RESPONSIVENESS SUMMARY

K Ply

October 18 – November 19, 2012 Public Comment Period

Agreed Order

Interim Action Work Plan

Prepared by
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Contents

Introduction 3
Site Location 3
Format of the Responsiveness Summary 4
Summary of Public Involvement 4
Contacts 4
List of Commenters 6
Acronyms and Abbreviations 6
Responses to Common Concerns 7
Sources of Contamination 7
Groundwater Plume Reaching the Harbor 9
Sampling 10
Building and Property Ownership 13
Disposal 13
Soil Stabilization 14
Stormwater Ditch 14
Relationship to the Western Port Angeles Harbor Site 15
Safety 15
Separating the RI/FS and Draft CAP Comment Periods 16
Making K Ply a Separate Site 16
Paying for Cleanup 17
Repositories 17
Mailing Lists 18
Appendix A: Comment Letters 19

Introduction

The Department of Ecology (Ecology) held a public comment period October 18 – November 19, 2012 with the Port of Port Angeles (port) for cleanup of the K Ply site. The following documents were available for public review and comment:

- **Agreed Order**—Requires the port to do an interim action (partial cleanup) and develop:
  - A remedial investigation and feasibility study, which describes the nature and extent of contamination. It will also evaluate options for final cleanup.
  - A draft cleanup action plan, which selects cleanup methods and describes how they meet Ecology's standards.
- **Interim Action Work Plan**—Describes the interim action (partial cleanup) tasks. During the interim action, the port will:
  - Tear down and remove mill buildings and structures, allowing them to complete site investigations.
  - Use erosion and stormwater controls to keep contamination from moving into Port Angeles Harbor.
  - Only remove contaminated soil if it is an immediate threat to human health or the environment.
  - Take soil samples to confirm areas that need to be stabilized. Cover and stabilize contaminated soil to protect groundwater.
  - Monitor groundwater and stormwater every three months.
- **Public Participation Plan**.

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

Site Location

The site is located at 439 Marine View Drive 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:

- Summary of Public Involvement
- List of Commenters
- Acronyms and Abbreviations
- Responses to Common Concerns
- Appendix A: Comment Letters

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 and Interim Action Work Plan ran October 18 - November 19, 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 420 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 - https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=28.
- 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 October 22, 2012 at the Olympic Medical Center. About 15 people attended the event.

Contacts

Connie Groven, Site Manager
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PO Box 47775
Olympia WA 98504-7775

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Connie.Groven@ecy.wa.gov

Diana Smith, Public Involvement Coordinator
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List of Commenters

Date	Name	Affiliation
10/30/2012	Bob Sextro	Community Member
11/6/2012	Darlene Schanfald	Olympic Environmental Council
11/7/2012	Scott Chitwood	Jamestown S'Klallam Tribe
11/8/2012	Matt Beirne	Lower Elwha Klallam Tribe
11/15/2012	Warren Snyder	Rayonier
11/19/2012	Erika Shaffer	WA Department of Natural Resources

Acronyms and Abbreviations

Ecology	Washington State Department of Ecology
IAWP	Interim Action Work Plan
MTCA	Model Toxics Control Act
RI/FS	Remedial investigation and feasibility study
WAC	Washington Administrative Code

Responses to Common Concerns

Sources of Contamination

Several commenters had questions and comments about potential sources of contamination. Some commenters expressed concerns that the agreed order and interim action work plan did not include a complete history of owners and operators or asked how Ecology could state that there were no known releases of contamination in a specific area. One commenter asked whether the port would assess areas where there were no known releases of contamination.

Some comments discussed potential additional sources of contamination at the site in addition to those discussed in the agreed order and interim action work plan, such as the former Peninsula Fuel property or Petroleum Pipeline No. 8. The commenter was concerned that figures did not show Pipeline No. 8.

One comment stated that Rayonier's operations may not have been the only source of hydraulic oil contamination. The commenter was also concerned that the agreed order did not give a full discussion of Rayonier's actions to contain the hydraulic oil contamination.

Ecology Response: The Agreed order and interim action work plan discussed key facts about the site, known contamination, and known potentially liable persons (PLPs). The interim action plan also considers areas of potential concern. These are locations where previous environmental investigations identified contamination, where historical operations were conducted that are typically associated with contamination, or where hazardous materials were found to be stored prior to mill demolition. It is not necessary for the agreed order and interim action work plan to include a complete history of owners, operators, or operations performed at the former mill, but should include the facts supporting the need for the agreed order and the work to be performed. The facts related to the two named PLPs and the reasons for requiring the work outlined in the agreed order were included. Additional information about the complete history of the mill operations and ownership will be included in the remedial investigation report.

<u>Sampling areas with no known releases</u>
Quite a bit of information has been generated about this site and is included in various reports and investigation documents related to the Marine Trades Area and K Ply sites. Based on these prior investigations, some releases of contamination are "known." Immediately following the mill demolition, a site assessment will be conducted to identify areas with surface soil contamination. This assessment will consider areas of known contamination and areas where historical operations could have caused contamination but no releases are known. This initial assessment will identify if addional soil stabilization actions are needed to prevent risks to human health or the environment in the interim time before site cleanup is completed.

Following this initial site assessment, a full remedial investigation will be completed. The remedial investigation will include a thorough review of the history of the site and operational practices. Areas of the site with known release will be sampled unless previous investigations have already characterized those areas. If the history of the site and operational practices indicate potential sources of contamination, but no known releases, those areas will be sampled

to confirm no releases occurred. Sampling is not planned in areas with no know potential source and no know release.

Potential additional sources of contamination beyond mill operations

Site boundaries are determined by the extent of contamination and not by property boundaries or type of operations. Enough information exists to define the western boundary of the K Ply site and separate it from the Marine Trades area site (see comment below); however, the other boundaries of the K Ply site are still being determined. It is possible that additional areas may be added to the site as the extent of contamination is investigated. The former bulk fuel plants along the southern property line, plus with any other possible sources, will be considered during the remedial investigation as the source of the TPH-G and TPH-Dx contamination in soil and groundwater is investigated.

Arguments have been presented both supporting and discounting pipeline no. 8 as a possible source of the gasoline and benzene soil and groundwater plumes beneath the K Ply mill building, but a conclusion has not been reached. Pipeline no. 8 continues to be considered as a possible source of contamination beneath the K Ply mill building. The location of pipeline no. 8 is approximated in Figure 3.2 of the Interim Action Work Plan and outlined in red indicating it is an area of potential concern.

