RESPONSIVENESS SUMMARY

Port Angeles Rayonier Mill

August 3 - September 5, 2012 Public Comment Period

Agreed Order Amendment

Materials Management Plan

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Introduction

The Department of Ecology (Ecology) held a public comment period August 3 - September 5, 2012 on an amendment to an agreed order (legal agreement) with Rayonier Properties LLC. Under the amendment, the agreed order will include cleanup work during the City of Port Angeles' (city's) combined sewer overflow (CSO) construction project.

The following documents were available for public review and comment:

- **Agreed Order Amendment** – Updates the original legal agreement to include the interim cleanup action.
- **Materials Management Plan (MMP)** – Describes the proposed interim action tasks on the former mill property and appropriate management of construction related materials.

Public comments and Ecology's responses are summarized in this document.

Site Location

The site is generally located at 700 North Ennis Street in Port Angeles.

Format of the Responsiveness Summary

Ecology reviewed all comments received. Comments from different reviewers often covered the same topics. We grouped and responded to common concerns, as well as many other comments and questions. The rest of this responsiveness summary is organized into the following sections:

- Changes to the Materials Management Plan
- Summary of Public Involvement
- List of Commenters
- Acronyms and Abbreviations
- Responses to Common Concerns
- Appendix A: Comment Letters

Changes to the Materials Management Plan

Based on comments we received, Ecology developed an addendum that clarifies the Materials Management Plan. The MMP addendum is fully enforceable under the agreed order. The MMP addendum clarifies:

1. That the city may use imported fill from the Holcomb Pit/Black Diamond Quarry for this construction project based on recent sample results.
2. That the city must use a low permeable material as a barrier between clean backfill and visibly contaminated soil left in place, as stated in the Material Management Plan. A woven filter fabric, as identified in the city's specifications, is not acceptable.
3. How Rayonier will manage materials such as concrete rubble, metal debris, and creosoted pilings that may be generated during construction of the CSO soil staging areas.
4. How the stockpiles will be inspected and maintained during construction and after construction.
5. How the stockpile areas will be constructed. To provide a visual and physical barrier, Rayonier will place a geotextile fabric on the prepared surface, rather than a plastic liner on compacted clean soil.
6. That if there is more visibly contaminated soil than can fit in the roll-off bins, Rayonier will designate an emergency overflow staging area within the soil stockpile areas. The emergency overflow area will be lined with a plastic sheet on top of the filter fabric. The visibly contaminated soil will be removed to new empty roll-off bins within a short time.
7. That the city may use Stockpile Area 3 for temporarily staging debris until the area is needed for other construction debris. The city is responsible for disposal of the debris.
8. That dewatered sediment from the outfall diffuser repair will be stockpiled separately from stockpiles of soil assumed to be clean.
9. That Rayonier is responsible for managing stormwater within the soil stockpile area.
10. That Rayonier will submit monthly stockpile inspection summaries and a post-construction stockpile cover design.
11. How the stockpile areas were constructed. That Rayonier may convert Stockpile Area 1's southern infiltration area to a stockpile storage bin if needed.
12. That Rayonier stored the soil cuttings from previous investigation work in the stockpile area.

Summary of Public Involvement

The Model Toxics Control Act (MTCA) mandates public involvement in the site cleanup process. The public comment period for the Agreed Order Amendment and Materials Management Plan ran August 3 – September 5, 2012. The public involvement process included a public meeting and presentations, a fact sheet and other outreach materials.

Fact Sheets and Other Outreach

Ecology used the following notices to advertise the comment period:

- Fact sheet mailer – Sent to about 390 neighboring residents and stakeholders.
- Email announcement – Sent to about 250 interested residents and stakeholders.
- News release
- Blog – Posts about the comment period and follow-ups to questions.
- Website - http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonier/2012/Pub-Comment-Period.html
- Other - Notices on Ecology's Public Involvement Calendar and Site Register**.** Legal ads in the Peninsula Daily News.

Public Meetings and Presentations

Ecology hosted a public open house and presentation on August 29, 2012 at the Olympic Medical Center. About 30 people attended the event.

Contacts

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List of Commenters

Date	Name	Affiliation
8/7/2012	Gerald Carpenter	Community Member
8/21/2012	Darlene Schanfald	Olympic Environmental Council
8/30/2012	Darlene Schanfald	Olympic Environmental Council
9/2/2012	Bob Sextro	Community Member
9/4/2012	Bob Sextro	Community Member
9/5/2012	Kathryn Neal	City of Port Angeles
9/10/2012	Bob Sextro	Community Member

Acronyms and Abbreviations

CSO	Combined sewer overflow
Ecology	Washington State Department of Ecology
MMP	Materials Management Plan
MTCA	Model Toxics Control Act
RI/FS	Remedial investigation and feasibility study
WAC	Washington Administrative Code

Responses to Common Concerns

The CSO Project

Several commenters had questions and comments about the city's CSO project. Some commenters asked about specific parts of the city's plans, such as when the city will work on the CSO project. Other commenters asked whether Ennis Creek restoration would happen as part of the CSO project and if new structures the city is building would allow for later restoration. Another question we received was how community members would be kept up to date.

Ecology Response: The agreed order amendment and MMP describe the interim action (partial cleanup) work during the CSO project. The documents only describe work that the city and Rayonier will do on the former Rayonier Mill property – not the full CSO project. Some basic information from city CSO project documents is outlined below. For more information:

- City of Port Angeles CSO construction website: http://www.cityofpa.us/CSO-ConstructionInfo.htm.
- City of Port Angeles CSO website: http://www.cityofpa.us/CSO.htm.
- City of Port Angeles CSO project manager James Burke, (360) 417-4809 or jburke@cityofpa.us.
- Ecology CSO website: http://www.ecy.wa.gov/programs/wq/permits/cso.html.

Timing
To complete the CSO project on-time, the city plans to work on different parts of the project throughout the year. The city is working to finish their entire CSO project by the end of 2015.

Restoration
The city designed a new bridge to cross Ennis Creek on the Rayonier property. The new bridge will carry the CSO pipes. The city selected a 100 foot span for the bridge to allow for creek meandering that may result from possible future restoration. However, restoration is not a part of the CSO project.

