

**Via FedEx & E-Mail**

May 31, 2017

Washington State Department of Ecology  
Toxics Cleanup Program  
300 Desmond Drive  
Lacey, WA 98503

Attention: Mr. Adam Harris, LHG

Re: Response to Opinion  
Chemtrade Performance Chemicals US LLC  
Kalama, Washington  
Cleanup Site No. 1784  
Facility No. 24634187  
VCP Project No. SW0492  
H&H Job No. CLR-045

Dear Adam:

On behalf of Clariant Corporation, Hart & Hickman, PC (H&H) is submitting this response to the Department of Ecology (Ecology) opinion letter dated February 9, 2017 issued for the Chemtrade Performance Chemicals US LLC facility site in Kalama, WA. Note that we have previously referred to the site as the former Clariant Corporation facility site.

In the opinion letter, Ecology indicated the need for additional information to demonstrate that it is not practicable to meet groundwater cleanup levels (CULs) at the current points of compliance (POCs) within a reasonable time frame, and to evaluate the establishment of conditional POCs at the site. In the letter, Ecology recommends the following:

- Preparation and submittal of a work plan for conducting a seep study for Ecology review and approval. The purpose of the recommended seep study is to evaluate the potential presence and location(s) of preferential pathways for contaminants associated with the site to enter sediments and surface water, and to evaluate compliance with surface water and sediment standards at locations of preferential pathways.
- Preparation and submittal of an updated conceptual site model (CSM) after completion of the seep study. In the opinion letter, Ecology indicates that the updated CSM should evaluate the manufacturing facility (hereafter referred to as the manufacturing plant area – MPA) as a possible source of contamination. The opinion letter notes that industrial processes which utilized zinc were conducted in the MPA through October 2016 that may

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have been a potential continuing source of environmental impacts.

- After submittal of the updated CSM, preparation and submittal of an outline of proposed remedial alternatives to be included in a feasibility study (FS) for Ecology review and approval. The approved remedial alternatives will then be considered in a FS with fully supported disproportionate cost analysis.

In accordance with Ecology's opinion letter, we have enclosed a work plan for conducting a seep study for your review and approval. The seep study work plan includes a discussion of groundwater CULs and POCs which are currently and potentially applicable to the site. In addition, we have enclosed a work plan for additional soil sampling in the MPA. The soil sampling work plan includes a discussion of soil CULs and POCs which are currently and potentially applicable to the site and a brief discussion of soil impacts at the site based on previous soil sample data.

We are requesting that Ecology provide comment/technical assistance regarding the applicability of the soil and groundwater CULs and POCs we have presented in the work plans, the methods we have proposed for evaluating data prior to comparison to CULs, and comments on the proposed scope of work presented in the plans.

If you have any questions or need additional information, please feel free to contact us at (704) 586-0007.

Sincerely,

**Hart & Hickman, PC**



Scott Drury  
Project Manager



Steven C. Hart, LG  
Principal

Enclosures (2): Seep Study Work Plan and Soil Sampling Work Plan

cc: Nicholas Acklam – Ecology (vial e-mail)  
Gil Insley – Clariant (via e-mail)