



RESPONSIVENESS SUMMARY

Superlon Plastics, Inc. Cleanup Site

Interim Action Work Plan

October 20 – November 18 Public Comment Period

SEPA Determination of Non-Significance

October 20 – November 2 Public Comment Period

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

December 2011

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Site Information

Address: 2116 Tacoma Way, Tacoma

Site Manager: Marv Coleman

Public Involvement Coordinator: Diana Smith

In 2009, the Washington State Department of Ecology (Ecology), White Birch Group, LLC and E.I. du Pont de Nemours and Company (Potentially Liable Persons or PLPs) entered into a legal agreement to begin cleaning up contamination at the Superlon Plastics property in Tacoma.

As part of the legal agreement (Agreed Order), Ecology required the PLPs to:

- Investigate the nature and extent of contamination.
- Conduct a feasibility study to examine possible cleanup options.
- Conduct an interim action (partial cleanup) at the site.

The PLPs began the first interim action in 2010. In 2011, the PLPs proposed a new interim action to:

- Remove contaminated soil and sludge containing volatile organic compounds from part of the site.
- Backfill the excavated area with some soil and gravel from the site and some new soil and gravel.

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 **October 20 – November 18, 2011**. The comment period for the SEPA Checklist and Determination ran from **October 20 – November 2, 2011**. Public comments and Ecology's responses for these comment periods are summarized in this document.

Site Background

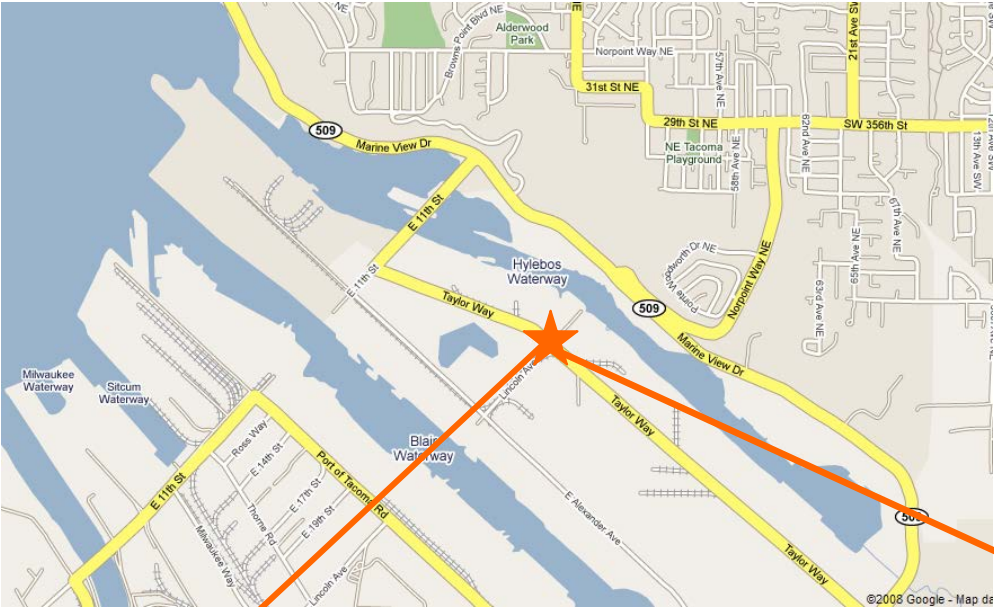
The 3.1 acre site is located at 2116 Taylor Way in Tacoma between the Blair and Hylebos Waterways. From 1925 to 1951, the property was used to produce and warehouse lead-arsenate pesticides. In 1951, the site was sold and operated as a lumber company and wood treatment facility until 1972. Superlon Plastics 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.

In 2007, Governor Gregoire and the Washington State Legislature approved the Puget Sound Initiative to restore the health of Puget Sound by 2020. As part of the Initiative, Ecology's Toxics Cleanup Program received resources to accelerate cleanups near the Sound. Ecology began to re-evaluate sites within this area where there had been no action due to lack of resources. Ecology re-evaluated Superlon, and several other sites, and made them high priority sites. In 2009, Ecology entered into an agreed order with the PLPs to begin cleanup work.

