



December 1, 2006

Bill Harris, Project Manager
SWRO Solid Waste and Financial Assistance Program
PO Box 4775
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Via Email: whar461@ecy.wa.gov

RE: Draft Remedial Investigation for the Uplands Environment of the Former Rayonier Mill Site, Port Angeles

To Mr. Harris:

We have reviewed the *Draft Remedial Investigation for the Uplands Environment of the Former Rayonier Mill Site, Port Angeles*, dated January 2006, and released to the public in October 2006.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits, including a specific goal to protect and restore the 2,000 miles of Puget Sound shoreline by 2015.

As this site sits on the Strait of Juan de Fuca, the toxic soils, if not removed, can continually contaminate marine life. It is important to human health, upland environment and marine environment that the soil cleanup is done right.

It is disappointing that cleanup at this site has taken so long. EPA began investigations in 1993 and now 13 years later we are still at this somewhat incomplete RI stage. This is not a simple leaking underground tank site but a site contaminated with significant levels of dioxins, PCBs, polyaromatic hydrocarbons (PAHs), and heavy metals – all of which are of grave concern for human and wildlife health.

The Governor has pledged to cleanup Puget Sound by 2020 and a site like this should be swiftly and completely addressed as part of the effort by the Department of Ecology to meet her goals.

Reviewing the comments prepared by Peter L. deFur, Ph.D on behalf of The Olympic Environmental Coalition is disheartening. Dr. deFur has had the opportunity to look at several generations of Rayonier reports. He concludes that data changes have been discounted, the overall picture is presented as rosier than reality, arsenic data is misrepresented, no new data (especially groundwater) has been collected in key areas, the text includes incomplete reporting (for example, some groundwater data

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are only described in the appendix), offsite impacts have been incorrectly characterized, the overall dioxin threat is minimized, and the report inappropriately handles exposures of wildlife, including endangered species.

We have reviewed many similar documents for other toxic cleanup sites and in no case have the reports been as misleading or incomplete. It is an insult to the Department of Ecology that Rayonier has presented such a poor report.

We strongly urge Ecology to

- a) Require a major rewrite of the document for the final version to address the significant deficiencies.
- b) Establish a time-schedule for the remaining needed documents for the site.
- c) Require a data collection plan to fill in the needed soil, air deposition, and groundwater data gaps in a timely fashion.
- d) Ensure that all risk characterizations for humans and wildlife in the vicinity of the Former Rayonier Mill Site incorporate both the upland, marine, and offsite impacts.
- e) Require the use of dioxin cleanup standards supported by the World Health Organization.

Thank you for the opportunity to comment on the RI. Please contact us with questions at (206) 382-7007 X215.

Sincerely,

Heather Trim
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