Communication
For updates on the CSO project information, visit the city's webpage at http://www.cityofpa.us/CSO-ConstructionInfo.htm. To receive updates about the project from the City of Port Angeles, email publicworks@cityofpa.us.

The Interim Action

Several commenters had questions and comments on how the city's CSO project can be treated as a MTCA interim action, as well as why the city and Rayonier are not removing more contamination. One commenter stated concerns about leaving contaminated soil near the CSO trenches and said that there should be further excavation of contaminated soil to avoid leaving "wedges of contaminated soil."

Ecology Response: Ecology sometimes allows interim actions to partly clean up a site before the final cleanup plan is complete. Interim actions are done to correct a problem that may get worse, reduce a threat, or help complete the RI/FS.

The best route for the city's CSO project involved crossing the Rayonier Mill site, and thus will likely encounter contaminated soil and groundwater. The city identified a path where they were less likely to encounter extensive contamination and cultural resources. In order to remove contamination while minimizing the potential for impacting cultural resources, the city and Rayonier are limiting trenching to the CSO pathway.

Thus, this interim action addresses contamination along the CSO construction path. Soils removed along the CSO path will be managed as contaminated soil unless proven to be clean. Only clean imported fill will be used as trench backfill – none of the removed soil will be placed back in the trench. Visibly contaminated soil will be over-excavated. The city may over-excavate six feet beyond the edge of the pipeline trench or up to the area where they may potentially find cultural or historic artifacts, whichever is less.

Roles and Responsibilities

Several commenters asked for clarification about whether Rayonier or the city would be responsible for overseeing dewatering sediments, moving soil at different stages, paying for excavating, paying for sorting soil by type of contamination, and managing stormwater. Another commenter asked to know exactly which agencies would be on-site during work and who would be paying for Ecology's work.

Ecology Response: Staff from the city and their contractors, Rayonier and their contractors, Ecology, and the Lower Elwha Klallam Tribe will be on the former mill property for various portions of the project. Section 1.5 of the MMP describes the roles and responsibilities for the city and Rayonier.

According to the City of Port Angeles, the city will pay for the city's excavation and sorting/segregating the soil by type. Rayonier will pay for moving, storing, and disposing of contaminated and potentially contaminated soil. Contact the city's Public Works Department at (360) 417-4800 for more information.

Rayonier pays Ecology oversight costs for work under the AO and MMP.

The city paid for the NPDES permit application fee as the permit covers the entire CSO construction project, including the portion not on the Rayonier property. Ecology's time reviewing water treatment, and permit reports is covered by this permit fee.

The city oversees the dewatering of the sediments removed from the deepwater outfall diffuser under the COE 404 permit. See http://apps.ecy.wa.gov/permithandbook/permitdetail.asp?id=37

for more information on COE 404 permits. For more information about the city's permit, contact the city's CSO project manager James Burke at (360) 417-4809 or jburke@cityofpa.us.

Sediments

Questions about sediments focused on whether, when, and how dewatered sediments would be tested. One commenter also asked about how long sediments would be temporarily stored on barges.

Ecology Response: The city will remove some sediments from Port Angeles Harbor as part of CSO project work on Rayonier's former deepwater outfall.

Rayonier will collect five to seven grab samples of the dewatered sediment and submit them to a lab for analysis. The lab will analyze the samples for dioxins, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), and phenols. (See page 10 of the MMP.)

The CSO outfall repair is a separate contract. The contractor will be responsible for how and when sediments are brought upland. The contractor will meet the requirements of the COE 404 permit. While sediments are likely not contaminated (Type 1), they will not be "mixed" with Type 1 soil. They will be stockpiled separately. We have clarified this in the MMP addendum.

Stockpiles

Several commenters expressed concern about the plan for covering and containing stockpiled soil and dewatered sediments. Commenters were concerned that the proposed methods would not last for several years under harsh weather conditions. One commenter asked about the dimensions of stockpiles.

Ecology Response:

Stockpile Maintenance

Ecology agrees that more detail on stockpile maintenance during and after construction is necessary. More details have been provided in the MMP addendum.

Rayonier will cover stockpiles with plastic sheeting and sandbags during construction. Rayonier will do daily inspections of the stockpiles during trenching and placement of soils in the staging area. Otherwise, inspections will be at least weekly or following significant storm events.

The purpose of the inspections is to ensure the best management practices (BMPs) are in proper working order. Rayonier will keep a summary of the inspections and corrective actions taken with photo log of the stockpiles. Rayonier will provide this to Ecology monthly.

After construction, Rayonier will create a more permanent cover for the piles. For example, this may be a 6-12 inches clean soil and grass cover. This cover will be used until a remedy for the upland portion of the Study Area is ready to be implemented. Rayonier will submit their design for a cover to Ecology for review and approval 60 calendar days after Rayonier places all soils in the stockpile area.

Soil Transport

The trucks transporting soil from the excavation to the stockpile area will not be covered. The soil is moist from precipitation or from dust control watering. It is unlikely there will be blowing dust during the short distance transport to the stockpile area. However, the contractor will use all means and methods to minimize airborne dust as necessary.

Stockpile Dimension

We provided an estimate when this question was asked during the comment period open house. The corrected "Typical Soil Stockpile" dimensions is 8 ft high, 70 ft wide, 120 ft long (see section 5.2.3.1 of the MMP). These are general dimensions, and there is flexibility in their field construction.

Sampling

Several commenters had questions about the types of sampling that Rayonier and Ecology would use on potentially contaminated soil. Commenters asked about how over-excavation areas would be sampled, exactly how far apart samples would be taken from stockpiled soil, how sediment would be sampled, how many soil samples Rayonier would take from roll-off containers, and how sampling equipment would be decontaminated. One commenter recommended splitting each sample and having the two resulting samples tested at independent labs. Another commenter asked how the city would verify that fill dirt was clean. Another commenter remarked that methods were not specified for re-typing (classifying) soil based on head-space organic vapor screening.

Ecology Response:

Split Samples

During the CSO construction on the Rayonier property, Ecology routinely makes site visits to observe the field work. During Ecology's visits, Rayonier and the city have been observed to be following sampling plans and protocols. Samples are being sent to certified labs and Ecology reviews the sampling results. At this point, we have seen no irregularities that have triggered concern and caused us to collect split samples.