Hydraulic oil contamination

Investigations conducted by Landau Associates, Inc. for Rayonier in 1988 (Environmental Evaluation, Peninsula Plywood Property, December 19, 1988), in 1989 (Petroleum Hydrocarbon Study, Landau, February 13, 1989) and 1990 (Ground Water Condition Former PenPly Facility, Landau Associates, Inc., April 27, 1990) concluded that substantial amounts of hydraulic oil were present in soil and floating on the groundwater in the vicinity of the hydraulic plywood presses. Ecology issued a remedial action order in 1990 (No. DE 90-S255) requiring Rayonier to ensure containment was in place to prevent leakage of hydraulic oil from the plywood presses if properly maintained by the subsequent owner and to collect hydraulic oil floating on the water table.

Two of the hydraulic presses were in operation since the mill was constructed in 1941 with another press added in 1947. The foundations for the first two presses originally did not have containment structures to catch and hold leaking hydraulic oil. The foundation of the press added in 1947 and the location of one of the original presses that was moved in 1974 did have containment structures at the time of the 1989 Landau study. Though it may be reasonable to assume that releases of hydraulic oil from these presses occurred prior to Rayonier's operation of the mill from 1971-1989, sampling was not conducted until the Landau studies for Rayonier. In 1991, Rayonier submitted documentation by a licensed professional that the containment currently in place was adequate to prevent leakage of hydraulic oil from the presses if the source of the leak was directly over or entirely directed to the containment pit and the pits were properly maintained.

Rayonier installed two extraction wells to create a "cone of depression" around each well which allowed the collection of floating hydraulic oil. A pump system was designed to skim the floating hydraulic oil from the surface and remove it. Though less oil was removed by the

system that originally expected, the system did appear to contain the hydraulic oil and it served its' purpose of providing an interim remedy while the mill was operating. Compliance measurements (Landau Associates, July 7, 2011) showed that the hydraulic oil was observed in the same 8 monitoring wells for over 15 years and is relatively immobile. Now that the mill buildings are demolished, we can move to a final remedy.

Following the closure of the mill in 2007, flooding in the crawl space beneath the building caused flooding at least four times, interrupting operation of the Rayonier's containment system. Section 2.3.2 of the Interim Action Plan incorrectly states that the system operation ceased several years ago. Rayonier continued intermittent operation of the system until August of 2012, but there were many months when the system was not fully operational and no oil was extracted. Ecology began discussions with Rayonier about how to remedy the decreased efficiency of the system in 2009 (Email from Lisa Pearson, 5/13/2009). Ecology will require a more accurate description of the Rayonier extraction well system in the RI/FS report.

Please send any information about potential sources of contamination to site manger Connie Groven at connie.groven@ecy.wa.gov.

Groundwater Plume Reaching the Harbor

Several commenters had questions about whether contaminated groundwater is reaching Port Angeles Harbor. Concerns included whether the bulkhead along the harbor is permeable, whether new monitoring well locations will show if the contaminant plume is moving closer to the harbor, and whether harbor water or sediments will be tested or monitored.

Ecology Response: Data collected under prior investigations show a plume of gasoline and benzene contaminated groundwater on the K Ply Mill site extend toward and reaching the bulkhead in some areas along the northern edge of the property.

Bulkhead

The bulkhead along the northern edge of the K Ply Mill site is a wooden bulkhead that is supported by riprap at the shoreline of Port Angeles Harbor. Construction drawings obtained from the port indicate the bulkhead was constructed in the 1920s to hold back the hydraulic dredge fill used to raise the site from marine tidelands to the current elevation, which varies between approximately 14 and 17 feet above mean sea level. The construction drawings indicate a set of two or three parallel "stepped" bulkheads separated from each other by 16 feet. Each bulkhead "step" is constructed of horizontal wooden planking nailed to rows of pilings. Each step is 6 to 8 feet lower than the next. These steps were necessary to raise the site in stages from the pre-existing natural tideland to the current elevation.

A shallow aquifer is present beneath the site with a groundwater flow direction to the northwest. The bulkhead does not provide a barrier to groundwater reaching Port Angeles Harbor. Based on the investigations conducted so far, it appears petroleum contaminated groundwater is reaching the surface water through the bulkhead in some areas. Two pairs of well installed to monitor the shallow (0-10 feet below the water table) and deeper (more than 10 feet below the water table)

groundwater found contamination only in the shallower groundwater. This groundwater passes into the surface water through the bulkhead, not through deeper seeps into the sediments. The volatile petroleum and petroleum-related contaminants of concern dissolve in water quickly and are not attracted to organic matter in the sediments. This is constant with the low concentrations of diesel and motor oil petroleum hydrocarbons that were detected in samples from the Port Angeles Harbor Sediment Characterization Study, Sediment Investigation Report (SIR, Ecology and Environment, 2012). So even though some contaminated groundwater is passing through the bulkhead, it doesn't appear to be causing sediment contamination.

Monitoring Well Locations and Groundwater Monitoring

Ecology is concerned with the contaminated groundwater reaching the harbor and is requiring the Port address this problem. As an initial step and part of their interim action plan, the Port installed three additional monitoring wells to monitor the northern toes of the contaminated plume. These new wells, along with five existing wells, were sampled prior to demolition and will be sampled quarterly during and following demolition for gasoline-range total petroleum hydrocarbons (TPH-G), diesel-range total petroleum hydrocarbons (TPH-Dx), benzene, toluene, ethylbenzene, and xylenes (BTEX). If an unstable condition (such as a sudden rise in any groundwater characteristic or contaminant level) is detected, indicating an increase in the movement of contaminants toward the harbor, the port will take additional steps to slow and control the plume movement until a final remedy is in place. The final remedy selected must protect the marine surface water and meet surface water standards at the point at which groundwater discharges into the surface water.

Harbor Sediment Sampling

The Port has begun preparing a remedial investigation work plan. In creating this plan, the history of the site and data from all previous investigations will be reviewed to identify data gaps and additional information necessary to fully characterize the extent of contamination. Unless enough data is available from other harbor studies, such as the Port Angeles Harbor Sediment Characterization Study, Sediment Investigation Report (Ecology & Environment, 2012), additional sediment samples will be collected to show whether harbor sediments have been impacted. Following cleanup, additional sampling of groundwater, surface water and sediments will be including in the monitoring plan as needed to ensure the effectiveness of any remedial actions taken.

