

Rayonier Pulp Mill Site, Port Angeles, WA; Comments on Proposed Cleanup

Thank you for the opportunity to comment. As you may or may not know, I became involved with the Rayonier site back in the 1990's as a site assessment manager with the EPA. We conducted an extensive Environmental Site Assessment on the property as well as some surrounding properties and Port Angeles Harbor. At the conclusion of this assessment, I recommended to EPA management that this site be placed on the National Priority List. This was met with a lot of resistance, particularly on the part of Rayonier, the City and Port of Port Angeles as well as Ecology. We were told that the clean up would go "faster, better, cheaper" with Ecology in charge. It is now 2025, so much for "faster". I no longer work for EPA and my comments are strictly my own.

While at the public meeting, I was informed that Ecology and Rayonier have entered into a Consent Decree for the cleanup. This has taken a very long time. I believe both Rayonier and Ecology should be embarrassed about this. Rayonier, has been dragging their feet about this cleanup for a very long, long time. It seems that they prefer to pay lawyers to delay the project rather than focus on getting the job done. I encourage Ecology to stand strong and not bend to any political maneuvers that Rayonier may try to use to further delay.

I was very disappointed that there were no representatives from Rayonier or their consultants at the public meeting. I hope you will convey this sentiment to them. As a responsible party, and a former prominent member of the community, I believe it was their duty to show up.

Overall, I thought the cleanup plan was solid and comprehensive. I am concerned about the timing. Ten years is a very long time. It has already been a very long time since this site first came to EPA's attention. For reference, when I first started working on this project my daughter was 7 years old, she is now 34....! 27 years is a very long time.

I had a few general comments and questions.

- There are a number of operable units that go into the cleanup. Do these units have specific schedules? Will these schedules be shared with the public?
- Air sparging is proposed to cleanup the contaminated groundwater. The air sparging units are located next to the shoreline. It is likely there will be saltwater intrusion. Has this method been tested in salt water environments?
- Ennis Creek. This used to be an important salmon stream. I believe that the schedule for restoration should be accelerated. Also, how many samples are proposed for the creek? The sampling locations on the diagram appeared to be limited. Will samples be collected at multiple times during the cleanup to

confirm the cleanup is effective? At what depth with the sediments samples be collected?

Thank you for the opportunity to comment. I look forward to hearing more about Ecology's progress on this important project.

Sincerely,

Joanne LaBaw
Joanne.labaw@gmail.com