

1. INTRODUCTION

1.1 BACKGROUND

This Remedial Investigation (RI) Work Plan is prepared for the former Rayonier Mill Site, located in Port Angeles, Washington, and owned by Rayonier, Inc., as part of an agreement among the Washington State Department of Ecology (Ecology), the Lower Elwha Klallam Tribe (the Tribe), and Rayonier, Inc. The Rayonier Pulp Mill, 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 Volume is one of 3, which include the Sampling and Analysis Plans (SAPs) for both the marine environment, and the Quality Assurance Project Plan (QAPP). Collectively, these documents form the set of project management plans for implementation of the RI in the marine environment 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 all data generated meet the specified data quality objectives (DQOs). These data can then be used to develop the feasibility study.

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 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 by collecting site-specific information as noted. Additionally, data that becomes available during concurrent investigations that meet data quality objectives will also be reviewed during the RI. 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 SAPs will be modified accordingly.

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 the Model Toxics Control Act (MTCA) Cleanup Regulation (Washington Administrative Code [WAC] 173-340).

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 marine sediments and marine biota, 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: Schedule
- Section 6: Project Management Staff

1.4 REGULATORY FRAMEWORK

Both Ecology and EPA have conducted routine regulatory compliance inspections at the former Rayonier Pulp Mill, 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 Rayonier 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 investigation (ESI) was conducted in support of this effort (Ecology and Environment, Inc. [E&E], 1998). Although the former Rayonier Mill Site scored high enough to qualify it for consideration to become an NPL site, EPA has opted to defer the listing and allow a CERCLA-protective cleanup to proceed under Ecology's direction. The deferral agreement (Ecology, EPA, and the Lower Elwha Klallam Tribe, 2000) has the concurrence of the Tribe.

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 Washington Administrative Code (WAC) 173-340-360 through 390. Remedial actions at the Rayonier Site will be conducted under the provisions of an Agreed Order with Ecology.

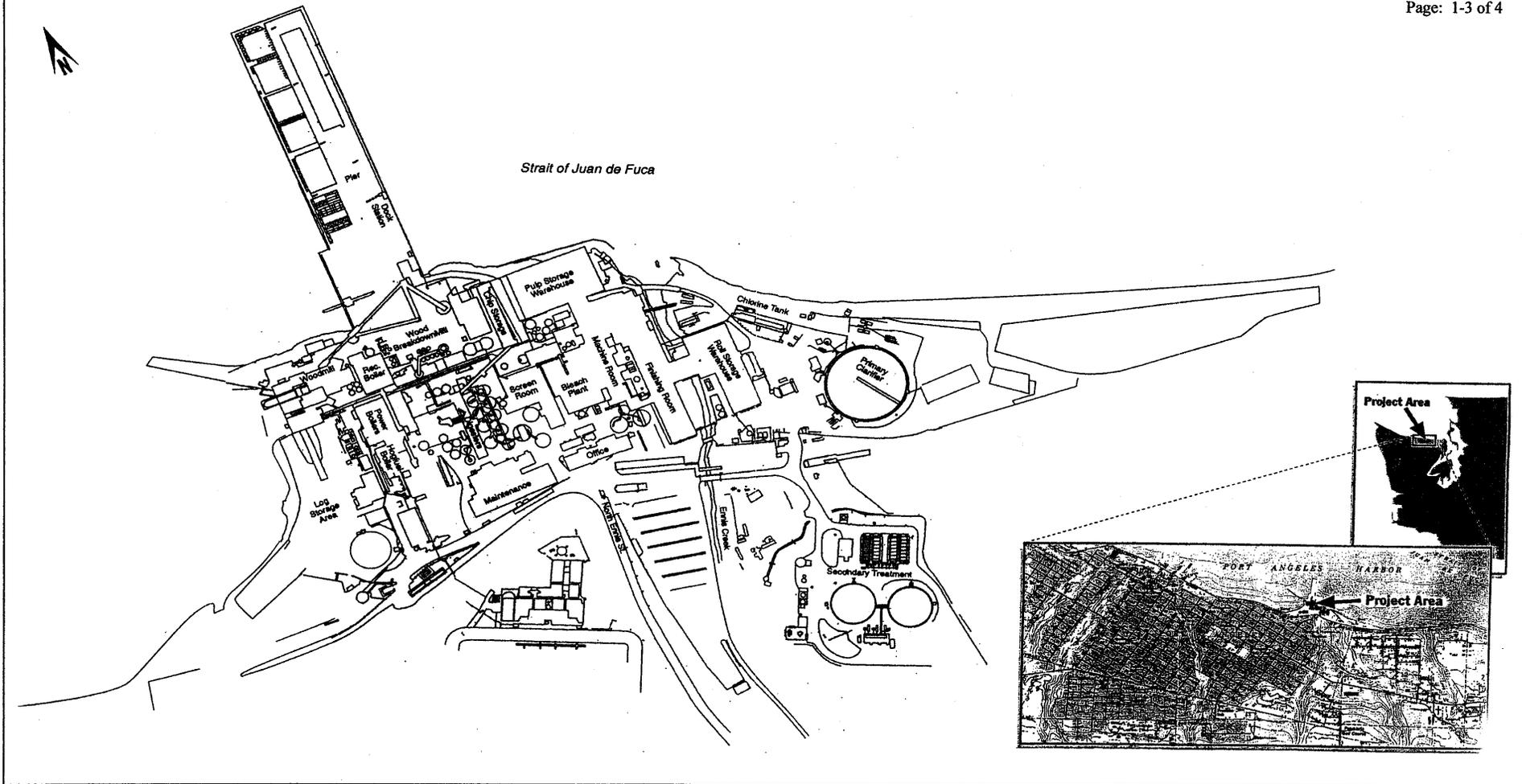


Figure 1-1. Rayonier Pulp Mill Vicinity Map.