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DEPARTMENT OF ECOLOGY
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March 9, 2021

Warren Snyder PE
Senior Manager, Director, Legacy Sites
Rayonier Advanced Materials
1301 Riverplace Blvd, Suite 2300
Jacksonville, FL 32207
warren.snyder@rayonieram.com

Re: Port Angeles Rayonier Mill Study Area Volumes I-III, Public Review Draft Comments

- **Site Name:** Port Angeles Rayonier Mill Site
- **Site Address:** 700 N Ennis, Port Angeles, Clallam County, WA
- **Facility/Site No:** 19
- **Cleanup Site ID No.:** 2270

Dear Warren Snyder:

Thank you for submitting the Interim Action Reports Volumes I, II, and III which constitute the remedial investigation and feasibility study for the Rayonier Mill Study Area. The Department of Ecology (Ecology) held a public comment period on the public review drafts of Volumes I, II, and III from August 29, 2019, through November 26, 2019. In response to comments submitted, Ecology requests the following revisions before approving the documents as final.

Revisions Requested

Public Concerns

Please update the disproportionate cost analysis (DCA) in Volume III to reflect public concern. In the draft Volume III, all the alternatives were scored equally for public concern. Based on public comments, it's apparent that the public concerns for each alternative are not equal. The public comments are summarized in Ecology's Responsiveness Summary, [Port Angeles Rayonier Mill Site, Interim Action Reports Volume I, II, and III Responsiveness Summary, January 2021](#).¹

¹ <https://apps.ecology.wa.gov/gsp/DocViewer.ashx?did=97831>

Public comments indicate a clear preference for certain alternatives, and concerns for other alternatives. For the soil alternatives, there was a strong preference for full removal of contaminated soil. There was strong concern about the use of remediation levels. Similar with sediments, there was a strong preference for full removal of contaminated sediments.

Based on the public comments, we ask that the public concern for each alternative be adjusted to reflect public preferences as follows:

Soil	SL-1	SL-2	SL-3	SL-4	SL-5
Public Concern	4	1	5	1	10

Groundwater	G-1	G-2	G-3
Public Concern	5	5	10

Sediment	S-1	S-2	S-3	S-4	S-5
Public Concern	1	2	4	6	10

Next Steps

Please revise the DCA of Volume III as described above and submit within 75 calendar days from the date of receipt of this letter as noted in the agreed order. Please contact me to discuss the most efficient means of revising the DCA.

Ecology will approve Volumes I, II, and III once these revisions are confirmed. In Ecology's approval letter, we will provide instructions for development of Volume IV, the Interim Action Plan.

If you have any questions, please contact me at (360) 407-6257.

Sincerely,



Marian L. Abbett, P.E.
Project Manager
Toxics Cleanup Program
Southwest Regional Office

MLA/tam

cc by email: Matt Beirne, Lower Elwha Klallam Tribe, matt.beirne@elwha.org
Rebecca S. Lawson, P.E., LHG, Ecology, rebecca.lawson@ecy.wa.gov
Ecology Site File