



DEPARTMENT OF
ECOLOGY
State of Washington

Portac Inc. Tacoma Site (Parcel 15) Responsiveness Summary

*Ecology's response to public
comments*

Facility Site ID: 1215

Cleanup Site ID: 3642

June 2021

Document and Contact Information

This document is available on the Department of Ecology's Site webpage at:
<https://apps.ecology.wa.gov/gsp/sitepage.aspx?csid=3642>

For more information contact:

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Summary

The Portac Inc. Tacoma Site (Site) is about 52 acres located at 4215 E Frontage Rd. (SR 509) next to Wapato Creek in the Tacoma Tideflats. The Port of Tacoma (Port) owns the Site. The Port is the potentially liable person (PLP) responsible for cleanup of contamination at the Site.

The Washington Department of Ecology (Ecology) held a public comment period from April 22 to May 23, 2021, inviting comment on the following cleanup documents:

- [Remedial Investigation \(RI\) Report](#)¹ and three volumes of appendices. The Report and Appendices are available at our [Site webpage](#)². The RI describes conditions and contamination at the Site.
- [Feasibility Study \(FS\)](#)³ and [FS Addendum](#)⁴. The FS and FS Addendum compare alternatives for cleaning up the contamination.
- [draft Cleanup Action Plan \(dCAP\)](#)⁵. The dCAP describes Ecology's plan for cleaning up contamination at the Site.
- [Agreed Order DE 15816](#)⁶. The AO is a legal agreement between Ecology and the Port that requires the Port to implement and maintain the cleanup actions described in the Cleanup Action Plan.
- [State Environmental Policy Act \(SEPA\) Determination of Non-Significance](#)⁷. The SEPA document describes Ecology's determination that cleanup activities are not likely to harm the environment.

The Site was a log yard and sawmill (see Figure 1). It was contaminated in the 1970s when slag (waste) from the Asarco smelter was brought to the Site to support roads for heavy equipment. At the sawmill, a wood preservative containing pentachlorophenol (PCP) was used. The PCP contaminated soil and groundwater. Prior cleanups included construction of a concrete cap to cover soil containing arsenic and a stormwater system to control movement of water off the cap. Contaminated soil was removed and properly disposed of off-site. Decreasing PCP concentration is still present in one monitoring well in the area where lumber was dipped into a tank containing PCP. The amount of PCP in groundwater is decreasing because of biological activity in the soil.

¹ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=84711>

² <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=3642>

³ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=91934>

⁴ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=91947>

⁵ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=98639>

⁶ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=98638>

⁷ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=99859>

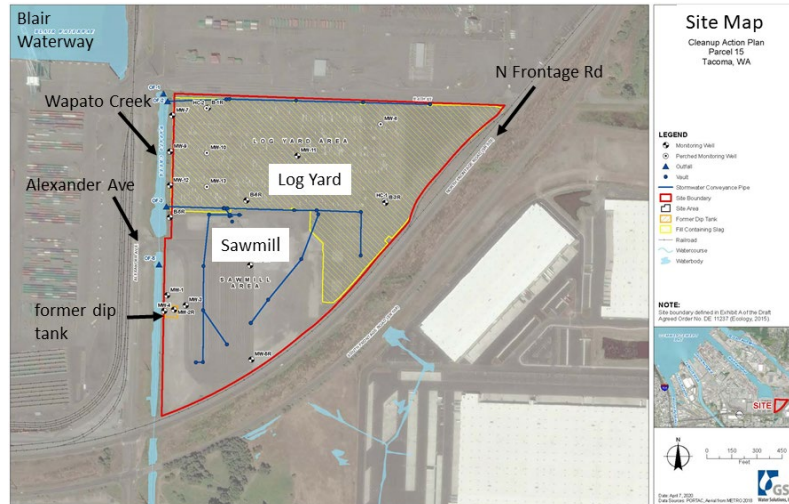


Figure 1. The location where the log yard and sawmill were located.

