

Harris, William W.

From: Alfredo Quarto [mangroveap@olympus.net]
Sent: Thursday, November 30, 2006 6:16 PM
To: Harris, William W.
Subject: Proper Procedure Must Be Implemented at Rayonier Cleanup Site

Bill Harris, Project Manager
SWRO Solid Waste and Financial Assistance Program
PO Box 4775
Olympia WA 98504-7775
Email: wha461@ecy.wa.gov

Subject: Draft RI Upland Soils Report

(The Draft Upland RI Report can be read online at
www.ecy.wa.gov/programs/tcp/sites/rayonier/rayonier_hp.htm)

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TELL ECOLOGY:

- * **Do not dismiss high levels of contamination without further examination.**
- * **Use credible dioxin sampling and analysis.**
- * **Use dioxin cleanup standards supported by the World Health Organization. Do not lessen the scientific standard out of fear of a Rayonier legal action.**
- * **Get current groundwater data.**
- * **Use all applicable data.**
- * **Use protective cleanup standards and eliminate biased language discounting the significant findings.**
- * **Set an enforceable schedule for all future work at the site.**

BACKGROUND ON CONCERNS

Do not dismiss high levels of contamination without further examination. Soils were sampled for 14 classes of compounds throughout the mill site. High concentrations of metals, particularly arsenic, copper, and lead are present at a number of sampling locations. So, too, are dioxins PCBs and PAHs (polyaromatic hydrocarbons). Individually and together, these are carcinogenic, endocrine disruptors, and toxic at very low doses. They can cause developmental problems in children and fetuses. Review of the Draft RI shows that throughout the mill area, numerous sites sampled contain multiple chemicals, some individual samples exhibited as many as 10 classes of compounds. The cumulative impact at each of these points could rank for cleanup and should effect further sampling in those areas. Rayonier and Ecology must include these data to see if they represent "hot spots" or are representative of contamination in the wider area. Then the areas need to be cleaned up if the levels do not meet criteria protective of human health and the environment.

Demand credible dioxin sampling and analysis. Off-site, EPA found worrisome levels of dioxins when it took initial samples of hospital and residential soils in Port Angeles in the late 1990s. Rayonier is supposed to continue this sampling but is resisting. Rayonier is attempting to excuse further soil

analysis with a flawed air deposition model. Ecology must revisit the air deposition analysis and use real data because Rayonier's models for determining to what extent air emissions impacted surrounding land are flawed as they do not match the hard EPA data taken earlier that showed high levels of dioxin. Other data collected over the years during which the mill was operating were compiled from the Port Angeles Clean Air Now and Clean Air Hotline, from the Dept of Health (above expected death rates in Port Angeles), and from the Olympic National Park. These data show Rayonier's air deposition pattern. This hard data must be considered. More soil sampling, including from beneath roof drip lines where pollutants are often found, should be taken from areas known to have been in the mill's emission pathways.

Use dioxin cleanup standards supported by the World Health Organization. Do not lessen the scientific standard out of fear of a Rayonier legal action. Dioxin is one of the most dangerous chemicals known to exist. Ecology should use cleanup standards for dioxin protective of human health and the environment. It has been agreed on that 6.67/ppt is the cleanup level to be followed for the protection of human health and the environment. Now, since Rayonier has been resisting, Ecology is looking for some middle ground in their new rule making of dioxin cleanup standards under the state Model Toxics Control Act. Even 6.67/ppt safety is questionable given that everyone has its "safe" body burden of dioxin, now found in fetuses and in large quantities in mothers' breast milk. Ecology should not go below the WHO recommendation. Rayonier seeks to find ways to discount elevated dioxins and furans concentrations already found in soils around Port Angeles to excuse themselves from further sampling, leaving residents, schools, health facilities and businesses in the dark about the nature and extent of dioxin contamination in their soils. Science-based standards, rather than Rayonier-based economic concerns, must be used to determine dioxin cleanup levels.

Get current groundwater data. Most groundwater data in the report are from 2003. A number of compounds detected above criteria include PCBs, pesticides, metals and PAHs. Manganese was not measured. Here again, a number of samples from individual sites showed multiple chemicals. A close comparison of the soil and ground water samples show the marine contamination can be linked to the upland soil pollution directly above. New samples should be taken for all these compounds since during the last three years above ground seepage into the marine environment could show increases. This new sampling should be done soon so as not to further detain the cleanup investigative process.

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, that sampling information has to be included in the evaluation.

Use protective cleanup standards and eliminate Rayonier's subjective, biased language. 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. Subjective terms like "low levels of contamination" should be discounted, particularly when the data does not support such biased language.

Set an enforceable schedule for all future work at the site. Multi-year delays that set back the release of the draft Uplands Remedial Investigation, and the yet to be released draft Marine Remedial Investigation, are unacceptable. The public has no way of holding any of the parties accountable for a timely cleanup, nor is there currently any requirement to notify the public when significant delays occur and for what reasons.

Sincerely,

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Alfredo Quarto, Executive Director

Mangrove Action Project
PO Box 1854
Port Angeles, WA 98362-0279
USA
phone/ fax (360) 452-5866
<mangroveap@olympus.net>
mailto:mangroveap@olympus.net
web site: <http://www.earthisland.org/map/map.html>