Contingency and Emergency Action Plan

for the

Superlon Plastics Site

Tacoma, Washington

Prepared for

The White Birch Group LLC
2116 Taylor Way
Tacoma, WA 98401

and

The Chemours Company FC, LLC
1007 Market Street
Wilmington, DE 19899

July 2021

PERC

Pacific Environmental Redevelopment Corporation
8424 East Meadow Lake Drive
Snohomish, WA 98290
425.827.6867

PIONEER Technologies Corporation
5205 Corporate Center Court SE
Suite A
Olympia, WA 98503
360.570.1700

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WA State Department
of Ecology (SWRO)

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ABBREVIATIONS AND ACRONYMS:

ACRONYM	DESCRIPTION
Chemours	The Chemours Company
DuPont	E.I. du Pont de Nemours and Company
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
Grasselli	Grasselli Chemicals Department
Latimer-Goodwin	Latimer-Goodwin Chemical Company
LQG	Large Quantity Generator
NPL	National Priorities List
PERC	Pacific Environmental and Redevelopment Corporation
PIONEER	PIONEER Technologies Corporation
RCRA	Resource Conservation and Recovery Act
SEPA	State Environmental Policy Act
The Companies	White Birch LLC and The Chemours Company FC, LLC

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1.0 Facility Information

The information in this plan has been developed for the following site:

Superlon Plastics Model Toxic Control Act Site
2116 Taylor Way
Tacoma, WA 98421-4302

EPA IDENTIFICATION: Large Quantity Generator (#WAH00036320)

The Superlon Plastics Model Toxics Control Act (MTCA) cleanup site is located in Tacoma, Washington. The site is located at 2116 Taylor Way, Tacoma, WA 98421-4302. Refer to Figure 1 for a layout of the property.

The Superlon MTCA site is being investigated and remediated consistent with an Agreed Order, number DE 5940, between White Birch Group LLC (White Birch), The Chemours Company FC, LLC (Chemours), E.I. du Pont de Nemours and Company (DuPont), and the State of Washington Department of Ecology (Ecology). Ecology has made a determination that the site is contaminated, an investigation must be conducted to determine the nature and extent of the contamination, and that remedial measures will be taken to address any identified threats to human health and the environment[1].

Hazardous waste will be generated as part of the soil remediation and subsequently the Superlon MTCA site will be classified as a Large Quantity Generator (LQG) of Resource Conservation and Recovery Act (RCRA) hazardous waste. This action has been evaluated as part of a State Environmental Policy Act (SEPA) Checklist by Ecology.[2]

The facility's United States Environmental Protection Agency (EPA) generator identification number is WAH00036320. As a LQG of hazardous waste, the site is required to have a Contingency Plan.

[1] https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2096
[2] https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=67489 and https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=71590

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2.0 Purpose

This plan has been prepared to cover remediation activities being conducted at the Superlon Plastics MTCA Site. The purpose of the plan is to identify emergency situations that may result from interim actions, remedial investigations, and potential remedial operations being conducted at the site to identify emergency response, evacuation, and incident reporting procedures that will be taken in the event of an emergency.

This plan has been developed for the Superlon Plastics MTCA Site and is designed to minimize hazards to human health or the environment from fires, explosions, tornadoes, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, surface or groundwater.

In addition, this Contingency Plan will demonstrate facility specific emergency procedures needed for medical emergencies and civil disturbances.

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3.0 Site History

A history of property ownership is as follows:

