



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office

PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

August 26, 2025

Warren Snyder
Senior Manager, Environmental Engineering
Rayonier Advanced Materials
1301 Riverplace Blvd., Suite 2300
Jacksonville, FL 32207
warren.snyder@rayonieram.com

Re: Port Angeles Rayonier Mill Site – Response to Ecology Comments: Draft Pre-Remedial Design Work Plan (August 15, 2025)

Site name: Port Angeles Rayonier Mill Site
Site address: 700 N Ennis, Port Angeles, Clallam County, WA 98362
Facility/Site ID: 19
Cleanup Site ID: 2270

Dear Warren Snyder:

On August 18, 2025, the Washington State Department of Ecology (Ecology) received Rayonier A.M. Properties, LLC (RAMP) response to Ecology comments on the Draft Pre-Remedial Design Work Plan (PRDWP) as provided via letter on May 5, 2025. As proposed by Ecology, RAMP agreed to relocate some sediment sampling locations with some modifications based on accessibility under the dock structure. Ecology concurs with the modifications and approves the Draft PRDWP, and appendices B (Sampling and Analysis Plan (SAP)) and C (Quality Assurance Project Plan (QAPP)). Typically, Ecology does not approve Health and Safety Plans (Appendix D).

In addition, RAMP intends to revise Appendix E, the Inadvertent Discovery Plan (IDP), in response to Ecology's May 5 comment letter. Ecology expects to work with RAMP and the Lower Elwha Klallam Tribe (LEKT) to ensure that there will be archaeological monitoring acceptable to the Tribe and Ecology for all ground-disturbing activities under the PRDWP and subsequent cleanup. The IDP must be finalized prior to field work, so RAMP should provide a revised IDP for Ecology and LEKT review a couple months before planned field work. The IDP will be a separate, standalone document.

Along those lines, Ecology completed a cultural resource consultation with the Department of Archaeology and Historic Preservation (DAHP) and affected tribes. Based on the high potential to impact cultural resources, Ecology's determination is that a professional archaeologist must monitor sediment sampling activities and that work proceeds under a project-specific IDP. Please see the enclosed Cultural Resource Review.

Ecology acknowledges that our May 5 comments on Appendix A, the Coastal Conceptual Site Model and Hydrodynamic Modeling Action Plan (CCSM & HMAP), are being addressed through our ongoing monthly discussions and will result in a separate, standalone document.

We look forward to RAMP executing the PRDWP. Please submit a final, clean version, PRDWP with Appendices B, C, and D by September 30, 2025. If you have any questions, please contact me at 360-489-4569 or marian.abbett@ecy.wa.gov.

Sincerely,



Marian L. Abbett, PE
Section Manager
Southwest Region Office
Toxics Cleanup Program

Enclosure: Memorandum – Ecology July 2025, Port Angeles Rayonier Mill Site Remedial Action Cultural Resources Review Activities, MTCA DAHP Project Nol 2025-06-03595

cc by email: Matt Beirne, Lower Elwha Klallam Tribe, matt.beirne@elwha.org
Connie Groven, PE, Ecology, connie.groven@ecy.wa.gov
Ecology Site File

Enclosure

Memorandum - Ecology July 2025

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DATE: July 3, 2025

TO: Marian Abbett
Department of Ecology, Toxics Cleanup Program

FROM: Sydney Hanson
Department of Ecology, Toxics Cleanup Program

SUBJECT: Port Angeles Rayonier Mill Site Remedial Action
Cultural Resources Review Activities, MTCA
DAHP Project No. 2025-06-03595

Project Location and Description

Under MTCA, the Washington State Department of Ecology (Ecology) consulted with the Department of Archaeology and Historic Preservation (DAHP) and affected tribes on the Port Angeles Rayonier Mill Site Remedial Action project, located at 700 N Ennis, Port Angeles, WA 98362 and within T30R06W02. This site has been assigned the FSID # 19 and the CSID # 2270. Cleanup is being completed under Agreed Order No. DE 6815.

Under Section 815 of the Model Toxics Control Act (MTCA), Ecology reviewed this project to determine if it would affect cultural resources. A United States Army Corps of Engineers permit will be required for the in-water work associated with this project. However, because that permit has not been obtained at this time, cultural resources review is being conducted under MTCA.

Determinations, Consultation, and Mitigation

Under MTCA and based on the consultation results detailed below, Ecology has made the following determination:

- Ecology made a determination of a high potential to impact cultural resources and historic properties for this project, given the following mitigation strategies:
 1. A professional archaeologist will monitor sediment sampling activities that will extend into native soils (i.e. below 3 feet).
 2. Ecology recommends that this cleanup proceed under a project-specific inadvertent discovery plan.

Ecology sent emails conveying the preliminary determination to the following parties on June 4, 2025, with a request for comments by July 2, 2025:

- WA DAHP, Jessica Stone
- Lower Elwha Klallam Tribe, Bill White
- Jamestown S’Klallam Tribe, Allie Taylor
- Suquamish Indian Tribe, Stephanie Trudel
- Port Gamble S’Klallam Tribe, Misty Ives

Comments were received during the response period from DAHP, who with our determination and mitigation plan. The Suquamish Indian Tribe responded to our request for comment by

deferring to the Lower Elwha Klallam Tribe. Based on Ecology's review of the project and comments received, we retained our preliminary determination with the outlined mitigation plan, and notified the same parties listed above on July 3, 2025.

An IDP has not yet been submitted for this project. Please provide a project-specific IDP at your earliest convenience.