



RESPONSIVENESS SUMMARY

Hardel Mutual Plywood Site

December 21, 2009 – January 29, 2010 Public Comment Period

Interim Action and SEPA Determination of Non-Significance

**Prepared by
Washington State Department of Ecology
Southwest Regional Office, Lacey, Washington**

January 2010

TABLE OF CONTENTS

Site Information.....	3
Site Background	3
Site Map	4
Comments Received and Ecology Responses	5
Comment #1: Harry Branch	5
Comment #2: Deborah Ross.....	5
Comment #3: Lisa Riener.....	6
Comment #4: Don Foran	7
Comment #5: Amy Hargrove, Department of Ecology.....	7
Comment #8: Vicki Cline, Department of Ecology	8
Comment #9: Geoffrey L. Glass, Engineer II, Olympic Clean Air Agency	8
Comment #10: Cari Hornbein, City of Olympia.....	10
Comment #11: Jason Kunz, Washington Department of Fish and Wildlife	12

Site Information

Address: 1210 West Bay Drive NW, Olympia, WA

Site Manager: Guy Barrett

Public Involvement Coordinator: Meg Bommarito

In 2007, the Washington Department of Ecology (Ecology) and Hardel Mutual Plywood entered into an Agreed Order for an investigation, feasibility study and interim actions at the Hardel Mutual Plywood site.

The agreement required Hardel Mutual Plywood, Inc. (Hardel) to complete the following:

- Remedial investigation to determine the nature and extent of contamination.
- Interim actions to remove free product and reduce contamination and risk to human health and the environment.
- Feasibility study to identify and evaluate cleanup alternatives.

Data collected during the Remedial Investigation indicated that the contamination might be moving via groundwater towards Budd Inlet.. In order to immediately address contamination and to prevent contamination from reaching Budd Inlet, Hardel is proposing to conduct several interim (partial cleanup) actions.

The comment period for the Interim Action Work Plan and associated State Environmental Policy Act Determination of Non-Significance ran from December 21, 2009 – January 29, 2010. Public comments and Ecology’s responses are summarized in this document.

Site Background

Hardel operated as a plywood manufacturing business from 1951 until 1996. The company ended operations after a fire severely damaged buildings on site. Those buildings have since been removed and only foundation walls, concrete slabs and drainage systems are still present on the site.

Historical site activities resulted in the release of petroleum products to soil and groundwater. Investigations at the site in 2004 confirmed presence of contamination, including:

- Heavy oil and diesel petroleum in groundwater and soil.
- Free floating petroleum product on the west site of the property.
- Polycyclic aromatic hydrocarbons in soil (north area of property) and in groundwater (south area of property).

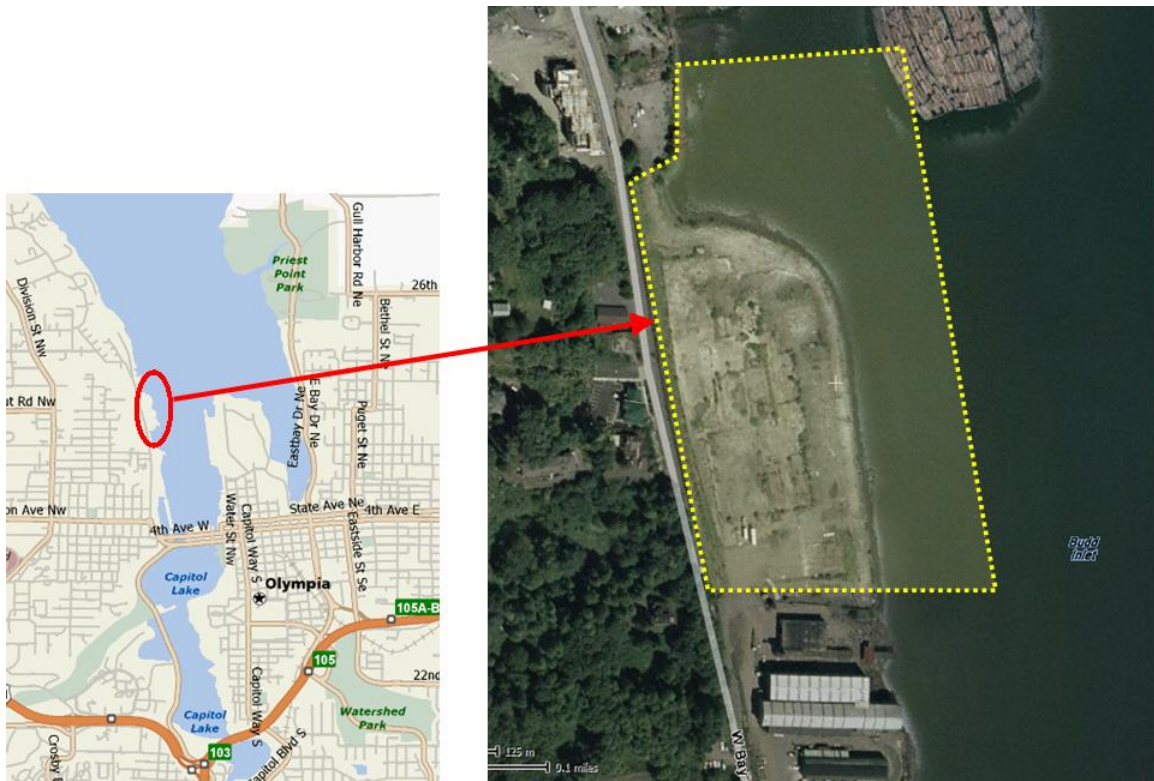
Ecology entered into an Agreed Order to begin cleanup with Hardel in April 2007. The agreement required Hardel Mutual Plywood (Hardel) to complete the following:

- Remedial investigation to determine the nature and extent of contamination.
- Interim actions to remove free product and reduce contamination and risk to human health and the environment.
- Feasibility study to identify and evaluate cleanup alternatives.

A Remedial Investigation (RI) was completed in 2007. Two areas of concern were identified for both soil and groundwater. A supplemental investigation revealed that contamination was moving in groundwater towards Budd Inlet.

Hardel conducted a Feasibility Study in 2009 and examined possible cleanup actions. In order to immediately address contamination and to prevent contamination from reaching Budd Inlet, Hardel is proposing to conduct several interim (partial cleanup) actions.

Site Map



Comments Received and Ecology Responses

The following comments were received during the December 21, 2009 – January 29, 2010 public comment period for the Hardel Mutual Plywood site. These comments will be added to the site file and available to the public.

Comment #1: Harry Branch

Re: Remediation of contamination at Hardel:

I cannot find anywhere that the site has been assessed for dioxin contamination. I believe the operating rationale is an assumption based on a single EPA statement that dioxin adheres to soil and doesn't migrate.

There are four reasons we shouldn't resort to this assumption:

1. Dioxin the THE chemical of concern for Budd Inlet.
2. Dioxin does become mobilized when combined with oily hydrocarbons and these hydrocarbons pervade much of Budd Inlet, including the Hardel Site.
3. Dioxin has migrated throughout Budd Inlet and is generally ubiquitous in benthic soils.
4. There is a hot spot immediately offshore to the north of the Hardel Site.

If we are really concerned about the health of Puget Sound, we need to do fate and transport modeling. We need to find all sources of the problem. When we have an opportunity to conduct any kind of remediation in Budd Inlet near shore soils we should include the chemical of concern and not rely on flawed assumptions.

Harry Branch

Ecology Response

Ecology shares your concern about the presence of dioxins/furans in Budd Inlet. Upland soils are typically sampled and analyzed for dioxins/furans at Budd Inlet Puget Sound Initiative sites when historic operations of a facility may have released dioxins/furans. Operations at the former Hardel Mutual Plywood site do not appear to have been a source of dioxins/furans so upland soils were not sampled and analyzed for this chemical of concern. Sediment samples were collected and analyzed for dioxins/furans as part of Hardel's remedial investigation so we are aware that dioxins/furans are present at certain locations. Ecology's strategy is to first have a better understanding of the nature and extent of dioxins/furans throughout Budd Inlet prior to initiating a cleanup remedy.

Comment #2: Deborah Ross

Hello. My name is Deborah Ross and I have just published a book, Konrad and Albertina, about the Schneider family who owned and developed a large portion of the West Bay area, including the Hardel property slated for cleanup. I am interested in knowing what archeological plans there are for the cleanup project. I did not see any reference to archeological work in the project description. Censuses show that there was an Indian family group living on that property in the

late 1800s, and Schneider family descendants report having found various artifacts when they still owned the property. I would be interested in being kept in the loop if there are any significant finds. Thank you for your consideration.