- In 1925, Latimer-Goodwin Chemical Company (Latimer-Goodwin) purchased an approximately five-acre parcel from Buffelen Lumber & Manufacturing Company. Latimer-Goodwin developed this property and manufactured lead arsenate, a fruit orchard pesticide, on the Property.
- In 1944, Grasselli Chemicals Department (Grasselli), a subsidiary of DuPont, purchased Latimer-Goodwin's land parcel and lead arsenate manufacturing facility, including processes, inventories, select contracts, goodwill, and trademarks. In 1945, DuPont purchased another one-acre land parcel from Buffelen Lumber & Manufacturing Company. Grasselli continued to manufacture lead arsenate and calcium arsenate insecticides until in 1946, and operated dust mixing operations and warehousing of agricultural chemicals until 1949. Grasselli also used the Property as their western U.S. sales office. Documentation obtained from DuPont indicates that Grasselli also operated a development program for insecticides in the northwest fruit growing area. According to DuPont this was a market development program. Based on historical aerial photographs and Sanborn maps, the lead arsenate manufacturing facility has been confined to Parcel A. The extent of DuPont land holdings was based upon a title search performed in 2007. In 1946 and 1951, portions of DuPont's land holding were sold to the City of Tacoma (Parcel C) and Buffelen Lumber Manufacturing Company (Parcel D), respectively. However, the Property remained in DuPont's possession.
- In 1951, DuPont sold the remaining land holding (Parcels A and B, totaling 6.07 acres), including the Property (Parcel A), to V.C. Monahan, who operated as Cabin Creek Lumber Company. In 1968, V.C. Monahan divided the land holding and sold 3.1 acres (Parcel A) to Justus Company, Inc. for use as a wood treatment facility.
- In 1972, Frank B. Lynott, of Justus Cedar Homes and Lindal Cedar Homes, ceased operation of the wood treatment facility on site and sold the 3.1 acre Property (Parcel A) to Mr. Ragnar M. Nars, operating as Superlon Plastics Company, Inc. (Superlon). In 1976, Parcel B was sold to Scott and From Co., Inc.
- From 1992 to present, ownership of the Property (Parcel A) was subdivided evenly into thirds, all of which were reconsolidated and granted through a series of quit claim deeds to White Birch Group, LLC.

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4.0 Current Conditions

The Property is currently owned by White Birch, LLC and operated by Superlon Plastics Inc., an extruded plastic pipe manufacturer. Taylor Way borders the northeast edge of the property. Beyond Taylor Way is a property owned by the Port of Tacoma. The property is bounded to the north by a railroad right-of-way owned by the City of Tacoma Public Works (Parcel D). Beyond this right-of-way is a vacant triangle shaped parcel of land owned by the Port of Tacoma. To the northwest are Lincoln Avenue and a warehouse operation. To the south and southwest is Port of Tacoma property, which is leased and operated as the Haub Log Yard. The property to the southeast is owned by RTH Tacoma, LLC and leased and operated by Fields Products, a roofing and waterproofing products manufacturing business.

The Property is located in a highly industrial area of the Tacoma Tidal Flats located between the Blair and Hylebos Waterways. Several known toxics cleanup sites are within 0.25 miles of the facility including two chemical manufacturing plants; the Reichold Chemical/SSA Container site and the Autofina (formerly ELF Atochem) site and the former Murray Pacific Log Yard #1, which is owned by the Port of Tacoma. The Hylebos Waterway National Priorities List (NPL) site is located less than 0.5 miles to the northeast.

The Tidal Flats were filled and developed in the early 1900s. Fill materials in the general area include dredge materials, native soils and various types of waste and debris including slag. The Property shows evidence of historical filling activities; however, the nature and origin of the fill material are unknown.

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5.0 Definitions

The following definitions are applicable to the implementation of this plan:

EMERGENCY is any situation which cannot be immediately controlled by assigned site or contract personnel, and:

1. Which results in or has the potential to result in a fire or explosion that could harm human health or the environment,
2. Which results in human injury or has a serious potential for human injury,
3. Which results in the use of water and/or chemical suppressants resulting in contaminated runoff, or
4. Which results in the release or the serious potential of a release of toxic substances above permissible exposure limits to the environment.

INCIDENT includes a fire, spill, fume release, or medical emergency that can be controlled within its area by site or contract personnel.