The cleanup plan describes how to prevent exposure of stormwater and surface water to arsenic-contaminated soil and groundwater, and prevent exposure of surface water to PCP-contaminated groundwater. The stormwater collection system will be improved and a permeable reactive barrier will be installed next to Wapato Creek on the northwestern corner of the Site. The barrier reduces arsenic in groundwater as it moves through the barrier. Groundwater will be monitored downgradient of the barrier to ensure its effectiveness and show that PCP contamination continues to decrease. When the Site is ready for redevelopment, a new improved cap will be constructed under a separate agreed order.

We used various methods to notify the public about the comment period for public review of the cleanup documents. We mailed a [fact sheet](#)⁸ to addresses within about ¼ mile of the Site. We sent an email notice to people and organizations who requested to be notified about cleanup sites on the Tacoma Tideflats. Public notice about the comment period was included in Ecology’s Site Register and events calendar. The Site webpage was updated with information about the comment period, where to submit comments, and how to download electronic documents. Notice was placed in Ecology’s SEPA register and sent to SEPA contacts for the Tideflats area. We placed a legal ad with information about the comment period in the Tacoma News Tribune.

Ecology received a comment from an individual and from an organization, Citizens for a Healthy Bay (CHB). We appreciate the thoughtful information in the comments. We considered the comments and did not change the documents (RI/FS, dCAP, AO DE 15816, and SEPA) under review during the comment period.

⁸ <https://apps.ecology.wa.gov/gsp/docviewer.ashx?did=99985>

Our response to comments are emails that were sent to the commenters. Our email responses are included in the next section of this report. The final section are the comments we received.

Response to Comments

Ecology's response to the comment from Mary Miller Chapman

From: Smith, Andrew (ECY)
To: mmchap99@msn.com
Cc: Davis, Nancy D. (ECY); Smith, Andrew (ECY)
Subject: Response to Comment on Portac Inc Tacoma Site (aka Parcel 15)
Date: Friday, June 11, 2021 4:33:15 PM

Mary,

Thank you for taking the time to review the remedial investigation, feasibility study, draft clean-up action plan and agreed order for the Parcel 15 site. We appreciate your support of this project.

Andrew Smith, PE., LPG
Unit Supervisor UST/Technical Support Unit
Toxics Cleanup Program, SWRO
360-407-6316
Work Cell 360-485-3987
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Ecology's response to the comment from Citizens for a Healthy Bay (Erin Dilworth)

From: Smith, Andrew (ECY)
To: edilworth@healthybay.org
Cc: Char.Naylor@PuyallupTribe-nsn.gov; Davis, Nancy D. (ECY); Smith, Andrew (ECY)
Subject: Response to CHB Comments on Portac Inc Tacoma Site (aka Parcel 15)
Date: Friday, June 11, 2021 4:28:17 PM

Erin,

Thank you for taking the time to review the remedial investigation, feasibility study, draft clean-up action plan and agreed order for the Parcel 15 site. Your comments are summarized as two main concerns.

- 1) CHB Comment: The likely contaminants at this site, based on other sites containing ASARCO slag, include arsenic, iron, calcium, and potentially significant concentrations of aluminum, antimony, barium, copper, lead, manganese, molybdenum, tin, titanium and zinc among other metals. Ecology needs to ensure that the nature and extent of these contaminants are investigated. Many of these contaminants are regulated by the Model Toxics Control Act (MTCA), and a thorough RI is needed to ensure the site is not in violation of MTCA standards.

Ecology Response: Numerous studies were done at the site during the 1980's. These studies determined that the contaminants of concern (COCs) identified at that time were arsenic, copper, lead and zinc in the soil and groundwater. A roller-compacted concrete cap and stormwater controls were constructed as the remedy for that original work in 1990. Groundwater data from previous studies indicated that concentrations of copper, lead and zinc were low to non-detectable. The arsenic concentrations were at least one thousand times higher than the other metals. Based on this information, the main focus of the latest RI/FS and CAP concentrate on the nature and extent of arsenic. In addition, the remedies that were selected for the cleanup of the site for arsenic will also work similarly for the other metals. Therefore, the removal of arsenic from groundwater due to the permeable reactive barrier wall will also result in the removal of concentrations of copper, lead and zinc.

