

Responsiveness Summary

Agreed Order No. DE 23716 and Public Participation Plan

Sonoco Products Co.

Public Comment Period: April 16, 2026 – May 27, 2026

Public Hearing: May 19, 2026

This document addresses questions and comments received by the Washington State Department of Ecology (Ecology) during the public comment period for the Sonoco Products Co. draft Agreed Order No. DE 23716 and the accompanying Public Participation Plan.

Public Engagement

On April 15, 2026, Ecology published notice in the *Courier Herald* of the public hearing and public comment period for the draft Agreed Order No. DE 23716. The public comment period began on April 16, 2026, and closed on May 27, 2026. Ecology posted notice of the public hearing and comment period on Ecology's website and in the *Washington State Contaminated Sites Register*. In addition, Ecology sent notices of the public hearing and comment period by mail to approximately 1606 people located near the cleanup site and 5 additional interested people. Ecology sent email notices to 54 people who had requested to be on Ecology's interested parties list for the site. Ecology held a public meeting and a public hearing virtually on May 19, 2026 at 6:00 PM.

Tribal Engagement

Ecology engaged with interested Tribes in accordance with the Tribal Engagement Plan developed for the site. This responsiveness summary only includes comments received as part of the public comment period.

Public Comments Received & Changes Made (if applicable)

We received one comment from People for an Abundant and Smarter MTCA during the comment period. Ecology reviewed all the comments received. No changes were made to the draft Agreed Order No. DE 23716 nor the associated *Public Participation Plan*.

A copy of the final Agreed Order and *Public Participation Plan*, including this Responsiveness Summary will be sent to all interested parties upon issuance and posted on the Ecology website at: <https://apps.ecology.wa.gov/cleanupsearch/site/17058>.

Individual comments received and Ecology responses are included in the section of this document titled "Public Comments Received".

Public Comments Received

Commenter 1 (People for an Abundant and Smarter MTCA) [Comment 1 of 1]

We have the following comments and questions about the Ecology Agreed Order in Sumner

- We have observed that current Ecology Site Managers and current Ecology management appear to be focused on a perfect MTCA process and a perfect MTCA outcome for many MTCA sites. As the saying goes, perfect is the enemy of good. We encourage the Ecology Site Manager and Ecology management to focus on a good and reasonable process to obtain a good and reasonable outcome for this site that does not take decades to complete or cost an excessive amount of money. What actions and decisions will Ecology employ for this site to focus on meaningful and good outcomes rather than perfection?*
- We have noticed that it often takes one or more decades to complete the work required by a MTCA Agreed Order, with the pace of completing Agreed Orders seemingly getting slower with each passing year. We urge Ecology to focus on completing the Agreed Order Work to be Performed quickly and achieving meaningful outcomes for the public in an efficient and effective manner. What approaches and procedures will the Ecology Site Manager and Ecology management use to work collaboratively with the potentially liable persons and quickly review and approve the Agreed Order Work to be Performed? What actions will Ecology employ to minimize unnecessary bureaucracy during the Agreed Order process and agree with a reasonable final remedy quickly, efficiently, and effectively?*
- We have seen that Ecology Site Managers are frequently overzealous and put undue emphasis on unrealistic exposures and hypothetical risks to human health and the environment. We urge Ecology to help focus everyone's time and effort on realistic exposures and actual risks at this site, starting with the Data Summary Report (Task 1) and the Remedial Investigation Work Plan (Task 2). For instance, the draft Agreed Order currently requires the Data Summary Report (Task 1) to compare constituent concentrations against residential screening levels. We understand that this site is located on property that is zoned as "Heavy Industrial". As such, there is no need for any residential screening levels within the properties that are zoned Heavy Industrial. All screening levels, preliminary cleanup levels, and cleanup levels in the Data Summary Report, Remedial Investigation Work Plan, and subsequent documents for soil direct contact and vapor intrusion pathways within Heavy Industrial properties should be based solely on industrial workers (not residents).*
- We urge the Ecology Site Manager and Ecology management to focus groundwater investigation activities in the Remedial Investigation Work Plan on realistic drinking water exposures and realistic surface water exposures. We have noticed that too many shallow groundwater monitoring wells are often installed at a MTCA site even though there are no current drinking water wells at (or immediately downgradient of) the site*

and a future drinking water well could not even be installed in shallow groundwater based on WAC 173-160 requirements for installing a drinking water well. Likewise, we have observed that Ecology frequently requires too many upland groundwater monitoring wells at sites adjacent to surface water. Groundwater monitoring for protection of surface water should exclusively be assessed with shoreline monitoring wells and/or passive samplers in shoreline pore water.

- Do the Ecology Site Manager and Ecology management have an open mind regarding the use of soil remediation levels, groundwater remediation levels, and conditional points of compliance at this site? We have noticed that some Ecology Site Managers don't fully understand remediation levels and conditional points of compliance and/or reject these MTCA concepts out of hand due to unnecessary caution and the pursuit of a perfect cleanup. Remediation levels and points of compliance should be based on actual exposures rather than potential exposures. For instance, if current and future drinking water pathways are not realistic at this site, a groundwater conditional point of compliance should be established within surface water or as close to surface water as practicable.*
- As described in Ecology Publication 21-04-050, the vision for Washington State's Solid and Hazardous Waste Plan is to "eliminate most wastes and toxics and use remaining waste as resources," with waste reduction as the highest priority for the state. We have observed that large amounts of waste are generated during MTCA investigations and MTCA cleanup actions. What actions and decisions will the Ecology Site Manager and Ecology management implement for the public to substantially reduce or eliminate wastes generated during investigation and cleanup activities at this site? Do the Ecology Site Manager and Ecology management have an open mind for passive investigation techniques, passive remedies, and natural remedies to minimize waste generation?*
- We request the Ecology Site Manager and Ecology management to read the 2025 book Abundance by Ezra Klein and Derek Thompson in the context of this Agreed Order and current MTCA regulations. The book has insights about how the pursuit of perfection when implementing well minded older environmental regulations (such as MTCA regulations) creates profoundly negative consequences on current social and environmental issues and priorities for the public such as climate change, land stagnation, reuse or redevelopment of underutilized urban/industrial MTCA properties, sprawl, waste reduction goals, infrastructure needs, manufacturing jobs, the local economy, and public trust in government leaders and agencies.*

Thank you for considering these comments and questions.

Sincerely,

People for an Abundant and Smarter MTCA

Ecology Response to Comment 1

The actual risks/exposures to human health and the environment at this Site are unknown at this time. Ecology works through the cleanup process according to the Model Toxics Control Act (MTCA). This includes a thorough sampling investigation to determine the actual exposures at the Site and a feasibility study to determine protective cleanup remedies. Ecology works closely with potentially liable parties (PLPs) to prevent unnecessary delays. Ecology looks to achieve meaningful and time-efficient outcomes for the Site which require a thorough remedial investigation to support cleanup determinations and future land uses. The Site is a priority for Ecology. No changes have been made to Agreed Order No. DE 23716 or the associated Public Participation Plan.