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6.0 Responsibilities and Duties

Due to the inconsistent timing of remediation projects, the primary contact may or may not be on-site. The primary emergency coordinator is:

Kenny King, Site Supervisor
Pacific Environmental and Redevelopment Corporation

The secondary emergency coordinator to be contacted in case the primary coordinator is unavailable is:

Jeff King, Project Manager
Pacific Environmental and Redevelopment Corporation

The Chemours emergency contact for the site to be contacted if the primary and secondary coordinators are unavailable is:

Sebastian Bahr, Project Director
Chemours Corporate Remediation Group

The primary emergency coordinator is responsible for and has the authority to commit time sensitive resources and funds, and to coordinate all emergency response measures for the site. In addition, he is responsible for being thoroughly familiar with:

1. The facility Contingency and Emergency Response Plan,
2. The operations and activities at the facility,
3. The location and characteristics of waste handled at the site,
4. The location of all records necessary to assist and implement the Contingency and Emergency Response Plan within the facility, and
5. The physical layout of the facility.

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7.0 Contingency Plan Implementation

If the emergency coordinator, designee, or on-site personnel determines there is an emergency or an imminent/actual threat to human health or the environment at this facility, immediate implementation of this contingency plan will be done. The following are examples outlining when this contingency plan will be implemented:

Fire or Explosion

- Fire occurring in the hazardous waste storage area
- Explosion in the hazardous waste storage
- Brush / Grass Fires
- Truck Fires
- Fire in the on-Site laboratory

Spills

- A sudden or non-sudden release which poses a threat to public health or the environment or is an uncontrolled release of a reportable quantity of a hazardous substance
- A release on-site that has been contained yet the potential exists for contamination of soil, surface water, or groundwater
- A release from containment, resulting in potential soil, surface-water, or groundwater contamination

Acts of God

- Earthquake
- Tornado
- Storms and severe weather

Medical Emergencies

- Cuts, bruises, small burns
- Broken bones
- Eye contamination

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8.0 Emergency Response Procedures

Fire or Explosion

If a fire, explosion, or smoke is detected then the following actions will be taken:

1. Assess possible direct and indirect hazards to human health or the environment that may result or have resulted from the fire, explosion, or smoke.
2. Evaluate the fire or explosion – if fire is the result and is small enough to be extinguished, use a portable fire extinguisher to put out fire – if in doubt, do not try to extinguish– EVACUATE.
3. Warn others in the area.
4. Proceed to the site Designated Rally Spot (Figure 1).
5. Take a head count.
6. If fire or explosion may compromise the Superlon Plastic's property, notification to the appropriate personnel will be completed – see list of contacts in Appendix A.
7. Call the Fire Department - 911 - (if possible).
8. Secure the area until emergency assistance arrives.
9. Meet emergency crew and advise fire chief of location and nature of the situation.

Hazardous Waste Releases (Spills)

If a spill occurs or is found then the following actions will be taken.

1. Identify the character, exact source, amount, and the real extent of any released material.
2. Assess possible direct and indirect hazards to human health or the environment that may result from the release.
3. Notify appropriate State or local agencies (as necessary).
4. Determine if evacuation of local areas outside of the facility is required, immediately notify the USEPA National Response Center at (800) 424-8802.
5. Ensure that releases will not recur or spread to other hazardous waste (if in the vicinity) at the facility (e.g. contain the release, via isolating the leak, over-packing a container, or stopping operations if necessary).
6. Provide treatment, storage and disposal of any material that is generated as a result from the release immediately.
7. Record the time, date, and details of any incident that requires implementing the contingency plan and submit a written report on the incident to the appropriate agency within 15 days of the incident.

Appropriate spill response equipment should be employed as needed to contain or control any spill or release. The location of spill response equipment is listed in Appendix B.

Earthquake or Significant Disturbances

All personnel and visitors should do the following:

- Remain calm. Do not attempt to evacuate.
- If indoors, find shelter under a desk or sturdy table. A doorway may provide some shelter if a piece of furniture is not immediately available.
- If outdoors, find a clear spot away from buildings, trees, and power lines.
- If you are in a vehicle, slow down and drive to a clear place. Stay in the vehicle until the shaking stops.
- Avoid places where objects may fall from overhead storage or near outside walls and windows.
- Follow instructions from the Emergency Coordinator or designated alternate.
- If the occurrence is an earthquake, once the building/ground stops shaking, follow the designated evacuation route quickly. If outside, stay away from buildings, trees, and electrical lines.
- Gather at the designated rally spot and take a head count.
- Secure immediate first aid.
- Secure the area and assess emergency assistance requirements.
- Meet the emergency crews and advise them of the situation.

