



September 12, 2024

Via Washington State Department of Ecology Public Comment Form

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Re: Grays Harbor Paper Cleanup – Public Comment

As a non-profit corporation dedicated to protecting water quality in Washington State, Twin Harbors Waterkeeper would like to express its appreciation that Ecology and Rayonier are finally taking steps to clean up the contaminated former Grays Harbor Paper. However, we have some concerns about the cleanup plans.

This cleanup should be taken very seriously. As Ecology acknowledges, the contaminants present at this site, including total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and toxic metals like lead and mercury, are known to have severe impacts on both human health and the environment. The soil, groundwater, and nearby sediments are all affected, and the potential for these contaminants to further spread or impact the Hoquiam River, Chehalis River Estuary, and Grays Harbor is of great concern.

The urgency to get the former Grays Harbor Paper site cleaned up cannot be stressed enough. This area is at risk for flooding, sea level rise, and tsunamis. Flooding of this site mobilizes the pollutants and may carry contaminants to nearby homes, businesses, and schools. Hoquiam residents have expressed concern to Twin Harbors Waterkeeper that past floods might have brought contaminants into their yards where their children and pets play. The pollutants at this particular site pose a higher risk to the community because it is located in a flood zone and, therefore, should be cleaned up as quickly as possible.

I. Drinking Water Contamination

It is important that this site is cleaned up thoroughly and promptly. Grays Harbor gets its drinking water from underground aquifers—*porous* rock formations below the ground that hold water—via numerous deep and shallow wells around the county. Ecology and Rayonier need to make sure that the contaminants from the site have not and will not reach our water supplies. The only reference to an investigation into this matter in the Agreed Order is on page 7 where

Ecology states, “The no further action letter [in response to Rayonier’s 1993 investigation of the ‘Silvichemical Area’] stated that *levels of chromium VI in the upper aquifer were unknown at the time of the issuance of the letter.*” (emphasis added).

II. Impact on Nearby Schools and Neighborhoods

Children are among the most vulnerable to the effects of environmental toxins, and any exposure—whether through contaminated soil, water, or air—can have long-lasting consequences on their health and development. Ensuring that the cleanup is thorough and that all contaminants are properly managed is essential to protect our children and their future.

In addition, the people who live in the neighborhoods surrounding the site are at risk of exposure to harmful substances. Many of these residents are already facing challenges due to the high unemployment rates and low-income levels in our community. The cleanup must prioritize these residents’ health and safety by ensuring that all contaminated areas are fully remediated and that no residual risks remain.

III. Impact on Workers

The workers who are employed in and around the site also deserve protection. Whether they are involved in the cleanup efforts or work in nearby businesses, their exposure to contaminants must be minimized. Proper safety measures, monitoring, and protective equipment are critical during the remediation process to ensure that workers are not harmed.

IV. Impact on the Economy and Waterfront Access

Furthermore, the successful cleanup of this site has the potential to revitalize the local economy by making the area safer and more attractive for new businesses and investments. A comprehensive cleanup that includes the waterfront areas will not only protect the environment but also allow us to reclaim and enjoy our natural resources. Restoring safe access to the waterfront will provide recreational opportunities, improve public health, and strengthen our connection to the natural beauty of Grays Harbor. However, these benefits can only be realized if the cleanup is done thoroughly and responsibly.

V. Inadequate Cleanup Measures

Rayonier’s previous insufficient attempts at cleaning areas of the site does raise concerns with how it will handle the cleanup going forward. Ecology needs to hold Rayonier accountable and closely monitor Rayonier’s Remedial Investigation Work Plan, Remedial Investigation, Remedial Investigation Report, Feasibility Study, and Draft Cleanup Action Plan. We want to ensure that Ecology and Rayonier will address the following inadequate cleanup measures identified in the Agreed Order during the cleanup process:

1. **Silvichemical Area Investigation:** Chromium contamination was investigated in 1993, but the levels of chromium VI in the upper aquifer were unknown, leaving uncertainty about the thoroughness of the cleanup.
2. **Boneyard Area:** Independent cleanup efforts took place here, addressing contaminants like TPH, PCBs, and lead. However, the “No Further Action” letter issued by Ecology does not guarantee that all risks were fully mitigated.