Sampling

Several commenters had questions about the types of sampling that had already been done at the site and what additional sampling the port would do at the site. Commenters asked about what types of analysis had been done on soil and water samples, how Ecology and the port could be confident that some other contaminants (polycyclic aromatic hydrocarbons (PAHs), phenols, polychlorinated biphenyls (PCBs), heavy metals, dioxins, and formaldehyde) are not present at the site, the extent of pentachlorophenol (PCP) contamination and how that was determined, groundwater sampling and movement, and the number of soil samples. One commenter asked specifically about which areas in Figure 3.3 the port will sample and why they will not sample some areas of concern shown in Figure 3.2.

One comment remarked that Ecology should take split samples to have another analytical comparison with the port's samples.

Ecology Response: The comments we received will be useful as we work with the port on their Remedial Investigation (RI) work plan.

Previous Sampling

The first environmental evaluation of the site in 1988 was initiated to support sale of the property. Soil and groundwater samples were collected from various locations throughout the facility and analyzed for potential contaminants stored or used in the plywood manufacturing process. Hydraulic fluid, gasoline, and diesel contamination were detected in subsurface soils and groundwater. PCP, phenol-formaldehyde, and methylene chloride were detected in soil near source areas for these materials. Based on this information, Ecology prepared a remedial action order for ITT Rayonier (the owner at that time) for containment structures beneath the hydraulic presses, a hydraulic oil recovery system, groundwater pumping, monitoring, and excavation of PCP-contaminated soils.

K Ply was first included in the Marine Trades Area Site in 1994 under an agreed order to investigate the extent and potential source(s) of petroleum hydrocarbon contamination in soil and groundwater. The scope of this investigation required installing monitoring wells, analyzing soil and groundwater samples for total petroleum hydrocarbons and benzene, toluene, ethylbenzene and xylenes (BTEX), and monitoring. Results of two source investigations reports showed higher concentrations in soil 5.5 to 10 feet below ground surface compared with shallower soil generally supporting smear zone contamination from hydrocarbons migrating along the water table rather from surface sources. Most of the sampling for these investigations occurred west of K Ply.

K Ply was also included in the Marine Trades Area Site under a 2005 agreed order to complete a remedial investigation and feasibility study. Several data gaps related to K Ply were identified by the remedial investigation work plan including establishing the eastern boundary of the plume under Westport Marine facility, sources of benzene contamination beneath the K Ply facility and how the bulkhead was performing. This work led to additional investigations in 2006 and 2007 to evaluate the western boundary of the K Ply plume along Cedar Street.

As a result of the sampling completed under the Marine Trades Area remedial investigation, it became clear that two separate areas of contamination exist with separate source areas (See Making K Ply a Separate Site, page 16).

Potential Contaminants of Concern

During an investigation, potential contaminants of concern are identified by reviewing previous information about at a site and identifying the processes and materials used. Samples are collected from areas where potential contaminants were used, stored, spilled, or disposed of. In soil and groundwater, potential contaminants of concern identified include petroleum hydrocarbons (gasoline, diesel, hydraulic oil), semivolatile organic compounds and metals (used in glues or possibly wood preservatives), lead and methyl tertiary butyl ether (gasoline

additives), and volatile compounds (solvent usage, maintenance activities). Sampling for PCBs in the hydraulic oil area and in locations where PCB transformers were used has not detected PCBs. All of these compounds have been included at various times in the previous investigations. A few of the investigations focused on gaining a better understanding of petroleum hydrocarbons and did not include the entire list.

The remedial investigation required under this agreed order will review the history of the site and previous sampling events. It will identify any data gaps in our understanding of the nature and extent of contamination and include sampling in the remedial investigation work plan to fill those gaps. Dioxin soil sampling (potentially from hog fuel boiler ash or emissions) is already being considered as a data gap.

Extent of PCP Contamination

In 1988, Rayonier, the owners/operators of the mill at the time, conducted an environmental evaluation on the mill property to support the sale of the facility. Soil and groundwater samples were collected from various locations through the facility and submitted for analysis for potential contaminants that were stored and used in the plywood manufacturing process. PCP was detected in soil near the panel oilers.

The 1990 remedial action order with Rayonier required removal of PCP contaminated soil that could be done without impairing the structural integrity of the plant building. In 1991, Rayonier removed soil in this area down to 6 feet below the ground surface. Sampling along walls of the excavation showed contamination remaining along the south wall that could not be removed without the possibility of losing structural support. Groundwater sampling at two locations downgradient of the PCP contaminated soil area did not detect any PCP in groundwater. This area will be sampled and addressed as part of the remedial investigation and a more detailed history will be included in the RI/FS report.

Site Assessment Sampling

Two new sampling events are currently planned on the site. The first sampling is a site assessment following demolition. This assessment is planned to identify any areas posing immediate risks to human health or the environment and protect areas previously covered by the mill building from additional rain or storm water infiltration until cleanup can begin. Since much of the property was previously covered by buildings, there is an immediate need to visually assess surface soils for obvious contamination, sample in areas of potential concern, and confirm areas assumed to be clean. This site assessment was completed on March 13, 2013 and results will be posted to Ecology's K Ply webpage when they are available.

Figure 3.2 of the interim action work plan shows areas of potential concern based on site history and Figure 3.3 shows the area where plastic sheeting will be used to stop addition infiltration into know areas of surface or subsurface soil contamination previously covered by the mill building.

The site assessment included only surface sample locations. Sample locations were chosen based on Figure 3.2 and sampled for contaminants known to be used or stored in these areas. Additional samples were also taken, based on Figure 3.3, within the mill footprint will help determine if any additional areas need to be covered due to exposed surface contamination. The

locations of the samples were based on visual indications of contamination, as well as random sampling, in the areas within the mill footprint and outside the plastic sheeting areas.

Remedial Investigation Sampling

After the site assessment sampling is complete (see page 12), a second round of sampling will support filling data gaps to characterize the nature and extent of contamination for the remedial investigation. This may also include additional sampling to help complete the feasibility study if early planning has already identified information needs. Sampling may include surface, subsurface, groundwater and sediment sampling.

The remedial investigation work plan will include a plan for this sampling. The plan development will include a thorough evaluation of the history of the mill, processes used, and previous sampling to determine any gaps in site characterization. It will re-evaluate site contaminants of concern. The results of the remedial investigation sampling will be presented in the remedial investigation report along with new results. If previous data for any contaminant is sufficient, the report will present data to show that no additional sampling is needed.

