



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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STATE ENVIRONMENTAL POLICY ACT
REVISED DETERMINATION OF NONSIGNIFICANCE

Superlon Plastics Site: Interim Action – Ditch Remediation

Date of Issuance (revised DNS): April 27, 2022

Original date of issuance: January 26, 2021, SEPA # 202100592

Lead agency: Department of Ecology, Toxics Cleanup Program, Southwest Region

Agency Contact: Joyce Mercuri, Cleanup Project Manager; joyce.mercuri@ecy.wa.gov; (360) 999-9590

Permit Number: Not applicable. Work is to be performed under the authority of a Model Toxics Control Act Agreed Order No. DE 5940.

Description of proposal: This Revised Determination of Nonsignificance (DNS) is for an expansion of excavation within a ditch located at the Superlon Plastics Model Toxics Control Act (MTCA) cleanup site in Tacoma, Washington (Cleanup Site ID # 2096). The excavation is to remove contaminated soil and sediment. Upon completion of the initially planned excavation in 2021, soil testing showed that the contamination continues beyond the initial excavation area.

Ecology is issuing this revised DNS and an amended SEPA checklist for the expanded excavation at the ditch.

The Superlon Plastics Site is located at 2116 Taylor Way in Tacoma, Pierce County, Washington. Arsenic and lead contamination at the site resulted from discharges at an arsenic- based pesticide manufacturing plant that operated on the Property from the 1920's through the 1940's. In 2021, contaminated sediments were removed from the bottom of a drainage ditch and from the embankment on the side of the ditch that is adjacent to the southwestern Property boundary. The ditch is part of the Port of Tacoma-managed stormwater conveyance ditch system.

The expanded project area will include excavation of contaminated sediments and underlying soils within an additional 446 foot length of the ditch, with a maximum width of 38 feet. The expansion includes a short north-south section of the ditch adjacent to the west side of the Superlon Property, and then continues westerly along Lincoln Avenue adjacent to Port of Tacoma property at 3408 Lincoln Avenue. Figure 4 in the SEPA checklist shows the expanded area of excavation. The work area will be accessed from a ramp into the ditch from the Superlon Property. An access pad approximately 10 feet wide will be constructed along the length of the ditch so that heavy equipment will not operate in roadways. As excavation and backfill proceeds, the access pad will be removed.

Ecology cleanup site manager oversight as well as under the requirements of a construction stormwater NPDES permit. Contaminated soils and sediments will be managed on the Superlon Property, using procedures for testing and disposal previously approved by the Department of Ecology for the cleanup excavations that are in process at the Property.

Location of proposal: The expanded excavation area is primarily located along Lincoln Avenue. The ditch is adjacent to 3408 Lincoln Avenue. Latitude 47.27023; Longitude -122.38532

Applicant/Proponent: The Chemours Company, FC, LLC; White Birch Group, LLC; E.I. DuPont de Nemours and Company.

Project representative:

Jeff King, Pacific Environmental and Redevelopment Corporation
E-mail: JKing@perc-nw.com
Phone: (425) 238-2212
Address: 8424 E. Meadow Lake Drive, Snohomish, WA 98290

SEPA Determination: Ecology has reaffirmed that the proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). We have updated the attached Environmental Checklist and the Supplemental Phase III Interim Action Work Plan – Ditch Remediation (PERC/Pioneer March 2, 2022). The work plan and this SEPA document are available at:
<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=2096>

This revised DNS is issued under WAC 197-11-340(2)(f).

The 14-day SEPA comment period for this Revised DNS will run from **May 5, 2022** to **May 19, 2022**.

Responsible official:

Rebecca S. Lawson, P.E., LHG, Section Manager
Toxics Cleanup Program, Southwest Region
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7600
(360) 407-6257

Signature 

Date April 27, 2022



SEPA ENVIRONMENTAL CHECKLIST (AMENDED)

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

A. BACKGROUND [\[help\]](#)

Name of proposed project, if applicable: **Superlon Plastics Site: Interim Action – Ditch Remediation.**

[Updated: This Amended SEPA checklist is for expansion of the ditch remediation area to include an additional 446' of the ditch. All new information is highlighted in blue italic font.]

1. Name of applicant: **White Birch Group, LLC (White Birch), E.I DuPont de Nemours and Company (DuPont), and The Chemours Company FC, LLC (Chemours)**

2. Address and phone number of applicant and contact person:

**Superlon Plastic Pipe Co. (Superlon)
2116 Taylor Way
Tacoma, WA 98421
Attn: Eivor Donahue – (253) 383 – 4400**

**Chemours Corporate Remediation Group
1007 Market Street, Office #3084
Wilmington, DE 19899
Attn: Sebastian Bahr (609)221-8253**

3. Date checklist prepared: **January 12, 2021** *[Updated: amended April 27, 2022]*

4. Agency requesting checklist: **Washington State Department of Ecology (Ecology)**

5. Proposed timing or schedule (including phasing, if applicable): **June 2021 – October 2021**
[Updated: June 2022 – October 2022]

6. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. **No future plans are connected with this proposal.**

[Updated: no additional expansions are anticipated.]

7. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The following reports relate to the proposed project:

- **PERC/PIONEER. 2017. Superlon Plastics Site: Remedial Investigation Phase IV Characterization of the Drainage Ditch Sediment – Results. February.**
- **PERC/PIONEER. 2020. Phase III Interim Action Work Plan – Ditch Remediation Version 2 for the Superlon Plastics Site Tacoma, Washington. August 31, 2020.**

[Updated: PERC/PIONEER, 2022. Supplemental Phase II Interim Action Work Plan - Ditch Remediation. March 2, 2022]

8. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the Property covered by your proposal? If yes, explain. **Yes. A Joint Aquatic Resource Permit Application (JARPA) is currently pending approval.**

[Updated: City of Tacoma Right of Way permit extension].

