PUBLIC PARTICIPATION PLAN

Port Angeles Rayonier Mill

Port Angeles, Washington

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Introduction

This Public Participation Plan is designed to promote meaningful community involvement during the investigation and cleanup of the Port Angeles Rayonier Mill site. It is required by state cleanup law—the Model Toxics Control Act—to describe Ecology's methods for informing the public. It also identifies opportunities for the community to become involved with the cleanup process through public comment periods, meetings, and Public Participation Grants.

Ecology updated this plan in 2009 to reflect the current status of site cleanup. It is also part of a 2010 Agreed Order (legal agreement) with Rayonier to move forward with site cleanup. In late 2007, site management was transferred from Ecology's Industrial Section to the Toxics Cleanup Program. More staff are now available to work on this complex cleanup process, which includes investigating Port Angeles Harbor sediments and off-property soils.

Rayonier is the Potentially Liable Person responsible for site cleanup. The company operated the former mill and owns the property as of 2010. The Lower Elwha Klallam Tribe has partnered with Ecology to oversee the cleanup process and review cleanup documents. Ecology also works with many stakeholders in the Port Angeles area, such as municipal and county government, state agencies, local environmental groups, business groups, and concerned citizens. This plan describes the history of the site, its cleanup, and future plans, as well as more details about how the agency addresses stakeholder concerns.

Site History

The former Rayonier Mill property consists of approximately 70 upland acres, fronting the beach and shoreline of the Strait of Juan de Fuca. (Figure 1). Ennis Creek runs down from the foothills of the Olympic Mountains and into Port Angeles Harbor. Rerouted a few times in its history, the creek runs roughly one-half mile through the Site. The delta of Ennis Creek and the adjacent shoreline is a site of great cultural importance to the Lower Elwha Klallam Tribe. On the east side of the creek, along the beach, was a wealthy fortified Klallam settlement known as Y'innis (I-eh-nus), which means "good beach" in the Klallam language.

Y'innis was one of more than 30 known Klallam villages in the region. The total population of the Tribe was as high as 10,000 in the early 1800's. In 1847, the settlement was known to be occupied by about 200 Klallam tribal members. A mural depicting the village can be viewed on the east wall of the Arthur D. Fiero Marine Laboratory near the Port Angeles ferry landing. At the entry to the village was an entrance pole representing Grandmother Bear, indicating that residents of the village were of that clan. A reproduction of this pole stands at the Lower Elwha Tribal Center.

After introduced diseases swept through the Tribe in the 1850's, only a few residents of Y'innis remained. Some of the survivors continued to live on the beaches of Port Angeles Harbor until the 1930's. At that time, land was purchased for a Tribal Reservation on the Elwha River and tribal members were relocated.

The Site was next occupied in 1887 by the Puget Sound Cooperative Colony. Members built a sawmill, which was the economic base of the colony and which contributed to the rise of Port Angeles. The gradual absorption of many Colony members into the town, and disputes over business profits led to abandonment of the mill by 1893.

Figure 1. Port Angeles Rayonier Mill Property Location

In 1917 the U.S. Government built a new sawmill on the site to mill spruce wood for building aircraft. However, the success of wooden aircraft proved to be limited, and the mill sat idle until it was purchased by Olympic Forest Products in 1929. The sawmill, rebuilt as a pulp mill in 1929-1930, was purchased by Rayonier and operated from the 1930's until its closure in February 1997. The mill used an ammonia-based acid sulfite process to produce dissolving-grade pulps for a specialty pulp market. With additional processing, the buyers of Rayonier's products incorporated the pulp into items such as photographic film, high-impact plastic, fabric, synthetic leather, and disposable diapers.

Environmental Concerns

Environmental practices at the Rayonier Mill evolved over the years of Rayonier's operations as public awareness increased and state and federal environmental laws became more stringent. Prior to 1972, mill effluent was discharged directly into Port Angeles Harbor through a series of outfalls along the shoreline. In 1972, primary treatment (settling) of the wastewater began and discharge was transferred to a deep-water outfall located more than a mile offshore. In 1974, a recovery boiler was constructed to recover spent sulfite liquor. A secondary treatment system was added in 1979. Air emissions and pollution control equipment also changed over time as state and federal air pollution requirements evolved.