Split Samples

During the demolition, site assessment, monitoring, and RI sampling on the K Ply property, Ecology plans to routinely make site visits to observe the field work. During Ecology's visits, the port and their contractors will be observed to see if they are following sampling plans and protocols. Samples are being sent to certified labs and Ecology will review the sampling results. If at any point Ecology notes irregularities that trigger concerns, we will collect split samples.

Building and Property Ownership

One commenter asked for clarification about whether the port or their contractor, Rhine Demolition, would own the building and the property once demolition began.

Ecology Response: The port is still the legal owner of the buildings and property. While the Peninsula Daily News article *PenPly mill demolition to start next month (Peninsula Daily News, October 9, 2012)* stated that "The building will become the property of Rhine Demolition," the port was referring to the contractor being the lead on the demolition project and having the responsibility to complete the project according to the contract. The Port, City, and Ecology are providing appropriate oversight on the project and the contractor's work.

In addition, the agreed order (section III) states that no change in ownership or corporate status will alter the port's responsibilities under the order.

Disposal

Several questions concerned how the port will dispose of clean demolition debris, contaminated debris other than "oily" debris, and remaining fly ash.

Ecology Response: The port and their demolition contractor are making extensive efforts to recycle and reuse as much of the clean demolition materials as possible. The port is planning to release a summary of the amount of material recycled following completion of demolition. The mill included extensive amounts of reusable timbers and metal.

Unusable clean demolition debris is being moved by truck to Tacoma and by rail to eastern Washington for landfill disposal. Some concrete remains on the property. The port plans to crush and recycle that at a future time.

Contaminated debris must be sampled and identified prior to disposal. Examples of contaminated debris encountered include asbestos-containing materials; glue and glue residues; grease or used oil; waste aerosols; soda ash; caustic soda solution; cleaners; antifreeze; waste paint; and transformers. Used oil, grease, and transformers went to Emerald Services, Inc. Emerald Services' Airport Way facility in Seattle handles oil, wastewater and other non-regulated recycling and processing. The waste glues, aerosols, soda ash, caustic soda solution, cleaners, and waste paint were disposed of at US Ecology Idaho's Grand View facility which handles treatment and disposal of hazardous wastes and non-hazardous industrial wastes.

The remaining fly ash and all materials cleaned from the inside and bottom of the stack were separated and stockpiled. The material was sampled for pH, metals and dioxins, so that it could be properly disposed of. The results of this sampling showed this material was eligible to be disposed as general construction debris; however, care was taken during the demolition and handling activities to minimize airborne dusts and to provide appropriate worker protection due to slightly elevated pH and low levels of dioxins, barium and cadmium. The ash and concrete with oily residue was sent the Roosevelt Regional Landfill in Roosevelt, Washington.

Soil Stabilization

One commenter expressed concern that the proposed method for covering areas of concern would not last under harsh weather conditions.

Ecology Response: The proposed method of covering areas of concern is expected to work as a temporary cover while the initial assessment of the property is completed. The Port has indicated a willingness to modify the covering if it does not prove adequate. The anticipated schedule includes moving quickly into the collection of additional data to fill data gaps and complete the RI/FS. The RI/FS work plan will include additional requirements for protecting areas of concern as needed until the cleanup is complete.

Stormwater Ditch

One commenter asked whether the stormwater conveyance ditch on the K Play and adjoining state-owned property is lined or unlined.

Ecology Response: This ditch is unlined and has only existed since 1993. It was created to provide storm water infiltration and runoff from the paved sections of the mill. Releases to the harbor from this ditch were regulated under the PenPly Industrial Stormwater Permit during the mill's operation and are now regulated under the Port's Construction Stormwater General Permit (CSWGP) under the National Pollutant Discharge Elimination System (NPDES) and the Interim Action Plan attached to the agreed order. Stormwater sampling under the CSWGP for turbidity, pH, and visual evidence of sheen occurs weekly. Sampling under the Interim Action Plan for TPH-G, TPH-DX, and BTEX is conducted quarterly.

Since the demolition began, the Port has built a sediment dam to slow the releases from this ditch to the harbor and allow most of the runoff to infiltrate into the ground. The remaining stormwater passes through the filtration fabric in the dam, decreasing turbidity, before reaching the harbor.

Relationship to the Western Port Angeles Harbor Site

Several commenters had questions about the relationship between the K Ply site and the Western Port Angeles Harbor site. They expressed concerns that the K Ply site may have contributed to contamination in harbor sediments.

Ecology Response: The K Ply RI/FS will assess whether the K Ply site has had an impact on Port Angeles Harbor (the harbor). The Western Harbor RI/FS will assess the boundaries of the Western Harbor site. At this time, we are not investigating K Ply as part of the Western Harbor site.

Ecology identified the Western Harbor site based on information from the Port Angeles sediments investigation. That investigation assessed contamination throughout the harbor. It identified two main areas of contamination – one in the inner (western) harbor and the Rayonier Mill site.

- For more information on the sediments investigation, visit http://www.ecy.wa.gov/programs/tcp/sites_brochure/portAngelesHarborSed/paSed_hp.htm.
- For more information about the Western Harbor site, visit https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=11907.

Safety

One commenter had questions about safety at the site. These included requests for informative signage and fencing around the property.

Ecology Response: The port placed fencing around the property prior to the start of demolition. This fencing will remain throughout the subsequent phases of the cleanup until the site is no longer a threat to human health or the environment. Ecology also worked with the port to

develop appropriate signage to warn the public of the threat and to provide information on the cleanup and contact information. Signs are posted on the fence at the main entry gate on Marine Drive and on the west side along Cedar Street.

Separating the RI/FS and Draft CAP Comment Periods

One commenter noted that the agreed order schedule shows one comment period for the draft RI/FS report and draft Cleanup Action Plan (CAP). The commenter requested that Ecology hold separate public comment periods for the RI/FS and draft CAP.

Ecology Response: To speed the cleanup process, the Model Toxics Control Acts allows for combining the comment periods for the RI, FS, and draft CAP. At times we will hold these comment periods separately. This may happen when documents are lengthy, there will be a long time between completing the RI/FS and the draft CAP, or there is sufficient community interest in so doing.

At this time, given the circumstances of this site, we plan to hold one comment period on the RI/FS and draft CAP. We will make the RI/FS available for review as a public review draft while we are developing the draft CAP. We will also continue to monitor the situation at the site and could hold separate comment periods if circumstances change.

Making K Ply a Separate Site

One commenter expressed concern that Ecology prematurely decided to make K Ply a separate cleanup site. The commenter requested that Ecology make the separation preliminary and subject to revision based upon further investigation, including potentially adding the Peninsula Fuels property as an area of concern for further investigation.