Medical Emergencies and Basic First Aid

The following site personnel are trained in basic first aid:

Kenny King, Site Supervisor

Chemours Contractor personnel may have basic first aid training as well. Individuals with first aid training should identify themselves if there is a medical emergency.

Local first aid and emergency responders (Appendix A) will be requested if medical assistance above basic first aid is needed. An employee should not provide medical attention unless they have been trained and have the necessary supplies available. Avoid contact with blood, body fluids, or other potentially infectious material by using protective equipment and safe practices.

First aid kits are available at the following locations:

1. Personnel contamination reduction corridor locker room
2. Field vehicles (potentially)
3. Office trailer and laboratory

9.0 Evacuation Procedures

Evacuation routes (Figure 1), including the designated rally spot, are posted at the following locations:

1. Office and safety tailgate meeting area
2. Personnel contamination reduction corridor (locker room)

Employees should become familiar with all evacuation routes and assembly areas. In the event of an evacuation, the Primary Emergency Coordinator will:

1. Conduct a headcount at the designated rally spot (Figure 1).
2. Stay in the rally spot until all personnel and site visitors have been accounted for and until personnel are authorized to leave the premises (if necessary).
3. If personnel are required to leave the site, personnel will not be able to return until authorized.

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10.0 Personnel Training

All on-site personnel will be briefed on the contents of this contingency plan once a year. An attendance sheet documenting this training is included as Appendix C. The attendance sheet will be retained in the project records.

On-site Availability

This plan is maintained in the field office of the emergency coordinator. Any employees or contractors performing work at the site should have access to this plan. All personnel on-site are required to become familiar with this contingency plan.

Off-site Availability

Copies of the plan have been submitted to the following organizations:

1. Tacoma Fire Prevention Bureau
2. Tacoma Fire Department, Station 12, HAZMAT
3. Washington State Department of Ecology
4. Tacoma Fire Department
5. St. Joseph Medical Center
6. Tacoma Police Department

Copies of the letters are attached in Appendix D.

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11.0 Record Keeping and Incident Reports

The emergency coordinator will notify agencies and local authorities (Appendix A) when required. Typically, this will occur if the emergency could threaten human health or the environment outside the facility, and if the initial assessment indicates that evacuation of local areas may be advisable.

When required, an initial verbal report to applicable agencies may be required. An initial verbal report must include the following:

- Name and phone number of reporter
- Name and address of facility
- Time and type of incident
- Name and quantity of material(s) involved to the extent known (if applicable)
- Extent of injuries (if any)

As required by the State of Washington any emergency requiring implementation of this Contingency Plan will be reported in writing within **15 days** to the local Emergency Planning and Response Commission.

In addition, a copy of any completed report(s) will be maintained in Appendix E of this plan for future site records.

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12.0 Plan Maintenance

Amendments

This Contingency Plan will be reviewed and amended, if necessary, whenever **any** of the following occur:

- The applicable regulations are revised.
- The plan fails in an emergency.
- There are changes in facilities or materials stored on-site that increase the potential for fire, explosion or release of hazardous substances, or the necessary response in an emergency.
- The list of emergency coordinators and respective information profiles change.
- There is a change in the on-site emergency equipment listed in Appendix B of this document.