Over the years, Rayonier was responsive to environmental concerns, but the mill did exceed environmental standards at times. As a result, members of the community have developed concerns about mill pollution. There have been citizen complaints of a range of health problems they believe are linked to the mill emissions. An independent study conducted by local environmental groups suggested a correlation, but further studies have not clearly shown a connection.

Mill Closure and Investigation

In March of 1997, Rayonier closed their Port Angeles mill. Later that year, community members and several western Washington organizations active in environmental, health, and education issues, petitioned the U.S. Environmental Protection Agency (EPA). They wanted EPA to investigate the Rayonier Mill site, the surrounding areas, and the Rayonier waste disposal facilities under the Superfund program. EPA responded by conducting a large inspection and sampling effort in 1997. That study, known as an Expanded Site Investigation, looked at nearly 300 samples of soils, surface water, harbor sediments, creek sediments, and marine organism tissues. Based on the results of this study, EPA concluded in January of 1999 that the site was eligible for Superfund status. However, state and local elected officials were concerned about how long a Superfund cleanup might take. They requested that EPA defer Superfund listing in favor of cleanup under Washington's Model Toxics Control Act (http://www.ecy.wa.gov/biblio/9406.html).

The Lower Elwha Klallam Tribe requested an oversight role in the cleanup. The site lies within the usual and accustomed resource area of the Tribe and is of major historical and cultural importance. In March of 1999, Ecology and the Tribe signed an agreement establishing an oversight role for the Tribe under the State cleanup process.

Beginning Further Investigation and Cleanup

In February of 2000, the EPA announced that they would defer placing the site on the Superfund list in favor of allowing the site to be cleaned up under the State cleanup law. In May EPA, the Lower Elwha Klallam Tribe, and Ecology signed a deferral agreement, outlining the terms and conditions under which the investigation and cleanup process would occur.

Rayonier completed two limited cleanup actions, known as Interim Actions. They decommissioned a 2.3 million-gallon fuel tank in 1993, and excavated and removed around 1,500 cubic yards of total

petroleum hydrocarbon (TPH) contaminated soil. Some contamination remains in the area of the old tank and will be addressed during future work.

In 1998, Rayonier cleaned up hydraulic oil and polychlorinated biphenyl (PCB) contamination along the west bank of Ennis Creek. The contamination was caused by leakage of PCB-tainted oil from large baling presses in the mill's Finishing Room. As part of this action, Rayonier removed about 7,500 tons of contaminated soil and disposed of it at the Port Angeles Landfill. Clean fill-material was used to replace the soils removed. This action did not include known contaminated soils immediately adjacent to Ennis Creek, which will also be addressed during future work.

In 2002, Ecology entered into an Agreed Order with Rayonier which required the company to complete a Remedial Investigation of the marine area of the site. In 2004, Ecology and Rayonier entered into another Agreed Order that required Rayonier to complete a Remedial Investigation and Feasibility Study for the upland portion of the study area. The upland Remedial Investigation was completed and put out for public comment in late 2006.

Current Activity and Site Status

As of 2010, Toxics Cleanup Program staff has completed several tasks necessary for continuing the cleanup process:

- Review of the Marine Remedial Investigation report and outlining further work for Rayonier.
- Publication of the Upland Remedial Investigation Responsiveness Summary—a document responding to public comments on the Remedial Investigation Report.
- Final negotiations on an Agreed Order to move forward with site cleanup.
- Investigation of Port Angeles Harbor sediments (http://www.ecy.wa.gov/programs/tcp/sites/portAngelesHarborSed/paSed_hp.htm).
- Investigation of off-property soil dioxins (http://www.ecy.wa.gov/programs/tcp/sites/rayonierOffProp/rayonierOffPr_hp.htm).