Ecology Response: This area of Port Angeles has had a long history of environmental investigations. Petroleum contamination was discovered in multiple areas during numerous investigations between 1987 and the present. The previous agreed order included three areas:

1. The Marine Trades Area, a portion of the Port of Port Angeles east of Tumwater Creek where mostly marine-related trades, such as boat building or repair, currently occur.
2. The former PenPly/K Ply mill building.
3. The Pettit Oil bulk fuel plant.

The boundaries of the Site were based on the prior investigations that identified petroleum contaminants in this general area. It was assumed that this contamination was primarily from the large number of bulk fuel facilities and pipeline in the area and contributed to a large comingled plume.

Further investigation under the 2005 agreed order and in a focused investigation along Cedar Street provided enough information to show that two distinct areas of contamination exist with **separate** source areas. This information will be available this spring in the Marine Trades Area

RI/FS. The Marine Trades Area RI/FS will continue to contain all the information about the K Ply Site to support the separation decision.

Enough information exists to define the western boundary of the K Ply site and separate it from the Marine Trades area site; however, the other boundaries of the K Ply site are still being determined. It is possible that additional areas may be added to the site as the extent of contamination is investigated.

Paying for Cleanup

One commenter asked about how the port would pay for cleanup. The commenter also stated that the port should have to pay more than a 10% match for Remedial Action Grant funding.

Ecology Response: Ecology has allocated $2 million in remedial action grant funding to help the port pay for cleanup this biennium. Under the program guidelines, the port will pay a 25% match.

Ecology uses remedial action grants and loans (see http://www.ecy.wa.gov/programs/swfa/grants/rag.html) to support local governments in cleaning up contaminated sites so they can be put back into productive use. The grants are funded through a tax on hazardous substances. The tax is authorized by the Model Toxics Control Act, which passed by voter initiative in 1988. You can visit Ecology's Toxics Cleanup Program's website for more information about funding cleanup: http://www.ecy.wa.gov/programs/tcp/paying4cu/paying4cu.html.

Repositories

One commenter requested that the port offices be another document repository so that the public can review files there.

Ecology Response: Information repositories are places the public can read and review site information, including public comment period documents. Site documents can be reviewed at:

- Ecology's website - https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=28.
- Port Angeles Library, 2210 South Peabody Street, Port Angeles, WA 98362. (360) 417-8500.
- Washington State Department of Ecology, 300 Desmond Drive, Lacey 98516. Please call (360) 407-6045 for an appointment.

Ecology had three repositories for this site, but recently learned that Peninsula College is no longer able to serve as a repository due to staffing cuts. Ecology investigated providing another repository in Port Angeles and contacted the port about this possibility. The port did not have the space or staffing to serve as an information repository.

Mailing Lists

Several commenters requested to be added to the mailing list for the K Ply site.

Ecology Response: We have added these commenters to the mailing list for the site. To be added to the mailing list, please send your contact information to public involvement coordinator Diana Smith at diana.smith@ecy.wa.gov or (360) 407-6255. Please include whether you would like to be added to the email or hard copy mailing list.

Appendix A: Comment Letters

From: Sextro, Bob
To: Smith, Diana (ECY)
Cc: Groven, Connie (ECY); darlenes@olympus.net
Subject: RE: K Ply Agreed Order and Interim Action Work Plan Comment Period
Date: Tuesday, October 30, 2012 12:10:29 PM
Attachments: Comments on the 2012 K Ply Site Interim Action Work Plan.docx

attached please see my technical comments on the K-Ply work plan. I'm not very familiar with the site but it seems to me that there are some information and data gaps that you need to fill before proceeding and these additions would be very helpful to public understanding of the site.
also, I had made numerous technkcal comments on the city of PA CSO through the Rayonier site, have you posted a responsiveness summary for public comments??

thanks, Bob

Bob Sextro
Principal Engineer
Sequim WA

Comments on the 2012 K Ply Site Interim Action Work Plan by Robert Sextro

Because of the variety of chemicals potentially used at this site (as described in Section 3.3.1) please indicate if some soil and/or water samples have previously been analyzed using broad-spectrum analyses such as SW8260 and SW8270 GC/mass spectral procedures. If samples have not been analyzed thusly, then either indicate how you can be so confident that other chemicals groups such as PAH, phenols, PCBs, heavy metals are not present in soil and/or water at levels of regulatory concern or add such GC/MS analyses and heavy metal analysis to a select number of soil and water samples for the sampling and analyses proposed in this Work Plan.

Section 2.3.1; this discussion regarding presence of PCP in the soil at the Panel oiler and that “Landau and associates concluded that PCP concentrations had not reached groundwater” is an extremely simplified and possibly incorrect statement. To maintain some sort of credibility with the concerned public this type of statement must be supported by data or an expanded discussion of exactly why this conclusion was reached (such as PCP was only found in the top 1 foot of soil and not detected in soil samples at any other depth), otherwise I recommend selected soil and groundwater samples also be analyzed for PCPs to verify empirically its extent at the site.

Section 2.3.2; please discuss the groundwater gradient, both rate and direction, and the number and dates of samples rounds done on the monitor wells and piezometers.

Section 3.2.1; expand the discussion to indicate if groundwater sampling and analyses was performed as part of the 2009 investigative activities. The plume shown on Figure 3.1 is mostly from 2007-2008 data which is over 4 years ago and some of these contaminants can degrade with time. If more recent groundwater data do not exist to confirm the current extent of the plume, then how can the public be sure that the proposed locations of the 3 new monitoring wells are in representative spots. Should one “mini-round of sampling and analyses” be done before placing and installing these new wells?

Section 3.3.3; it is stated that 12-20 surface samples will be taken in the area shown on Figure 3.3. However Figure 3.3 has different color coded areas (both a brown perimeter and green perimeters) and

does not include all areas of concern that are shown in red on Figure 3.2. Please explain which areas on Figure 3.3 are to be sampled and indicate why the other areas of concern shown in red on Figure 3.2 are not being sampled.

Table 3.1; please clarify the description “stable groundwater conditions” used in the footnote, how it applies and why it only applies to PZ-6. Assuming “stable” applies to analytical results the footnote seems to imply that if the analytical results are highly variable then PZ-6 would be sampled more often than annually after the first year. Further, how will stability be determined, visually, statistically, graphically with trends or?? Stability could also refer to “the plume being hydraulically stable”, both laterally and vertically.