9. List any government approvals or permits that will be needed for your proposal, if known.

- **US Army Corps of Engineers approval of the Joint Aquatic Resource Permit Application (JARPA).**
- **Ecology's approval of Interim Action Work Plan for Ditch Remediation.**

[Updated: Reverification letter for U.S. Army Corps of Engineers Nationwide Permit #38 was issued for NWS-2019-613 on February 15, 2022. Ecology approved the Supplemental Phase III Interim Action Work Plan – Ditch Remediation 3-2-2022]

10. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The project is an Interim Action necessary to remediate the drainage ditch that separates the Superlon Plastics Property, located at 2116 Taylor Way, Tacoma, Washington and the Port of Tacoma-owned property located at 3408 Lincoln Avenue in Tacoma, Washington (see Figure 1). The IA are a is approximately 400 feet in length and has a maximum width of 65 feet (see Figure 2).

The objective of the Interim Action includes the following:

- **Remove the biologically active zone of the sediment (defined as up to 12 inches) of approximately 380 linear feet of the sediment in the bottom of the ditch in widths varying from 9 feet to 16 feet. Assuming a 10-foot average width and a 1 foot thickness, the estimated volume of sediment to be excavated is 141 cubic yards (CY).**
- **Remove the ditch side slope soils between the edge of the ditch and the Superlon Property from the excavation limits (see Figures 2 and 3) where the arsenic and lead concentrations exceed MTCA industrial cleanup standards (These soils are referred to as ‘berm’ soils)**
- **Remove remaining berm soil between the Superlon/Port of Tacoma property line and the western limits of the excavations previously conducted on the Superlon Property to remediate arsenic and lead concentrations.**
- **Place a clay barrier or geotextile membrane at the edge of the berm excavation to limit potential for groundwater seepage from Superlon Property to the ditch.**

During this project, approximately 141 cubic yards of sediment and 3,423 cubic yards of berm soil will be excavated, stockpiled, characterized, and disposed of off-site.

[Updated: The expanded project area will include excavation of contaminated soils/sediments within an additional 446 foot length of the ditch, with a maximum width of 38 feet. The work area will be prepared by cutting vegetation. The work area will be accessed from a ramp into the ditch at the Superlon Property. An access pad approximately 10 feet wide will be constructed in the center of the ditch so that heavy equipment will not operate in roadways. As excavation and backfill proceeds, the access pad will be removed. The expanded project area does not include the berm soils as they were completed in 2021. See new Figure 4.]

- 11. Location of the proposal.** Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Property is located at 2116 Taylor Way, Tacoma, Washington. The Property covers 3.1 acres and is listed as tax parcel number 0321351042. The Property is owned by White Birch and operated by Superlon, an extruded plastic pipe manufacturer. Cleanup activities on the Property are managed by Pacific Environmental and Redevelopment Corporation for Chemours.

The Property is bordered by Taylor Way to the northeast, and a railroad right-of-way owned by the City of Tacoma Public Works and a small parcel of land owned by the Port of Tacoma to the north. The Property is bordered by Lincoln Avenue to the northwest and a Port of Tacoma property to the south/southwest. The Property is bordered by RTH Tacoma, LLC property to the southeast, which is leased by Gardner Fields Products, a roofing and waterproofing products manufacturing business.

The proposed work is located at the drainage ditch and its northeastern side slope that is location adjacent to the southwest property line of the Superlon Plastics Property, located at 2116 Taylor Way, Tacoma, Washington. The ditch separates the Superlon Property from the neighboring Port of Tacoma property to the southwest at 3408 Lincoln Avenue in Tacoma, Washington.

[Updated: The expanded project area includes a short north-south section of the ditch adjacent to the Superlon Property as described above, then continues along Lincoln Avenue adjacent to Port of Tacoma property at 3408 Lincoln Avenue. See new Figure 4.]

B. ENVIRONMENTAL ELEMENTS [\[help\]](#)

1. Earth [\[help\]](#)

- a. General description of the site: [\[help\]](#) (circle one): **Flat**, rolling, hilly, **steep slopes (drainage ditch)**, mountainous, other
- b. What is the steepest slope on the site (approximate percent slope)? **The Property is flat with slope $s < 1\%$. The drainage ditch has side slopes of approximately 1:1.**
- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. **The berm soil includes fill material with underlying silts and sands. The drainage ditch is 6.5 feet of sediment with the top six inches being classified as freshwater sediment.**
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. **There are no surface indicators or history of unstable soil in the immediate vicinity.**
- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. **The focus area of the interim action is approximately 400 feet in length and has a maximum width of 65 feet (see Figure 2). The purpose of this Interim Action is to address arsenic and lead that is present in the drainage ditch adjacent to the Superlon Property and potentially associated with the Superlon Site.**

Objectives for the interim action are to:

- **Remove the biologically active zone of the sediment in the drainage ditch (defined as up to 12 inches) of approximately 380 linear feet of sediment in the ditch. The estimated excavated volume of sediment is 141 cubic yards.**
- **Remove the berm soils between the edge of the drainage ditch and the Superlon Property where arsenic and lead concentrations exceed MTCA industrial cleanup standards. Berm soils will be excavated across approximately 405 linear feet. The estimated excavated volume of berm soils is 3,423 cubic yards.**
- **Remove the remaining berm soil between the Superlon/Port of Tacoma property line and the western limits of the excavations previously conducted on the Superlon Property to remediate arsenic and lead concentrations.**
- **Excavations will be backfilled to the approximate pre-remediation grade using clean backfill materials purchased from a commercial vendor. Backfill will be placed in lifts and loosely compacted using the excavator.**

[Updated: The expanded project area will include excavation of contaminated soils/sediments within an additional 446 foot length of the ditch, with a maximum width of 38 feet. Sediments and underlying soils of up to approximately 954 cubic yards may be removed. Excavations up to 2 feet deep will be backfilled using a commercially available sediment mix. For any part of the excavation that extends below 2 feet deep, clay-rich soil will be used to replace similar soils that are found at that depth.]

