

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY Northwest Region Office PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

July 20, 2022

Sam Alcorn, Planner Economic and Community Development Department City of Kent 220 Fourth Avenue S Kent, WA 98032

Re: Bridge Maralco Site SEPA File# RPSW-2221350 / ENV-2022-4, Ecology SEPA# 202202964

Dear Sam Alcorn:

Thank you for the opportunity to provide comments on the draft State Environmental Policy Act (SEPA) Checklist (CONSULT) for the Bridge Maralco Site project. Based on review of the checklist associated with this project, the Department of Ecology (Ecology) has the following comments:

The Environmental Health Section of the SEPA Checklist (Section 7) identifies the presence of black dross on the property, a byproduct of past aluminum smelter operations from 1980 to 1986. The black dross is on the property in a large stockpile estimated to be approximately 29,000 cubic yards in volume. Other smelter byproducts are present inside the abandoned smelter building and include dross, baghouse dust, and aluminum oxide (processed from dross) totaling approximately 1,100 cubic yards. The other source of contamination on the site was a former 35,000 gallon diesel underground storage tank (UST) which was removed in 1995. The contaminants of concern for this Site include metals, fluorides and chlorides, and petroleum-related contaminants. One or more of these contaminants of concern have been detected in soil and/or groundwater at the property exceeding the State Model Toxics Control Act Cleanup Regulation (MTCA) cleanup or screening levels. These contaminants of concern are also suspected in sediment and surface water due to the presence of an intermittent stream and wetlands on the property.

The property entered into the Ecology Voluntary Cleanup Program (VCP) in May 2022. The Remedial Investigation (RI) Work Plan is currently being reviewed by Ecology. The investigation will help determine and characterize the contamination on the property, to support the

Sam Alcorn July 20, 2022 Page 2

evaluation of source removal and cleanup options per MTCA Feasibility Study (FS) requirements. Ecology appreciates and concurs with the information provided in the SEPA Checklist.

Section a(9) of the SEPA Checklist (Project Description) notes that along with construction of the proposed warehouse building on the property, the project will include removal and cleanup of contaminated soils, per Ecology regulations (MTCA). Ecology understands that the City of Kent SEPA process (including associated permits and permit conditions) must be completed prior to initiation of waste or soil removal from the project property.

Previous investigations and other environmental documents can be found on the Ecology website: <u>Maralco - (5055) (wa.gov)</u>

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact Kim Vik from the Toxics Cleanup Program at (206) 556-5258 or by email at <u>kim.vik@ecy.wa.gov</u>.

Sincerely,

Kelli Sheldon

Kelli Sheldon SEPA Coordinator

Sent by email: Sam Alcorn, salcorn@kentwa.gov

ecc: Kim Vik, Ecology