



Department of Ecology
Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775
Attn: Connie Groven
Cleanup Project Manager

2020-03-06

Re: MPC Comments on RI/FS Port Angeles Harbor

Ms Groven,

We at McKinley Paper Company ("McKinley") write concerning the remedial investigation and feasibility study (RI/FS) for the western Port Angeles Harbor (FSID # 18898; CSID # 11907), released January 16, 2020 for public comment.

McKinley is the owner of private property within the area studied in the RI/FS, including what is called the "lagoon," so we have a special interest in what the RI/FS proposes, especially for work proposed for the areas on and near our property.

McKinley is at a critical stage of re-starting pulp and paper production at its mill on the western Harbor. Since McKinley bought the mill in Port Angeles in 2017, we have designed and installed a complex and expensive processing system to re-configure and re-start the mill using recycled paper exclusively. In addition to meeting the state's need for consumption of recycled paper and production of eco-friendly paper, the restart allows McKinley to employ workers skilled in paper production in jobs that add great benefit to the local economy. We are currently in the process of resuming paper production as we write this.

Our re-started mill operations require that we operate on or have uncompromised access to literally every square meter of our property, which is already geographically constrained. Our mill will require truck shipments into our mill of recycled paper including old cardboard and outbound shipments from our mill of our paper products. This requires free-flowing truck access along Marine Drive and within our mill facility, including the ability to route truck traffic to avoid waits and delays. We will be operating 24/7 and 365 days per year.

7850 Jefferson St NE #150
Albuquerque, NM 87109
505.224.2300

1815 Marine Dr
Port Angeles, WA 98363
360.565.7070

County Rd. 19
Prewitt, NM 87045
505.972.2100

For these reasons, we write to urge the Department of Ecology to accept the preferred cleanup remedies proposed in the RI/FS for the sub-areas, called sediment management areas (SMAs). They are consistent with the state environmental cleanup regulations.

McKinley is opposed, however, to more extensive work that is not necessary to protect human health and the environment and that could impede or interfere with our re-started mill operations. While we are concerned about the extent and impact of the proposed intertidal excavation and capping described in the preferred alternatives for the SMAs, we know that if the areas to receive that treatment were to increase or the work required were more intrusive, it would have an adverse effect on our operations of the mill. While impacts to operational efficiencies are a primary consideration, we are also very concerned about public and worker safety, given the volume of truck traffic that will be moving in and out of the mill for paper production.

We ask that Ecology please accept this public review draft of the RI/FS and allow this process to move on.

Feel free to contact me if you have any further questions or comments on the matter.

Best regards,



Wilfrido Rincón
Managing Director
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