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. **Erosion is not expected. Excavations will be limited to 12 feet by 6 feet sections at any given time. In addition, a Stormwater Pollution Prevention Plan (SWPPP) was developed and best management practices identified in the SWPPP will be implemented to eliminate/control erosion.**

[Updated: The SWPPP has been updated to include the expanded project area.]

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)? **No impervious surfaces are proposed as part of this project.**
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: **Erosion is not expected. The primary stormwater control consideration is preventing any sediment or other contaminants from escaping the worksite either up- or downstream. The following, adapted from typical in-water work practices, will be implemented:**

- i. **Work during the time of lowest flow condition, typically July-August in this region.**
- ii. **Isolate the work area with a downstream cofferdam and, if there is flow from upstream, an upstream cofferdam.**
- iii. **Excess water will be pumped into the existing pond on the Superlon site.**
- iv. **When re-watering the work area, the cofferdams will be removed slowly to avoid high-velocity flows. Exposed soils within the work area will be stabilized.**

[Updated: As was done for the initial excavation, and in accordance with the Stormwater Management Manual of Western Washington, the disturbed slopes of the ditch will be reseeded.]

2. Air [\[help\]](#)

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. **The only potential emissions to the air would be dust generated during remediation activities and exhaust from construction vehicles. The amount of dust emissions is expected to be low and will be controlled using water as needed.**
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. **No, there are no anticipated off-Property sources of emissions or odors expected to affect the project.**
- c. Proposed measures to reduce or control emissions or other impacts to air, if any: **If necessary, water will be used to control and reduce visible dust.**

3. Water [\[help\]](#)

- a. Surface Water:
 - i. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. **The proposed project is an Interim Action to address arsenic and lead in a drainage ditch classified as fresh water sediments and the ditch consists of freshwater wetland vegetation species. The drainage ditch is owned by the Port of Tacoma. Surface water in the ditch infiltrates within the ditch but has the potential to eventually flow into the Blair Waterway.**

- ii. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. **Yes.** **Approximately 141 cubic yards of sediment will be excavated from the bottom of the drainage ditch. Approximately 3,423 cubic yards of soils will be removed from the northeastern side slope of the ditch. The drainage ditch and side slope will be restored using the appropriate d imported material to ensure the restoration of a viable biologically active zone. Washington State Department of Transportation stormwater ditch seed mix will be place d on the banks of the ditch following excavation.**

[Updated: The expanded project area will include excavation of contaminated soils/sediments within an additional 446 foot length of the ditch, with a maximum width of 38 feet. Sediments and underlying soils of up to approximately 954 cubic yards may be removed. Excavations up to 2 feet deep will be backfilled using a commercially available sediment mix. For any part of the excavation that extends below 2 feet deep, clay-rich soil will be used to replace similar soils that are found at that depth. Plans for the extended excavation area are in the Supplemental Phase II Interim Action Work Plan - Ditch Remediation. March 2, 2022.]

- iii. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. **Approximately 141 cubic yards of sediment will be excavated from the drainage ditch. The drainage ditch will be restored using imported material to ensure the restoration of a viable biologically active zone. Stormwater ditch mix will be place d on the banks of the ditch following excavation. Backfill material will be clean backfill purchased from a commercial vendor.**

[Updated: Sediments and underlying soils of up to approximately 954 cubic yards may be removed. Excavations up to 2 feet deep will be backfilled using a commercially available sediment mix. For any part of the excavation that extends below 2 feet deep, clay-rich soil will be used to replace similar soils that are found at that depth. Backfill will be clean backfill purchased from commercial vendors.]

- iv. Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. **No.**

[Updated: Removal of surface water may be required if water collects behind the coffer dams in place to isolate the work area. If water is removed, it will be pumped into the existing infiltration pond which is in place at the Superlon Property and is overseen by Ecology through the Model Toxics Control Act action that has been underway at the Property since 2018.]

- v. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. **No.**

- vi. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. **No.**
- b. Ground Water:
- i. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. **Groundwater will not be withdrawn from a well for drinking water or any other purposes.**
- ii. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example, Domestic sewage; industrial, containing the following chemicals . . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. **No waste materials will be discharge d into the ground from septic tanks or any other sources.**
- c. Water runoff (including stormwater):
- i. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. **The primary source of potential runoff is stormwater. Stormwater at the adjacent Superlon Property is diverted to the center of the Property and doe s not run into the ditch. Stormwater controls will be implemented to prevent sediment and other contaminants from leaving the Interim Action project Site during construction. Consistent with the SWPPP, the following will be implemented:**
- **Work during the time of lowest flow condition, typically June – August in this region.**
 - **Isolate the work area with a downstream cofferdam and, if there is flow from upstream, and upstream cofferdam.**
 - **The intake basin on Lincoln Avenue will be blocked using either a pipe plug or sandbags and plastic, if constructing a cofferdam in the channel is unfeasible.**
 - **If there is flow in the channel from upstream, it must be bypassed around the work area. Unless the planned work can accommodate a gravity-flow bypass pipe in the channel, a bypass pump will be used, with the intake upstream of the upper**

cofferdam and the discharge downstream of the lower cofferdam. Energy dissipation will be provided at the point of discharge to avoid scour.