Fill Soil

The city provided Ecology with their specification for fill soil to replace soil in pipeline trenches. It meets Ecology's requirements for clean soil. Samples will be collected from the imported fill material at the source and tested for a number of chemicals, such as petroleum, metals, PCBs, and pesticides. The chemical concentrations must be less than the Soil Screening Levels listed in

Table 1 of Rayonier's Supplemental Upland Data Collection Work Plan. For more details, see the city's spec at http://www.cityofpa.us/PDFs/CSO%20PROJECT/Section02200Earthwork.pdf.

Over-excavation Area Sampling

Section 4.2.2 of the MMP explains that Rayonier will sample the soil from the sidewalls and bottom of the over-excavation to document any contamination remaining. Samples will be collected every 20 feet. These will be analyzed for contaminants Rayonier suspects to be present based on the nature of the visible contamination and its location relative to historical mill operations and previous sampling.

Each time they sample, Rayonier will confer with Ecology as to the proposed sampling and analysis methods via phone call and follow-up email. If contamination remains, then the city will take measures to reduce the potential that clean backfill material could be recontaminated. This may mean placing a plastic liner between the contaminated soil and clean backfill.

Roll-off Container Sampling

Rayonier will collect the number and type of samples necessary for their waste disposal authorization. That is to say that the facility receiving the soil will dictate the number and type of samples, and for what they should be analyzed.

Soil Sampling, Analysis, and Quality Assurance

Rayonier will submit a stockpile sampling plan for Ecology review and approval. The comments we received will be useful as we work with Rayonier on their plan.

The soils are stockpiled according to the excavation location, excavation depth, and likely level of contamination. The sampling plan will describe the number and type of samples to be collected from each stockpile. The analysis will consider the types of contaminants expected to be present based on existing data. For example, soils from trench segments near the former fuel tank area may have petroleum contaminants and thus will be sampled for petroleum, at a minimum.

We will post the stockpile sampling plan on the Rayonier Mill website at http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonier/2012/Pub-Comment-Period.html when it is available.

Headspace Screening Criteria

There are several field screening methods being used to designate Type 3 soil. Decisions regarding Type 3 soil are made on a case-by-case basis using all the available observations and data in the field. So no specific criteria were set for headspace screening.

Sediment Sampling

Please see page 9 of this responsiveness summary for responses to questions about sediment sampling.

Water Treatment/NPDES Permit

Several commenters had questions about how the city and Rayonier would treat groundwater and stormwater they encounter during CSO project work. One commenter asked why Rayonier used the 2005 Stormwater Management Manual rather than the 2012 version.

Ecology Response: The city is managing water treatment under a National Pollutant Discharge Elimination System (NPDES) water quality permit. We have placed copy of the final permit and a PowerPoint presentation about it on the Rayonier Mill website at http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonier/2012/Pub-Comment-Period.html.

The NPDES permit requires the city to use measures outside and inside the mill property to prevent dirty water reaching Port Angeles Harbor during CSO project construction. Best management practices the city will use to manage construction stormwater and groundwater include:

- Placing filters in storm drains.
- Using silt fences along trenches.
- Inspecting and monitoring these measures.

Inside the mill property, the city will:

- Collect and pre-treat stormwater and groundwater from pipeline trenches. Water will be collected into a settling tank where solids will settle out. From there it will be pumped through a sand filter that removes finer solids. Then it will go through a carbon unit to remove organics.
- Sample treated water before it is discharged to the wastewater treatment plant. The water will be analyzed for a variety of parameters:
    - Arsenic
    - Cadmium
    - Chromium
    - Copper (total)
    - Cyanide
    - Lead
    - Mercury (total)
    - Molybdenum
    - Nickel
    - Selenium
    - Silver
    - Zinc (total)
    - pH
    - BOD (biochemical oxygen demand)
    - TSS (total suspended solids)
    - Total Phenolic Compounds
    - Volatile Organic Compounds
    - Acid Extractable Compounds
    - Base-neutral Compounds
    - Dioxin
    - Pesticides
    - Total Petroleum Hydrocarbons (gasoline)
    - Total Petroleum Hydrocarbons (diesel)

<u>Stormwater Management Manual</u>
Rayonier used the 2005 Stormwater Management Manual as the 2012 version was not final until after completion of the MMP.

Other Reports

Several commenters had questions about other reports related to the CSO project. Commenters wondered how these reports would be made available. These included the NPDES permit, the city's stormwater pollution prevention plan, the city's best management practices manual for stormwater management, the city's specification for fill dirt and fill dirt sampling, the city's CSO project design, Rayonier's stockpile sampling plan, Rayonier's materials management completion report, a list of approved permits, and the city's and Rayonier's health and safety plans.

Another commenter asked whether all Rayonier MMP submittals will be scheduled for public review and comment.

Ecology Response: Several of the reports commenters asked about are now available. We have created links to the following documents on the Rayonier Mill website at http://www.ecy.wa.gov/programs/tcp/sites_brochure/rayonier/2012/Pub-Comment-Period.html:

- Stormwater and groundwater management:
  - The NPDES permit.
  - The city's stormwater pollution prevention plan.
  - The city's best management practices manual for stormwater management.
- Rayonier submittals:
  - A list of additional permits and approvals.
  - Rayonier's health and safety plan.
- City documents available through a link to the city's CSO construction website:
  - The city's specification for fill dirt and fill dirt sampling.
  - The city's CSO project design.
  - The contractor's health and safety plan.

We will post Rayonier's stockpile sampling plan when it is available. We will post Rayonier's materials management completion report when it is available after the CSO project work is done.

We will not hold a formal public comment period for all of Rayonier's MMP submittals. However, we will make documents available on our website when we approve them and we always welcome questions and comments. You can send technical questions and comments to site manger Marian Abbett at the contact information listed on page 5.

Safety

Several commenters had questions about safety related to the site. These included requests for more informative signage around the property, more and higher fencing around the property, guards, and a hotline to call if someone notices trouble at the site.

