



## Terminals 5 6 & 7 Uplands Site Response to Comments

Today's Date: August 8, 2023

Cleanup Site ID: 15440  
Facility ID: 97700  
Address: Marine Drive, Port Angeles  
County: Clallam  
Site webpage: <https://apps.ecology.wa.gov/cleanupsearch/site/15440>  
Comment Period: June 1 to July 3, 2023

### Documents for review and comment

- Agreed Order DE 21560
- Remedial Investigation Work Plan (RIWP)-Phase 1
- Public Participation Plan

### Background

The site is located at the industrial waterfront of Port Angeles and comprises properties along Marine Drive. Industrial history shows the properties were used for various purposes including mill operations, wood processing, and log storage. Pentachlorophenol (PCP) and tetrachlorophenol (TeCP) are hazardous chemicals that were used as wood preservatives at the site. A hog fuel boiler burned salt-laden wood that may have contaminated the soil with dioxins and furans. Large aboveground storage tanks of fuel oil and ammonia were present on the properties.

Environmental reports and information about historical operations suggest petroleum hydrocarbons, dioxins/furans, TeCP, PCP, and related compounds may be present in soil and groundwater at levels that require cleanup under the state's cleanup law, the Model Toxics Control Act (MTCA; Figure 1).

Agreed Order DE 21560 requires the Port of Port Angeles to investigate contamination at the study area. The port is a potentially liable person (PLP) responsible for the investigation. The area of investigation is called the study area because the full extent of contamination at the site is not known. The way the investigation will be conducted is described in the RIWP-Phase 1.

The Phase 1 investigation focuses on determining whether contaminated soil or groundwater is moving from the study area into the harbor. Data will be collected from groundwater and soil. Topographic and visual surveys will be conducted and the condition of a stormwater pipe in the study area will be evaluated.

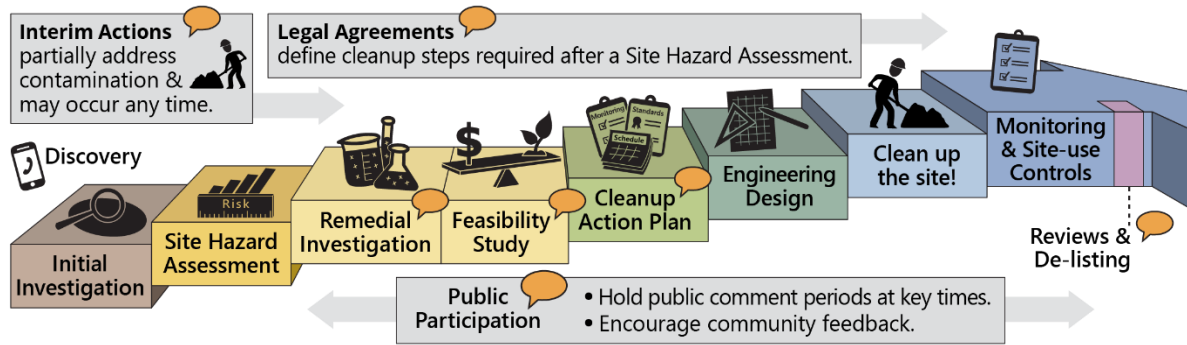


Figure 1. The Model Toxics Control Act (MTCA) is Washington’s cleanup law. There are several steps in the MTCA cleanup process. The comment bubbles indicate major milestones in the process when there is an opportunity for public comment.

Based on the long history of Tribal presence around the harbor, there is a high probability of cultural resources in the study area. The likely presence of cultural resources in the study area limits investigation and cleanup activities that would disturb the ground. We are coordinating with the Lower Elwha Klallam Tribe on this issue.

We received three comments during the comment period. The comments and our responses are shown below. We considered the comments and made no changes to Agreed Order DE 21560, the RIWP-Phase 1, or the Public Participation Plan, so we finalized these documents.

The port will begin conducting the investigation outlined in the work plan during summer 2023.

You can follow the progress of cleanup at the [Terminals 5 6 7 Uplands webpage](https://apps.ecology.wa.gov/cleanupsearch/site/15440).<sup>1</sup>

**Prepared by**

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<sup>1</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/15440>

## **Comment from Steven Pelayo**

My comment is only tangentially related... It is very clear that Port Angeles appears to be held hostage by its history. The Rayonier site, and now the Terminal/Uplands site. We have an amazing waterfront, but the majority of it is undevelopable. My fear is that both sites won't be revitalized for decades! The tribe's influence also appears backward looking, and not aggressively investing in our future. We need PROGRESS. This is further echoed by the numerous commercial real estate properties that have also been vacant for years. We have so much potential curb appeal, if only we didn't look like an abandoned wasteland. We need more aggressive city leadership that is focused on these issues. Please don't let this be a repeat of Rayonier and waste another 10-20 years getting this site cleaned up. Please work quickly to convert this site into a PRODUCTIVE asset for the City. Personally, I'd like to see a large waterfront marina with hotel and vacation condominiums (like Roche Harbor); OR a corporation like Microsoft develop a special R&D campus with 1,000 high paying professional jobs. These are the truly bold ideas that could distance PA from its past struggles.