Ecology Response

Thank you for sharing the information about former tribal use of this property. Hardel's consultant has hired Paragon Research Associates to do the Archaeology study and to put together an Unanticipated Discovery Plan that the contractor will need to follow during digging. We are also coordinating with the Dept. of Archaeology and Historic Preservation concerning the interim action work at the Hardel site. We will notify you of any significant finds during the field work.

Comment #3: Lisa Riener

Attention: Facility site #75128579; Hardel Plywood Cleanup near W. Bay Drive, Oly.
Location: 1210 West Bay Dr. NW., Olympia, Wa.
And includes 17.8 acres, which includes 11.1 acres of tidelands.

This letter is to comment on the site within the City of Olympia; the W. Bay Budd Inlet site of the Hardel Mutual Plywood, and the cleanup of contamination by Hardel Plywood.

In the Dept. of Ecology report, of this site, the 2009 investigation revealed contamination migrating toward Budd Inlet. Hardel Plywood is proposing partial cleanup of the site. Interim actions will likely be taken this Spring by Hardel Plywood. The Dept. of Ecology is taking comments (at the above mailing address) during this comment period which ends January 29, 2010.

The Dept. of Ecology is putting together a SEPA checklist, and SEPA determination. Ecology will draft up a Cleanup Action Plan outlining what steps will be taken to complete the cleanup.

From 1924 through 1996 this property was used for logging and related businesses. Hardel's operated a plywood manufacturing business from 1951 to 1996. Historical site activities resulted in the release of petroleum products to the soil and groundwater on this site. Free floating petroleum hydrocarbons (gasoline and diesel fuels) are on the NW side of the property.. Polycyclic aromatic hydrocarbons are in the soil on the North side of the property, and in the groundwater, South of the property.

A remedial investigation (RI) completed in 2007.

My questions are:

1. How is Hardel's proposal for a partial cleanup, different than those suggested by the 2007 RI?
2. There is to be soil sampling after this partial clean up. What about water sampling? It was mentioned, that hydrocarbons are in the groundwater, also.
3. Where is the contaminated soil going to go?

Please answer my questions.

Thank you,
Lisa Riener

Ecology Response

See below for Ecology's response to each question.

1. How is Hardel's proposal for a partial cleanup, different than those suggested by the 2007 RI?

Ecology Response

The 2007 Remedial Investigation concluded that an interim (partial) cleanup was not necessary because contamination did not appear to be migrating at that time. However, during a recent round of groundwater monitoring it appears that contaminated groundwater was migrating toward Budd Inlet. An interim action was then decided upon to prevent the migration.

2. There is to be soil sampling after this partial clean up. What about water sampling? It was mentioned, that hydrocarbons are in the groundwater, also.

Ecology Response

The interim action work plan specifies that groundwater sampling will occur during and after the interim action. Dewatering effluent as well as monitoring well groundwater samples will be obtained and analyzed.

3. Where is the contaminated soil going to go?

Ecology Response

The soil will be hauled to a landfill licensed to accept this material. An exact location hasn't been determined at this time.

Comment #4: Don Foran

Thank you for keeping us informed about the clean up plans for facility site 75128579, the old Hardel property. We are glad there will be further removal of contaminated soil to try to stop contamination of groundwater and Budd Inlet. We do request as residents of 1801 West Bay Dr NW #305, that work on the site not take place earlier than 6:30 am weekdays if possible (we sleep with an open deck door for fresh air and don't relish the sound of jackhammers or other heavy equipment during our sleeping hours).

Maggie and Don Foran

Ecology Response

The Hardel Mutual Plywood site is one of several sites on Budd Inlet that are being investigated and remediated as part of the Puget Sound Initiative focus. Field work is scheduled to begin for the Hardel interim action during the second quarter of 2010. The work will not commence earlier than 7:00 AM to address your concerns and abide by local protection standards, Chapter 173-60 WAC.

