



RESPONSIVENESS SUMMARY

Superlon Plastics, Inc. Cleanup Site

April 27 – May 27, 2009 Public Comment Period

**Agreed Order for a Remedial Investigation,
Feasibility Study and Interim Action**

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

June 2009

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Site Information

Address: 2116 Tacoma Way, Tacoma

Site Manager: Laura Klasner

Public Involvement Coordinator: Meg Bommarito

The Washington State Department of Ecology, White Birch Group, LLC and E.I. du Pont de Nemours and Company are entering into a legal agreement to begin investigation of contamination at the Superlon Plastics property in Tacoma.

The Agreed Order is a legal document that will require 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.

The comment period for the Agreed Order ran from April 27 through May 27, 2009. 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.

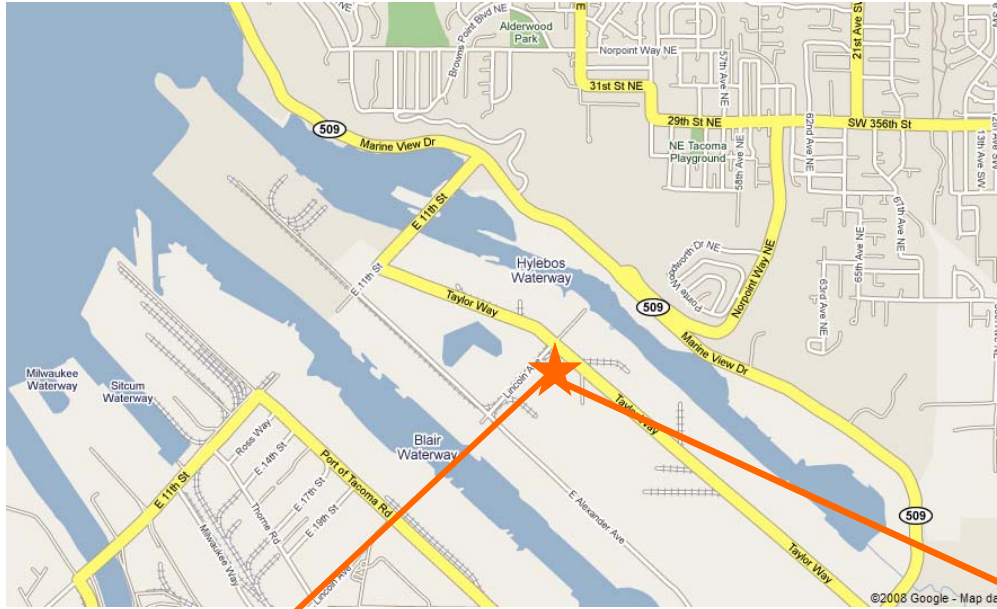
Ecology referred the site to the Environmental Protection Agency (EPA). In 1991, EPA performed an investigation of the site and recommended further investigation to determine if there was a need for removal of contamination.

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 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.

Site Location



Comment #1: Nigel Blakley, EcoRisk Support Services

ECORISK SUPPORT SERVICES RECEIVED

MAY 14 2009

Washington State
Department of Ecology



May 13, 2009

Laura Klasner, Site Manager
Washington State Department of Ecology
SWRO Toxics Cleanup Program
P.O. Box 47775
Olympia, WA 98504-7775

Re: Draft Agreed Order for Superlon Plastics Co., Inc Site

Dear Ms Klasner,

ERSS has been contracted to conduct a review of the Department of Ecology's implementation of the MTCA requirements for conducting a Terrestrial Ecological Evaluation (WAC 173-340-7490). As you know, all sites with soil contamination are subject to these requirements.

Based on the results from our review to date, we recommend that all Agreed Orders include a stipulation to insure that a TEE is conducted in the Remedial Investigation. As an example, the following is taken from Agreed Order No. DE 6558 (New City Cleaners) which is also currently available for public comment:

The report shall include, but not be limited to, the following:

...

...

c. A terrestrial ecological evaluation or a demonstration that the Site meets the conditions for an exclusion from a terrestrial ecological evaluation as specified in WAC 173-340-7491.

We suggest including this, or similar, wording in the subject Agreed Order.

Thank you for the opportunity to comment.

Yours Sincerely,

Nigel Blakley PhD, PE
EcoRisk Support Services

Ecology Response



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

CERTIFIED MAIL

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June 1, 2009

Nigel Blakley, PhD, PE
EcoRisk Support Services
4946 Beverly Dr NE
Olympia, WA 98516-2213

Dear Mr. Blakley:

Re: Superlon Plastics, Inc., FS/ID#2776343, Agreed Order, Public Comment Period, Response Letter

Thank you for your May 13, 2009 letter concerning Terrestrial Ecological Evaluation (TEE) requirements within the Draft Agreed Order (order) for the Superlon Plastics Co., Inc. Site. Although Part VII.C [Draft Remedial Investigation (RI) Work Plan] of the order does not specifically mention the TEE requirements, it does state that the RI Work Plan must meet the RI content requirements outlined in Washington Administrative Code (WAC) 173-340-350(7). This section of the code requires a TEE under subsection 173-340-350(7)(c)(iii)(F). Therefore, we will not amend the order to include additional TEE language.

Please be assured that Ecology intends to follow through with the substantive requirements of the WAC including, but not limited to, completion of a TEE. I have discussed the TEE requirements with the potentially liable parties (PLPs) and will forward your comment to them. If you would like to discuss this issue further, please contact me by phone (360-407-6265) or email (lkl461@ecy.wa.gov).

Regards,

A handwritten signature in cursive script that reads "Laura Klasner".

Laura Klasner, PE
Site Manager
Toxics Cleanup Program
Southwest Regional Office

LMK/ksc:AO Comment response N Blakley may2009

cc: Eivor Donahue, Superlon
Tim Bingman, DuPont
Lisa Pearson, Ecology