## **Response from Ecology**

Thank you for your comment about the speed of cleanup and possible future uses of the properties.

Under MTCA, the cleanup process is designed to be as streamlined as possible. Ecology's role at the site is to ensure there is no potential for exposing people and the environment to contamination at the site. As a first step, we need to investigate if contamination at the site is a source of contamination to the harbor.

MTCA sets strict cleanup standards to ensure the quality of cleanup and protection of human health and the environment are not compromised. At the same time, the rules that guide cleanup under MTCA have flexibility to allow cleanups to be addressed on a site-specific basis. We are working as quickly as possible to determine if the site is a source of contamination to the harbor, which is being cleaned up under a separate agreement. You may see people surveying and sampling the Terminals 5 6 & 7 Uplands site during summer and fall, 2023.

The Port of Port Angeles owns and operates the properties under investigation as a log yard. Potential future development or sale of one or more of the properties is up to the property owner. The city has jurisdiction for land use. Any change from the current industrial heavy use designation of the site will be made by entities responsible for land use. Ecology has jurisdiction for cleanup at the site and protection of the cleanup actions into the future.

## **Comment from Dean Miller**

The steep slope across Marine Drive from the logyard (known herein as Terminals 5 6 & 7 Upland Site) is extremely wet. I just walked it three weeks ago and up on the slopes there are seeps that may be groundwater, may be surface water from the houses upslope and could be leakage from City water or sewer lines that run down to a bricked-in structure at the corner of Hill and Marine. Gravity would carry those waters into the soils of the study area, so it might be wise to test your way up hill.

Also, there's a concrete structure (size of a house foundation) on the hillside, very near Hill and Marine intersection. I would guess you'll need to characterize that as a potential point source, depending

what its history is.

The archaeological concerns out on the fill and at the spot where the fill and original shoreline meet, are going to be tricky, so just relax and listen.

I walk the beaches of the Hook daily. Last year, I found small chunks of obsidian on the beach of the inside of the Hook that at least one (very) experienced Peninsula archaeologist says likely is not just chaff from the fill dumped on the Hook over the decades. Rather, it's more likely something from human/native use, possibly Kuril Island obsidian trail origin. Big surprise to me.

My point is, the sheltered shoreline behind the hook got heavy use by the various peoples who were here first. It would be stupid to ignore the archaeological opportunities and the cultural concerns about what's buried. It would be good to make our grandchildren proud of how we handled this.

### **Response from Ecology**

Thank you for your comment and observations about possible groundwater movement and cultural resources in the area.

The focus of the Remedial Investigation Work Plan-Phase 1 is to see if contaminated soil or groundwater is moving into the harbor. The groundwater wells installed at the shoreline and the shoreline soil sampling will measure if contaminants are present and entering the harbor from the site. Historical industries such as mill operations and wood processing are possible sources of contamination. Environmental reports and historical operations suggest the contaminants at the site that require cleanup might include petroleum hydrocarbons, dioxins/furans, TeCP, PCP, and related compounds. Groundwater or surface water upgradient of the study area could also be a source and may be investigated during additional phases of the investigation if questions remain about the source of contamination or whether contaminated groundwater or surface water from the hillside are contributing to site contamination.

As you observed, there is a high probability of cultural resources in the area. The Phase I investigation is designed to minimize soil disturbance while gathering important information about the site's soil, groundwater, and features. A professional archaeologist will monitor all ground disturbing activities and follow an inadvertent discovery plan, which outlines the protocols and communication plan to be followed if an archaeological resource is found. A tribal monitor is invited to observe also. We are coordinating with the Lower Elwha Klallam Tribe on this plan to safeguard possible cultural resources at the site.

### **Comment from Anonymous Anonymous**

Please! Do whatever it takes to make this property clean, safe and available for sale. The potential is astronomical.

### **Response from Ecology**

Ecology's role is to make sure conditions at the site protect people and environment from potential exposure to contamination. This role is different than the role of the city that has jurisdiction for current and future land use. The Port of Port Angeles owns the properties under investigation. Potential future sale of one or more of the properties is up to the owner.

The Remedial Investigation Work Plan-Phase 1 is the initial stage in cleanup of the site.

We will learn the following from the investigation:

- The condition of groundwater discharging to the harbor.
- Whether contaminated soil exists along the shoreline and could erode into the harbor.
- The stability of the shoreline slope, the location of seeps and outfalls, and the condition of paved areas.
- The condition of a buried stormwater pipe and whether it may be transporting contaminated soil or groundwater.

If an interim action is necessary to reduce a threat to people or the environment, then the public will have an opportunity to comment on the proposed action.