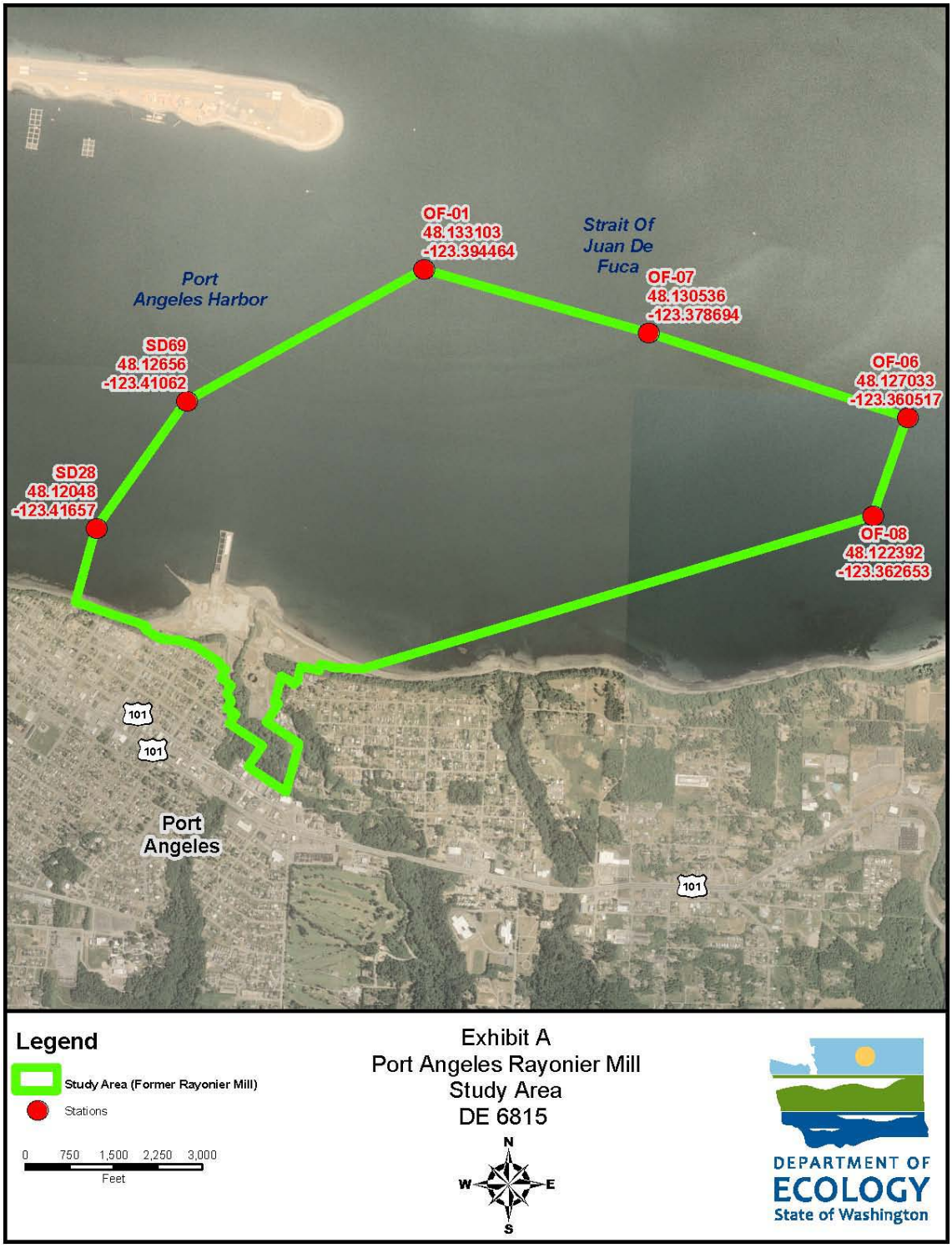
Once completed, the Remedial Investigation reports will help inform the Feasibility Study process. The Feasibility Study evaluated possible cleanup options, which will then inform a final cleanup decision. The harbor sediment and soil dioxin investigations will help Ecology determine the extent of Rayonier's contamination and better define the full site.

The new Agreed Order between Ecology and Rayonier requires Rayonier to gather more data about the nature and extent of contamination. These data will inform future cleanup decisions. Cleanup will begin in the Study Area—a portion of the site that does not include the full extent of contamination (Figure 2). Under the Agreed Order, Rayonier must complete the following work:

- Collect data and summarize all information for the upland part of the site.
- Collect data and summarize all information for the marine part.
- Evaluate possible cleanup options for the Study Area.
- Draft an Interim Action Plan for the Study Area.

