



## **RESPONSIVENESS SUMMARY**

**Pacific Wood Treating Cleanup Site**

**April 25 – May 25, 2011 Public Comment Period**

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*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**

**June 2011**

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## Site Information

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**Address:** 111 West Division Street, Ridgefield

**Site Manager:** Craig Rankine

**Public Involvement Coordinator:** Diana Smith

In 1996 and 2001, the Washington State Department of Ecology (Ecology) and the Port of Ridgefield (port) entered into Agreed Orders (legal agreements) to address contamination at the Pacific Wood Treating cleanup site. The port has already taken several interim (partial) cleanup actions to remove contamination. Now the port will complete interim actions in two areas or “cells.” The port will:

- Remove contaminated soil from 3 areas within cells 1 and 2 (see map on page 4). These areas will be filled with clean soil.
- Send contaminated soil as Corrective Action Management Unit (CAMU)-eligible waste to an off-site hazardous waste landfill. Ecology’s determination that contaminated soil from the site is CAMU-eligible waste under the federal Resource Conservation and Recovery Act was available for public comment during the interim action comment period.
- Decommission the steam injection treatment system. The port will use the system to remove some remaining contamination. Then system piping, injection wells and groundwater extraction system will be removed.
- Remove existing buildings, concrete pads and rail lines. Remove and replace the stormwater collection system. Remove or modify existing monitoring wells.
- Place a 2-3 foot thick soil cover over cells 1 and 2. Planting will help stabilize the soil cover.
- Place an environmental covenant (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 **April 25 – May 25, 2011**. The comment period for the SEPA Checklist and Determination ran from **April 25 – May 9, 2011**. Public comments and Ecology’s responses for these comment periods are summarized in this document.

## Site Background

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

From 1964-93, Pacific Wood Treating operated on the site. It pressure-treated wood products with oil-based treatment solutions containing creosote, pentachlorophenol (PCP), and a water-based mixture of copper, chromium and arsenic.

### ***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 (EPA) 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.