Ecology Response: We agree that informational signs are needed. We are working with Rayonier on new signs to post around the property. We are also exploring whether the fencing needs improvement, and the appropriate next steps.

The city does not have a hotline, but is keeping the public updated through the CSO project website at http://www.cityofpa.us/CSO-ConstructionInfo.htm.

Biomass

One commenter questioned why biomass cogeneration projects are being allowed in Port Angeles. The commenter expressed concerns that biomass projects are continuing to pollute Port Angeles Harbor and surrounding land with dioxin and unknown particulates.

Ecology Response: Past sources produced far more pollution than modern, regulated biomass cogeneration plants, which must meet federal health standards for air emissions. Before the 1970s, air and water pollution were not regulated, so untreated wastewater and boiler ash deposited dioxins directly into the harbor. Also, facilities like the Rayonier Mill burned salt-laden wood, which produced much higher levels of airborne dioxin.

It took decades for contaminants to build up in the sediments to their current level. Several of the sources that produced the contamination found in harbor sediments no longer exist. Remaining sources are regulated in a manner that is much more protective of human health than in the past.

For more information on biomass burning:

- The Olympic Region Clean Air Agency (ORCAA) is the permitting agency for the proposed Nippon Paper Industries combined heat and power cogeneration plant in Port Angeles. See http://news.orcaa.org/2011/04/nippon-noc/ and http://www.orcaa.org/news/preliminary-recommendations.
- If you have general questions about forest biomass cogeneration, please see Ecology's fact sheet at https://fortress.wa.gov/ecy/publications/publications/1002036.pdf. If you need further information, Linda Kent (360-407-6239 or Linda.Kent@ecy.wa.gov) can help you find the right contact.
- For ORCAA documents related to the Nippon permit: http://data.orcaa.org/permits-applications/all-permits-applications-entries/nippon-cogeneration-noc-application-2011/

Concurrent Comment Period

Several commenters expressed concern that the MMP was a final document and Ecology had signed the agreed order ahead of the public comment period. Commenters were concerned that the MMP would need to be modified based on public comments.

Ecology Response: While Ecology rarely holds a concurrent public comment period for a cleanup site, we occasionally do this when it is needed for work to move forward. Concurrent public comment periods are those when Ecology signs the legal agreement before the comment period begins or during the comment period.

In this case, we held a concurrent public comment period to allow the city to begin CSO project work on the former mill property as soon as possible. The city is working towards a deadline to control combined sewer overflows into Port Angeles Harbor by the end of 2015. The current CSO project is part of this work. In order to meet their deadline, the city needed to begin mobilizing equipment and preparing work areas during the comment period. The vast majority of the work at the Rayonier Mill site, and other sites where we hold concurrent comment periods, is occurring after the comment period ends.

We value and consider the comments we receive during comment periods. During this comment period, we reviewed and considered comments and questions as we received them. We have developed an addendum to clarify elements of the MMP based on that.

Appendix A: Comment Letters

From: Jerry Carpenter [mailto:gdcarpenter37@yahoo.com]
Sent: Tuesday, August 07, 2012 1:24 PM
To: Abbett, Marian L. (ECY)
Subject: Port Angeles Bay Clean-up

I have to ask why we (ie., the Federal government) are paying to clean up Rayonier's mess, while approving Nippon's continued pollution of the same area. In 10 or 20 years will we again clean up the dioxin and other unknown particulate materials that will be spread downwind, settling on the surrounding bay and land? Why not just wait and create a Super Fund site and clean up all their mess at one time. It would save money since we would only have to do all the planning and clean-up once.

Grerald Carpenter
248 Bon Jon View Way
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Olympic ENVIRONMENTAL Council

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21 August 2012

Marian Abbett, Project Mgr
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RE: COMMENTS ON PA CITY-RAYONIER CSO FMMP and AO

The Olympic Environmental Council submits these comments on the City of Port Angeles-Rayonier Final Materials Management Plan and the Ecology-Rayonier AO.

We reiterate that this project is completely unnecessary and an accident waiting to happen which, later, will be more costly environmentally and economically than investing in green methods for handling stormwater in the City of Port Angeles. Documents show that the CSO project costs have been wrongly cited and full disclosure of information has been kept from decision makers. Rather than, as City staff repeatedly stated, this "faster, cheaper" project will show itself to be costlier, unsafe and poorly thought out. It conflicts with the intents and the goals of the PSP Initiative, the Shoreline Management Act, and the MTCA cleanup of the Rayonier Mill-Ennis Creek-Strait of Juan de Fuca/Harbor. Putting such a project in designated tsunami, earthquake,* sea level rise, failing bluff zones already experiencing impacts from climate change, without even considering these, is plainly unprofessional.

Adding insult to injury is the fact that public funds are being spent in this way. Professional engineers inside and outside of the City exclaim disbelief that a CSO system is being built to handle stormwater overflows. As OEC predicted, the City is now talking about implementing piece meal LID projects and raising rate payer rates on top of those rates being charged for the CSO project. Ecology should have insisted that the City demonstrate fiscal prudence and invest in its I&I problems, citywide infrastructure needs and green stormwater handling methods. Keeping stormwater out of the sewage system would stem the overflow problems more cheaply, quicker and more fully. Keeping stormwater in the sewage system perpetuates the ongoing toxicity of marine life in the Strait, the Harbor and Ennis Creek.
*"It doesn't signal much danger. It's far enough away ... that it won't do very much. But there's a small chance it will trigger something." John Vidale, director of the Pacific Northwest Seismic Network.
http://peninsuladailynews.com/article/20120819/NEWS/120819964/swarm-of-quakes-deep-under-ocean-180-miles-west-of-peninsula **Swarm of quakes deep under ocean 180 miles west of Peninsula 8-19-12**

Following are our comments on the FMMP we feel will strengthen the plan and provide more public and environmental safety for the long term.

There should be two labs testing the excavated soil. This would give confidence that clean is clean and contaminated in contaminated to particular levels.

P. 3, para 3:
"Rayonier *assumes* that the City will dewater this sediment,…"
It should not be *assumed.* This phrase is used again on P. 5 under 2.3 and P. 10, 4.3. Yet on P. 3, bullet 4, *The City shall dewater sediment…* The word "assume" should be replaced with wording such as *Rayonier will be ensured…*showing the City will be dewatering.

