

Harris, William W.

From: Charles and Eycke Strickland [chareyck@olyphen.com]
Sent: Tuesday, November 28, 2006 7:08 AM
To: Harris, William W.
Subject: Clean-up of Rayonier Site in Port Angeles WA

Importance: High

Before Rayonier developed their Port Angeles site some 75 years ago the land, the water and groundwater of the site and the surrounding residential areas could not possibly have been contaminated with the concentration of toxins that it is today.

I am asking that the Department of Ecology insist that Rayonier clean up the entire site of dangerous contaminations. Once again I am urging that Rayonier be held to the highest standards of testing for contaminants available and that the entire site be cleaned up to ³residential standards² instead of the proposed ³industrial standards.²

After years of insufficient testing and a lengthy and inadequate attempt to clean-up of the site, it is ironic that if the site had been declared a ³superfund² years ago it might have been cleaned up by now.

I agree with the Olympic Environmental Council assessment below.

Respectfully submitted,

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Olympic Environmental Council has reviewed the draft Uplands Remedial Investigation report, and is asking Ecology to:

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 ³hot spots² 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 ³industrial² 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 ³low levels of contamination² 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 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.