

Harris, William W.

From: Bob Vreeland [bvreeland@tenforward.com]
Sent: Monday, December 04, 2006 3:18 PM
To: Harris, William W.
Subject: Draft RI Upland Soils Report

Mr. Bill Harris, Project Manager
SWRO Solid Waste and Financial Assistance Program

Dear Sir:

I am writing to express my concern about the Draft Ri Upland Soils Report. The report identifies high levels of contamination at some sites but seems to downplay their importance. Some sites contain high concentrations of several toxic and potentially toxic metals and compounds. The cumulative effect at these sites must be considered. Further examination of these sites must also be conducted.

It appears that the dioxin standards proposed by Rayonier do not meet the test of best available science. This must not be allowed. Given the known toxicity of dioxin, cleanup standards supported by the World Health Organization must be used.

The air deposition analysis must be revisited. At a minimum, the assumptions used in the modeling of the air emissions impact from former Rayonier mill must be examined carefully.

Current groundwater data is not included in the report. This must be rectified.

The report fails to include earlier sampling data that showed higher concentrations of contamination. The report must include the data or clearly explain why the data is not included.

The report contains language implying that the site is not very contaminated. Some of the samples show levels that don't meet industrial cleanup standards. Given these data, it appears that additional sampling may be needed. Until additional data are analysed, the report should not contain language stating or implying there are low levels of contamination on the site.

Given the multi-year delays of the release of the draft Upland Remedial Investigation and the yet to be released Marine Remedial Investigation, an enforceable schedule for future work must be set.

Thank you for the opportunity to comment on the draft RI report.

Sincerely,

Robert Vreeland
Fishery Biologist, Retired

