

Responsiveness Summary

Tetra Pak

FSID#34822454

Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program

Site Manager: Scott Rose

Public Involvement contact: Michael Bergman

Ecology received one comment on the proposed Delisting from the Hazardous Sites List for the Tetra Pak site. The comment period was held from March 21 through April 22, 2013. The delisting (No Further Action) and comment period documents are available in the site file and online at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2615>

Comment from: Greg Wingard

I saw in the recent site register that this site is listed for a no further action letter.

From the brief description, it appears there are two potential types of remaining contamination, which may exceed cleanup levels. Soil that was too difficult to access, and contamination remaining underneath a placed asphalt cap.

The site groundwater is reported as being contaminated with PCP. What level is the PCP in groundwater currently at, and does it meet or exceed WAC 173-200 limits? If so, has Ecology set a point of compliance for groundwater that is something other than throughout the site?

To what extent is Ecology relying on institutional controls to meet cleanup levels at this site? As the weakest, and least permanent of site contaminant treatment, removal or control technologies, institutional controls as a mechanism for meeting standards is notoriously weak, and has a demonstrated record of failure across the country.

Thanks for your assistance in providing some additional information on this proposed Ecology action.

Ecology Response:

Thank you for your inquiry. Ecology appreciates your interest in ensuring our cleanups are protective of human health and the environment, as well as being permanent to the maximum extent practicable. Ecology's answers to your questions are as follows:

Groundwater data collected in 2002 and 2003 identified concentrations of PCP ranging from 1.48 to 7.58 micrograms per liter (µg/L). The current MTCA Method B cleanup level for PCP in groundwater is 0.22 µg/L. PCP has not been detected in groundwater above cleanup levels since 2010. WAC 173-200 are Water Quality Standards and are not applicable to groundwater beneath the Site. Cleanup levels for groundwater are established under MTCA and are the most stringent based on all exposure pathways.

The specific points of compliance for groundwater are the monitoring wells at the site, and include MW-1, MW-2, MW-3, MW-5, MW-6, and MW-8.

Institutional controls in the form of property use restrictions and restrictions on groundwater usage are being implemented at the site due to the presence of soil containing PCP and dioxin beneath and adjacent to the existing building. Soils adjacent to the existing building could not be safely removed without impacting the structural integrity of the building, so that area was capped with asphalt. As an added control already in place, a chain-link fence surrounds the facility, which restricts access to the area.