



RESPONSIVENESS SUMMARY

Periodic Review

Emerald Kalama Chemical Site

April 28 – May 30, 2016

Public Comment Period

Prepared by

Washington State Department of Ecology
Industrial Section
Waste 2 Resources Program
300 Desmond Drive
Olympia, Washington 98504

June 2016

Introduction

This document addresses questions and comments received by the Department of Ecology (Ecology) during the public comment period on the Periodic Review at the Emerald Kalama Chemical LLC facility (Site) in Kalama, Washington. The Periodic Review is a review by the Washington State Department of Ecology (Ecology) of post-cleanup Site conditions and monitoring data to ensure that human health and the environment are being protected at the Emerald Kalama Chemical LLC facility. Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Ecology published notice of an opportunity to comment on the Periodic Review in Ecology's Site Register on April 28, 2016. In the notice, Ecology invited public review of the Draft Periodic Review and provided a 30-day public comment period. The deadline for submittal of written comments was May 30, 2016.

Ecology received comment from one private citizen. The comments appear in bold text below, followed by Ecology's responses in regular text.

Comments and Responses

Commentor:

Diane L. Dick
13 St. Helens Lane
Longview, WA 98632

I am requesting a public hearing to review the periodic review. I am requesting an extension of the public comment period. Reasons:

- 1. I am not aware that a legal notice was published in the Longview area newspaper informing the public of the periodic review comment period.**

Ecology Response:

Ecology believes public participation is very important and we provide opportunities for participation that are proportional for each site. We provided notice of the opportunity for comment on this periodic review with a 30 day public comment period as required by the Model Toxics Control Act cleanup regulation, WAC 173-340-600(4)(e). Under our cleanup regulation (WAC 173-340-420), we are required to only publish notice of a periodic review in the Site Register and also notify potentially liable persons of the results of the periodic review. A legal notice is not required.

We are available to discuss this site and your comments further with you. Please contact Guy Barrett at (360) 407-6999 to set up a meeting or phone call.

Per WAC 173-340-600(5), if ten or more persons request a public meeting on the subject of the public notice, the department shall hold a public meeting for the purpose of receiving comments. An extension and hearing are not justified as we only received one comment.

2. The latest data of groundwater monitoring show some COCs, including benzene and diphenyl oxide, with levels increasing or not indicating steady decline. Why?

Ecology Response:

It is not uncommon for groundwater concentrations to fluctuate over time and throughout the year as water table elevations change. The overall trend at this site indicates decreasing concentrations of contaminants of concern.

3. Some of the contamination continues far above the CD cleanup levels. Why?

Ecology Response:

The remedy at this site is still being employed since cleanup levels haven't been met at all locations. This is an operating facility, so remedial measures such as excavation may not be feasible in all locations. The cleanup remedies selected for this site include long term source control methods that take time. Human health and the environment are being protected at this Site and the cleanup action remains effective. Ecology will continue to conduct periodic reviews every five years until cleanup levels have been reached.

4. How is groundwater that reaches the Columbia River being monitored?

Ecology Response:

Groundwater monitoring wells are located along the Columbia River shoreline to ensure protection of surface water. The Intermediate Sand Recovery Wells and shallow interception trench and trench sump pumps in the West Impact Areas continue to maintain hydraulic control of the upper sand aquifer which prevents migration of affected groundwater to the Columbia River.

5. Emerald Kalama Chemical continues to release toxic chemicals on site as fugitive and stack air emissions.

Ecology Response:

Fugitive and stack air emissions from the operating facility are regulated by the Southwest Clean Air Agency (SCAA) under Air Operating Permit SW99-10-R1A. Please check with John St. Clair at SCAA for details on fugitive and stack air emissions at this Site by calling (360) 574-3058, extension 127. Air emissions were not part of the cleanup action for this facility and were not subject to this periodic review.

- 6. It is unclear what is happening to the chemical contaminants in treated wastewater which escape treatment process efficiency.**

Ecology Response:

The treated wastewater from the site is regulated under the National Pollutant Discharge Elimination System (NPDES) Permit No. WA 000028-1. The permit requires that all known, available, and reasonable methods of prevention, control, and treatment be applied to the wastewater prior to discharge. The NPDES permit requires regular monitoring of the wastewater. There are trace contaminants in the treated wastewater that is discharged to the river. Ecology evaluates the levels of these contaminants to ensure that the discharge meets State Water Quality Standards to protect human health and aquatic life. Please contact Ecology's Greg Gould at (360) 407-6934 for details on NPDES permit requirements.

- 7. Emerald Kalama Chemical has applied for a Shoreline Substantial Development and Conditional Use Permit for a dredging program in the Columbia River. How will this affect groundwater and the CAP?**

Ecology Response:

It is not anticipated that the proposed river dredging will affect the groundwater or Cleanup Action Plan requirements at this Site.