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October 14, 2020

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

Re: Western Port Angeles Harbor Sediment Cleanup Unit Remedial Investigation/Feasibility Study Public Review Draft Comments

- **Site Name:** Western Port Angeles Harbor, Port Angeles, Clallam County, WA
- **Facility/Site No:** 18898
- **Cleanup Site ID No.:** 11907

Dear Allison Geiselbrecht,

Thank you for submitting the *Western Port Angeles Harbor Sediment Cleanup Unit Remedial Investigation /Feasibility Study Public Review Draft* report (RI/FS), dated 2019 Draft. The Department of Ecology (Ecology) held a public comment period on this draft from January 16, through March 16, 2020. In response to comments submitted, Ecology requests the following revisions before approving the document as the final RI/FS.

Revisions requested

Tribal concerns

To address concerns regarding Tribal treaty rights, revise the fourth paragraph of Section 12.7.2 as shown.

- “These and other institutional controls would be detailed as appropriate in an OMMP to be developed and refined during remedial design, also ensuring that such controls minimize the potential to impact the exercise of Tribal treaty rights, including Tribal access to treaty resources, or to unreasonably encumber future uses of state-owned aquatic lands. Institutional controls that have the potential to impact the exercise of Tribal Treaty rights will be developed in consultation with Lower Elwha and the S’Klallam Tribes.”

Wood debris and benthic toxicity

Some comments expressed concerns that the report minimized wood debris impacts and that the evidence doesn’t fully support a conclusion that wood debris does not pose a toxicity concern. Ecology agrees that there remains some uncertainty around the effects or contribution of wood debris on toxicity. Please remove definitive statements that state wood debris does not pose a toxicity concern with the SCU, including:

- In the Executive Summary, Page 3 of 7, revise the second bullet.
“Various types of woody debris (e.g., bark) were observed throughout the western Harbor, with higher concentrations observed near historical and current log storage areas, ~~but the woody debris was not associated with benthic toxicity.~~”
- In the bullet summary list at the beginning of Section 9, revise the fifth bullet as shown:
“Evaluation of the presence of wood debris, ~~and the determination that wood debris, although widespread, does not pose a toxicity concern within the SCU.~~”

Update Cover Page

Please prepare an updated cover page for the final document by replacing “2019 Draft, Public Review Draft” with “October 2020 Final”.

Next Steps

Please revise the RI/FS to resolve the comments above and submit a revised electronic version of the RI/FS within 30 calendar days from the date of receipt of this letter. Ecology will need updated hard copies of the RI/FS. Please contact me to discuss the most efficient means of providing hard copies. Ecology will approve the RI/FS once these revisions are confirmed.

The next step is to sign the Agreed Order amendment to prepare the preliminary draft cleanup action plan. The preliminary draft cleanup action plan is due 120 days from the effective date of the amendment. This can be signed now and should be signed no later than 14 days after Ecology’s approval of the Final RI/FS. Please prepare the preliminary draft cleanup action plan using the recommended alternatives from the RI/FS.

If you have any questions about this comment letter, please contact me at (360) 407-6254 or connie.groven@ecy.wa.gov.

Sincerely,



Connie Groven, P.E.
Toxics Cleanup Program
Southwest Regional Office

CGG: sl

By certified mail: 9489 0090 0027 6086 8814 23

cc: Karen F. Goschen, Port of Port Angeles
Nathan West, City of Port Angeles
David Massengill, Georgia-Pacific LLC
Chris Nagaura, Nippon Paper Industries USA Co., Ltd.
Nicole Kimzey, Merrill & Ring
Ecology Site File