



RESPONSIVENESS SUMMARY

Superlon Plastics, Inc. Cleanup Site

January 25 – February 25, 2010 Public Comment Period

**Interim Action Work Plan and
SEPA Determination of Non-Significance**

Prepared by
Washington State Department of Ecology
Southwest Regional Office
Toxics Cleanup Program
Lacey, Washington

March 2010

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Site Information

Address: 2116 Tacoma Way, Tacoma

Site Manager: Marv Coleman

Public Involvement Coordinator: Meg Bommarito

The Washington State Department of Ecology, White Birch Group, LLC and E.I. du Pont de Nemours and Company (Potentially Liable Persons or PLPs) entered into a legal agreement to begin investigation of contamination at the Superlon Plastics property in Tacoma.

The Agreed Order is a legal document that requires White Birch Group, LLC and E.I. du Pont de Nemours and Company to:

- Conduct a Remedial Investigation to determine the nature and extent of contamination.
- Conduct a Feasibility Study to examine possible cleanup options.

In order to safely and effectively conduct the Remedial Investigation, some partial cleanup actions will be taken at the site. These actions include demolishing Building B and removing debris from its basement, laying gravel or recycled concrete over some areas of contaminated soil and managing surface water on the site. The Interim Action Work Plan and the State Environmental Policy Act Determination of Non-Significance were available during a 30 day public comment period.

The comment period for the Agreed Order ran from January 25 – February 25, 2010. Public comments and Ecology’s responses are summarized in this document.

Site Background

The 3.1 acre site is located at 2116 Taylor Way in Tacoma between the Blair and Hylebos Waterways. From 1925 to 1951, the property was used to produce and warehouse lead-arsenate pesticides. In 1951, the site was sold and operated as a lumber company and wood treatment facility until 1972. Superlon Plastics purchased the site to manufacture plastic piping from 1972 to present. The company is still in operation.

In 1990, an Ecology site investigation led to the discovery of 34 corroded drums on the dirt floor in one of the building basements. Several contaminants were detected above state standards in soil, groundwater and standing water. Contaminants include arsenic, cadmium, lead, mercury, gasoline and oil range hydrocarbons, pentachlorophenol, tetrachloroethylene, trichloroethylene, cis-1,2-dichloroethylene, vinyl chloride, and chloromethane.

Ecology referred the site to the Environmental Protection Agency (EPA). In 1991, EPA performed an investigation of the site and recommended further investigation to determine if there was a need for removal of contamination.

As part of the Governor’s 2007 Puget Sound Initiative, an effort to restore the health of Puget Sound by 2020, Ecology’s Toxics Cleanup Program received resources to accelerate cleanups within 1/2 mile of the Sound. Ecology began to reevaluate sites within this area where there had been no action due to lack of resources. Superlon, and several other sites, were evaluated and became high priority sites.

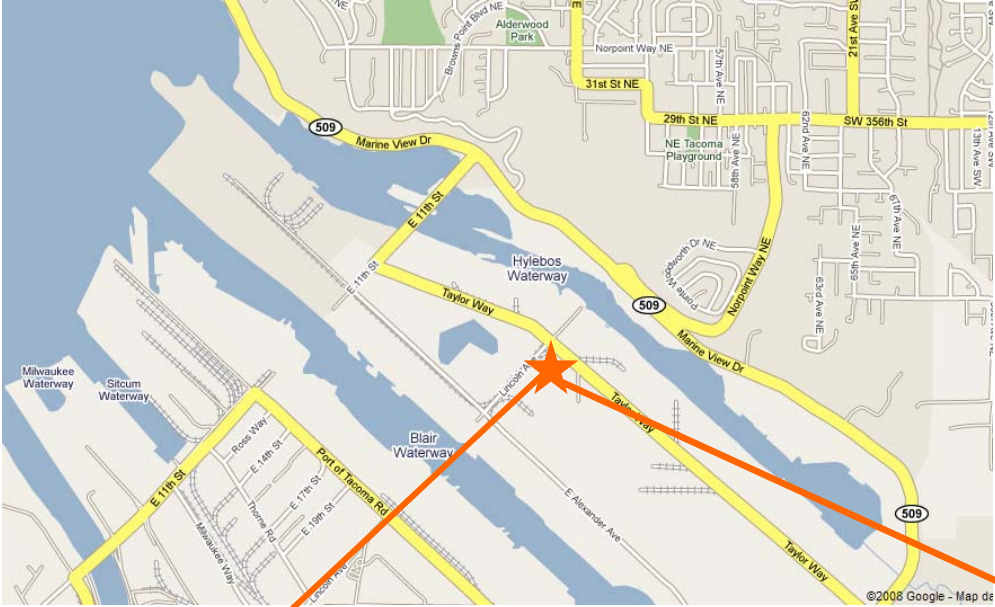
In 2007, Ecology staff investigated the site and discovered the corroded drums were still on the site and found no evidence of cleanup. White Birch Group, LLC and E.I. du Pont de Nemours (the potentially liable persons or PLPs) and Company and Ecology began negotiating the Agreed Order to begin cleanup.