Explain who will oversee and ensure the dewatering so that Rayonier does not have to "assume?"

Who will pay for the City's excavation and segregation of the soil?

Page 4,bullet 3: After Rayonier samples the soil at the limits of excavation of contaminated soil, what then?

P. 6, top In this passage, it is unclear whether dewatered sediment will be tested. *"The results of the sediment data review indicate that the dewatered sediment will likely meet the requirements of Type 1 (i.e., uncontaminated) soil."* On P. 10, 4.3 it is stated that Rayonier will test the sediment for particular contaminants.

3.0 Bullet 3. *Stockpiling Type 2 [contaminated or likely contaminated] soil with appropriate long-term management…."* Stockpiling this material on-site in a harsh weather climate is potential for movement of the toxic soil, <u>unless encased in a solid water proof container.</u>

Bullet 5: What are the treatments of the excavation and construction waters?

3.1 *"…and the use of environmental covenants will reduce the potential for direct contact by humans and terrestrial ecological receptors to any contaminated soil…"* Explain how "covenants" can/will accomplish the above. A "covenant" is a document. What is stated in it? What enforcements are built into it?

P. 7, Para. 1 and Pp 9-10, 4.2.1. Vertical and Lateral Limits of overexcavation.
It appears from this paragraph that protecting the CSO trench and pipeline may conflict with the MTCA cleanup and that pipeline protection will trump excavation of contaminated soils on the MTCA site. This will cause Ecology to develop "*environmental covenants…to protect human health and the environment for any remaining contamination that may be left in place."* This is bizarre. Any such potential conflicts should be dealt with during the siting of the pipeline. If there is a potential that "*contaminated soil outside the limits of the CSO trench"* that could cause a "*lateral setback"* leaving a "*wedge of soil contamination immediately adjacent to the trench that later cannot be excavated*" is a potential, then <u>further excavation of contaminated soil should be done while trenching to avoid a situation that would cause "wedges of contaminated soil" or "lateral setbacks" to occur.</u>

The CSO is going through a MTCA site, not the reverse. The City and its CSO project should have to meet the cleanup criteria of the MTCA site needs, not visa versa. We strongly urge Ecology ensure

there is **NO** future need to leave contaminated soils on site; that the City and Rayonier take responsibility during the CSO project to remove **ALL** the contaminated soil that could be affected by the pipeline in the Study Area; i.e., that the City "over excavate".

4.2.1. Vertical and Lateral Limits of overexcavation
There is no mention how the City will access the pipes to assess and repair leakage, cracks, breaks and replacement of parts or all of the pipeline in the future. Is there a plan in place that covers these future actions? If not, why not?

P. 10 4.3 Removal of Sediment from Deepwater Outfall Diffuser
For how long will the removed sediment "be temporarily stored on a barge?"

It is good that Rayonier will verify the sediment classification by sampling and analyzing for dioxins, cPAHs, PCBs and phenols. However, it is confusing, worrisome and conflicting that the sediment will be stockpiled with Type 1 (uncontaminated) soil **before** Rayonier samples and receives analysis of the sediment samples. (See P. 15, 5.2.4 Handling of Sediment Removed from Deepwater Outfall Diffuser) Sediment should be stockpiled away from any soils.

P. 12 5.2.3 Material Handling/Stockpile Management Procedures
We feel that the stockpile plan is faulty and that it is **NOT** the BMP. We disagree with the concept of minimizing when there is a way to fully ensure there is no stormwater contact and erosion of stockpiled materials. The plan to keep toxic material on the ground and cover it with a tarp is unsuitable protection in the Mill climate. The forceful winds in the area have the potential to move and rip tarps, thus exposing the contaminated material and allowing its movement. Leaving it on the ground, even on a "compacted fill pad" is not full protection from the driving rains experienced in this area. It would be safest to place the contaminated material in enclosed metal or plastic (water proof) containers. This would ensure no movement/runoff of this material. It is better to be safe than sorry; to put more expensive protection up front than having to take "*corrective action*" later. (See P. 15, 5.3 Post-Construction Stockpile Management/Maintenance)

Pp 13-14. 5.2.3.1 Type 1 and Type 2 Soil
There is explanation of trucking contaminated soil to stockpile areas and to roll-off containers (for Type 3 contaminated soil). It does not mention that before trucking, covers will be placed over the soil before deliverance to destination points. Covering is necessary. Failure to do so will allow the soil to blow off the trucks.

P. 15 5.5 Groundwater and Stormwater Management and Disposal
Describe, herein, "where and how" of the pretreatment for the groundwater prior to discharging it to the City's wastewater treatment plant, rather than directing readers to other documents, untimely and difficult to access.

P. 16 6.0 Health and Safety

When will the public be able to review the City and Rayonier HASPs? Before permitting?

7.0 Required Permits and Approvals
Which *City* permits have been approved of the several named? Please detail approved permit approval dates and expected dates of pending permits. Which *Rayonier* permits are needed? Please detail approved permit approval dates and expected dates of pending permits.

P. 17 9.0 Interim Action Submittals
Will the Rayonier's CSO Materials Management Completion Report for Ecology be part of a public review process?

10.0 Submittal Schedule Will all Rayonier submittals be scheduled for public review and comment?

P. 5-2 1.1.1
Please explain why the 2005, rather than the 2012 Stormwater Management Manual for Western WA is relied on for this project.

OTHER COMMENTS
Rayonier took responsibility for paying Ecology costs for the MTCA work. The CSO is separate. We would like to know who is paying Ecology for its work on this project. Please inform.

Part of the agreement that goes unmentioned in this FMMP is replacement of the bridge and realigning Ennis Creek. The pipe cannot go across Ennis Creek without the bridge, or is the pipe going to be anchored to one of the old bridges that will remain? When will the bridge be built and the Creek realigned to meander? Please explain.

Please list **all** the parties aside from Rayonier's that will be on site for stages and for the full extent of this project. City. State. Federal. Tribe. Contractors. Other.

Will there be guards on site 24/7 to ensure no unauthorized person enters the Mill area?

