

November 30, 2006

Bill Harris, Project Manager  
WA Department of Ecology  
PO Box 47775  
Olympia, WA 98504-7775  
Subject: Comments on Uplands Remedial Investigation Report –Rayonier Mill Cleanup

Dear Bill:

The State of Washington owns filled tidelands, tidelands and bedlands that have been leased to Rayonier for many years. The Department of Natural Resources manages these lands for Washington State. The DNR has participated and commented throughout the environmental cleanup of the Rayonier site.

The following comments are provided at this point in the evaluation process:

1. Comments on the drafts of both Volume 1 and 2 were submitted in February and March 2003 (Copies of the submitted comments are attached). There has not been written response as to how the comments were addressed. It is not clear if and how these comments were incorporated into the current draft.
2. Areas along the shore in filled tidelands resulted in samples containing multiple compounds. Over 10 classes of compounds were identified in samples at WM20, WM21, and DK20. These areas need additional sampling and cleanup considerations to determine extent of contamination and any synergistic effects between the compounds.
3. Reconstitute the RTAG (Rayonier technical advisory Group) in order to address and discuss the levels and phases of cleanup.
4. Due to the uncertain nature of future uses at the site, DNR continues to support evaluations for MTCA Method B unrestricted land use cleanup levels. 1) the land is in direct contact with the water so this allows for a continued pathway for ongoing releases to the aquatic environment that are not acceptable and 2) even if they intend to use it for industrial purposes in the near future, we do not want to limit our future opportunities at the site by increasing the cost of folks doing business in this area.

We look forward to working with all parties and moving forward with cleanup at the former Rayonier Mill site. Thanks for the opportunity to comment. If you have any questions, please contact me at 360-457-2570 ext 221 or Joanne Snarski at 360-902-1070.

Sincerely,

Martha Hurd  
Straits District Manager, Aquatics, Orca Straits District

Cc David Roberts  
Joanne Snarski  
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