From:	Darlene Schanfald
To:	Groven, Connie (ECY)
Subject:	KPly AO and Interim Action Work Plan
Date:	Sunday, November 04, 2012 9:40:25 PM

Connie:

I want to compliment you and others that presented at the OMC the overview of the KPLY work. It was very clearly presented.
I have a few suggested modifications on the Interim Action Work Plan.

* Temporary fencing should be erected all around the site so the public knows not to cross the site.
* There must be signage around the site so that the public knows not to cross on to the site.

* There should be sampling and analysis done for a fuller suite of contaminants.
Are all contaminants listed over the years on EPA's TRI included, such as dioxin?
Formaldehyde needs to be sampled for inside buildings as well as out side.

* Good that the AO states Ecology may take split samples. Ecology should take split samples and have
another analytical comparison with that of the Port's.

* In addition to the 2 libraries and Ecology, the Port should be another "repository" at which the public
can review files. It is recommended they be added as a "depository."
* The value of financially helping the Port with costs is understood, but 90% is too much. This rural
community is not poor; particularly the Port is not, and so much assistance gives no incentive
to the Port to be responsible for the site pollution. Also, Ecology may be expending too much
on one site, rather than looking at the true costs, as well as potentially short changing other
cleanup sites by diminishing your funding source so much.

* A 10/9/12 PDN article, *Port hires firm to raze PenPly site* says "The building will become the property
of Rhine Demolition." Does the construction firm now own the building? The AO, O.Transfer
and Interest in Property refers to such an action. Please explain who owns the property once
demolition begins.

* 3.2.3 Stormwater Sampling. It is good that the Port will sample stormwater.

* 3.2.4 Mill Demotion Monitoring. How will the clean mill demo be disposed of? Will other toxic debris
beyond "oily" be properly disposed of?

* 3.3.1 Areas of Potential Concern. It is confusing what you mean by "there were

no known releases in
this area." This is often stated. Will the contractor be assessing these areas for contaminants
regardless of "no known releases,or ignoring these areas because of no known releases?"

* 3.3.3 Soil sampling. Twelve to 20 surface soil samples for the entire site are too few samples.
Increase the number.

3.4.3 Soil Stabilization and Infiltration Control Actions. Plastic sheeting to cover "areas of concern" in
this inclement weather is unwise. Perhaps a small bldg could be left up in which to store the
soils so there would be no exposure and runoff.
Is there research that documents this sheeting will hold up to the type of weather patterns
experienced in the PenPly area?
To where has the fly ash been deposited when the mill was operating? To where will the
contractor deposit the remaining ash?

--

Darlene Schanfald
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JAMESTOWN S'KLALLAM TRIBE

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Connie Groven
Site Manager, K Ply Cleanup Site – Port of Port Angeles
SW Regional Office
PO Box 47775
Olympia, WA 98406-7775

November 6, 2012

RE: Comments on the Agreed Order with Port of Port Angeles for the K Ply site, 439 Marine Dr., Port Angeles, WA

Dear Ms. Groven:

The Jamestown S'Klallam Tribe has received Ecology's announcement that it is entering into a legal agreement with the Port of Port Angeles for cleanup of the K Ply site. Proper restoration of the marine ecosystem of Port Angeles Harbor, including the sensitive shoreline habitat and the adjacent uplands, will require our combined efforts. As one of the Treaty Tribes with usual and accustomed areas that include Port Angeles Harbor, it's important that the Jamestown S'Klallam Tribe be involved in the Port Angeles Harbor cleanup efforts. Accordingly, we have read the Interim Action Plan developed for the Port of Port Angeles at the K Ply work site. We understand that the action work plan entails demolishing and removing the above ground mill structures to prepare the site for cleanup and redevelopment. Removal of the buildings will also allow for additional monitoring to more completely describe the nature and extent of contamination.

The Tribe does not have in-house toxic contaminant expertise. Therefore, these comments do not address the completeness of the monitoring regime identified in the Interim Action Plan. Nor can we say if the decommissioning's best management practices are fully protective of human and ecosystem health. Our layperson review revealed no obvious errors or omissions. However, the Tribe will consult with experts in this field whenever we feel that monitoring or remediation efforts are insufficient to protect Treaty Rights. For example, measuring petroleum products was not a condition of the site's stormwater general permit and was not required until this interim action. Further, the Tribe asserts that the decades- long history of stormwater discharge from the K Ply site has contributed to the harbor toxic sediments which Ecology is simultaneously attempting to address.

The Tribe appreciates the efforts Ecology has taken to make information available to stakeholders and the general public. As of November 5, 2012, the link to the Western Harbor cleanup had posted no reports or information. The link to the Port Angeles Harbor sediments investigation work has an extensive list documenting the findings to date, and the intent of Ecology to identify other potentially liable parties.

Please continue to keep the Jamestown S'Klallam Tribe apprised of the status of cleanup for this site and the others of Port Angeles Harbor. Please add my name as well as Hansi Hals of my staff to your distribution list for correspondence on matters concerning Port Angeles Harbor. Our individual email addresses are: schitwood@jamestowntribe.org and hhals@jamestowntribe.org.

Sincerely,

Scott Chitwood
Natural Resources Director

From: Matt Beirne
To: Groven, Connie (ECY)
Subject: K-Ply
Date: Thursday, November 08, 2012 9:35:03 AM

Hi Connie,

Just checking in about the K-Ply demo and contaminant plume that we discussed yesterday. Can you please contact me once you've had an opportunity to discuss our concerns with Rebecca? Again, just to recap, we are concerned that the contaminant plumes are not as well contained as previous studies may have suggested and that there may indeed be connectivity to the waters of Port Angeles Harbor. We strongly recommend the following actions be initiated:

1) Retain a contractor to assist with the removal of contaminated soils/ sediments that are within close proximity of the shoreline and likely to migrate.
2) Continue probe based sampling activities to characterize the extent of BTEX (and other) contamination along the shoreline
3) Initiate excavation activities parallel to the shoreline to remove contaminated soils and establish a containment barrier to prevent further migration of contaminants toward the waters of the harbor.

We understand that Ecology's original intent was to have the infrastructure on site removed and then use AKARTS for stormwater management and containment of contaminants. However, it appears that the proximity of the plume to the waters of Port Angeles harbor may warrant a more aggressive approach that likely should involve actual removal of contaminated soils and the installation of containment barriers or extraction wells.

I am interested in a site visit in the near future and would like to be apprised of ongoing sampling activities at this site.

Thanks for your consideration and understanding.