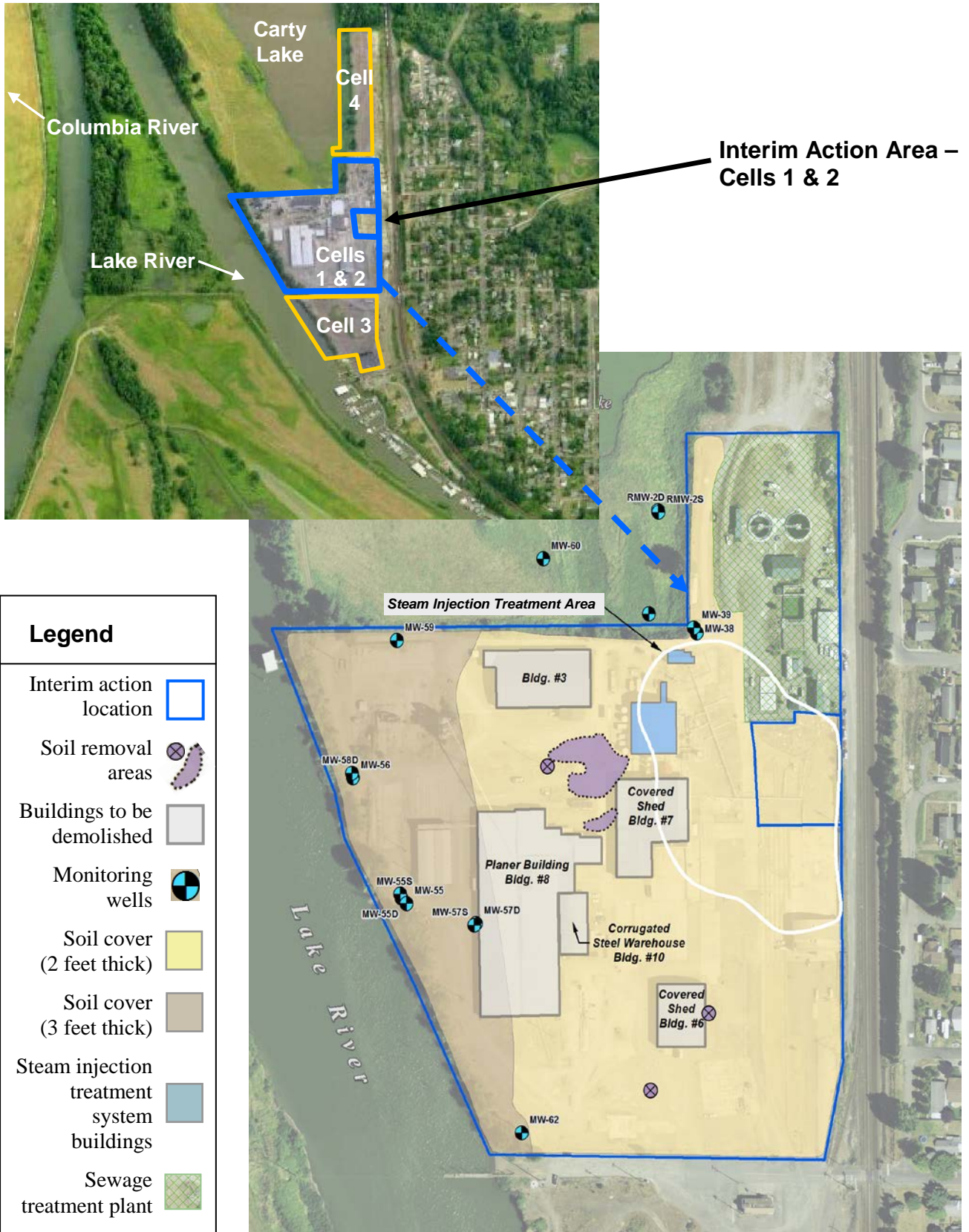
### ***Department of Ecology Cleanup***

In 1996 and 2001, Ecology and the port entered into Agreed Orders to clean up contamination on the property, in the refuge and in the river. Cleanup actions have shrunk and contained the plume so that it no longer impacts the national wildlife refuge. Cleanup actions taken to date include:

- Using steam injection treatment to remove contamination from soil and groundwater.
- Removing over 100 tons of solid waste and 1,222 tons of hazardous waste, and covering cells 3 and 4 of the site with a soil cover.
- Dismantling several structures and the tank farm.

Ecology has contributed over \$50 million for cleanup through grants and loans funded by the State and Local Toxics Control Accounts.

# Site Location



## **Comment #1: Eirik Thorsgard, Confederated Tribes of the Grand Ronde Community of Oregon**

Has the area ever been reviewed for archaeological material? If not can a HAZWHOPPER qualified archaeologist monitor during sediment removal?

Eirik Thorsgard MAIS  
Cultural Protection Coordinator  
Tribal Historic Preservation Officer  
Confederated Tribes of the Grand Ronde Community of Oregon

## **Comment #1A: Eirik Thorsgard, Confederated Tribes of the Grand Ronde Community of Oregon**

Thanks again for forwarding a copy of the ID. The only change that needs to be noted is that I am the contact point at Grand Ronde not David Lewis.

## **Ecology Response**

Ecology provided Mr. Thorsgard a copy of the Unanticipated Discovery and Monitoring Plan (same as a Cultural Resource Protection Plan) that was developed for this site in 2010.

This phase of work will include excavation along the shore of Lake River during the summer of 2011 or 2012. If the port anticipates that native soils will be encountered, or if native soils are unintentionally encountered, an archaeologist will be contacted to monitor excavation. The archaeologist may be Hazardous Waste Operations and Emergency Response (HAZWOPER)-qualified but does not need to be if they are not handling hazardous materials. As work on the interim action progresses, the Port of Ridgefield will be able to provide information about who will be conducting the archaeology work.

Ecology and the port expect to encounter mostly fill soil in the work area along the shore of Lake River. There will be no in-water or sediment removal work done during this phase of the cleanup.

Ecology changed the contact information for the Confederated Tribes of the Grand Ronde Community in the Unanticipated Discovery and Monitoring Plan.

## **Comment #2: John Pagnone**

Why is it that companies that have a high potential for doing serious environmental damage are not required to purchase insurance?

### **Ecology Response**

Ecology does require certain facilities to have financial assurance mechanisms in place, including dangerous waste recyclers, used oil processors, and dangerous waste treatment, storage and disposal facilities. For more information, visit Ecology's Hazardous Waste and Toxics Reduction Program website at <http://www.ecy.wa.gov/programs/hwtr/index.html>.

Sometimes, financial assurance is required when a site is undergoing cleanup of accidental spills or contamination caused by activities at the facility. The assurance that Ecology requires varies by type of site. In the case of Pacific Wood Treating, there was no requirement for financial assurance in place when they were operating.

Ecology uses Remedial Action Grants and Loans (used for the Pacific Wood Treating Cleanup; see <http://www.ecy.wa.gov/biblio/1007012.html> for program guidelines) to support local governments in cleaning up contaminated sites, so they can be put back into productive use. The grants are funded through a tax on hazardous substances. The tax is authorized by the Model Toxics Control Act, which passed by voter initiative in 1988. You can visit Ecology's Toxics Cleanup Program's website for more information about funding cleanup: <http://www.ecy.wa.gov/programs/tcp/paying4cu/paying4cu.html>.

Ecology isn't just focused on cleanup. The Hazardous Waste and Toxics Reduction Program works with local governments and the owners and operators of facilities to ensure contamination doesn't enter the environment in the first place. For a little more background on this program, visit <http://www.ecy.wa.gov/pubs/1004029.pdf>. For more information on Ecology's work on reducing toxic threats, visit <http://www.ecy.wa.gov/toxics/index.htm>.