- o An effective cofferdam will be constructed of sandbags or straw bales covered in plastic sheeting. The plastic will be anchored by sandbags in a trench on the dry side of the cofferdam. A second downstream cofferdam will be installed to provide extra security; any leakage from the first cofferdam will be detected and pumped out prior to the second cofferdam.
 - o We do not anticipate any tidal flow or influences. If there is any tidal flow from downstream, the plastic will be anchored with trenched sandbags on both sides to prevent backflow into the worksite.
 - o Excavated areas will be backfilled in stages such that there will not be large areas of exposed soils at any given time.
- If it is necessary to manage excess water, it will be pumped into the existing infiltration pond on the Superlon Site.
 - When re-watering the work area, the cofferdams will be removed slowly to avoid high-velocity flows. Exposed soils within the work area will be stabilized.

[Updated: The expanded project area will be isolated with a downstream cofferdam; and if there is flow from upstream, an upstream cofferdam. A second downstream cofferdam will be installed. Any leakage from the cofferdams will be pumped into the existing infiltration pond on the Superlon Site.]

Cofferdams will be constructed of sandbags, with a barrier clay to be used on the downstream side of the dam.]

- ii. Could waste materials enter ground or surface waters? If so, generally describe. **Cleanup activities will not result in any further impact to surface water. All excavated soils will be placed on the Superlon Property and tested/managed/disposed of in accordance with the Construction Stormwater General NPDES permit for the on-Property cleanup actions.**
- iii. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. **No, the proposed work does not alter or otherwise affect drainage patterns in the vicinity of the Property. The drainage ditch will be restored to existing conditions.**

- d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: **See 3.c.i. above.**

4. Plants [\[help\]](#)

- a. Check the types of vegetation found on the site: [\[help\]](#)

Deciduous tree: alder, maple, aspen, other

Evergreen tree: fir, cedar, pine, other

Shrubs

Grass

Pasture

Crop or grain

Orchards, vineyards or other permanent crops.

Wet soil plants: **cattail**, buttercup, bulrush, skunk cabbage, other: **reed canary grasses**

Water plants: water lily, eelgrass, milfoil, other:

Other types of vegetation: Himalayan blackberry

- b. What kind and amount of vegetation will be removed or altered? **Vegetation in the drainage ditch and side slope will be removed. Re-vegetation is not required within the ditch; however, sediment will be restored using the appropriate imported material to ensure the restoration of a viable biologically active zone. Washington State Department of Transportation stormwater ditch seed mix will be placed on the banks of the ditch following restoration of the side slope.**

- c. List threatened and endangered species known to be on or near the site. **There are no known threatened and/or endangered species on or near the Property.**

- d. Proposed **landscaping**, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **No landscaping is proposed as part of this project.**

[Updated: An appropriate seed mixture will be used to revegegate the disturbed slopes of the ditch.]

- e. List all noxious weeds and invasive species known to be on or near the site. **The Superlon Property has blackberry bushes.**

5. Animals [\[help\]](#)

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. [\[help\]](#)

Examples include:

Birds: hawk, heron, eagle, **songbirds**, other: All of these may be intermittently present at the site.

Mammals: deer, bear, elk, beaver, other: **None known**

Fish: bass, salmon, trout, herring, shellfish, other: **None known**

- b. List any **threatened** and endangered species known to be on or near the site. **There are no known threatened and/or endangered species on or near the Property.**
- c. Is the site part of a migration route? If so, explain. **No. This Property is not part of a migration route.**
- d. Proposed **measures** to preserve or enhance wildlife, if any: **No measures are proposed to preserve and/or enhance wildlife.**
- e. List any invasive animal species known to be on or near the site. **No invasive animal species are known to be on and/or near the Property. Cernuella virgate (vineyard snail) is known to be present at some properties to the north of Lincoln Avenue in the Tacoma tide flats. However, the Port of Tacoma wetland biologist informed Ecology that the snail is not present to the south of Lincoln Avenue and is not likely to be present in wetland environments.**

6. Energy and Natural Resources [\[help\]](#)

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. **The completed project does not have any energy requirements.**
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. **No. This project will not affect the potential use of solar energy by adjacent properties.**
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: **Energy impacts were evaluated during the initial remedial action design for the Property. Conservation features and practices will be in accordance with ongoing measures on the Property, including no idling of vehicles and/or equipment on-Property.**

7. Environmental Health [\[help\]](#)

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. **No environmental health hazards will occur due to the cleanup activities. However, the Property is a MTCA hazardous waste cleanup**

site with soil and perched water contamination. The proposed project deals with contaminated soil. Trained environmental technicians and scientists will be performing the work at the Property and additional measures will be taken to prevent exposure to the contaminated soil during cleanup activities. To ensure and promote safety, a comprehensive Health and Safety Plan was prepared for remediation activities on-Property. All workers will be appropriately trained and certified. All workers will be required to wear the appropriate personal protective equipment while conducting the proposed project activities.

- i. Describe any known or possible contamination at the site from present or past uses. **The Superlon Property is a MTCA hazardous waste cleanup site with arsenic and lead contamination in soil, perched water, and groundwater.**

[Updated: The sediment/soils at the edge of the excavation area from 2021 contained elevated levels of arsenic and lead. The current expansion project is to continue the remediation.]