Matt Beirne

Rayonier

Value From The Ground Up™

Corporate Headquarters

November 15, 2012

Via E-Mail & U.S. Mail

Ms. Connie Groven
Department of Ecology
SWRO Toxics Cleanup Program
P.O. Box 47775
Olympia, WA 98504-7775

Re: Public Comment on Proposed Agreed Order and Interim Action Work Plan for the Port Angeles Plywood Mill Property

Dear Ms. Groven:

Rayonier respectfully submits the following comments on the proposed Agreed Order and Interim Action Work Plan for the Port of Port Angeles' ("Port") plywood mill property ("K-Ply Mill"). As you know, Rayonier was a former tenant of the property and operator of the plywood mill for a portion of the mill's operating life and is in a unique position to clarify some points based on our direct knowledge of the mill operational history. Further, based on our site investigations completed to date, we can provide Ecology with additional facts and evidence which we believe will be helpful for accurately assessing site conditions and determining appropriate remedial alternatives. Finally, since Rayonier was named in the Agreed Order and Work Plan and was subject to a prior Agreed Order with Ecology from 1994 through 2012 for a former hydraulic oil release at the mill site, we are obligated to provide comments.

Our comments are divided into three main categories, as follows:

Category	Description
1. Premature findings of fact and conclusions	The agreed order makes several findings of fact and "determinations" which appear to be premature based upon available information. Because the Port will undertake further investigation of its K-Ply mill property, the Agreed Order should be revised accordingly.
2. Incomplete and/or inaccurate fact statements	In several instances, factual statements are incomplete or inaccurate. These statements should be revised.
3. Public review and comment sequence	The proposed concurrent public review and comment process sequence should be revised.

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www.rayonier.com | Jacksonville, FL 32207

These comments are set forth below.

1. Premature Findings of Fact and Conclusions

1. a. Potential Premature Separation of K-Ply from the MTA Site

In the Agreed Order, Ecology sets forth a significant new determination: the groundwater impacts at the K-Ply mill associated with a portion of the MTA gasoline plume constitute a separate and distinct "Site" under MTCA rather than being a portion of the MTA Site. The stated basis for Ecology's "determination" is the data compiled in the draft MTA RI/FS. The gasoline plume under the K-Ply mill may be segregated from the MTA Site after the MTA RI/FS is final and the Port completes the RI/FS as proposed. However, because the MTA RI/FS is not a final document and has not been released for public review and comment we do not believe that Ecology should make this determination at this point in time.

Further, the Agreed Order does not sufficiently recognize the potential relationship between "pressurized petroleum Pipeline No. 8" and the gasoline groundwater plume identified beneath the K-Ply Mill. This pipeline was a significant operational component of the MTA. Rayonier's investigation to date indicates that this pressurized pipeline is the most likely source of the gasoline plume. Our November 15, 2011 comment letter to Ecology on the draft MTA RI/FS summarizes many of these points in greater detail. If the Port's K-Ply RI/FS corroborates that position, then the gasoline plume is clearly an MTA issue -- not a K-Ply Mill issue. Consequently, segregating the impacts under K-Ply from the MTA may be factually incorrect.

Similarly, documented groundwater impacts in the right of way spanning the K-Ply Mill and the former Peninsula Fuel properties are prematurely defined as the "K-Ply Site" and exclude the Peninsula Fuels property prior to finalizing the RI/FS. Section V.V.f.5. of the Agreed Order and Figure 4.7 of the Work Plan describe and illustrate the potential connectivity of the Peninsula Fuel property with the gasoline groundwater plume. Exclusion of the Peninsula Fuel Property at this juncture is premature and not appropriate given the information presented in the Agreed Order and Work Plan.

The Agreed Order, at a minimum, should identify the segregation into a separate "Site" as a preliminary / draft finding subject to revision based upon further facts and investigation including without limitation inclusion of the Peninsula Fuels property as an area of concern for further investigation.

1. b. Premature Determination of Gasoline Plume "Sources"

The MTA RI/FS provides information on the location of the gasoline plume and hydraulic oil impacts beneath the K-Ply Mill and in the surrounding streets and alleys. The Agreed Order and the Interim Action Work Plan recognize substantial data gaps concerning the operations on the K-Ply mill over time and the potential / unknown contribution of pressurized petroleum Pipeline No. 8 to the gasoline plume. The Agreed Order does not, however, describe an adequate basis to determine the "source" or "sources" of the gasoline plume. At best, the current data allows the location to be identified but is not adequate to determine the source of the identified impacts. Despite this, Agreed Order Sections V.F.1., 2. & 3. "determine" the source of the gasoline impacts as operations within the plywood mill.

There is a data gap related to Petroleum Pipeline No. 8 which impedes the ability to "determine" that the source of the gasoline plume is from plywood mill operations. Rayonier is aware of no information establishing any use of gasoline within the plywood mill structure. If Ecology has such information, then it should be included in the Agreed Order. Rayonier has provided technical reports to Ecology identifying the location of the underground petroleum pipeline network, which extends beneath the entire length of the K-Ply Mill. That pipeline serviced the Peninsula Fuel / Mobil Fuel Depot and was in no way connected to the plywood operations.

Notably, the figures in the Agreed Order and the Interim Action Work Plan omit the existence and location of pressurized petroleum Pipeline No. 8. This omission divorces the pipeline from its critical feature – the fact that it is co-located with the gasoline plume. The figure below shows the location of pressurized petroleum Pipeline No. 8 in plan view.

