Washington Department of Health (James Watt, PhD)

Hi Marian,

Washington Department of Health, Site Assessment and Toxicology section (SATS) reviewed the Interim Action Plan for Port Angeles Rayonier Mill Study Area (Feb 2025), with particular interest in the proposed cleanup levels, conceptual site model, and future remedial actions as they pertain to protection of human health. SATS has the following comments/questions:

Pg. 30 – Section 4.2

In Section 4.2, the plan states that soil CULs are set to Unrestricted Land Use but suggests that this will be re-evaluated if the PLP demonstrates that future use of the land will be industrial. SATS recommends that this standard remains the most stringent to protect human health, and as a corollary, it would allow for future unrestricted use of the property. Furthermore, in 6.2.1, the plan states that, "all soil exceeding the unrestricted land use soil CULs…will be excavated" and that soil will be sampled, "during remedial design to refine the remediation footprint both laterally and vertically". With the soil standard open to being re-evaluated, it raises the possibility that the cleanup footprint will be reduced while this process is underway, should the CULs revert to industrial. It would be most efficient to excavate where applicable to the stricter standard while the process is already underway, rather than have to revisit this process in the future, introducing a new environmental impact. This would also provide a "more permanent cleanup action for all or part of the site", as stated in section 6.3, Rationale for Selecting the Remedies.

Pg. 69 – Table 4-4

This shows the sediment cleanup levels (CUL) for the COCs. Although the table is titled, "Sediment Cleanup Levels Protective of Human Health", for most chemicals the CUL is Regional or Natural Background. SATS agrees that these numbers are lower than those derived from human health screening calculations for specific populations interacting with the site, but it is inaccurate to infer that these values were derived from human health-protective exposure estimates. It would be informative to include, in the table, human health-based values (specifically, the most conservative, with the exposure model population identified) to provide this comparison, especially because MTCA permits cleanup screening levels to be set higher than levels based on protection of human health.

The Regional Background for cPAH TEQ is listed as 64 ug/kg, but in the cited Ecology document (North Olympic Peninsula Regional Background Sediment Characterization (2016)), cPAH TEQ is listed as 31 ug/kg (natural background 16 ug/kg). However, in Ecology (2016), there is also a Port Angeles-specific value of 64 ug/kg which used samples from Port Angeles Harbor combined with three other locations. This runs counter to WAC 173-204-560 (5)(d): "Calculation of regional background for a contaminant must exclude samples from areas with an elevated level of contamination due to the direct impact of known or suspected contaminant sources, including areas within a sediment cleanup unit or depositional zone of a discharge." Although this cleanup plan follows the standard set by Ecology in the 2016 Regional Background document, it is worth stating that the Regional Background here includes Port Angeles-specific data that make the cleanup levels less conservative than if they had been derived from areas not influenced by the PLP.

Thank you for the opportunity to comment on this Interim Action Plan. Please feel free to reach out if you if have questions or would like any further clarifications.

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