- ii. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. **None.**
- iii. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. **No toxic or hazardous chemicals will be stored, used and/or produced throughout the life of the proposed project. Excavated contaminated soils will be managed, tested, and disposed at the Superlon Property in accordance with the Ecology-approved contaminated media management plan as described in the Remedial Design report for the Superlon Plastics Site (PERC/PIONEER 2017b).**
- iv. Describe special emergency services that might be required. **Emergency medical services are required in the event someone is injured. All emergency procedures will be in accordance with the Property-specific Health and Safety Plan.**
- v. Proposed measures to reduce or control environmental health hazards, if any: **Safety procedures and requirements, including daily tailgate meetings and personal protective equipment requirements, are outlined in the Property-specific Health and Safety Plan.**

b. Noise [\[help\]](#)

- i. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **None.**

- ii. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.
Equipment noise will be created or associated with the project. Work hours will be limited to 7:00 AM to 4:00 PM.
- iii. Proposed measures to reduce or control noise impacts, if any: **None. Noise associated with the proposed project is not expected to be excessive. The Property is located in an industrial area.**

8. Land and Shoreline Use [\[help\]](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. **Current and adjacent property uses are industrial. The proposed project will not affect current land uses.**
- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? **No.**
 - i. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: **No.**
- c. Describe any structures on the site. **The structures at the Superlon Property include two metal/wood framed building with sheet metal siding. There are no structures in the ditch Interim Action area.**
- d. Will any structures be demolished? If so, what? **No structures will be demolished as part of the proposed project.**
- e. What is the current zoning classification of the site? **Industrial.**
- f. What is the current comprehensive plan designation of the site? **Industrial.**
- g. If applicable, what is the current shoreline master program designation of the site? **The Property is outside of the S-10-Port Industrial Area Shore line District.**
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. **No. The City of Tacoma does not consider the ditch to be a jurisdictional wetland.**

- i. Approximately how many people would reside or work in the completed project? **No people will reside in the completed project area. Approximately 6 people are employed by Superlon. The Site is a MTCA Cleanup Site. Superlon employees may work in the portion of the ditch project area once the MTCA Cleanup Process is completed.**
- j. Approximately how many people would the completed project displace? **None.**
- k. Proposed measures to avoid or reduce displacement impacts, if any: **Not applicable. No people will be displaced as a result of the proposed project.**
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **The proposed project is consistent with existing and future land use at the Property.**
- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: **None. No impact to agricultural or forest lands is anticipated for the proposed project.**

9. Housing [\[help\]](#)

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **Not applicable. The current and future land use for the Property is industrial.**
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **Not applicable. The current and future land use for the Property is industrial.**
- c. Proposed measures to reduce or control housing impacts, if any: **Not applicable. The current and future land use for the Property is industrial.**

10. Aesthetics [\[help\]](#)

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? **Not applicable. No structures are proposed as part of this project.**
- b. What views in the immediate vicinity would be altered or obstructed? **Not applicable. No structures are proposed as part of this project.**
- c. Proposed measures to reduce or control aesthetic impacts, if any: **Not applicable. No structures are proposed as part of this project.**

11. Light and Glare [\[help\]](#)

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **No light glare will be produced. Work hours will be limited to 7:00 AM to 4:00 PM.**
- b. Could light or glare from the finished project be a safety hazard or interfere with views? **Not applicable. The finished project will not have any light or light glare.**
- c. What existing off-site sources of light or glare may affect your proposal? **Not applicable. No existing off-Property sources of light or glare will affect the proposal.**
- d. Proposed measures to reduce or control light and glare impacts, if any: **Not applicable. The proposed project will not have light glare.**

12. Recreation [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity? **None.**
- b. Would the proposed project displace any existing recreational uses? If so, describe. **No. The Property is currently zoned as industrial and the future zoning is industrial.**
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **None. The Property is not designated nor informally used for recreational purposes.**

13. Historic and cultural preservation [\[help\]](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe. **No. There are no buildings, structures, or sites eligible for listing on preservation registers.**
- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. **No historical landmarks or features are located on the Property (Historical Research Associates, Inc. (HRA). 2010. Archaeological Reconnaissance and Historic Property Inventory for the Superlon Plastics Site, City of Tacoma, Pierce County, Washington. June). At the Corps of Engineers' request, the project will be monitored for archeological resources by HRA of Seattle, Washington.**

[Updated: Archaeological monitoring was conducted during the initial phase of the ditch remediation in 2021. No archaeological or cultural resources were identified.]

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. **HRA conducted archival research and a reconnaissance-level archeological resources investigation of the Superlon Property. At the Corps of Engineers' request, the project will be monitored for archeological resources by a qualified person (archeologist or tribal monitor).**

[Updated: Archaeological monitoring will be conducted for the 2022 project as it was for the 2021 work.]

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. **At the Corps of Engineers' request, the project will be monitored for archeological resources by an Ecology-approved Archeologist.**

14. Transportation [\[help\]](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. **The Property is served by Taylor Way and Lincoln Avenue.**
- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? **Pierce Transit Route 60 provides bus services in the vicinity of the Property. The nearest bus stop is at the intersection of Lincoln Avenue and Taylor Way.**
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? **The proposed project will not impact parking spaces.**
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). **The proposed project will not require any new improvements to existing roadway, pedestrian, bicycle, and/or state transportation facilities.**
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. **No. This project will not use water, rail and/or air transportation.**
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? **Trucks will be required for delivering backfill material and to transport waste soil for disposal**