Superlon has been working with Washington State Labor & Industries to ensure the safety and health of their employees. Several steps have been taken to make sure employee health is protected.

In order to safely and effectively conduct the Remedial Investigation, some partial cleanup actions will be taken at the site. These actions include demolishing Building B and removing debris from its basement, laying gravel or recycled concrete over some areas of contaminated soil and managing surface water on the site. The PLPs drafted an Interim Action Work Plan outlining steps that would be taken to complete the Interim Action.

In addition, the PLPs did a State Environmental Policy Act review to determine if the proposed actions would have an adverse effect on the environment. Ecology reviewed this information and determined that there would be no adverse impact. The Work Plan and the Determination of Non-Significance were available for public review and comment during the January comment period.

Site Location



Comment #1: Leslie Ann Rose, Citizens for a Healthy Bay



February 18, 2010

917 Pacific Avenue
Suite 100
Tacoma, WA 98402
Phone (253) 383-2429
Fax (253) 383-2446
chb@healthybay.org
www.healthybay.org

Mr. Marv Coleman, Site Manager
Washington Department of Ecology
SWRO Toxics Cleanup Program
P. O. Box 47775
Olympia, WA 98504-7775

Re: Superlon Plastics Co., Inc. Interim Action Work Plan

Dear Mr. Coleman:

Citizens for a Healthy Bay (CHB) appreciates the opportunity to review and submit comments to the work plan and SEPA determination referenced above.

Executive Director
Bill Anderson

The tasks described in the interim action work plan prepared by Superlon and reviewed by Ecology will address site contamination issues. CHB also concurs that the action poses no significant adverse environmental threats rather that the action will enhance the environmental quality of the site.

Board of Directors

Cheryl Greengrove
Bruce Kilen
Artee Young
Bill Pugh
Lee Roussel
Dylan Stanley
Robert Stivers
Sheri Tonn
Allen Zulauf

CHB appreciates the efforts made by Superlon and the Dept. of Ecology to improve the environmental conditions of this site and to complete the planned remedial investigation.

CHB is a community based, non-profit environmental organization representing the community stakeholders in the Commencement Bay Nearshore/Tideflats Superfund problem area and surrounding area. Our membership includes citizens of the greater Commencement Bay and South Puget Sound area.

Thank you for your consideration of our remarks and for including them as part of the formal site record.

Sincerely:

Leslie Ann Rose
Senior Policy Analyst

cc: Eivor Donahue, Superlon
Meg Bommarito, Ecology

A tax-exempt
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nonprofit corporation

Ecology Response

As always, thank you for your consideration of the SEPA review and Interim Action Work Plan and your comments regarding those documents. Marv Coleman, Site Mgr.

Comment #2: Ariona, Department of Ecology, Waste 2 Resources Program

The applicant proposes to demolish an existing structure. In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present, such as PCB-containing lamp ballasts, fluorescent lamps, and wall thermostats containing mercury, are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the “Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes,” posted at Ecology’s website, www.ecy.wa.gov/programs/hwtr/demodebris/. The applicant may also contact Rob Rieck of Ecology’s Hazardous Waste and Toxics Reduction Program at (360) 407-6751 for more information about safely handling dangerous wastes and demolition debris.

Property owners, design professionals, and contractors are encouraged to consider how all building materials might be salvaged and reused. Doors, windows, cabinets and other valuable fixtures may be salvaged for reuse prior to demolition. Local salvage and reuse organizations provide services to evaluate, remove, and re-sell used building materials. For assistance in finding local reuse and recycling options for building materials, contact Anya Caudill at (360) 407-6084.

Ecology Response

Thank you for your review and comments regarding these documents. Marv Coleman, Site Mgr.

Comment #3: Roberta Woods, Department of Ecology, Water Quality Program

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Proper disposal of construction debris must be on land in such a manner that debris cannot enter the stormdrains draining to waters of the state, e.g., the drainage ditch along southwest of work area which drains to Hylebos Waterway or cause water quality degradation of state waters.

