

SEPA Addendum for Reichhold/SSA Containers Facility
SEPA Environmental Checklist, completed October 3, 2008
Determination of Nonsignificance, issued October 9, 2008

DESCRIPTION OF THE ORIGINAL PROPOSAL:

In 2006, SSA Containers Inc. (SSA) purchased property located at 3320 Lincoln Avenue East (the Site) in Tacoma, Washington, within the Commencement Bay industrial area. The property had been formerly owned and operated by Reichhold Inc. (Reichhold) and had supported a chemical manufacturing plant that produced chemical and chemical-related products. At the time of purchase, cleanup actions were underway to address the legacy soil and groundwater contamination resulting from Reichhold's historical chemical manufacturing operations.

Two decades prior to this sale agreement, Reichhold began working with the U.S. Environmental Protection Agency (USEPA) and the Washington State Department of Ecology (Ecology) to complete site investigations and to implement various cleanup activities. Under Washington State law (Model Toxics Control Act [MTCA], Washington Administrative Code [WAC] Chapter 173-340) Ecology issued a Cleanup Action Plan (CAP; Ecology 2008a) in 2008 to document the final cleanup decision for the Site. The cleanup decision outlined in the CAP was considered a comprehensive site-wide remedy that would be protective of both human health and the environment. Once completed, this industrial site would meet the cleanup levels under the MTCA Method C Industrial Criterion for soil, and surface water cleanup levels for groundwater discharge to waters of the state.

The environmental checklist prepared by SSA in 2008 (SSA Containers, Inc. 2008) evaluated the proposed cleanup activities described within the CAP, and the subsequent determination of non-significance completed the State Environmental Policy Act (SEPA) process for the final remedial actions at the Site. The CAP was formally approved by Ecology, after circulation for public review and comment, in December 2008. The remedial actions outlined within these documents were planned to occur between 2009 and 2011.

DESCRIPTION OF THE SEPA ADDENDUM:

SSA has prepared this SEPA Addendum to provide minor new information regarding supplemental remedial activities that are required to meet the Site goals outlined in the 2008 CAP. The supplemental remedial activities are defined in the anticipated CAP Amendment.

The remedial activities required by the 2008 CAP included:

- Excavation of contaminated soil at four discrete areas within the Site, and off-site disposal, along with selective on-site treatment.
- Monitored natural attenuation of groundwater at established points of compliance.

In 2009, SSA completed these remedial activities and submitted a Construction Completion Report to Ecology detailing the efforts (Floyd|Snider 2009).

After 5 years, additional information became available regarding a contaminant of concern, dioxins/furans, that had not been identified as part of the earlier cleanup efforts, and was found in concentrations that exceeded the MTCA Method C Industrial Criterion. In order to remain in compliance with the Ecology-mandate of implementing a remedy protective of both human health and the environment, supplemental remedial activities must occur at the Site, as defined in the CAP Addendum. The activities proposed to address locations with known dioxin/furan contamination include:

- Excavation of contaminated soil at six discrete areas within the Site.
- Relocation of the excavated soil into a defined area of known dioxin/furan contamination on-site, and placement of a surface cap in this area.

These activities, which supplement those actions described by SSA in the 2008 SEPA environmental checklist, and by Ecology in the 2008 CAP, would ensure that cleanup levels for soil under the MTCA Method C Industrial Criterion are achieved at the Site. Implementation of the proposed supplemental remedial actions would not result in new or significant adverse environmental effects. The activities would fulfill the Site goals provided by Ecology in 2008, would remain consistent with the intent of the original environmental documentation, and would result in an overall improvement of environmental health at the Site.