Comment #5: Amy Hargrove, Department of Ecology

The facility addressed in this proposal is a suspected contaminated site that is listed on Ecology's confirmed and suspected contaminated sites list. Hazardous substances may be present at the site in amounts and/or concentrations likely to affect human health or the environment. Site cleanup may be required in the future by ecology under the model toxics control act. This property is within a half mile of several known or suspected contaminated sites:

- Solid Wood INC FSID #94656838
- Port of Olympia Bulk Storage FAC FSID #13510
- Vacant lot Deskoba West Bay LLC FSID #2026160
- Industrial Petroleum Distributors FSID #1436
- Budd Inlet Sediment FSID #3097108
- BMT Northwest FSID #69923242

If contamination is suspected or discovered during development or construction activities, sampling must be conducted. If contamination is confirmed during testing, Ecology must be notified. Contact the environmental report tracking system coordinator at the southwest regional office at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Amy Hargrove with the Toxics Cleanup Program at the Southwest Regional Office at the phone number given above.

Ecology Response

Under the agreed order between Ecology and Hardel Mutual Plywood, the purpose of the proposed interim action is to remove the contaminated soil and free product in two localized areas. Confirmational sampling and analysis will also be performed to ensure soil contaminated above Model Toxics Control Act cleanup levels has been removed.

Comment #8: Vicki Cline, Department of Ecology

The proponent is responsible for inspecting the site to determine the location of all existing wells. Any unused wells must be properly decommissioned and decommission reports submitted to Ecology as described in WAC 173-160-381. This includes resource protection wells and any dewatering wells installed during the construction phase of the project.

Ecology Response

Hardel Mutual Plywood is under order from Ecology and will comply with applicable laws and regulations, including Chapter 173-160 WAC.

Comment #9: Geoffrey L. Glass, Engineer II, Olympic Clean Air Agency

In general, ORCCA considers any forced aeration to remove volatile compounds from soil or groundwater to be a stationary source of air pollution and requires review and possibly a permit from ORCCA. Stationary internal combustion engines may also require review. It appears from the checklist that these operations are not likely to be established on site. Passive aeration of soils, removal of contaminated soils, and operation nonroad engines that are mobile by both design and application are exempt from permitting by ORCCA.

Ecology Response

The interim action for Hardel Mutual Plywood site will entail work in two discrete areas. Soil containing heavy oil, diesel, and polyaromatic hydrocarbons (PAHs) will be excavated and transported to a landfill licensed to accept this material. Free product will also be removed from the groundwater in these localized areas. Groundwater containing dissolved hydrocarbons will be treated on site and then discharged to the LOTT treatment plant or other licensed water handling facility. This interim action will be done under an agreed order between Ecology and Hardel and is exempt from certain local and state permitting requirements. Thank you for your comment.

Comment #10: Cari Hornbein, City of Olympia



City of
OLYMPIA

900 Plum Street, P.O. Box 1967, Olympia, WA 98507-1967

www.olympiawa.gov

Executive/Council: 360.753.8447

Legal: 360.753.8449

Administrative Services: 360.753.8325

Community Planning & Development: 360.753.8314

Fire: 360.753.8348

Human Resources: 360.753.8442

Parks, Arts & Recreation: 360.753.8380

Police: 360.753.8300

Public Works: 360.753.8588

January 29, 2010

Mr. Guy Barrett, Project Manager
WA Department of Ecology
SWRO Toxics Cleanup Program
MS-47775

Dear Mr. Barrett:

RE: Comments on SEPA Determination for Hardel Mutual Plywood

Thank you for the opportunity to comment on the SEPA Determination for the Hardel Mutual Plywood cleanup. The City of Olympia would like to offer the following comments regarding the Determination of Non-Significance.

1. Based on information in KPFF's e-mail dated January 27, 2010, the contractor performing the cleanup will submit a haul route plan and temporary erosion control plan to the City of Olympia for review and approval. In addition, Tom Hill, City of Olympia Building Official, has indicated that a grading plan will be required; please contact Tom at 360-753-8314 for more information.
2. Please be aware that there is a historic structure (George Lane House) across the street, and to take precautions with heavy equipment and trucks so that vibration is minimized. Please contact Jennifer Kenny at 360-753-8031 if you have questions regarding this structure.
3. Please be aware that there is a heron rookery with several nests within 1,000 feet the of the Hardel site, and to consult with the Department of Fish and Wildlife regarding the timing of work relative to nesting season or other impacts upon this rookery.
4. Hours of work shall be consistent with the City's noise protection standards, which are attached for your convenience.