- 2) CHB Comment: The Washington Department of Health's Office of Drinking Water and the Fife Department of Public Works (Site ID 25050) show that groundwater at the site is contaminated with arsenic and is a human health concern. This groundwater is used for drinking water by a community that is largely composed of indigenous people, including members of the Puyallup Tribe of Indians. It is critical that immediate action be taken to address this groundwater contamination, and ensure that it meets human health criteria.

Ecology Response: The arsenic in the groundwater is limited to the boundary of the site. The objective of the remedial action is to control or treat the contaminated groundwater as it leaves the site. As part of the remedy, an environmental covenant will be placed on the site limiting the use of the site groundwater for drinking water. In addition, the groundwater at the site is considered to be non-potable because the total dissolved solids is greater than 10,000 mg/l (WAC 173-340-720 (2)(b)(ii) and it is adjacent to marine waters (WAC 173-340-720 (2)(d)).

We appreciate you taking the time to review these documents. We value your input and if you have any additional concerns moving forward, please don't hesitate to contact me.

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Comments Received

Comment from Mary Miller Chapman

Ecology is entering into a legal agreement called an Agreed Order DE 15816 with the Port of Tacoma (Port) to cleanup arsenic and pentachlorophenol (PCP) contamination at the Portac Inc Site in the Tacoma tideflats.

I fully support this effort, and wish you all the best. Many thanks for the work you have done to this point, and continue to do!

Mary Miller Chapman

Comment from Citizens for a Healthy Bay (Erin Dilworth)



May 23, 2021

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Ecology PO Box 47775
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Andrew.Smith@ecy.wa.gov
Submitted electronically

Executive Director
Melissa Malott

Re: Comments on Portac Inc Tacoma Site (aka Parcel 15) Agreed Order (AO), Remedial Investigation (RI), Feasibility Study (FS), Draft Cleanup Action Plan (dCAP), State Environmental Policy Act (SEPA) Checklist, and SEPA Determination of Non-Significance (DNS)

Board of Directors
Desiree Wilkins Finch

Dear Mr. Smith,

Barry Goldstein
Anders Ibsen
Jennifer Keating
Melissa Nordquist
Candice Ruud

Thank you for providing the opportunity to review and comment on the Parcel 15 AO, RI, FS, CAP, SEPA Checklist, and SEPA DNS.

Anne Taufen
Sheri Tonn
Alan Varsik

Citizens for a Healthy Bay (CHB) is a 31-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

Raeshawna Ware

Due to the volume of documents to review during a time of high permitting activity around Commencement Bay, CHB staff and expert members of CHB's Policy and Technical Advisory Committee have not been able to thoroughly review these documents, but are very familiar with the industrial activities on site and

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their associated contamination impacts. Our high-level comments are outlined below.

The likely contaminants at this site, based on other sites containing ASARCO slag, include arsenic, iron, calcium, and potentially significant concentrations of aluminum, antimony, barium, copper, lead, manganese, molybdenum, tin, titanium, and zinc, among other metals. *Ecology needs to ensure that the nature and extent of these contaminants are investigated.* Many of these contaminants are regulated by the Model Toxics Control Act (MTCA), and a thorough RI is needed to ensure the site is not in violation of MTCA standards.

The Washington Department of Health's Office of Drinking Water and the Fife Department of Public Works (Site ID25050) show that groundwater at the site is contaminated with arsenic and is a human health concern. This groundwater is used for drinking water by a community that is largely composed of indigenous people, including members of the Puyallup Tribe of Indians. *It is crucial that immediate action be taken to address this groundwater contamination, and ensure that it meets human health criteria.*

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Parcel 15 AO, RI, FS, CAP, SEPA Checklist, and SEPA DNS.

Sincerely,



Erin Dilworth
Policy & Technical
Program Manager
Citizens for a
Healthy Bay
253-383-2429 ext. 3
edilworth@healthybay.org

cc: Char Naylor, Puyallup Tribe of Indians