bottom
Construction quality assurance L9C20
Leak scenario L63C19, L69C14, L69C15
Life of liner L9C2, L65C1
Protective cover L62AC24, L63C16.10
Longview mill wastewater treatment plant L49C9

Meteorological data L9C2, L9C10, L63C16.22
Mitigation (natural resources)
Likelihood of success L49C4
Monitoring L47C16
Revised mitigation plan L9C12
Mitigation and monitoring detail L69C9
Monitoring/testing in Plan of Operation L9C3
Monitoring through post-closure L62C15
Mt. Solo Landfill experience L42C4, L62AC17

No-Action Alternative L63C15.90
Noise
General L22C3
Train noise L26C5, L63C16.37
NPDES permit L69C16, L62AC3

Odor . . . . . L45C6, L62AC11 and 13

Plan of Operation L9C3

Property values L26C1

Rail safety
Likelihood of spills (see Spills below)
Upgrading of C&C/Woods line L69C25
Repetition in EIS L9C27

Scoping comments, response to L11C1
Section 404 guidelines L43
Sedimentation/detention basin capacity L18C6
Seismic design L18C3
Silver Lake water quality
General L11C8, L62C9
Dilution of spills L62AC1
Nutrient input L55C12
Silver Lake water volume L46C1, L56C2
Soils - SCS/Weyerhaeuser classification systems L41C16
Solid waste recycling and transfer facility (SWRTF) L62C11, L71C1
Source of waste L62C4
Spills
Leachate spill on land L61C5
Likelihood of leachate spill L69C13
Likelihood/effect of solid waste spill L71C9
Spill response plan L69C17
Streamflow (runoff and baseflow) L69C39

Taxes - removal of site from tax rolls as timber land L41C15
Technical reports, circulation of L9C1

Waste accepted at landfill
Construction and demolition waste L62C6
Imported waste L8C3
Testing/inspection L17C1, L22C2
Volume L9C15, L62C3, L62C4
Waste import L8C3
Wetlands
Change in acreage L56C3
Mitigation L62C14
Wildlife
Impacts L63C16.26, L63C16.27
Detail on species L69C21
Mitigation L69C55