Site Location



Comment #1: Karina Stone, City of Tacoma, Environmental Services/Science and Engineering



City of Tacoma
Public Works Department

November 2, 2011

Marv Coleman, Site Manager
Department of Ecology
Southwest Regional Office
300 Desmond Dr. SE
Lacey, WA 98503-1274

Dear Marv:

Thank you for the opportunity to comment on the Determination of Nonsignificance for the Superlon Plastics Company, Inc. – MTCA Interim Remedial Action. The City of Tacoma Environmental Services reviewed the environmental checklist and has the following comment:

Environmental Services has no objection to the proposed project. The proposal shall meet all substantive requirements contained in the City of Tacoma Surface Water Management Manual and Tacoma Municipal Code 12.08.

The City of Tacoma Surface Water Management Manual is available online at www.cityoftacoma.org/stormwater

If you have questions regarding these comments, please contact Karina Stone at (253) 502-2286.

Sincerely,

A handwritten signature in blue ink that reads "Karina Stone".

Karina Stone, P.E.
Environmental Services/Science & Engineering

Environmental Services ■ Science and Engineering ■ 326 East D Street ■ Tacoma, Washington 98421-1801 ■ (253) 591-5588
www.cityoftacoma.org

Ecology Response

Thank you for your consideration of the SEPA review and your comments regarding those documents.

Comment #2: Karina Stone, City of Tacoma, Environmental Services/Science and Engineering



City of Tacoma
Public Works Department

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WA State Department
of Ecology (SWRO)

November 15, 2011

Marv Coleman, Site Manager
Department of Ecology
Southwest Regional Office
P.O. Box 47600
Olympia, WA 98504-7600

Dear Marv:

Thank you for the opportunity to comment on the Interim Action Work Plan – Sludge Excavation and Disposal Program for the Superlon Plastics Site, Tacoma, Washington. The City of Tacoma Environmental Services reviewed the Action Plan and has the following comments:

1. Environmental Services has no objection to the proposed Action Plan. The proposal shall meet all substantive requirements contained in the City of Tacoma Surface Water Management Manual (SWMM) and Tacoma Municipal Code 12.08.
2. Best Management Practices (BMPs) shall be implemented to prevent construction activities from adversely impacting downstream resources and on-site stormwater flows. Identify methods and locations for implementing BMPs to meet the substantive requirements of Volume 2 of the City of Tacoma SWMM.
3. Note that BMPs shall be upgraded as needed for unexpected storm events and to ensure that sediment and sediment-laden water do not leave the site.

The City of Tacoma SWMM is available online at www.cityoftacoma.org/stormwater

If you have questions regarding these comments, please contact Karina Stone at (253) 502-2286.

Sincerely,

Karina Stone, P.E.
Environmental Services/Science and Engineering

Environmental Services ■ Science and Engineering ■ 326 East D Street ■ Tacoma, Washington 98421-1801 ■ (253) 591-5588
www.cityoftacoma.org

Ecology Response

Thank you for your comments. Substantive requirements and BMPs for remediation related construction will be met. Some new, non-remediation related construction work will be required and permits for those activities are currently being obtained.

Marv Coleman

Comment #3: Leslie Ann Rose, Citizens for a Healthy Bay



November 16, 2011

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Tacoma, WA 98402
Phone (253) 383-2429
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chb@healthybay.org
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Mr. Marv Coleman, Site Manager
Washington State Department of Ecology
SWRO Toxics Cleanup Program
P. O. Box 47775
Olympia, WA 98504-7775

Re: Superlon Plastics Co., Inc. Proposed Interim Action Plan, Agreed Order DE 5940

Dear Mr. Coleman:

Citizens for a Healthy Bay (CHB) appreciates the opportunity to review and submit comments to the action plan referenced above.

Executive Director
Bill Anderson

Under the proposed plan White Birch, LLC and DuPont (the Companies) will excavate sludges containing volatile organic compounds (VOCs) historically placed on the site so that a new inventory storage structure can be constructed. Excavated material will be hauled to the Chemical Waste Management facility in Arlington, Oregon and the excavation site will be backfilled with stockpile site soils supplemented with imported soil.

