



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

July 27, 2023

Jeff King
Pacific Environmental & Redevelopment Corporation
8424 E Meadow Lake Drive
Snohomish, WA 98290

Re: Formal CAP-OSP OU3 REL Change REL

- **Site Name:** Superlon Plastics
- **Site Address:** 2116 Taylor Way, Tacoma, Pierce County, WA 98421
- **Facility/Site No.:** 2776343
- **Cleanup Site No.:** 2096

Dear Jeff King:

In accordance with the Agreed Order No. DE 5940 (AO), the potential liable parties (PLPs), Chemours Company FC, LLC and White Birch Group LLC, are required to conduct remedial actions at the Superlon Plastics Site (Site). Currently the PLPs are conducting an interim action (IA) focusing on a property parcel (Pierce County Parcel No. 0321351042) within the Site. The scope of the IA is outlined in the Cleanup Action Plan for On-Property Soils and Perched Water (CAP-OSP),¹ and revised through an addendum to the Superlon On-Property Feasibility Study (FS-OSP Addendum I).²

The CAP-OSP and FS-OSP Addendum I, along with several other IA supporting document, were reviewed and commented by the public between September 14 to October 16, 2017. Ecology approved the IA work after the issuance of responses to the comments received during the public comment period.³ The final scope of the IA includes,

¹ Cleanup Action Plan for On-Property Soils and Perched Water for the Superlon Plastics Site. Tacoma, Washington. PERC/PIONEER, July 2015.

² Superlon Plastics Site: Addendum 1 to the Feasibility Study for On-Property Soils and Perched Water. PERC/PIONEER, June 2017.

³ Responses to Comments Superlon Plastics Co., Inc. September 14 to October 16, 2017 Public Comment Period. Ecology, 2018.

- Treating perched water in-situ by adding an additive;
- Excavating and disposing of soils with COCs greater than RELs based on groundwater protection in OUs 1, 2, 3;⁴
- Excavating and disposing of soil with contaminants of concern (COCs) greater than remediation levels (RELs) based on human direct contact in Operable Units (OUs) 4 and 6;
- Covering the Property; and
- Applying a deed restriction to ensure on-going industrial use.

Since it started in 2017, the IA has been completed in OU6 and nearly completed in OUs 1, 2, and 4. Prior to the commencement of IA work at OU3, a Phase V Remedial Investigation was conducted at the Site to obtain a better understanding of the soil and perched water in the OU. The findings were presented to Ecology in the Remedial Investigation Phase V Characterization of Operable Unit 3 Report.⁵

Ecology received your June 1, 2023, request for a change to the arsenic REL for OU3 soil from 114 milligram per kilogram (mg/kg) to 588 mg/kg. The current arsenic REL for OU3 soil of 114 mg/kg is calculated based on the protection of perched groundwater REL of 0.67 milligram per liter (mg/L), while the proposed new soil REL is calculated based on protection of on-site worker via direct contact pathway.⁶ The basis of the proposed change is the finding of the Phase V RI that the concentrations of arsenic in the perched groundwater at ten locations within OU3, ranging from 0.0059 mg/L to 0.43 mg/L, are below the groundwater REL of 0.67 mg/L.

Ecology will grant this requested change to the arsenic REL for OU3 soil from 114 mg/kg to 588 mg/kg, with below understandings:

⁴ The property was identified as six operable units based on their fill types.

⁵ Remedial Investigation Phase V Characterization of Operable Unit 3 Report Superlon Plastics Site, Tacoma, Washington. December 2023.

⁶ Feasibility Study Report for On-Property Soils and Perched Water at the Superlon Plastic Property, Tacoma, Washington. PERC, December 2014.

- The requested change of arsenic REL in the soil is only affecting the interim action activity within OU3, which was outlined in the CAP-OSP and revised by FS-OSP Addendum I;
- Based on the data available to Ecology, within in the top 15 feet of the soil column (the soil that on-site workers might be in contact with), the arsenic mass in OU3 accounts for less than 5% of the total arsenic that are accessible for excavation in all OUs;
- The perched water arsenic data used to support the change is collected during one single groundwater sampling event from temporary wells. As a part of the future site-wide RI, Ecology may require additional data from designated groundwater monitoring wells to be installed at OU3 to demonstrate the perched groundwater is consistently under the RELs;
- The risk to human health and the environment associated with remaining arsenic, and other COC, will be again evaluated during the final remedial investigation, as new conditions (e.g., data, science, site use) may occur after the interim action is complete.

Ecology has also determined the requested change is not a substantial modification to the CAP-OSP and therefore additional public comment period is not required.

Thank you for your efforts to keep this cleanup project moving forward. Please contact me at (360) 999-9587 or sam.meng@ecy.wa.gov with any questions or concerns.

Sincerely,



Sam Meng, P.E., Ph.D.
Cleanup Project Manager
Toxics Cleanup Project
Southwest Regional Office

By certified mail: 9489 0090 0027 6339 2998 21

cc: Sebastin Bahr, Chemours sebastian.bahr@chemours.com
Nathan Starr, LG, Pioneer Technologies Corporation starrn@uspioneer.com
Rebecca S. Lawson, PE, LHG, Ecology Rebecca.lawson@ecy.wa.gov
Kara Tabeau, Assistant Attorney General kara.tabeau@atg.wa.gov
Ecology Site File