

**Harris, William W.**

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**From:** Bob Lynette [windenergy@olympen.com]  
**Sent:** Wednesday, November 29, 2006 12:43 PM  
**To:** Harris, William W.  
**Subject:** Rayonier Draft Upland Remedial Investigation Report

To: Bill Harris, Project Manager  
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I fully endorse the Olympic Environmental Council's comments on the subject plan, the major points of which are below. I also question the quality control of the samples taken by Rayonier that are in such conflict with earlier test sample results. There is no logic to the much lower levels of contamination found by Rayonier in many cases. These differences are dismissed in an almost casual manner in the draft report without any explanation. Please address this concern.

Major points made by the Olympic Environmental Council and endorsed by me.

**Do not dismiss high levels of contamination without further**

**examination.** High concentrations of metals, particularly arsenic, copper, and lead are present at a number of sampling locations and are dismissed offhand. Rayonier claims laboratory or limited unique site contamination whenever concentrations exceed standards, instead of further investigating the data. Rayonier and Ecology should include these data as they could potentially represent "hot spots" of contamination. The selected sites need to be cleaned up if the levels do not meet criteria that protect human health and the environment.

**Use standards for dioxin that are protective of human health and the environment.**

Dioxin is one of the most dangerous chemicals known to exist. Rayonier seeks to find ways to discount elevated dioxins and furans concentrations in soils around Port Angeles. Not investigating these dioxin levels further leaves residents in the dark about the nature and extent of dioxin contamination in their soils. They are proposing to use their own dioxin standards, created by a lawsuit settlement, not science, which is inadequate for this cleanup.

**Revisit the air deposition analysis.** Models used to determine to what extent air emissions impacted surrounding land are flawed. Rayonier shirks responsibility for its actions by blaming the highest soil concentrations on another source, a hospital waste incinerator operational when the mill was active. Rayonier proposes this hypothesis because concentrations were higher than the modeled deposition rate predicted. Confusion about the degree to which particular sources contributed to the contamination does not change the fact that the soils in those areas continue to be a threat to public health and the environment.

**Use all applicable data.** Rayonier fails to account for the differences between the sampling results in the RI and earlier sampling results that showed higher concentrations of contamination. Without a coherent and convincing reason to not use the earlier data, all of the sampling information has to be included in the evaluation.

**Use protective cleanup standards.** Rayonier continues to use explanations and language that paint this site as not very contaminated, when in fact many of the samples came back with levels of contaminants that don't even meet the more relaxed "industrial" cleanup standard. While the decision about what cleanup levels are used at the site will come at a later date, all relevant documents should avoid subjective terms like "low levels of contamination" when the data does not support such biased language.

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