During construction, all releases of oils, hydraulic fluids, fuels, other petroleum products, paints, solvents, and other deleterious materials must be contained and removed in a manner that will prevent their discharge to waters and soils of the state. The cleanup of spills should take precedence over other work on the site.

A permanent vegetative cover should be established on denuded areas at final grade if they are not otherwise permanently stabilized.

Properties adjacent to the site of a land disturbance should be protected from sediment deposition through the use of buffers or other perimeter controls, such as filter fence or sediment basins.

All temporary erosion control systems should be designed to contain the runoff from the developed two year, 24-hour design storm without eroding.

Provision should be made to minimize the tracking of sediment by construction vehicles onto paved public roads. If sediment is deposited, it should be cleaned every day by shoveling or sweeping. Water cleaning should only be done after the area has been shoveled out or swept.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Ecology Response

Thank you for your review and comments regarding these documents. Marv Coleman, Site Mgr.

Comment #4: Brad Harp, Tacoma Pierce County Health Department



Governed by a local Board of Health

February 11, 2010

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Superlon Plastics Comments:

Thank you for providing the Tacoma-Pierce County Health Department (Health Department) with the opportunity to comment on this proposed action.

Perhaps the checklist is not meant to provide detailed information about the remediation efforts, but rather whether the intended work will have any environmental impact in and of themselves. If so, these comments may not be pertinent, but the Health Department offers them for your consideration.

1. While the site background information acknowledges that the soil is contaminated at this site, we cannot find further information about the extent of the contamination. Information regarding the extent of the contamination would be helpful in determining the sufficiency of the outlined interim actions.
2. One of the first pages is Ecology's notice and SEPA determination being available for public comment. On that page, it says that the interim action plan describes several steps that will be taken to immediately address contamination (including building demolition, soil removal, and capping). Does stockpiling soil on site constitute removal, and does crushed rock placement constitute capping?
3. Section A (11) - in the brief but complete description of the proposed actions, no mention is made at all as to soil contamination and disposition - see next item.
4. Section B (1) (e) describes grading less than four (4) inches of surface soil into a stockpile and covering it with 20 mil plastic. No mention is made whether some or all of it is actually contaminated. If so, how does that address the presence of contaminated soil? We would also recommend the need for the soil to be placed on top of plastic to isolate the soil from contact, but preferably removed from the site entirely.
5. Section B (2) (a) is supposed to address types of air emissions from the proposed work but does not specifically detail the hazards of metal contaminated dust from the building interior and the metal contaminated soils. Information on file at the Health Department about this site indicates that the interior of Building B is significantly impacted by metal contaminated dust, and the soil is significantly contaminated with metals.

6. Section 3 (c) (1) Surface water has ponded in the basement of Building A, Building B, and the ground in between. The site does not drain well in those areas (if at all). Soil is contaminated in Building B and it is not clear from the information provided that it will be addressed. Also, after reviewing this document there does not appear to be sufficient information in the plan to address the propensity for water to continue ponding in this area, on top of possibly still contaminated soil, except for the placement of crushed rock. If 4 inches of soil are scraped and replaced by crushed rock, is this sufficient to adequately address the poor drainage.

7. Section 3 (c) (2) - the information provided does not indicate how the proposed actions will improve the environmental quality of the property. No details are provided about the extent of the soil contamination or specific means of addressing it. The source of the contamination should be considered the soil at this location, and source removal is the method that would most significantly impact environmental conditions. If the extent of the "cleanup" of the soil contamination is to scrape it into a stockpile and cover it with plastic, then Ecology may want to consider whether those actions would sufficiently improve the site conditions, especially given the wet conditions of the site.

Sincerely,

Brad D. Harp
Environmental Health Program

Ecology Response

Dear Brad,

Thanks for your review and comments on the Superlon Plastics SEPA. Your comments are well founded with respect to the fact that the checklist may not have completely conveyed the intent of this phase of work. It would be clearer to someone that reviewed the Interim Action Work Plan and Remedial Action Work Plan, rather than just the SEPA checklist. I'll respond to each of your comments in turn, but the upshot of this phase of the work is that its purpose is to safely prepare the site for conducting a remedial investigation...this phase of the work is not intended to be a remedial investigation or remedial action.