off-Property. Truck traffic will be limited between 7:00 AM and 4:00 PM. The anticipated maximum daily truck traffic will be 20 truckloads, based on previous work done at the Property.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. **The proposed project will not interfere or affect the movement of agricultural and/or forest products.**
- h. Proposed measures to reduce or control transportation impacts, if any: **The following transportation and traffic procedures were documented in the Remedial Design Report (PERC/PIONEER 2017b):**
- Truck Access: Haul trucks will enter the Property at the construction access control point gate (see Figure 4). The trucks will enter one at a time with the help of a remediation contractor-supplied spotter.
 - Traffic-Control Needs: The need for traffic control will be based on the number of trucks entering and leaving the Property. If truck traffic is expected to exceed 20 trucks per day for more than five days, construction signage and active traffic control (i.e. flaggers) will be used to help the trucks enter and exit the Property and Taylor Way. Trucks waiting to be loaded will be directed to park within in the median of Taylor Way, making sure to not block access to neighboring properties.
 - Accident Prevention and Response: All drivers will be informed of the nature of the materials to be hauled. In addition, all loads will be tarped before leaving the Property to prevent loss of material during transit. All loads leaving the Property will be provided with a non-hazardous shipping manifest. In the event of an accident or spill, the driver will be instructed to report the incident to an emergency response number listed on the shipping manifest, at which point the appropriate landfill agency will dispatch emergency spill response crews and notify PERC, Ecology, and either the Washington or Oregon Departments of Transportation (depending on the spill location).
 - Spotters: Spotters will be used to direct the movement and staging of trucks and other equipment.
 - Decontamination: If necessary (i.e., if visible ditch is present), the wheels of the trucks that enter the Exclusion Zone will be cleaned with a brush or a power washer as they leave the exclusion zone, and will exit the Property from the construction access control point gate at Taylor Way. The Exclusion Zone is presented on Figure 4.

- Maintenance of Site Entry: As a condition of the Construction Stormwater Pollution Prevention Plan, no visible soil or debris will be allowed along the entrance to the Property. When soil is being transported from the Property, the entryway will be swept when the trucks leave (if visible soil or debris is present), and periodically throughout the day.

15. Public Services [\[help\]](#)

- a. Would the project result in an increased need for public services (for example, fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. **No. The proposed project will not result in an increased need for public services.**
- b. Proposed measures to reduce or control direct impacts on public services, if any. **Not applicable.**

16. Utilities [\[help\]](#)

- a. Circle utilities currently available at the site: [\[help\]](#)
Electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other. **None within the proposed work area.**
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. **The proposed project does not include the installation of utilities.**

C. SIGNATURE [\[help\]](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Name of signee: **Jeff King, LG**

Position and Agency/Organization: **Pacific Environmental and Redevelopment Corporation**

Date Submitted: January 13, 2021

Updated: This SEPA checklist was updated by Department of Ecology April 27, 2022, to provide amended information related to the expansion of the work area for remediation of the ditch in 2022.



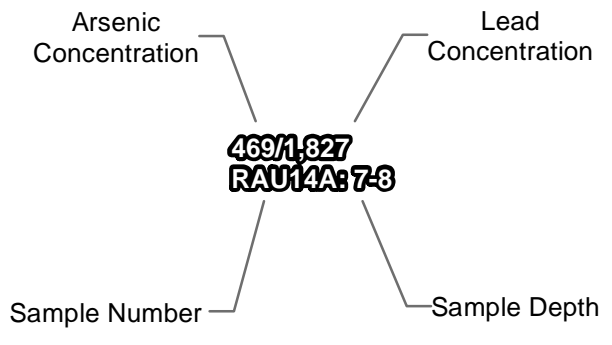
Site Location
 Ditch Interim Action Work Plan
 Superlon Plastics Site, Tacoma, Washington

