

# 1 INTRODUCTION

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## 1.1 BACKGROUND

This Remedial Investigation/Feasibility Study (RI/FS) Work Plan for the Uplands Environment is prepared for the former Rayonier Mill Site, located in Port Angeles, Washington, and owned by Rayonier, Inc. (Rayonier). An RI is also being conducted for the Marine Environment adjacent to the mill site and management plans describing those RI activities were issued earlier (Foster Wheeler 2002a)

The former Rayonier Mill Site, located at 700 North Ennis Street, occupies approximately 80 acres on the northern coast of Washington's Olympic Peninsula bordering on the Strait of Juan de Fuca (Figure 1-1). Until the Rayonier Pulp Mill was dismantled in 1997, it operated as a dissolving sulfite pulp mill that produced acetate, specialty paper, fluff, and viscose grade pulps.

This Work Plan is Volume I of a three-volume set which includes the Sampling and Analysis Plan (Volume II), and the Quality Assurance Project Plan (Volume III). Collectively, these documents form the set of project management plans for implementation of the uplands RI/FS at this facility.

Throughout this project, methods will be implemented to produce data that are scientifically valid, meet established objectives, and are legally defensible. Rayonier recognizes its responsibility to implement procedures that ensure that all data generated meet the specified data quality objectives (DQOs).

## 1.2 PURPOSE

The general objectives of this RI are to evaluate the nature and extent of any chemicals of concern (COCs) so that an assessment of the current and future risks to human health and the environment they pose can be determined. As with most large sites, a phased approach will be followed throughout the investigation. The first phase will address currently identified data gaps. As necessary, subsequent phases will focus on the collection of data to fill any additional data gaps identified. Any interim or removal actions on site will be identified, and the Sampling and Analysis Plan (SAP) will be modified accordingly. The general objectives of the FS are to develop and evaluate alternative cleanup actions.

## 1.3 WORK PLAN ORGANIZATION

This Work Plan was prepared based on the U.S. Environmental Protection Agency's (EPA's) *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (OSWER Directive 9355.3-01) and developed in accordance with MTCA (Chapter 173-340 WAC).

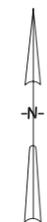
The organization of the Work Plan is presented below:

- Section 1: Introduction – background, purpose, organization, and regulatory framework
- Section 2: Site Background and Setting – description and history of operations and environmental setting
- Section 3: Initial Evaluation – summary of previous investigations for soils, Ennis Creek sediments, and groundwater,, known and expected contaminants, and the conceptual site model (CSM)
- Section 4: Work Plan Rationale – data quality objective needs and general approach
- Section 5: Remedial Investigation Tasks – project planning, sample collection and analysis, data validation and evaluation, and assessment of risks
- Section 6: Feasibility Study Tasks – general approach to development and evaluation of cleanup alternatives
- Section 7: Schedule
- Section 8: Project Management Staff
- Section 9: References

## 1.4 REGULATORY FRAMEWORK

Both the State of Washington Department of Ecology (Ecology) and the Environmental Protection Agency (EPA) have conducted routine regulatory compliance inspections at the former Rayonier Mill Site, including a multi-media compliance investigation in 1993. In 1997, EPA initiated a site assessment and hazard ranking scoring process (as described in EPA, 1990) for the site to determine if it should be recommended for the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). An expanded site inspection (ESI) was conducted in support of this effort (Ecology and Environment [E&E] 1998). Although the site scored high enough to qualify it for consideration to become an NPL site, EPA has opted to defer the listing and allow a cleanup to proceed under Ecology's direction. A deferral agreement was entered into between EPA, Ecology, and the Lower Elwha Klallam Tribe (Tribe) in May 2000.

In Washington State, the administrative process and standards for investigating and cleaning up facilities impacted by hazardous substances are promulgated under MTCA (WAC 173- 340; Ecology, 2001). Under MTCA, a remedial investigation and feasibility study (RI/FS) (WAC 173-340-350) is required once a site is prioritized for remedial action. The RI/FS focuses on collecting, developing, and evaluating enough information to select a cleanup action under WAC 173-340-360 through 390. Remedial actions at the Rayonier Site will be conducted under the provisions of an Agreed Order with Ecology.



**Figure 1-1  
Rayonier Pulp Mill Vicinity Map.**