1. We currently have data that confirms the contamination in site soils and groundwater. However, this data was generated as a Phase I – Phase II site assessment by the Port of Tacoma. A properly conducted Remedial Investigation, which would include determining the full nature and extent of the contamination, has not been conducted. The purpose of this phase is simply to prepare the property to conduct such an investigation by removing obstacles (such as building B) and securing the property so that it does not present a hazard to human direct contact and the peripheral environment in the interim.

2. Stockpiling the soil and placing crushed rock are not intended to be either removal or capping. The initial removal and stockpiling of surface soils is intended to prepare the surface of the site so that the remedial investigation can be conducted more safely and effectively. Currently, the site surface is very uneven and overgrown in places by brush; other areas contain equipment and materiel that need to be moved. The purpose of the crushed rock is threefold: 1) To provide more stable surfaces to support the investigation equipment (drill rigs and such) and 2) particularly in the area where Building B is located, groundwater, when high, floods the soil floor basement. As you know, this portion of the site is incredibly contaminated. The purpose of the crushed rock here is to get grade up high enough that the working surface will be above the high water elevation and to provide a more stable surface to support the investigation equipment. While building demo materials will be removed and disposed of right away, the stockpiled surface soil and crushed rock that will be added will be removed and disposed of once the extent of contamination has been identified and we design and implement a remedy. 3) The added benefit of this is that the crushed rock also provides a barrier against those really contaminated soils so that the investigation work can be more safely carried out with respect to personnel safety and spreading contaminated material around.

- 3 & 4. As noted above, the near surface soil removal is not intended to be cleanup, per se, but rather to prepare the site for the remedial investigation. We do see some heavy metal contamination in the surface soils, but, based on concentrations, it's probably more related to the Tacoma Smelter Plume. The really contaminated soil is deeper and associated with the contaminated groundwater and the soils in the basement. In any case, it will go away with other contaminated soils when we remediate. I agree with your comment about a bottom liner for the storage cell; I will have them do that.

5. When L&I did their investigation, they required the owners to remove miscellaneous loose materials (except in the highly contaminated basement area), remove loose dust and dirt, and coat the building components. Although this reduced that problem quite a bit, subsequent wipe sampling indicated that some areas still have some surface contamination. In addition, the consultant has sampled the various building components in order to determine proper handling during demolition and proper disposal. It may be necessary to use water spray to abate airborne dust, similar to how we demolished American Plating. If, based on the building materials analyses it appears that this should be done, I will require them to do so. If done, dripping from this activity would fall into the basement area of the building, which is already full of contaminated water. The same with soil removal.

6. This SEPA is strictly meant to address site preparation for conducting the remedial investigation. Once the site is prepared, the remedial investigation (RI), which is described in a separate document and is a completely separate phase of the project, will address the nature and extent of both groundwater and soil contamination. (Note: The reason for doing SEPA on this preparation phase is because filling, grading, and demolition will be taking place. The actual remedial investigation is subject to our approval, but is not subject to SEPA.) Again, the placement of crushed rock is not intended to be a remediation step; its purpose is only to stabilize the working surface for the RI and to prevent interim exposure to the contaminated soils and groundwater.

7. This phase is not intended to improve the environmental quality of the site. Again, it is simply site prep for the RI. The RI will address the extent of contamination and the resultant feasibility study (FS) will address the corrective actions (remedial actions) that will be implemented. Even though the RI/FS have not been performed, we all anticipate that soil removal will be a significant element of the corrective action, likely with some form of proactive groundwater remedial action.

Some additional background: The water in the basement of Building B appears to be, at least partly, the result of the original building being built at or close to the elevation of the original tideflats. Thus, the propensity for it to flood. Post remedial action, the property will be filled to bring the existing low areas up to grade, which will eliminate the flooding problem. (If you haven't been to the site, the basements of both buildings are several feet lower than the ground surface surrounding them. Got pix if you're interested.)

Building B appears to be the only location where the lead arsenate manufacturing took place and the reasons for the extreme contamination there are pretty obvious. Building A was built later, and although it floods in a similar manner, I suspect that contaminated groundwater and soil that may exist in that location is more the result of migration from the basement of Building B. Contamination associated with Building A will, of course, have to be addressed as well. The Remedial Investigation Work Plan details sampling there, as well as Building B and the rest of the property. (I'm guessing the first phase of the RI will probably lead us to off-site investigation also, at least in the groundwater.) No sampling has been done so far under Building A. The lateral ditch going from the property to the Lincoln Ave. ditch will be sampled, along with the LAD itself and its outfall.

It's a challenging site. Let me know if any questions.