3. **Former Log Yard Area:** Although some contaminated soil was removed, lead levels still exceeded cleanup standards, indicating that the remediation was insufficient.
4. **Finishing Area:** Contaminants including TPH, lead, chromium, PCBs, and PAHs were found in soil and groundwater. Some excavation was done, but the investigation was not under a consent decree, raising concerns about the adequacy of the cleanup.
5. **Landfill Base Area:** Contaminants like PAHs, lead, chromium, TPH, and BTEX were detected, with TPH levels still exceeding cleanup standards. The lack of comprehensive follow-up raises concerns about ongoing environmental risks.
6. **Sediment Contamination:** Sediments near the site's wastewater outfalls were found to exceed state sediment cleanup standards for mercury and PCBs, failing biological tests. It appears that not all contaminated sediments were adequately remediated.
7. **Gasoline and Maintenance Area:** Benzene, TPH, lead, and other chemicals were found in soil and groundwater. Although some remediation took place, contamination still exceeded safe levels as recently as 2017.
8. **Powerhouse Area:** No. 6 fuel oil contamination persisted despite earlier cleanup efforts. Groundwater monitoring from 1993-1995 showed concentrations of TPH, PAHs, and other contaminants above screening values, indicating the inadequacy of past remediation.
9. **Utility Chase Area:** A ruptured oil line in 1992 caused contamination that persisted even after some soil was excavated. TPH and PAHs still exceeded safe levels, highlighting the insufficiency of the cleanup.
10. **Warehouse Area:** Soil and groundwater contamination with chromium, lead, TPH, and PCBs was detected in 1993. The extent of the cleanup is unclear, suggesting that risks may remain.
11. **Hog Fuel Storage Area:** Historical contamination with chromium, lead, and TPH was detected, with groundwater monitoring showing ongoing exceedances of safe thresholds from 1992-1995, indicating inadequate cleanup.
12. **Shoreline Contamination:** Groundwater monitoring from 1992-1995 detected TPH, lead, chromium, and other hazardous substances along the shoreline, with no comprehensive cleanup action taken, posing ongoing risks.
13. **Paper Machine Area:** Contamination with TPH and PCBs exceeded cleanup levels, and even after some soil was excavated, significant contamination remained. Ecology did not issue a "No Further Action" letter, indicating that the cleanup was incomplete.

VI. Conclusion

While we appreciate the steps that have been taken so far, including the development of the Agreed Order between Ecology and Rayonier, we believe that the cleanup process must be both comprehensive and expedited. The Agreed Order outlines necessary actions such as a remedial investigation and feasibility study, but these must be conducted with the utmost thoroughness and transparency.

We strongly urge the Department of Ecology and Rayonier to ensure that the cleanup plan addresses all areas of contamination comprehensively, including those that may have been previously overlooked or inadequately addressed.

Furthermore, the community must be kept informed and involved throughout the entire cleanup process. Public participation is a critical component of the MTCA, and we call on the Department of Ecology to ensure that all public comment periods, meetings, and updates are

widely advertised and accessible to all residents, including the Latino community and local Native American tribes. The Agreed Order makes no mention of the local tribes, but the Public Participation Plan does briefly refer to a Tribal Engagement Plan. It is essential that the voices of those who live, work, and study near the site are heard and that our concerns are taken seriously.

Finally, we would like to emphasize the importance of adhering to the agreed-upon timelines. Any delays in the cleanup process could have serious consequences for our community, and we urge all parties involved to prioritize the health and safety of our residents by completing the cleanup as swiftly as possible.

In conclusion, we support the efforts to remediate the Grays Harbor Paper Mill site, but we also demand that the cleanup be thorough, transparent, and timely. The future of our community depends on it.

Thank you for your attention to this critical matter. We look forward to your response and to a cleaner waterfront in Hoquiam.

Sincerely,

Savannah Rose
Policy Director
Twin Harbors Waterkeeper