SIGNAGE. Signage goes a long way towards protecting the public. Signage was to be posted some years ago. Sign language that finally was posted was uninforming and minimal. No signs remain now.

Signage is needed and should be posted all around the Mill site. Signs should be entitled "Warning." They should be easily visible in an easy to read from a distance font size informing the public what the activity is about and to stay off the property. The wording should include the list of concerned contaminants.

Respectfully submitted,

Darlene Schanfald

Darlene Schanfald
Project Coordinator
Rayonier Hazardous Waste Cleanup Project

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From: Darlene Schanfald [mailto:darlenes@olympus.net]
Sent: Thursday, August 30, 2012 3:31 PM
To: Abbett, Marian L. (ECY); Lawson, Rebecca (ECY)
Cc: Ruppenthal, Allyson (ECY); Katherine Elizabeth Duff
Subject: Add'l AO CSO comments

Miriam, Rebecca:

It was good to see you last night.

I want to add comments for OEC to those made earlier.

I understand Ecology's role in this interim cleanup action and the intent of the AO, as separate from the City of Port Angeles's project, *per se.* But I want to underscore that you can strengthen the AO with Rayonier.

First, there absolutely has to be **covers on the stockpiles** appropriate to the environmental conditions to the site. We have experienced continual displacement of plastic sheeting covering at the Daishowa Landfill off Monroe Road and on the Rayonier mill site in the past. The plastic does not stay put. Remediation is too late for what has blown and run off. Rayonier must use a hard,impenetrable material such as plastic or steel to maintain the stockpiles. For heavens sake, if stockpiles are going to sit for 3 yrs on site, one cannot expect plastic sheeting to protect the contaminated piles that long, let alone for a day, week or beyond.

The site is in a very rough weather climate in between October through March, and days in the months in between. Sea level in the area has risen; storm surges with resulting waves at high tide roll further in; bluffs will continue to fall bringing trees down over the pipeline; winds are strong. In October 2010 there was a tornado at the nearby City dock during CrabFest and tents, display equipment and displays went flying and crashing.

If the contaminated soil spreads around the site and into the water bodies, all involved will have a polluted mess on hand, let along potential law suits. Don't worry about Rayonier's pocket book; worry about the local environment, wildlife and human health and costs for runoff,numan contact and accidents. You'll have the entire town on your back if the trail has to be closed.

Since Rayonier are being made to excavate years earlier than planned, Rayonier has the option to charge the City for solid containers for the stockpiled soils, or make other financial arrangements with the City. Ecology MUST ENSURE that Rayonier contains the stockpiled soils in such a manner that there is no chance of soil movement beyond the stockpiled areas. The current plan is unacceptable and needs revision.

Question. If the stockpiles will be 8 ft high, 16 ft wide, and 170 ft in length, who is doing this measuring? How will Ecology know the stockpiles will actually fit these dimensions?

Second, the **fencing** is inadequate; it always has been. It is too short and spaces between the chain links allow contamination to blow off site. Robbie Mantooth gave you an example of this last night--plumes of dirt swirling around the trail. This has been ongoing since Rayonier closed. Anyone standing on the bluff on a windy day looking down on the mill site will witness this.

Additionally, the site is only fenced on its south side; inadequately on its east side, and not even fenced on its north and west side. In other words, the site is easily accessible. And with no warning signs, what tells people to stay off the site? Nothing. Adequate fencing around the entire site that maintains the on site materials is needed. That is, height, length, and fencing material without big holes. This fencing is way past due; better later than never given the work activity from now through 2016.

The City should not be in charge of **signage.** Rayonier should not be in charge of signage. Ecology should be in charge of signage. And the signage should be with the serious intent to protect the public, not City coffers or others that want to keep from the public the seriousness of the contaminants. The signs should have very large red lettering spelling WARNING. DANGER ZONE. The signs should list the contaminants on site; at least a good overview with some of the health impacts. And the sign should include, in big red lettering, KEEP OUT. The international danger sign, skull and bone should be under WARNING. Your contact information should be listed.

As well, there should be a **hot line** to call if there is trouble. The City should pay for it.

To do any less than the above will demonstrate laxness in proper handling of the conditions and improper public protection.

Third, as Gary Gleason said, "Trust but verify." You heard from several of the public last night they want independent (split) sampling and analysis corroborate the "clean fill" and contamination levels of the excavated and dredged potentially contaminated soil and sediment. Please include this in the Management Plan.

Fourth, after reading yesterday's PDN and finding out the work has started prior to public comment and that the bridge has already been demolished and stockpiled, once again, the public has not been given the full story. This has been true from the get go of this CSO plan: untruths about cost comparisons between low impact development and pipe conveyance to handle stormwater; lack of information given the City Planning Commission and City Council and Ecology -- bodies responsible for approving the project and its funding; keeping NEPA required data from the Planning Commission; and no public data given the public about the project specifics attached to the AO. Project data, including that the work has begun and bridge demo is already stockpiled and that a bridge has to be built to attach the pipeline to cross Ennis Creek--information like this should have been an addendum to the AO so the public has the full picture.

Water Quality Department is Ecology and involved in the CSO. Thus Ecology has the responsibility to tell the whole story to the public when asking for input on the AO.

Bob Sextro's comments should be followed. Add a Section 10 and include the plan and the QAQC, etc.
And how is this work going to continue during the Fall, Winter, Spring drenching rains?

So you heard many concerns and suggestions last night to strengthen the AO. We hope you will incorporate and address these in the AO. Not just a response to comments, but an actual rework of the AO.

Respectfully,

- -
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Rayonier Hazardous Waste Cleanup Project
Olympic Environmental Council Coalition
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From: Sextro, Bob [mailto:robert.sextro@noblis.org]
Sent: Sunday, September 02, 2012 12:15 PM
To: Smith, Diana (ECY)
Cc: Abbett, Marian L. (ECY)
Subject: RE: Public Comment Period for Rayonier Mill Agreed Order Amendment and Interim Cleanup Plan

again, thanks for having the open house in PA, here are my comments for your consideration and action, regards, Bob

my email glitched and I'm resending, sorry for any duplication

Bob Sextro

Principal Engineer

Sequim WA

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Comments on the July 2012 City of PA Final Materials Management Plan

This Materials Management Plan (MMP) is provided for review and comment as a “final” document. This seems unusual as normally final documents are just that, final and ready to implement. Thankfully, comments are being taken by Department of Ecology (Ecology) on this MMP as it is not complete and not ready to be implemented. Also some of the comments have been modified based on material presented by Ecology in the open house meeting on 29 August in Port Angeles.

