



RESPONSIVENESS SUMMARY

Pacific Wood Treating Cleanup Site

June 7 – July 8, 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

August 2010

Table of Contents

Site Information	3
Site Background.....	3
Site Location	5
Comment #1: Gretchen Kaehler, Department of Archeology and Historic Preservation	6
Comment #2: Robert G. Whitlam, Department of Archaeology and Historic Preservation.....	7
Comment #3: Mike Drumright, Department of Ecology	8
Comment #4: Sam Iwenofu, Department of Ecology.....	9
Comment #5: Greg Wingard.....	11
Comment #6: Mitch and Nancy Madsen	11
Comment #7: Tina Hallock, Southwest Clean Air Agency	13

Site Information

Address: 111 West Division Street, Ridgefield

Site Manager: Craig Rankine

Public Involvement Coordinator: Meg Bommarito

The Washington State Department of Ecology and the Port of Ridgefield entered into two Agreed Orders to address contamination at the Pacific Wood Treating cleanup site (1995 and 2001). The Port is moving forward to complete the requirements of these orders. The Port will complete an interim (partial) cleanup action which will:

- Remove contaminated soil from two areas of the property. Excavation areas will be backfilled with soil.
- Install a minimum 2 foot thick cover of soil over areas of site (see map on page 3) where some residual contamination will remain.
- Place an environmental covenant (type of deed restriction) on the property to protect people from contamination remaining on site.

Ecology completed a State Environmental Policy Act (SEPA) review of the proposed Interim Action and determined that it is not likely to have significant negative environmental impacts (a Determination of Non-Significance).

The comment period for the Interim Action Work Plan ran from June 7 – July 8, 2010. The comment period for the SEPA Checklist and Determination ran from June 7 – June 21, 2010. Public comments and Ecology’s responses for these comment periods are summarized in this document.

Site Background

The 41-acre former Pacific Wood Treating facility is located at 111 West Division in Ridgefield. The property was leased from the Port of Ridgefield.

From 1964-93, Pacific Wood Treating pressure-treated specialty wood products with wood preservatives such as creosote, pentachlorophenol (PCP) and copper/chromium/arsenic solutions. Contaminants were released to the environment through spills, leaking wastewater storage tanks, storm water run off and leaks from the buried drain system.

Environmental Protection Agency Investigation

In 1985, as part of a focused nationwide effort to address impacts from wood treating facilities, the US Environmental Protection Agency (USEPA) investigated the property. Wood treating chemicals, including PCP, polyaromatic hydrocarbons, arsenic (in soil and groundwater), and dioxins (in soil); were found above state cleanup standards.

Pacific Wood Treating entered into a legal agreement with the EPA through the Resource Conservation and Recovery Act. This agreement required Pacific Wood Treating to determine the full extent of contamination and then clean it up. In 1993, Pacific Wood Treating stopped operations and declared bankruptcy. The company discontinued cleanup work.

Department of Ecology Cleanup

In 1995, Ecology and the Port entered into an Agreed Order to conduct Interim (partial cleanup) Actions to address the most contaminated areas of the site, the tank farm. The Agreed Order required the Port to:

- Upgrade the stormwater system.
- Empty, dismantle and remove storage tanks.
- Dispose of solid waste and hazardous chemicals.
- Fully characterize contamination in soil and groundwater.
- Excavate and remove contaminated soil.

The Port completed the Interim Actions between 1996-98. Groundwater sampling conducted in 2001 revealed groundwater contamination had extended into the Ridgefield National Wildlife Refuge.

Second Cleanup Agreement with Ecology

In 2001, Ecology and the Port entered into a second Agreed Order to address remaining contamination on the property, in the refuge and in the river. This agreement required the Port to:

- Clean up the worst areas of contamination in the former tank farm area (next to refuge) and other highly contaminated areas.
- Improve stormwater quality and demolish some buildings and structures to make cleanup easier.
- Finish the Remedial Investigation and conduct a Feasibility Study to evaluate cleanup alternatives.

To date, the Port of Ridgefield has completed several cleanup actions including;

- Removal of 100 tons of solid waste and 1,222 tons of hazardous waste.
- Installation and operation of a steam-enhanced treatment system to remove contamination from groundwater and soil.
- Removal of 110 million gallons of contaminated water.
- Removal of most of the former Pacific Wood Treating infrastructure to allow better access to cleanup areas.

Site Location



Comment #1: Gretchen Kaehler, Department of Archeology and Historic Preservation

Mr. Rankine:

I have attached a letter submitted last year by Rob Whitlam, State Archaeologist. The letter recommends that you develop a Cultural Resources Protection Plan (CRPP). If you have developed such a plan, may we have a copy please? The plan should include recommendations for monitoring of project areas by a professional archaeologist and inadvertent discovery procedures that would be followed in the case of an inadvertent discovery. The area has such a high probability for containing archaeological resources as well as burials, we feel it is important to have the CRPP developed prior to project commencement.