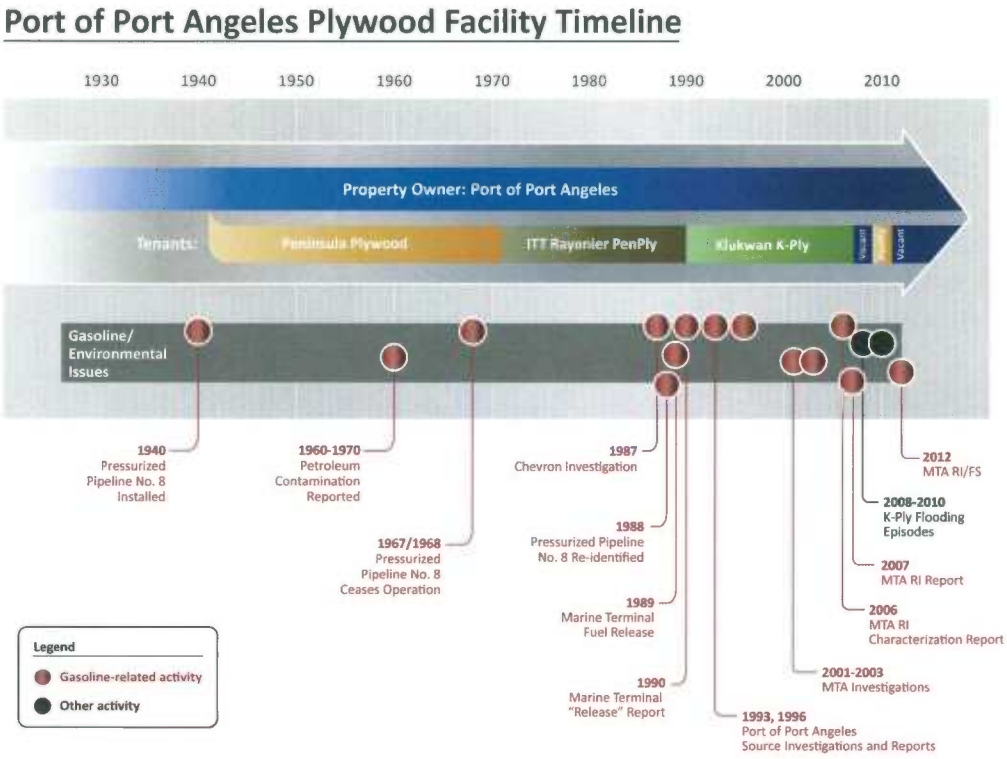
The Agreed Order and Interim Action work plan should be revised to eliminate any determinations or findings of fact that the source of the gasoline plume is from K-Ply Mill operations.

2. Incomplete and/or Inaccurate Fact Statements

2. a. Incomplete Description of Mill Ownership and Operational History

Findings of Fact Section V.D. outlining the history of mill ownership and operations is incomplete. The Agreed Order states that the K-Ply Mill operated from 1941. Section V.D., however, only identifies ITT-Rayonier as an operator of the K-Ply Mill. This identification is incomplete and does not provide an accurate description of the K-Ply Mill owners and operators. The complete ownership and operation of the K-Ply Mill is much more detailed as depicted in the following timeline graphic.

The Agreed Order and Work Plan should be revised to describe the complete ownership and operational history.



2. b. Mischaracterized Hydraulic Oil Release Duration

As you know, Rayonier was subject to an Agreed Order with Ecology, from 1994 through 2012 for operation of a hydraulic oil recovery and containment system at the K-Ply Mill. Hydraulic oil had accumulated on the groundwater under a discrete portion of the K-Ply Mill during the long history of plywood press operations. It is well documented that the hydraulic oil was used in plywood presses that operated at the K-Ply mill from its first days in 1941 until its final closure in 2011. The Agreed Order at Section V. D. however leaves the impression that the hydraulic oil remedy was required solely in response to Rayonier's operation of the presses. This is incorrect. As indicated in the previous comment, others operated the hydraulic presses before and following Rayonier and there is evidence that releases of hydraulic oil occurred during these operational periods up until final closure of the mill in 2011 and into 2012 while the mill was being decommisioned.

The Agreed Order should be revised to state that the duration of the release of hydraulic oil is currently unknown.

2. c. Mischaracterized Hydraulic Oil Containment Action

The Interim Action Work Plan mischaracterizes the hydraulic oil containment actions by Rayonier. Section 2.3.2 of the Work Plan states that the hydraulic oil recovery effort was "generally ineffective" and that Rayonier terminated the "recovery efforts several years ago." These statements are inaccurate and misleading. Rayonier's interim action did, in fact, recover hydraulic oil and did maintain "containment" of the hydraulic oil that remained on the surface of the water table. Operation of the system ceased in August 2012 – not several years ago. The system was turned off at that time because the work area was inaccessible and the Port's demolition operations resulted in the need to remove the recovery system.

Therefore, Rayonier shut down the system, advised Ecology of the status and requested termination of the 1994 Agreed Order.

The Agreed Order and Work Plan should be revised to correct this mischaracterization.

3. Public Review and Comment Sequence

The Agreed Order contemplates a concurrent public review and comment period for the Draft Public Review RI/FS and the Draft Corrective Action Plan. A concurrent public comment period may not provide public and other stakeholders an adequate opportunity to review and comment on the technical data, findings, remedial action review and assessment as well as the draft / presumptive remedy. Concurrent sequencing also means the Port and Ecology will not have public input on the RI/FS results *before* making critical remedial alterative decisions. Public comment in advance of DCAP decisions may provide a more informed remedial selection process and lessen the chance of opposition to the DCAP determinations.

Ecology should consider re-sequencing the public comment period on the RI/FS and DCAP to provide for separate and distinct review and comment periods.

We appreciate the opportunity to submit these comments and look forward to Ecology's considered evaluation of these issues. Please feel free to call me if you have any questions about the facts or information presented herein.

Respectfully Submitted,

Warren Snyder, P.E.
Senior Manager, Environmental Engineering

WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

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November 19, 2012

Connie Groven, Toxics Cleanup Program
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

Re: Port Angeles Harbor Sediment Investigation Report

Dear Ms. Groven:

The Washington State Department of Natural Resources (DNR) would like to thank you for the opportunity to comment on the Agreed Order and Work Plan for the K-Ply Mill Site in Port Angeles

DNR's comments are based on principles of stewardship and proprietary management derived from our legislative defined goals to protect State-Owned Aquatic Lands (SOAL) and preserve them for the public's benefit. We appreciate Ecology's consideration of these and any future comments related to this and other cleanups in Port Angeles Harbor.

The K-Ply site is located immediately adjacent to the Western Port Angeles Harbor Sediment Site, and partially on fill located within State Owned harbor area currently managed by the Port of Port Angeles under a Port Management Agreement. DNR requests that it be placed on the mailing list for reports and other documents related to the development of the RI/FS and the Cleanup Action Plan required under this Agreed Order. This request also includes any reports and documents relating to groundwater sampling.

Exhibit B (Work Plan), 2.2: Is the stormwater conveyance ditch, partially located on State Owned harbor area, lined or unlined?

In Exhibit B, Appendix B, some of the groundwater plumes extend to the bulkhead. Will monitoring for sheens and other evidence of contamination by petroleum hydrocarbons and other organic contaminants in surface water and tideland sediments occur? Has the stability and the permeability of the bulkhead been evaluated?

Sincerely,

Erika A Shaffer, MS
Sediment Specialist

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