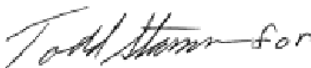
MAYOR: Doug Mah
MAYOR PRO TEM: Joe Hyer
CITY MANAGER: Steven R. Hall

COUNCILMEMBERS: Craig Ottavelli
Rhenda Iris Strub
Karen Rogers
Stephen H. Buxbaum
Jeannine Roe

Mr. Guy Barrett
January 29, 2010
Page 2

Again, thank you for the opportunity to comment. If you have any questions or wish to discuss any of these comments with me, I can be reached at 360-753-8048.

Sincerely,



Cari Hornbein, AICP
Senior Planner

CH:nl

Attachment: OMC 18.40.080, Protection Standards

cc: Tom Hill, City of Olympia, Building Official and Permitting/Inspection Services Manager
Jennifer Kenny, City of Olympia, Associate Planner-Historic Preservation

Ecology Response

The response to this comment is broken down into sections. Please see below for response to each comment.

1. Based on information in KPFF's e-mail dated January 27, 2010, the contractor performing the cleanup will submit a haul route plan and temporary erosion control plan to the City of Olympia for review and approval. In addition, Tom Hill, City of Olympia Building Official, has indicated that a grading plan will be required; please contact Tom at 360-753-8314 for more information.

Ecology Response

Ecology contacted Mr. Tom Hill and a grading plan will now be written by Hardel's consultant for the interim action.

2. Please be aware that there is a historic structure (George Lane House) across the street, and to take precautions with heavy equipment and trucks so that vibration is minimized. Please contact Jennifer Kenny at 360-753-8031 if you have questions regarding this structure.

Ecology Response

Ecology contacted Jennifer Kenny regarding the George Lane House. Ms. Kenny asked that we be aware of and take care not to affect the house. She also said we should contact the Dept. of Archaeology and Historic Preservation if any historic artifacts are found. As mentioned, Hardel has hired a consultant to perform an archaeology study and will put together an Unanticipated Discovery Plan that the contractor will need to follow during digging. We are also coordinating with the Dept. of Archaeology and Historic Preservation concerning the interim action work at the Hardel site.

3. Please be aware that there is a heron rookery with several nests within 1-,000 feet the of the Hardel site, and to consult with the Department of Fish and Wildlife regarding the timing of work relative to nesting season or other impacts upon this rookery.

Ecology Response

Ecology contacted Washington Department of Fish and Wildlife to discuss their concerns. See comment #11 below.

4. Hours of work shall be consistent with the City's noise protection standards, which are attached for your convenience.

Ecology Response

The interim action work is proposed from 7 AM to 7 PM Monday through Friday and will comply with noise protection standards.

Comment #11: Jason Kunz, Washington Department of Fish and Wildlife

Hello Mr. Barrett,

I reviewed several aerial photo/mapping applications, the WDFW PHS recommendations and feedback from the WDFW District Wildlife Biologist about this particular site and the nearby Herron Rookery.

I have the following comments:

WDFW typically regulate heron colonies out to 300 meters (basically a 1000 ft) for both timing restrictions and more importantly, vegetation alteration. The latter should not occur within 1000 ft of the colony (measured from the outermost nests). Loud disturbance should not be allowed within 1000 ft during nesting season (2/1 through 7/15).

Consistent traffic volume increase may not be a major factor (a study done for Kenmore Colony is attached) and may be tolerated, particularly if the area is urban in nature and birds are acclimated to noise.

New and inconsistent noise and human disturbance may cause decline in productivity and/or abandonment of colony (see attached MS thesis from Canada).

I have the following recommendation:

Since the proposed project is less than 900 feet away and increased/inconsistent volume from heavy machinery and dump trucks hauling heavy loads is imminent, the timing restriction of 2/1 through 7/15 should be applied to the earth removal project at the Hardel Site in order to avoid any impacts to the nearby heron colony during the breeding season.

Thank you for this opportunity to comment and promote the protection of an important wildlife species that makes Washington so great.

Sincerely,

Jason Kunz

WDFW - Area Habitat Biologist
Region 6 - Habitat Program

Ecology Response

After further discussions with WDFW, Hardel's consultant gathered noise level information related to concrete crushing, water pumps and truck traffic. The quietest methods of accomplishing this interim action will be employed. To minimize any increase in noise during the proposed interim action, Hardel will perform monitoring to ensure attainment of the noise action level for protection of the nearby heron rookery. WDFW says the heron rookery has been disturbed by tree cutting and it is best to begin this interim action as soon as possible.