Thank you,

Gretchen Kaehler
Assistant State Archaeologist, Local Governments
Department of Archaeology and Historic Preservation
Olympia

Ecology Response

A draft Unanticipated Discovery and Monitoring Plan (same as a Cultural Resource Protection Plan) was submitted to Gretchen Kaehler and on July 7 she provided comments on that document. Those comments were incorporated into the plan and on July 9 the final Plan was submitted to Ms. Kaehler.

The Plan indicates any time native soil is going to be encountered during site interim action grading work, a professional archaeologist will be on-site to monitor for cultural resources and administer the Plan. Interim action site grading will take place in Cells 3 and 4. Native soil is only expected to be encountered in Cell 3.

Comment #2: Robert G. Whitlam, Department of Archaeology and Historic Preservation



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

September 30, 2009

Ms. Connie Groven
Toxic Cleanup Department
Department of Ecology
PO Box 47600
Lacey, Washington 98504-7600

Re: Port of Ridgefield Pacific Wood Treating Site Project
Log No: 093009-06-ECY

Dear Ms. Groven:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed Port of Ridgefield Pacific Wood Treating Site Project in Clark County, Washington.

We concur with the professional archaeologist's recommendations to assure no activities extend beneath the fill cap. We recommend that you develop Cultural Resources Protection Plan (CRPP) to assure all work is reviewed and verified to assure it only occurs in the fill cap.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribes and this department notified.

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
email: rob.whitlam@dahp.wa.gov

Ecology Response

In response to this letter Ecology spoke with Gretchen Kaehler at the Washington Dept. of Archaeology & Historical Preservation (DAHP) regarding the recommendation that “no activities extend beneath the soil cap.” This recommendation was provided because when this letter was written a Unanticipated Discovery and Monitoring Plan (same as a Cultural Resource Protection Plan) had not been prepared and submitted to DAHP. As indicated in Ecology’s response to Comment #1 (above) on July 9, a final Plan was submitted to Ms. Kaehler. The Plan indicates that any time native soil is going to be encountered during site interim action grading work a professional archaeologist will be on-site to monitor for cultural resources and administer the Plan.

Comment #3: Mike Drumright, Department of Ecology

If greater than 250 cubic yards of inert, demolition, and/or wood waste is used as fill material, a solid waste handling permit is required from the local jurisdictional health department. Standards apply as defined by Washington Administrative Code (WAC) 173-350-990-Criteria for Inert Waste.

To mitigate the impact of the impervious surfaces resulted from the future development, the applicant may wish to refer to the low impact development strategies in the comprehensive land use plan. You can find the Low Impact Development Technical Manual at the Puget Sound Partnership website http://www.psp.wa.gov/downloads/LID/LID_manual2005.pdf.

The applicant proposes to demolish an existing structure(s). 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.

Deconstruction

Property owners, design professionals, and contractors are encouraged to consider how building materials might be salvaged and reused. Buildings may also be completely deconstructed to maximize material recovery and recycling. Doors, windows, cabinets and other valuable fixtures and materials may be salvaged for reuse prior to demolition. Local salvage and reuse organizations provide services to evaluate, purchase, remove, and re-sell used building materials; a federal tax deduction may be available for donating building materials. For assistance in

finding local reuse and recycling options for building materials, contact Ariona at (360) 407-6351.

Demolition with specifically treated wood

The applicant proposes to remove a structure(s) that may contain treated wood. Please refer to Ecology's publication "Focus on Treated Wood Exclusion," available at <http://www.ecy.wa.gov/pubs/0304038.pdf>, for suggested best management practices and disposal requirements for treated wood. For additional information or clarification, please contact Dee Williams with Ecology's Hazardous Waste and Toxics Reduction program, at (360) 407-6348.

Ecology Response

Regarding Mr. Drumright's comment Ecology checked with the local jurisdictional health department (Clark County Health Department) and was informed that a solid waste handling permit was not required because the concrete debris which would remain on Cell 3 was less than 250 cubic yards. The rest of the comments are noted and appropriate action will be taken for building demolition and materials handling.

