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Sent: Wednesday, July 30, 2025 8:11 AM

To: Abbett, Marian L. (ECY) <MABB461@ECY.WA.GOV>

Subject: Public Comment Submission – Port Angeles Rayonier Mill Study Area Cleanup

Ms. Abbett,

Thank you for this opportunity to comment on the proposed cleanup of the Rayonier Mill.

1. The soil cleanup is inadequate in leaving large quantities of contaminated soil on site to pose potential releases of contamination under a number of scenarios including earthquake, tsunami, and sea-level rise. In addition, hindering any future use of such a large area adjacent to the shore is inappropriate and clearly economically stupid.
2. The cleanup of the offshore areas is replete with “to be determined.” This creates the likelihood of further delays and controversies. It was also not clear how stable the ENR/capping will be under extreme conditions, again such as a tsunami.
3. The proposed cleanup, or rather lack thereof, of the Ennis Creek watershed, based on limited sampling that claimed no site-related contamination flies in the face of an earlier Ecology study (attached) that showed stack emissions from the mill caused substantial dioxin contamination in many areas of Port Angeles. It seems highly likely that the contamination along Ennis Creek is site-related and must be addressed.

Thanks,

Bob

Draft Report Available for Public Review and Comment

In 2008, Department of Ecology analyzed one soil sample from 85 different locations near and downwind of the Rayonier Mill property. The purpose of this sampling is to help determine:

- The concentration of dioxins and furans (referred to as dioxins in this fact sheet) in surface soils that might have been impacted by air emissions from the Rayonier Mill; and
- The former Rayonier Mill's contribution to measured dioxin contamination, compared to other possible sources.

Ecology released data in February of 2009 and now has further evaluation of the study. The draft report is ready for public review at the locations listed in the box on the right. Please submit comments by August 30, 2011.

Study Conclusions

Chemical and spatial patterns in the data indicate that the former Rayonier Mill was one source of dioxins. Other sources also contributed to the dioxins found in this study. Ecology did not design this study to determine the boundaries of Rayonier's responsibility or assess human health risk. Instead, it identifies areas of concern and potential sources. Under state cleanup law, Rayonier must address its off-property dioxin contamination.

Figure 1 compares the data to a level of 11.1 parts per trillion (ppt) TEQ.* This is the "Method B" direct contact value for protection of human health. Above 11.1 ppt, there is greater than a one-in-a-million additional cancer risk, depending on type and length of exposure. Forty samples had above 11.1 ppt TEQ.

Figure 1. Soil dioxin concentrations in parts per billion (ppt) TEQ*



*TEQ is a measure of the toxicity of a dioxin mixture. For more on TEQs, see the Reading Guide, available online and at the locations listed to the right.

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Comments Accepted

July 14–August 30, 2011

Submit Comments and Questions to:

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DOCUMENT REVIEW LOCATIONS

Port Angeles Public Library
2210 South Peabody Street
Port Angeles, WA 98282
Phone: (360) 417-6300

Peninsula College
1502 E. Leighton Blvd.
Port Angeles, WA 98282
Phone: (360) 417-6280

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Contact Debbie Nelson,
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Ecology's Toxics Cleanup website
http://www.ecy.wa.gov/toxicscleanup/soil/index_brachmanrayonierOffPropulRayonierCRP.asp

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