Figure 1

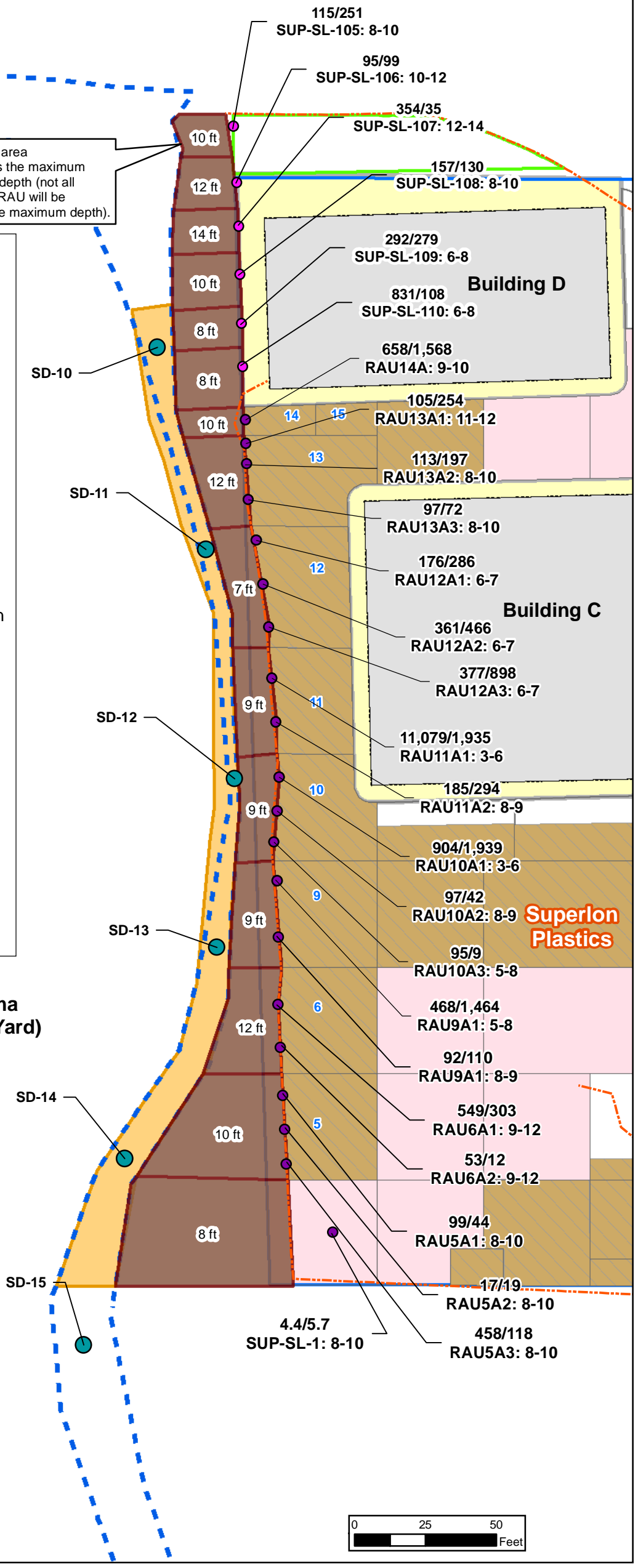


Legend

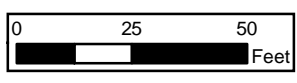
- Ditch Excavation Area
 - Berm Soil Excavation Depths
 - Side Wall Sample
 - Direct Push Sample
 - Ditch Sample Location
 - Temporary Chain-link Fence
 - City of Tacoma
 - Property Boundary
 - Drainage Ditch
 - Building Footprint
- On-Property Remedial Features**
- Soil Remedial Action Units that Require Remediation
 - Soil Remedial Action Units Not Requiring Remediation
 - Soil Remedial Action Units Completed
 - Soil Areas Not To Be Remediated



**Port of Tacoma
(Holbrook Log Yard)**



Reference Number:
 Applicant Name: Jeff King
 Proposed Project: Removing Soil
 Location: 3408 Lincoln Ave
 Sheet 2 of 4
 Date: 5/9/2019
 Updated: 5/7/2020



Document Path: G:\Projects\Superlon\Maps\2019\Feb\Fig_2_Ditch_Expansion_Areas.mxd; Author: MK; Date Saved: 5/7/2020



**Interim Action Work Area
Ditch Interim Action
Superlon Plastics Site, Tacoma, Washington**

Figure 2



Legend

- Ditch Excavation Area
- Berm Soil Excavation Depths
- Temporary Chain-link Fence
- City of Tacoma
- Property Boundary
- Drainage Ditch
- Building Footprint

On-Property Remedial Features

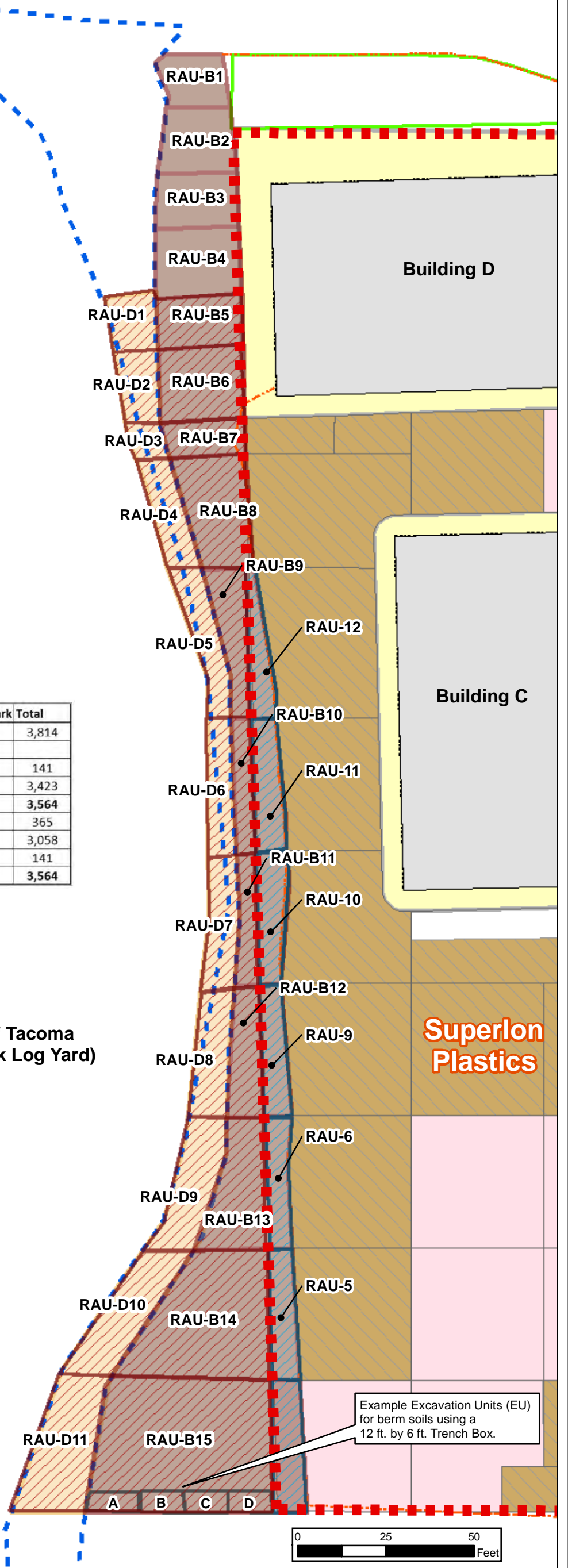
- Soil Remedial Action Units that Require Remediation
- Soil Remedial Action Units Not Requiring Remediation
- Soil Remedial Action Units Completed
- Soil Areas Not To Be Remediated
- Interim Action Excavation Unit
- Interim Action Remedial Action Units
- Superlon Plastics Site Remedial Action Units

Item	Units	Below the OHW Mark	Above the OHW Mark	Total
Excavation Area	square feet	3,814	0	3,814
Excavation Volume Sediment	cubic yards	141	0	141
Excavation Volume Soil	cubic yards	3,423	0	3,423
Total Excavation Volume	cubic yards	3,564	0	3,564
Fill Volume Clay	cubic yards	365	0	365
Fill Volume Soil	cubic yards	3,058	0	3,058
Fill Volume Ditch Mix	cubic yards	141	0	141
Total Fill Volume	cubic yards	3,564	0	3,564

Notes:
 * The values in this table are excavation area and volume estimates. The Ordinary High-Water Line (OHW) is 8.51, using the NAVD88 Datum, for Tacoma, WA (NOAA 2017). Nominal amount of the total excavation volume will fall above the OHW (approximate to or less than 1% of the total excavation volume). All excavation volumes fall below the OHW mark.