Comment #4: Sam Iwenofu, Department of Ecology

The applicant proposes to dispose of soil contaminated with listed hazardous waste generated from a cleanup site at a subtitle C landfill. The proponent must request for a contained-out determination for soils contaminated with listed hazardous waste under Ecology's Contained In "Policy Criteria". Request for Contained -out Determination must be addressed to:

Ava Edmonson, Section Manager
Hazardous Waste & Toxics Reduction
Department of Ecology
Southwest Regional Office, HWTR
P.O. Box 47775
Olympia, WA 98504-7775

Contained-out Determination Request/Proposal must:

1. Be requested in writing by the property owner or duly authorized representative and addressed to the appropriate Ecology regional office HWTR or Toxics Cleanup manager or staff person;
2. Provide data of adequate quantity and quality to represent site specific conditions and the concentration and risk of each constituent for which the hazardous waste was listed and any possible breakdown products;
3. At a minimum, be accompanied by the following:
 - a. Specific location, company name, and responsible party (property owner or operator)
 - b. Site map showing the location of buildings, sample locations, and locations of wells or surface waters

- c. A description of the cleanup action (e.g., voluntary action or MTCA order), the Ecology site contact or assigned site manager, and a summary of the cleanup methods employed (including an estimate of the total volume of contaminated media to be addressed).
- d. A description of the type of business, products or wastes managed, and sources of contaminants. If the contamination is the result of a specific incident (such as dumping, fire, tank rupture), a description of that incident.
- e. Description of sampling methods employed.
- f. Sample data summary showing comparison of sampling results with applicable MTCA B, hazardous waste characteristics, and Washington dangerous waste criteria (toxicity, persistence).
- g. If contaminants are subject to EPA's land disposal restrictions (Phase IV) for underlying hazardous constituents, a summary of sample results and comparison with applicable LDR Phase IV standards.
- h. A description of proposed methods for storage, treatment or disposal of contaminated media that would be covered by the contained-in determination. Include the name of facilities that will receive the subject wastes.

Ecology Response

As determined by Mr. Iwenofu, a Contained-out Determination is not needed. See email correspondence below.

From: Iwenofu, Samuel (ECY)
Sent: Tuesday, July 20, 2010 8:52 AM
To: Rankine, Craig (ECY)
Subject: SEPA Comment City of Ridgefield

Hi Craig,

I am withdrawing the SEPA COMMENT that requires the City of Ridgefield to request for a contained-out determination for soils contaminated with listed hazardous waste under Ecology's Contained in "Policy Criteria". Reason for withdrawal: The proponent proposes to dispose of soil contaminated with listed waste generated from a cleanup site at a subtitle C landfill.

Thanks,

Samuel Iwenofu
Inspector Chemist
Hazardous Waste & Toxics Reduction
South West Regional Office
Department of Ecology

Comment #5: Greg Wingard

Meg:

You are listed as the public involvement coordinator for this site.

I notice that stormwater discharges from this site have been an issue since the EPA actions in the 1990's.

What is the current status of the NPDES permit for this sites stormwater discharges?

Regards,

Greg

Ecology Response

Greg,

Presently storm water and groundwater treatment system discharge is covered under construction and industrial general NPDES permits. A public comment period was recently completed regarding combining those permits into a combined individual NPDES permit that will go into effect August 1, 2010.

For more information go to:

http://www.ecy.wa.gov/programs/wq/permits/permit_pdfs/PortofRidgefield/PortofRidgefieldFS.pdf

Comment #6: Mitch and Nancy Madsen

Hello Craig.

My name is Mitch Madsen and I'm a homeowner (#3 Depot St.) across from Cell 4 of the Pacific Wood Treatment (PWT) cleanup project in Ridgefield. Soil has been accumulated in the Cell 4 area over the past year and I contacted the Port of Ridgefield to determine the future appearance of the site. I was told that this was soil from the I5/Pioneer St. interchange project, being staged for cleanup backfill at the old PWT facility. The engineer (I forget his name) said that the final elevation would be about four feet above what existed when the project began. Is this still the plan? I see on page 3 of the brochure that there is backfill, geotextile cover, two feet of clean soil cover and a stabilizing vegetation cover. What will be the final elevation, including maximum height of the mature vegetation?

We are delighted at the cleanup project and how thoughtfully it has been conducted. Our only concern is the possible loss of view when the project is complete. Our house sits lower than surrounding structures and has a great view of the Refuge, especially Carty Lake. This view is a chief pleasure in our living here and a major selling point when the time comes for us to move. Can you give us these details? Thanks for your time.

Ecology Response

Mitch and Nancy,

I spoke to one of the Port's consultant at Maul Foster and about this issue. Following the Cell 4 interim action, to be conducted this summer, the finished grade will be brought to a maximum elevation of 39 feet, approximately 3-4 feet above the grade that it was prior to stockpiling in Fall 2009. Additional soil may be temporarily stockpiled at Cell 4 above this elevation (as it is currently), however this stockpiled soil is expected to be moved to Cell 2 for capping in 2011. Temporary soil stockpiles are not expected to be higher than the currently permitted elevation of 64 feet. As part of the interim action, vegetation will be established via a grass seed mix for erosion control.