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- The interim action work plans states that, "*Site... boundaries are currently undefined...*" An investigation to delineate the site boundaries should be conducted before the structure is constructed and all VOC-contaminated sludges historically placed on the site are removed. Removing only a portion of the sludges – enough to facilitate site development is an insufficient address to the problem. Groundwater and soil can only be adequately protected by removal of all VOC-contaminated sludges from the site.
- The interim action work plan states that, "*Soils possibly containing concentrations of cadmium, lead, and/or arsenic greater than the MTCA cleanup standards for industrial sites may remain following excavation. Exposure to these soils will be managed through backfilling the excavation and gravel capping to act as a barrier to direct contact.*" Possibly contaminated soils excavated from the site should be tested to determine: 1) whether or not chemical concentrations exceed MTCA cleanup standards for industrial sites and; 2) if contaminants can/will leach from the soil into the groundwater. Soils that do not meet the appropriate MTCA standards or can/will leach contaminants into the groundwater should be disposed of appropriately and not reused on site.

CHB generally supports action plans that combine site cleanup with site redevelopment but only when the problem is addressed from a site-wide perspective. CHB urges Ecology to require that the boundaries of the site are fully delineated, that all VOC-contaminated sludges are removed from the site and that contaminated soils not be placed back onto the site. Thank you for consideration of our remarks.

Sincerely:

Leslie Ann Rose
Senior Policy Analyst

A tax-exempt
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nonprofit corporation

Ecology Response

Thank you for your review and comments regarding these documents. Ecology has the following responses to comments:

1. Remedial Investigation plans anticipate fully delineating the Site, including areas beyond property boundaries. The interim action was designed to address an unexpected find of VOC contaminated sludge (likely Occidental Lime Sludge) that was located on a part of the property where a new storage building was to be built to accommodate the needs of Superlon Plastics. The location was chosen before the presence of the lime sludge was discovered.

As it turned out, the proposed building location did not meet the Tacoma Fire Department's criteria with regard to its distance from the nearest fire hydrant, so the location had to be changed. The building is now planned for the east end of the site, where remediation is not an issue. In the meantime, moving the location of the building allowed the contractor to move forward with removing the deposit of lime sludge.

Due to its distinctive appearance, the contractor was able to totally removal the sludge up to the eastern boundary of the property. Confirmation sampling was done. The PLPs intend to determine if lime sludge extends beyond the property boundary and if groundwater contamination from the lead/arsenate manufacturing extends beyond the boundary.

Investigation past the property boundary has been delayed due to the adjacent property owner refusing to provide access as of this date. If access is not provided voluntarily, Ecology will take administrative steps to make it happen. The PLPs are in accord with Ecology's plan in this regard. Other boundaries of the site delineate property owned by the Port of Tacoma, which is cooperating in providing access for remedial investigation.

2. Some soils containing concentrations of heavy metals at greater than MTCA cleanup standards may be left on site in locations where removal is not practicable. If so, they will be managed in accordance with common MTCA practices, such as capping the area to preclude direct contact with the soils and instating a restrictive covenant to further control contact. As it happens, remedial investigation so far has indicated that contaminated soils are present in the fill material that overlays the native estuary sediments and that the underlying sediments are largely unaffected. As a result, it is expected that most or all of the contaminated fill will be accessible for removal, except that which is under existing structures that cannot be removed. It is the intent of the PLPs and Ecology that any removable contaminated soil will be removed and disposed of as is appropriate. No soils that exceed MTCA cleanup standards will be reused on the Site.
3. The PLPs are conducting extensive sampling of in-situ and excavated soils to determine if contaminant levels exceed MTCA cleanup standards and if soils must be designated as hazardous waste for the purposes of disposal.
4. It has already been established that groundwater has been impacted by the contaminants of concern. The remedial investigation continues to determine the full extent of groundwater contamination. As noted above, the investigation has focused, so far, on the contamination on the property. However, work plans include determining the extent of contamination off property when the PLPs can obtain access to adjacent properties.

Thanks again for your comments. Please let me know if you have any questions.
Marv Coleman