

Toffol, Emily (ECY)

From: Arthur (R.D.) Grunbaum <rd@fogh.org>
Sent: Friday, June 14, 2024 11:36 AM
To: Toffol, Emily (ECY)
Cc: Roberts, Tara (ECY)
Subject: In Re: Grays Harbor Paper LP Site 44124741; Cleanup ID 2262

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Ms. Emily Toffol
Department of Ecology
Industrial Section
PO Box 47600
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In Re: Grays Harbor Paper LP, Draft Agreed Order

Ms. Toffol,

Thank you for this opportunity to comment on the above referenced draft document. We have not finished our review, but did notice this particular omission and wanted to make sure that the concern outlined below became part of the process.

We note that the plant which produced a monocyclic aromatic aldehyde-phenol containing methoxy, or vanillin was not considered in this draft agreed order.

In 1988 ITT Rayonier announced it would increase its vanillin ex-lignin capacity from 800 MTons/yr to 1500 MTons/yr and ran that part of the plant until it closed in January 1993. The plant likely emitted a variety of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) during its operation. It likely involved solvents like methanol, ethanol, benzene, terpenes, and toluene for extraction and purification. In addition, some of the VOCs above, like benzene and toluene are also classified as HAPs.

Depending on the process, chlorinated organic compounds like chloroform or tetrachloroethylene could be of concern.

Contamination of the soil and groundwater could result in more specialized treatment and disposal during the remedial cleanup process.

What residuals from that operation could still be present at the site? What, if any, hazards could be attributed to these?

Thank you,

R.D.

Arthur (R.D.) Grunbaum, President
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