The referenced Supplemental Work Plan from 2010 with appendices A to C is also incomplete as many of the matrix sampling techniques are not specifically provided for in the plan and the use of disposable versus decontaminated and reused sampling equipment is not specified in either document. Also, when referencing such a lengthy document and set of appendices, the exact section and pages should be referenced in each cased where it is being referenced. Consideration should be given to further append the MMP with the portions of the Supplemental work plan that are being used to implement this project.

For a sampling and analyses project such as this where 1) soil is to be segregated and handled by how “clean” it is, 2) soil is to be imported and characterized as “clean” for use as backfill in a trench, and 3) trench sidewall and bottom soil is to be sampled to show that “all contaminated soil (both horizontally and vertically)” along the new pipeline has been removed, representativeness of soil samples is a key quality parameter for all aspects of the project. Part of US EPA’s definition of representativeness is “influenced by documented and appropriate project design and achieved in part through using known and standard sampling procedures”. Since how and how many soil samples will be collected is not

provided in the MMP or referenced documents and Rayonier's plans are not available for review, many of the following comments are aimed at the need to stated clearly how and how many soil samples are to be collected in order to represent the goal of specific sampling (such as segregation).

Specific Comments

Page 4, fourth bullet; explain exactly how the City will verify and document "that all imported backfill material does not exceed applicable screening levels". How many soil samples, and sampled how, will be collected per X number of cubic yards of backfill? Nominally, one representative (either grab or composite) sample per 1000 CY or truck batch of fill soil would be the protocol. It was stated by both Ecology and a City of PA engineer that this "specification" exists and is part of the package for the contractor. However, this specification for sampling and determining "clean fill soil" must be appended to the MMP so that the "public" has access and can review.

Sixth bullet; explain how Rayonier will characterized the sediment to determine proper handling. If this information is to be part of Rayonier's "yet to be prepared" sampling plan, then that sampling plan must be made available for public review and comment.

Eighth bullet; how will Rayonier sample the stockpiled soil materials? Specifically, how many soil samples will be collected, and how collected, per stockpile (and assume a volume size for a given stockpile which was stated by Ecology to be about 8 feet high by 16 feet at the base by 100 feet long). If, in fact, the stockpiles will be that large, the importance of depth of soil sampling will become key to determining "representative" sampling. Again, if this information is to be part of Rayonier's "yet to be prepared" sampling plan, then that sampling plan must be made available for public review and comment.

Tenth bullet; how will the dewatered water be sampled, analyzed and what are the constituents of concern and acceptable levels for the WWTP? Similar to the first comment, the city representatives stated that the specification for acceptable waste water for the treatment plant is "available" but it must be included in this MMP to provide a complete picture of acceptable disposal of all waste streams generated by this project.

Page 9, paragraph 1; the screening criterion for considering re-typing soil based on head-space organic vapor screening is not provided here or in the Supplemental work plan. Some quantitative guideline should be provided such as greater than 500 or 1000 ppmv is to be handled as type 3 soil until the laboratory analytical results are available. If this information is to be part of Rayonier's "yet to be prepared" sampling plan, then that sampling plan must be made available for public review and comment.

Page 10, section 4.2.2; further explain exactly what soil samples on "20 foot centers" means and how these soil samples will be collected. If the trench section is 60 feet long, 15 feet deep, and 20 feet wide, where and how many soil samples are taken at the center nodes? If this information is to be part of Rayonier's "yet to be prepared" sampling plan, then that sampling plan must be made available for public review and comment.

Page 10, section 4.3; explain how (what sampling method) and where Rayonier will collect "five to seven" grab samples of dewatered sediment. If this information is to be part of Rayonier's "yet to be prepared" sampling plan, then that sampling plan must be made available for public review and comment.

Page 12, section 5.2.3; Ecology stated very clearly that these soil stockpiles could likely be retained on the property for 3 to 5 years or more. This should be a clear indication the best management practices (BMP) for these stockpiles must be bolstered to maintain the integrity of the piles for that length of time. If that means that semi-permanent contains be used rather than "plastic covered piles" or that the specifications for the liners and covers be "strengthened" so as to provide BMP for this duration of time, it should be clearly stated in the MMP and in Rayonier's plans.

Page 13, section 5.2.3.2; further explain how and how many soil samples Rayonier will collect from each roll-off container of type 3 soil or will several grab samples be composited as so to treat each roll-off as a separate disposal batch?

Pages 17 to 18, section 10; as stated previously, the "plans" prepared by Rayonier, such as the stockpile sampling plan and the sampling and analysis plan must be provided to the public for review and comment.

Supplemental Work Plan, Appendix A, Sampling and Analysis Plan (2010)

The Sampling and Analysis Plan (SAP) was not written to provide details and criteria for the types of sampling proposed in the MMP. Specifically, there are no sampling procedures for stockpile, sediment and water from the sediment dewatering. This includes the equipment used to sample these matrices and details of where representative samples will be collect and how many samples are needed to characterize the given stockpile, roll-off bin or portion of excavation. If this information is to be part of Rayonier's "yet to be prepared" sampling plan, then these comments should be provided to Rayonier and then that sampling plan must be made available for public review and comment.

Specific Comments

Section 3.2.1.3; the head space procedure is provided but any semi-quantitative threshold used to differentiate soil types during this CSO excavation is not included, and really should be. For example, will headspace reading of 500 to 1000 ppmv be considered Type 3 soil (at least until further testing) or?

Section 3.3.2; the MMP should indicate if the sampling procedures for "test pits" is what will be used for excavations, plus add details of the "20 foot center" sampling approach for side walls and bottom of the trench. Also further details need to be provided if sampling will be done directly from the back hoe, including what a sampled backhoe bucket represents (as to the "20 foot centers") and how exactly VOCs will be representatively sampled from an open backhoe bucket.