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Figures

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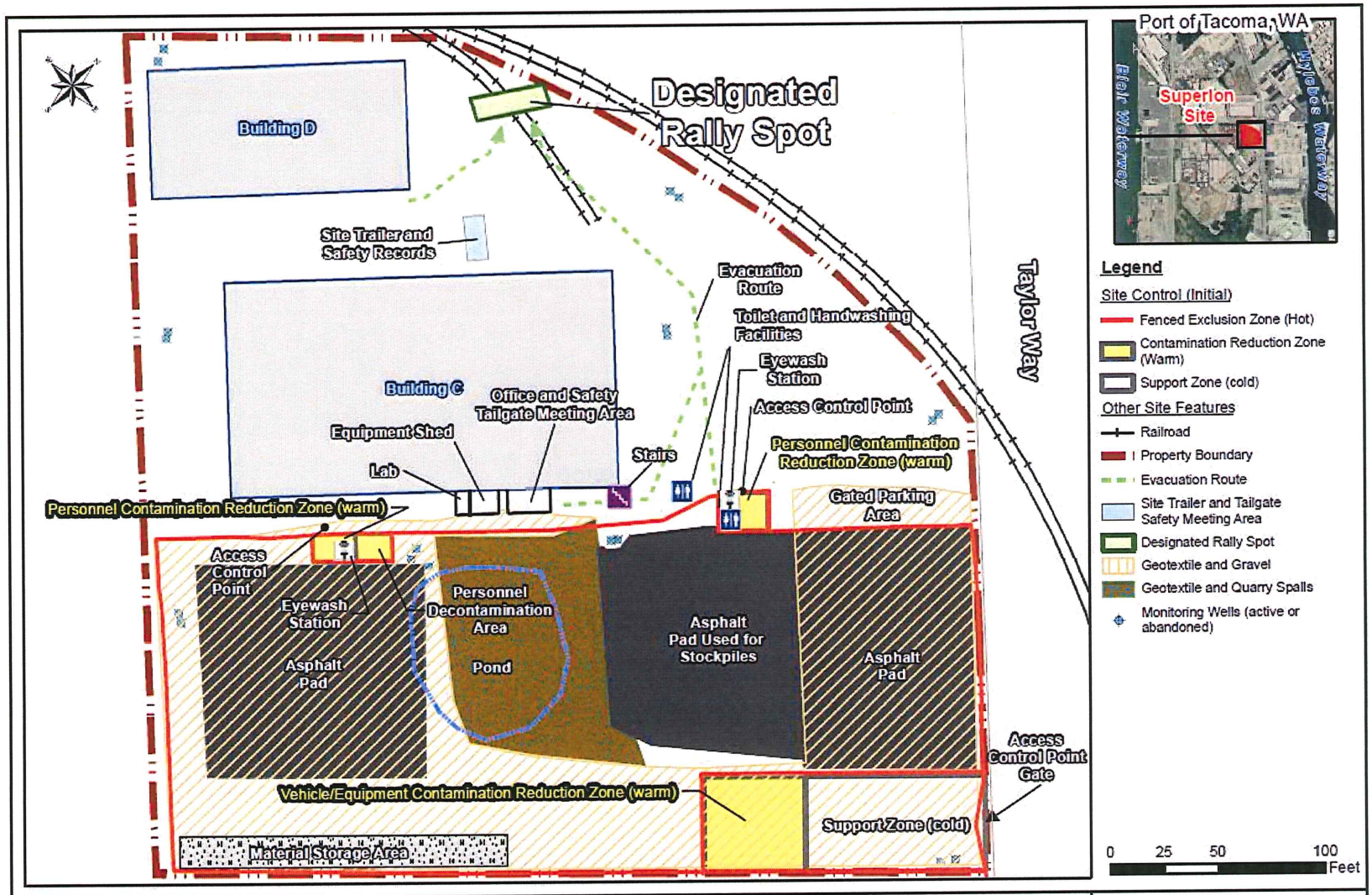

PIONEER TECHNOLOGIES CORPORATION

Site Features
Superlon Plastics Site
Tacoma, Washington

Figure 1

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Emergency Response Information

Response	Name	Phone
Fire	Tacoma Fire Department	911
Police	Tacoma Police Department	911
Ambulance	Tacoma Ambulance Department	911
Medical Emergency	St. Joseph Medical Center 1717 South J Street Tacoma, WA 98405	(253) 426-4101
CRG Project Director	Sebastian Bahr	Office/Cell: (609) 221-8253
PERC Project Manager	Jeff King	Office: (425) 827-6867 Cell: (425) 238-2212
Site Supervisor	Kenny King	Cell: (425) 346-0921
SPILLS (Environmental Release Contact)	Jeff King	Office: (425) 827-6867 Cell: (425) 238-2212
CRG Health & Safety Manager	Brian Ambrose	Office: (302) 528-6553
USEPA National Response Center	--	800-424-8801