Keep in mind that the Port expects to create a waterfront development which likely means building construction sometime after cleanup is complete. I'm not sure anyone knows how many or exactly where or how high those buildings will be, but the Port will likely be providing a chance to comment on those plans sometime in the future. Or you can ask the Port directly anytime about their development plans. They are a public entity.

Comment #7: Tina Hallock, Southwest Clean Air Agency



Southwest Clean Air Agency

11815 NE 99th Street, Suite 1294 • Vancouver, WA 98682-2322
(360) 574-3058 • Fax: (360) 576-0925
www.swcleanair.org

June 9, 2010

Craig Rankine, Site Manager
SW Toxics Cleanup Program
2108 Grand Blvd.
Vancouver, WA 98642

RE: Pacific Wood Treating Cleanup Site

Dear SEPA Official:

The Southwest Clean Air Agency (SWCAA) was recently notified that your agency has issued/will issue a SEPA Determination for the above project. Please be advised that SWCAA administers/enforces a number of regulations that may apply to the proposed project. The applicability of these regulations depends on the exact nature of the project in question. The following paragraphs provide a brief summary of the requirements for the general types of activity that may be affected for this project.

Asbestos (SWCAA Regulation 476):

- Prior to **demolition or renovation** of a structure, a thorough asbestos inspection must be conducted by an AHERA certified inspector in order to ascertain the presence of asbestos containing material (ACM) in all affected structure(s) or area(s). A copy of the AHERA asbestos inspection report must be posted for viewing at the project site.
- **If the asbestos inspection reveals ACM to be present in the affected structure(s) or area(s):**

ACM **must be** removed, or if appropriate, encapsulated by certified personnel in full accordance with the Southwest Clean Air Agency's (SWCAA) Regulations SWCAA 476 (Standards for Asbestos Control) and with 40 CFR Part 61 Subpart M (National Emission Standards for Asbestos). A **Notification of Demolition and Renovation**, a **Notice of Intent to Remove or Encapsulate Asbestos** and a copy of the AHERA asbestos inspection report for each structure **are required** and **must be** submitted to SWCAA for approval. There is a **10 business day waiting period** from the time the notices are submitted before asbestos removal, structure demolition or structure renovation can begin. All asbestos **must be** completely removed from the affected structure(s) or area(s) prior to structure demolition or structure renovation taking place.

- **If the asbestos inspection does not reveal ACM to be present in the affected structure(s) or area(s), and the structure is to be demolished:**

A Notice of Intent to Remove or Encapsulate Asbestos would not be required. A Notification of Demolition and Renovation and a copy of the AHERA asbestos inspection report are required and must be submitted to SWCAA. There would be a 10 business day waiting period from the time the notification is submitted before the demolition can start.

- **If the asbestos inspection does not reveal ACM to be present in the affected structure(s) or area(s), and the project involves only renovation and that renovation does not involve the removal of load bearing walls:**

A Notice of Intent to Remove or Encapsulate Asbestos would not be required. A Notification of Demolition and Renovation would not be required.

Construction Dust (SWCAA Regulations 400-040):

- Construction activities have the potential to generate dust nuisances related to the movement of equipment and material handling operations. Creating such nuisances is prohibited by SWCAA's General Regulations. Section 400-040(2) of the general regulations states that "No person shall cause or permit the emission of particulate from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited." Section 400-040(8)(a) further states that "The owner or operator of a source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions." All parties involved with the project are required to minimize particulate fall-out and/or fugitive dust through the use of common preventive measures such as water trucks, water sprays, reduced equipment speeds, etc. Violations of the above regulations can result in penalties being assessed against the property owner or project operator.

New Source Review of Air Pollution Sources (SWCAA 400-109,110)

- SWCAA's General Regulations regulate the installation and/or modification of any building, structure, or facility that emits or may emit an air contaminant. An air contaminant is defined as "...dust, fume, mist, smoke, other particulate matter, vapor, gas, odorous substance, or any combination thereof." Section 400-109 of the General Regulations requires the project proponent to submit an Air Discharge Permit Application for any proposed installation or modification that creates a new or increased source of air contaminants. In addition, Section 400-110 requires the issuance of an Air Discharge Permit prior to commencing construction of any project that constitutes a new or increased source of air contaminants. If the proposed project includes any new or modified air pollutant sources, the proponent should consult with SWCAA to determine if an Air Discharge Permit application is required.

The proponent of this project may contact SWCAA at 360-574-3058 for more information on the agency's requirements. Notification forms, regulations and other information are available on the internet at www.swcleanair.org.

Sincerely,



Tina Hallock
Secretary

Ecology Response

The comments from SWCAA are noted and the appropriate measures will be taken in advance and during demolition as needed.