

Timothy Goodman

The Washington State Department of Natural Resources appreciates the opportunity to comment on the Draft Cleanup Action Plan and Supplemental Remedial Investigation and Feasibility Study for the Upland Area of the Port Gamble Bay and Mill Site.

Please add a figure and text to communicate ownership of the study area and remedial action areas. It appears that certain of the areas proposed for capping are very close to the State owned aquatic lands (SOAL) boundary line and it is difficult to definitely discern ownership with the available figures. If areas designated for capping are on SOAL, than the cleanup proponent will need to coordinate with DNR on access.

One of the primary concerns of DNR is that the preferred remedy does not result in long-term mobilization and re-adsorption of contamination in adjacent sediment on SOAL. DNR is pleased to read that tidal pumping studies were completed and the cleanup proponent performed some degree of fate and transport modeling based on reasonably conservative assumptions. Since the DCAP and RI/FS presented limited descriptions of the modeling, DNR would appreciate the opportunity to review or be briefed on the detailed technical aspects of fate and transport assumptions and calculations. Additionally, DNR looks forward to reviewing the engineering design details of the upland caps when available.