Ecology is holding a public comment period on this Agreed Order. At the end of the public comment period, Ecology will consider public comment on the proposed Agreed Order and the order will be changed if needed.

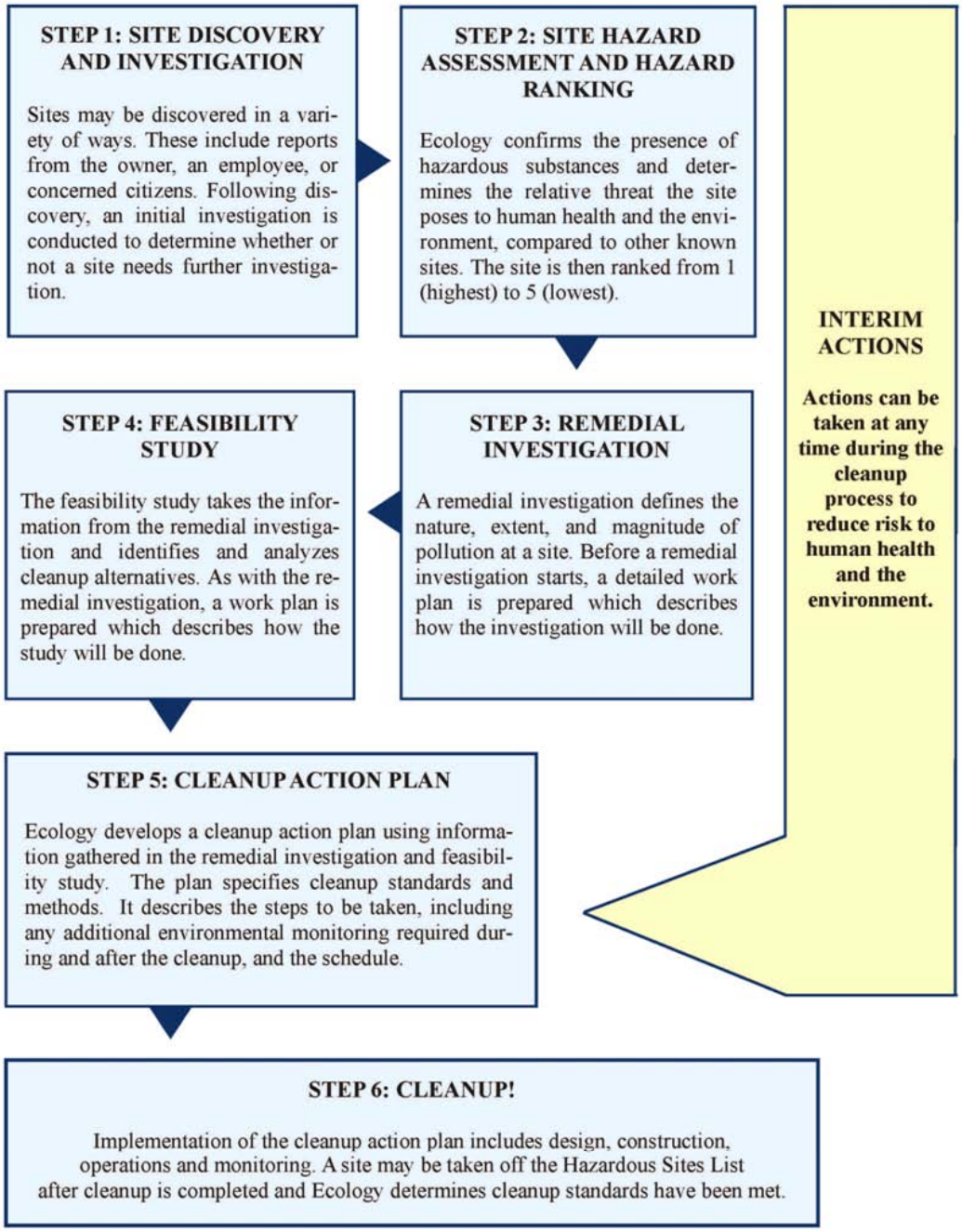
Figure 2. Port Angeles Rayonier Mill Study Area Map
The full site boundary has not yet been defined. For the purpose of moving forward with cleanup, Ecology has defined a study area (in green).