Section 3.11; as commented on previously, re-affirm that this is the decontamination procedure to be used on all sampling equipment that is to be re- used and stipulate in the MMP how much will be re-used or disposable for each type of sample to be taken.

Section 3.13; stipulate in the MMP exactly how samples from fixed areas such as the trench will be surveyed or positioned both vertically and horizontally. This will become extremely important in the future "cleanup" of the Rayonier site as the spatial locations of the excavation samples in the X-Y-Z coordinates must be known.

Section 3.14; stipulate in the MMP exactly which portions of the IDW guidelines will apply to the excavation, stockpiles, dewater water, and roll-off bins.

SAP, appendix B, QAPP

Section 2; this section describes the project organization and responsibilities for QA and there is no indication in the MMP of a similar organization for the CSO or explanation of how what is provided in Section 2 applies to the CSO excavation. Again, it is very important that the sampling organization have these QA responsibilities in place before sampling and analyses starts.

Section 3.7; the field blank samples should add field blanks for methanol, if, in fact, methanol will be used to preserve the gasoline range TPH and VOCs in soil samples. Their frequency of use should also be added to table 3.

Section 7.2.5; this section describes surrogate spikes that are typically used and added to all samples analyzed by the organic methods listed, such as SW 8270 and SW8260. However table 1 does not list and provide percent recovery QC limits for said added surrogates. This surrogate listing by analytical method and appropriate recovery limits are almost always included in complete QAPPs. Add the surrogate compounds to each method's analyte list, designate them as surrogates and provide the QC limits for each.

Table 1; the QC limits provided for precision of soil samples at 0-20 and 0-30 RPD appear to restrictive or tight (these limits are more commonly used for water samples), a more normal QC acceptance criteria for precision would be 0-40 and 0-50 RPD for soil. There continued use on the MMP will likely result in more qualified or highly estimated results.

Also in table 1 the practical quantitation limits (PQL) for gasoline range TPH and VOCs seem low for methanol preserved soil samples. Please add discussion to the text and/or footnote the table to indicate how these low PQLs are routinely obtainable using methanol preservation (if in fact methanol preservation is to be used on these soil samples).

From: Sextro, Bob [mailto:robert.sextro@noblis.org]
Sent: Tuesday, September 04, 2012 11:16 AM
To: Smith, Diana (ECY)
Cc: Abbett, Marian L. (ECY); darlenes@olympus.net
Subject: RE: Public Comment Period for Rayonier Mill Agreed Order Amendment and Interim Cleanup Plan

almost forgot, assume that I can submit a comment via email without attachment so here goes.

There was discussion at the open house in PA about split samples done by an independent lab to "check" Rayonier's results. As a QA expert, I support the use of split samples when appropriate. Therefore, I recommend collection of 5-10 percent split samples mostly directed towards the trench/excavation sampling, as these sample results would be some of more important and less easily re-sampled during this project. I also think it will be more than acceptable to use Ecology's internal analytical lab for all such analyses they perform, which I assume would be most of the COPCs at the site except for dioxins and furans. Given that dioxins are not very mobile in the environment and I would not expect them to be in the trench samples anyway, perhaps dioxins would not be analyzed on the splits except for splits on the sediment and/or stockpiled soil. Also, given that type 3 soil was said to be containerized and disposed of fairly quickly since it is "visually contaminated", I see no reason for split samples on type 3 soil as the licsensed disposal facility will be more critical of the analytical results then "we" are.

thanks for accepting this additional comment, regards, Bob

Bob Sextro

Principal Engineer

Sequim WA

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(360) 582-1422 (office)

From: Kathryn Neal [mailto:Kneal@cityofpa.us]
Sent: Wednesday, September 05, 2012 4:58 PM
To: Abbett, Marian L. (ECY)
Cc: Lawson, Rebecca (ECY); Mike Puntenney; James Burke; Warren Snyder
Subject: Comments on the MMP

Marian,
The City has just a few comments on the MMP, intended to clarify the intent and facilitate a smooth construction process. Please call me if you would like to discuss.

1. On page 14, section 5.2.3.2, third bullet point, replace 'the City' with 'Rayonier' in the sentence below …If the soil cannot be dumped directly into the roll-off containers, the City will dump the soil on an impervious surface near the roll-off container as directed by Rayonier, and then **Rayonier (not the City),** will place the soil into the roll-off container using a front-end loader or similar equipment.
2. Somewhere in the body of the MMP, it should be explicitly stated that Rayonier is responsible for management of stormwater runoff from the soil stockpile areas.
3. With regard to Type 3 Soil Over-Excavation Limits, the MMP Section 4.2.1 requires Where contaminated soil is left in place at the limits of construction:

   "…measures will be taken by the City to reduce the potential for recontamination of clean backfill material. Such measures may include installation of an impermeable barrier such as a polymer geomembrane or a bentonite mat placed at the overexcavation limits between clean backfill and the soil left in place."

   Our contract specification Section 02210 Paragraph 3.05 Filter Fabric – Woven for Separation says;

   "In areas where contaminated soil is to remain following contaminated soil over excavation install woven filter fabric to separate clean backfill from contaminated soils. Install woven filter fabric so as to extend a minimum of 5-feet beyond the limits of contaminated soil to remain."

   Does Ecology consider the woven filter fabric specified above to be sufficient?. If so, please add it as an option in the MMP. If not, please let me know as quickly as possible.

   Thank you.

Kathryn Neal, P.E.
Engineering Manager

City of Port Angeles
Public Works and Utilities
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From: Sextro, Bob [mailto:robert.sextro@noblis.org]
Sent: Monday, September 10, 2012 12:29 PM
To: Sturdevant, Ted (ECY)
Subject: comments on the MMP for Rayonier

I forwarded my attached comments to Ecology staff last week, but just wanted to let you know that I do not believe that the currently written MMP for City of PA is complete and the SAP from Rayonier is not yet available. without a complete MMP and a SAP that details how Rayonier will collect representative soil and sediment samples and a specification of what constituents "clean fill soil", I do not believe this project should go forward. The public needs an opportunity to review Rayonier's plan too and the clean soil specification.

thanks for your consideration, Bob

Bob Sextro

Principal Engineer

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