



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 21, 2017

Electronic Copy

Allison Geiselbrecht, Ph.D  
Floyd | Snider  
601 Union Street, Suite 600  
Seattle, WA 98101

Re: Request for Extension – Agreed Order No. DE 9781  
Western Port Angeles Harbor Site, Port Angeles, WA

Dear Ms. Geiselbrecht:

On December 5, 2017, Ecology received an email from the Western Port Angeles Harbor Group (WPAHG) requesting an extension of time for submittal of the Agency Review Draft (ARD) Remedial Investigation/Feasibility Study (RI/Fs). Currently the ARD RI/FS is due February 1, 2018. WPAHG has requested a new submittal date of no later than April 6, 2018.

WPAHG identified several reasons for requesting a schedule extension related to additional evaluations listed below that will be included in the FS:

- **45 cm point-of-compliance (POC)** - The introduction of a 45 cm POC in the inner harbor areas as identified by Ecology is requiring significant revamping of all existing alternative analyses.
- **Terminal 6 and transload development** - There are limited opportunities in the Port Angeles waterfront for a transload facility. The transload facility is critical for remedy implementation. Securing permission from the Port of Port Angeles (as owner) is crucial, given long-term impacts to the Port's Terminal 6 property. Additionally, the WPAH Group is adjusting to the footprint of the transload facility to incorporate future Port tenant access. The WPAH Group is working closely with the Port to evaluate the use of the adjacent "Triangle Property" for sand stockpiling. This property (located across Marine Drive from Terminal 6) has on-site wetlands. The Port also performed a Triangle Property wetland survey, which is being incorporated into the transload operational footprint. Finally, site-specific cost information (including development, mitigation, and lease costs) are now being included in FS.

All of this work is considerably more detailed and site-specific than normally performed in an FS evaluation, but is necessary given the limited transload opportunities in Port Angeles.

- **Mitigation** - Due to fill requirements for some remedial alternatives, WPAHG is evaluating potential “in kind” mitigation opportunities. This mitigation evaluation is more detailed and site-specific than is typically required in an FS, but is necessary to ensure implementability and a detailed understanding of costs.
- **Regional quarries and transportation** - The FS development process is evaluating local and regional quarries for suitable specifications and sufficient volumes of ENR and cap material for each relevant remedial alternative. This is necessary to ensure implementability and a detailed understanding of costs, including transport costs, due to the Site’s relatively remote location.

These additional detailed analyses justify the need for a schedule extension and support April 6, 2018 as a reasonable date for submittal of the ARD RI/FS. Ecology approves this 64 day extension of schedule. The ARD RI/FS report is now due no later than April 6, 2018. If you have any questions, I may be reached at (360)407-6254.

Sincerely,



Connie G. Groven, PE  
Cleanup Project Manager  
Toxics Cleanup Program  
Southwest Regional Office

CGG: kb

By Certified Mail: [91 7199 9991 7037 7471 8538]

cc: Rebecca S. Lawson, P.E., LHG, Ecology  
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