Toxic Cleanup Process

The Model Toxics Control Act defines different stages in the cleanup process (Figure 3). Agreed Orders and Consent Decrees are legal documents used to formalize cleanup agreements between Ecology and the responsible parties. All legal agreements must go through public comment, as well as the Remedial Investigation, Feasibility Study, and Cleanup Action Plan. Interim Actions may be taken during steps at any point in the process to reduce or eliminate pollution that poses an immediate threat to human health or the environment. Interim Action plans and related legal agreements also go through a public comment process.

Figure 3. Steps in the Model Toxics Control Act Cleanup Process



Public Participation Activities and Responsibilities

The purpose of this Public Participation Plan is to promote public understanding and participation in the cleanup process for this site. This section of the plan addresses when and how Ecology will keep the public informed about site activity and provide opportunity for comment and involvement. The agency will consider and use community input whenever possible. The following is a list of the public involvement tools, their purpose and a description of when and how they will be used during the Rayonier Mill cleanup.

Public Involvement Tools

Formal Public Comment Period
Comment periods are the main way Ecology gets feedback from the public on proposed cleanup decisions. Comment periods usually last 30 days and are required at key points during this cleanup process before final decisions are made. The public can comment in writing (e-mail or letter).

Public Meetings and Hearings
Public meetings may be held at key points during the investigation and cleanup process. Ecology may also offer public meetings for actions of particular interest to the community. Also, if ten or more people request a public hearing during the 30 day comment period, Ecology will hold a public hearing for the purpose of taking oral comments on draft documents.

Responsiveness Summaries
After every public comment period, Ecology reviews all written comments received. This information is compiled into a responsiveness summary. The responsiveness summary will include the agency's general responses to public concerns. It may also include responses to specific questions, especially where those questions lead to a significant change in a cleanup document.

Ecology considers revisions to cleanup documents based on public input. If significant changes are made, then a second comment period is held. If no significant changes are recommended, then the draft documents will be finalized. The responsiveness summary will be available upon request and included with the other site documents in the Information Repositories listed below.

Information Repositories
Information repositories are places where the public can go to review site information. Repositories are often at libraries or other publicly accessible buildings. During the comment period, cleanup documents will be available for review at each repository. Some site information will remain at repositories for the duration of the cleanup. Ecology's Central files can make copies of the documents for a fee.

The information repositories for this site are:

Ecology's Web site: http://www.ecy.wa.gov/programs/tcp/sites/rayonier/rayonier_hp.htm

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
300 Desmond Dr.
Lacey, WA 98503
(360) 407-6365

North Olympic Library System, Port Angeles
Reference Desk
2210 South Peabody St.
Port Angeles, WA 98362
(360) 417-8500

Peninsula College Library, Reference Desk
1502 East Lauridsen
Port Angeles, WA 98362
(360) 417-6280

The physical repositories also hold all public review documents for the Port Angeles Harbor Sediments Investigation and the Rayonier Mill Off-Property Soil Dioxin Study. Electronic copies are available at the following Web sites:

- http://www.ecy.wa.gov/programs/tcp/sites/portAngelesHarborSed/paSed_hp.htm
- http://www.ecy.wa.gov/programs/tcp/sites/rayonierOffProp/rayonierOffPr_hp.htm

Mailing list
Ecology has a list of individuals, organizations, and agencies interested in the investigations and cleanups in the Port Angeles area. This list is used to distribute information via mail and e-mail. Information sent by mail is limited to fact sheets and site updates. E-mails include links to electronic information on Ecology's Web site. To be added to the mail list, contact Hannah Aoyagi at 360-407-6790 or haoy461@ecy.wa.gov.

Site Register and Public Events Calendar
Ecology's Toxics Cleanup Program uses its bimonthly Site Register and Web-based Public Involvement Calendar (http://apps.ecy.wa.gov/pubcalendar/calendar.asp) to announce public meetings and comment periods. To receive the Site Register in electronic or hard copy format, contact Linda Thompson at 360-407-6069 or by email at ltho461@ecy.wa.gov. It is also available on Ecology's website at http://www.ecy.wa.gov/programs/tcp/sites/8801/8801_hp.html.