The following contacts are posted at each emergency phone location:

Emergency Contact Information

Emergency Coordinator	Phone
Kenny King	Cell: (425) 346-0921
Jeff King	Office: (425) 827-6867 Cell: (425) 238-2212
Sebastian Bahr	Office/Cell: (609) 221-8253
City of Tacoma Fire Department	911
St. Joseph Medical Center	(253) 426-4101
24 Hour Emergency Response	911
USEPA National Response Center	(800) 424-8802

Site Medical, Fire, and Spill Response Equipment

Item	Location
First Aid Kit	Personnel contamination reduction corridor (locker room); office and safety tailgate meeting area; laboratory
Fire Extinguisher	Personnel contamination reduction corridor (locker room); office and safety tailgate meeting area; all heavy equipment; laboratory
Spill Kit	1. One by the containment cells on the Asphalt pad used for stockpiles within the hot zone 2. One in the southwest corner of the personnel contamination reduction corridor (locker room)
Shovel	In the storage shed next to the Personnel Decontamination Area
Disposable Gloves	Personnel contamination reduction corridor (locker room) and laboratory
Communication Equipment	Cell Phones

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The following personnel have reviewed this contingency and emergency response plan:

Name	Date

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This plan has been distributed to the following local agencies:

Date: August 27, 2010	Tacoma Fire Prevention Bureau Tom Pickford, Fire Inspector Fire Prevention Bureau 3471 South 35th Street Tacoma, WA 98402 Fax: (253) 594-7943 Phone: (253) 591-5740	Washington State Department of Ecology Southwest Regional Office Mr. Marv Coleman, Project Manager Toxics Cleanup Program 300 Desmond Drive SE Lacey, WA 98504-7775 Email: mcol461@ecy.wa.gov		
April 26, 2013	Tacoma Fire Department, Station 12 - HAZMAT Captain Tom Price 2015 54th Avenue East Tacoma, WA 98424 Email: tprice@cityoftacoma.org Fax: (253) 922-7683 Phone: 253-591-5712	Washington State Department of Ecology Southwest Regional Office Mr. Marv Coleman, Project Manager Toxics Cleanup Program 300 Desmond Drive SE Lacey, WA 98504-7775 Email: mcol461@ecy.wa.gov		
June 13, 2018	Tacoma Fire Department Allen Estes, Safety Battalion Chief 901 Fawcett Ave Tacoma, WA 98402 Phone: (253) 973-0094 Email: aestes@cityoftacoma.org	Washington State Department of Ecology Southwest Regional Office Mr. Marv Coleman, Project Manager Toxics Cleanup Program 300 Desmond Drive SE Lacey, WA 98504-7775 Email: mcol461@ecy.wa.gov	St. Joseph Medical Center Eileen Newton, Manager Emergency Preparedness Disaster Planning 1717 S J St, Tacoma, WA 98405 Phone: (253)426-6664 Email: eileennewton@chifranciscan.org	Tacoma Police Department Lt. Travis 3701 S Pine St Tacoma, WA 98409 Phone: (253) 830-6579
July 21, 2021	Tacoma Fire Department Allen Estes, Safety Battalion Chief 901 Fawcett Ave Tacoma, WA 98402 Phone: (253) 973-0094 Email: aestes@cityoftacoma.org	Washington State Department of Ecology Southwest Regional Office Joyce Mercuri, Project Manager Toxics Cleanup Program 300 Desmond Drive SE Lacey, WA 98504-7775 Phone: (360) 407-6858 Email: joyce.mercuri@ecy.wa.gov	St. Joseph Medical Center Eileen Newton, Manager Emergency Preparedness Disaster Planning 1717 S J St, Tacoma, WA 98405 Phone: (253)426-6664 Email: eileennewton@chifranciscan.org	Tacoma Police Department Lt. Travis 3701 S Pine St Tacoma, WA 98409 Phone: (253) 830-6579

This plan was amended on the following dates:
Date: April 26, 2010
Date: April 2013
Date: June 2018

Current Version: July 2021