DISCIPLINE SPECIFIC UPDATES:

The primary environmental element reviewed in the SEPA environmental checklist, and changed as a result of the additional activities at the Site, is land disturbance covered in Section B.1 of the SEPA checklist. As part of the upcoming remediation, up to 1,500 cubic yards of soil would be excavated from six discrete areas within the Site. The excavated soil would be relocated on-site, and would be placed in or near an area of known dioxin/furan contamination, within a larger defined area planned for regrading. This 317,000-square-foot section would then be topped with a geotextile indicator layer and capped with a minimum 12-inch-thick cap of crushed rock surfacing. The cap design would allow for infiltration of stormwater and would prevent any stormwater that does not infiltrate from contacting any contaminated soil. The surface of the cap would be sloped to allow for sheet flow of stormwater that did not infiltrate.

Alternatively, an impervious cap could be constructed as a component of development of the Site, coordinated with the supplemental remedial action. This concept would involve the placement of asphalt and buildings, along with stormwater controls within the regraded area, described above. If this approach is implemented, Ecology approval would be received for the surface capping details. Development actions at the Site would be evaluated with an independent and separate SEPA evaluation for property development. Regardless of the design, the contaminated material would be capped such that direct contact for humans and ecological exposure would be prevented.

The discussion related to environmental health, included in Section B.7 of the SEPA checklist, is updated per this SEPA Addendum to include a discussion of the contaminated soil that would remain on-site. Although contaminated soil would remain at the Site, a cap would be placed to

contain the contaminated soil below the ground surface and provide a barrier from direct contact pathways. To ensure this technology is successful in protecting human health and the environment, institutional controls would be implemented including a restrictive covenant requiring cap maintenance and inspection to prevent exposure to contamination. Details on contaminated soil management is discussed in the *Reichhold/SSA Containers Supplemental Focused Remedial Investigation/Supplement Focused Feasibility Study* (Floyd|Snider 2016).

The other discipline-specific reviews included in the SEPA environmental checklist would remain unchanged as result of the proposed activities.

DESCRIPTION OF EXISTING DOCUMENTATION AND DETERMINATION:

SSA prepared the original SEPA environmental checklist to provide information about the proposal to Ecology, affected agencies, and to the public. Upon review, Ecology issued the determination of non-significance because the cleanup action was not likely to have significant adverse environmental impacts (Ecology 2008b). These documents were prepared in accordance with SEPA, demonstrate project compliance with SEPA, and remain relevant to overall cleanup efforts at the Site.

SEPA RULES ALLOWING FOR ADDENDUM:

As provided in the Washington SEPA Rules (specifically, WAC 197-11-600(4)(c)), existing documents may be used in conjunction with an addendum to provide a comprehensive review of a proposed action, as long as the addendum does not substantially change the analysis of significant impacts contained within the existing environmental document. Additionally, the addendum may only add minor new information, and when the modifications to the proposal would not result in any new significant environmental impacts. Addendums can also be used when new information becomes available, such as the dioxin/furan contamination discovered 5 years after remedial activities were completed at the Site.

This SEPA Addendum does not change the evaluation provided in the previously approved project documents as described above. Only minor new information has been added in order to document the additional activities that must occur to achieve the MTCA Method C Industrial Criterion at the Site.

A public comment period for SEPA addendums is not required. This document will be retained as part of the project file and will be made available upon request to affected agencies or interested persons.

REFERENCES:

Floyd|Snider. 2009. *Reichhold/SSA Containers 2009 Remedial Actions Construction Completion Report*. Prepared for SSA Tacoma, Inc. 18 December.

Floyd|Snider. 2016. *Reichhold/SSA Containers Supplemental Focused Remedial Investigation/ Supplement Focused Feasibility Study*. Prepared for SSA Tacoma, Inc. February.

SSA Containers, Inc. 2008. *SEPA Environmental Checklist*. Submitted to the Washington State Department of Ecology. 3 October.

Washington State Department of Ecology (Ecology). 2008a. *Reichhold/SSA Containers, Inc., Cleanup Action Plan*. Public Review Draft. October.

_____. 2008b. *Determination of Nonsignificance*. From K. Seiler, Department of Ecology Southwest Regional Office, to SSA Containers, Inc. 9 October.

SIGNATURE:

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