Port of Tacoma
(Holbrook Log Yard)

Superlon
Plastics



Reference Number:

Applicant Name: Jeff King

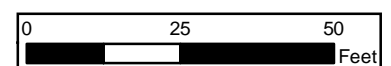
Proposed Project: Removing Soil

Location: 3408 Lincoln Ave

Sheet 3 of 4

Date: 8/3/2020

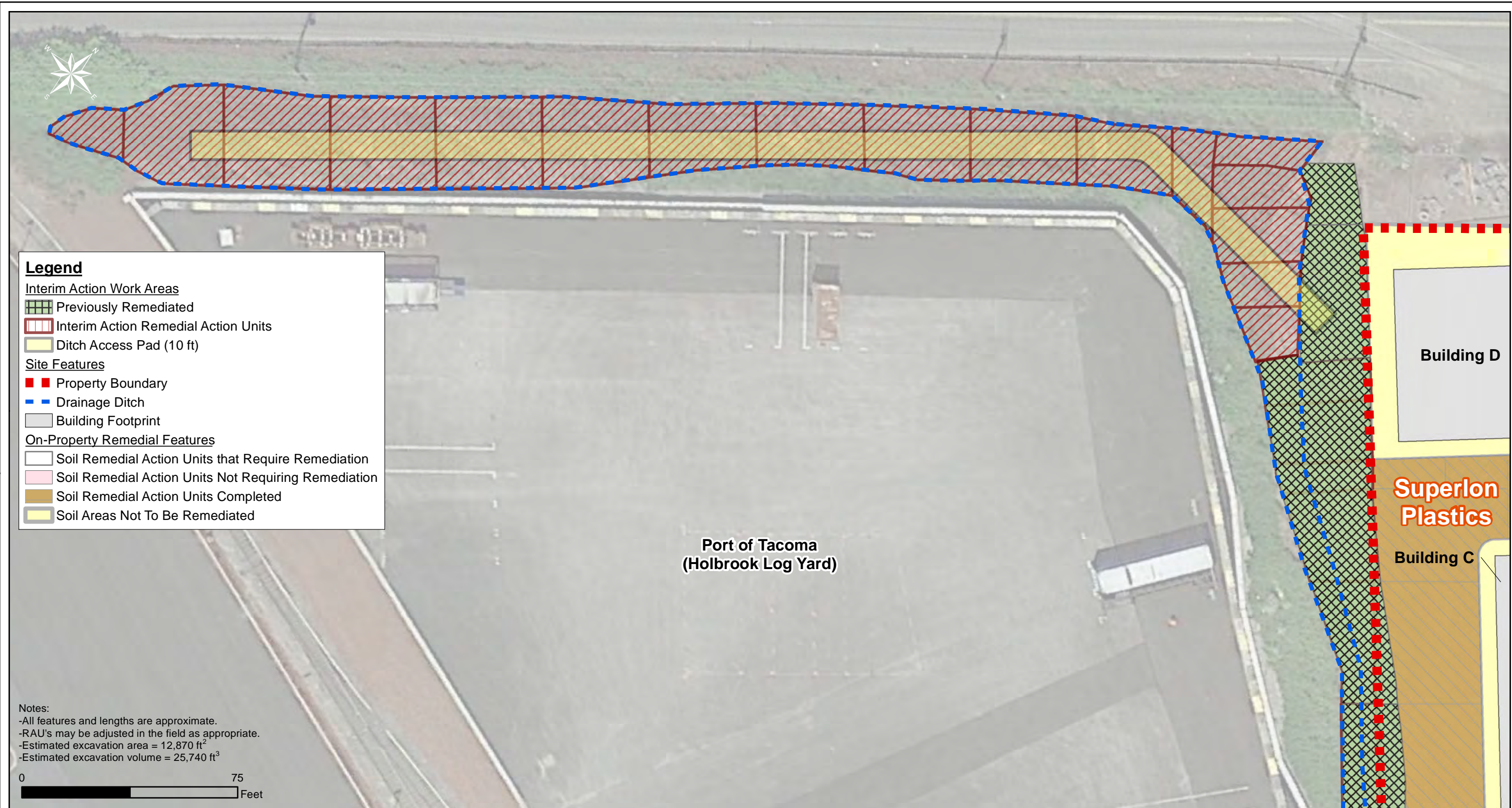
Example Excavation Units (EU) for berm soils using a 12 ft. by 6 ft. Trench Box.



PIONEER
TECHNOLOGIES CORPORATION

Interim Action RAU and EU Work Areas
Ditch Interim Action
Superlon Plastics Site, Tacoma, Washington

Figure 3



PIONEER
TECHNOLOGIES CORPORATION

Interim Action Work Area
Access Pad Location
Superlon Plastics Site, Tacoma, Washington

Figure 4
**EXPANDED DITCH
REMEDIATION AREA**

New Figure for Revised SEPA 4-27-2022