Fact Sheets / Updates
Ecology will mail fact sheets to persons and organizations interested in the Rayonier Mill site to inform them of public meetings and comment periods, and other important site activities. Ecology may also mail updates about the progress of site activities.

Newspaper Display Ads
Ecology may place ads in the local paper to announce public comment periods and public meetings or hearings for this site. The *Peninsula Daily News* will be used to publish information about this site.

Ecology Web Site
Rayonier Mill site information and materials available for public comment will be posted on Ecology's Web site: http://www.ecy.wa.gov/programs/tcp/sites/rayonier/rayonier_hp.htm.

Public Participation Grants
Competitive grants are available to non-profit organizations every two years. These funds may be used to provide additional public involvement, to receive technical assistance, and enhance the public's understanding of the cleanup process. For more information, please contact Blake Nelson at (360) 407-6044 or bnel461@ecy.wa.gov, or visit Ecology's Solid Waste and Financial Assistance Program Web site: http://www.ecy.wa.gov/programs/swfa/grants/ppg.html

Translation and Interpretation Services
Ecology will provide translation and interpretation services to any person who requests them. Please contact Hannah Aoyagi, Public Involvement Coordinator at 360-407-6790 or haoy461@ecy.wa.gov to request a translation of this or any other documents related to this site.

Plan Updates
This Public Participation Plan is meant to be a living document and may be updated as the project proceeds. Updates will be announced during public comment periods and posted on the Rayonier Mill Web site.

Public Points of Contact
For project-related questions, contact Marian Abbett of Ecology's Toxics Cleanup Program at 360-407-6257 or by email at Mabb461@ecy.wa.gov.

For copies of this document or questions about public involvement, contact Hannah Aoyagi at (360) 407-6790 or by email at haoy461@ecy.wa.gov.

Glossary

Agreed Order - A legal agreement between Ecology and a Potentially Liable Person to conduct investigation and cleanup work.

Ammonia-based acid sulfite process – Wood pulp is extracted from wood chips using chemicals containing sulfur and ammonia. This pulp can then be used to make a variety of paper and non-paper products.

Cleanup Action Plan - A document that explains which cleanup alternative(s) will be used at a site. The Cleanup Action Plan is based on information and analysis generated during the Remedial Investigation and Feasibility Study. It also takes into account public comments and community concerns.

Contaminant - Any hazardous substance that does not occur naturally or occurs at greater than natural background levels

Dissolving grade pulp – A type of wood pulp that can be used for making rayon fabric, cellophane, and cellulose acetate (used in photography film).

Feasibility Study - This study develops and evaluates cleanup options for a given site.

Interim Action – A partial cleanup action taken to address immediate threats to human health and the environment.

Model Toxics Control Act - Legislation passed by citizens of the State of Washington through an initiative in 1988. Its purpose is to identify, investigate, and clean up facilities where hazardous substances have been released. It defines Ecology's role and encourages public involvement in the decision making process. Regulations are administered by the Department of Ecology (http://www.ecy.wa.gov/biblio/9406.html).

Potentially Liable Person - Any individuals or companies potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology uses legal agreements to require Potentially Liable Parties to clean up sites.

Poly-chlorinated biphenyls (PCBs) - Banned in 1977, PCBs were used a coolants and lubricants in electrical equipment. Because of their stability, however, these chemicals still persist in the environment. They have a wide range of health effects, including skin problems, liver damage, anemia, and thyroid problems. More information on PCBs can be found at: http://www.atsdr.cdc.gov/tfacts17.html

Recovery boiler – Uses wastes from the wood pulping process to produce steam energy.

Remedial Investigation - This study characterizes the site and defines the extent of contamination.

Sediments - Settled particles located at the bottom of a lake, river or in wetlands. Sediments also include settled particulate matter exposed by human activity (dredging, for example).

Spent sulfite liquor – A waste product of the wood pulping process.

Superfund – The federal government's program to clean up uncontrolled hazardous waste sites throughout the nation. More information about the program is available at http://www.epa.gov/superfund.

Total petroleum hydrocarbons (TPH) - These chemicals are found in gasoline and include many toxic compounds. Humans can be exposed to petroleum hydrocarbons by breathing them in air, ingestion, and through skin contact. More information about TPH can be found at: http://www.atsdr.cdc.gov/tfacts123.html