



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: March 5, 2018

Lead agency: Department of Ecology, Toxics Cleanup Program, SWRO, Technical Assistance/Formal Cleanup Unit

Agency Contact: Marv Coleman, Cleanup Project Manager/Inspector, mcol461@ecy.wa.gov, 360-407-6259

Permit Number: *N/A*- Work being performed in accordance with MTCA Agreed Order No. DE 5940.

Description of proposal: The project is being conducted to remediate (clean up) soil and perched water at the Property, which is located at 2116 Taylor Way, Tacoma, Washington in a highly industrial area of the Tacoma Tidal Flats between the Blair and Hylebos Waterways (see Figure 1). The cleanup activities are being conducted to address soil and perched water contamination caused by historical manufacturing operations and fill activities in the vicinity of the 3.1 acre property. During the project, the contaminated soil will be removed and perched water will be treated **in** order to achieve cleanup standards. The cleanup activities include the following:

- Treating on-Property perched water in-situ using an additive that has been demonstrated to be effective;
- Excavating and disposing of soil with arsenic and lead concentrations greater than Property-specific remediation levels;
- Constructing a gravel cover on the Property; and
- Applying a Deed Restriction to limit the Property to industrial land use.

During cleanup activities, approximately 12,000 cubic yards (or 19,800 tons) of contaminated soil will be excavated and disposed of off of the Property.

Location of proposal: 2116 Taylor Way, Tacoma, WA, Pierce County, Section 35, Township 21 North, Range 3 East, Tax Parcel No. 0321351042.

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Applicant/Proponent:

- **White Birch Group, LLC**
Eivor Donahue
2116 Taylor Way
Tacoma, WA 98421
253.383.4000
- **E.I DuPont de Nemours and Company & Chemours Company FC, LLC**
Kevin Garon
1007 Market Street, Office #3084
Wilmington, DE 19899
704.560.6435

Ecology has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). We have reviewed the attached Environmental Checklist and Remedial Design Report that describes the proposed action. This is available at: **Ecology's Southwest Regional Office, 300 Desmond Drive, Lacey, WA. Contact Marv Coleman, Cleanup Project Manager, mco1461@ecy.wa.gov, 360.407.6259.**

This determination is based on the following findings and conclusions:


- **The purpose of the project is to remediate environmental contamination and prevent harm to human health and the environment.**

The comment period for this DNS corresponds with the comment period for the Draft Remedial Design document & Environmental Checklist end on October 16, 2017 to correspond with the comment period on the aforementioned documents

Responsible official:

Rebecca S. Lawson, P.E., LHG
Regional Section Manager, SWRO
Department of Ecology
PO Box# 47775
Olympia, WA 98504-7775
360-407-6241

Signature



Date 3/5/2018

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[X]: There is no appeal.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for non-project proposals:

For non-project proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements -that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable: **Superlon Site: On-Property Remediation of Soil and Perched Water**
2. Name of applicant: **White Birch Group, LLC (White Birch), E.I duPont de Nemours and Company (DuPont), and The Chemours Company FC, LLC (Chemours)**

3. Address and phone number of applicant and contact person:

Superlon Plastics Pipe Co (Superlon)
2116 Taylor Way
Tacoma, WA 98421
Attn: Eivor Donahue- 253.383.4400

Chemours Corporate Remediation Group
1007 Market Street, Office #3084
Wilmington, DE 19899
Attn: Kevin Garon - 704.560.6435

4. Date checklist prepared: March 1, 2018

5. Agency requesting checklist: Washington State Department of Ecology (Ecology)

6. Proposed timing or schedule (including phasing, if applicable):

The project will be conducted from third quarter of 2017 to third quarter 2020. Work will be conducted approximately nine and a half months a year (from the beginning of March until the middle of December). The two and a half month work break each year was scheduled to account for typical inclement weather during that time of the year.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. No future plans are connected with this proposal.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The following reports have been prepared for the Superlon Property (Property):

ESM Consulting Engineers, LLC (ESM). 2009. Superlon Plastics MTCA Interim Action Stormwater Site Plan. December.

ESM. 2009. Superlon Plastics MTCA Interim Action Construction Stormwater Pollution Prevention Plan. December.

ESM. 2017. Construction Stormwater Pollution Prevention Plan for Superlon Plastics. July.
Pacific Environmental & Redevelopment Corporation (PERC)/PIONEER Technologies Corporation (PIONEER). 2013. Remedial Investigation Report for On-Property Soils and Surface Water at the Superlon Plastics Property, Tacoma, Washington. August.

PERC/PIONEER. 2014a. Feasibility Study Report for On-Property Soils and Perched Water at the Superlon Plastics Property, Tacoma, Washington. December.

PERC/PIONEER. 2014b. Sample and Analytical Plan & Quality Assurance Project Plan for the Superlon Plastics Site. Revision 4. June.

PERC/PIONEER. 2016a. 2016 Groundwater Monitoring Report for the Superlon Plastics Property, Tacoma, Washington. October.

PERC/PIONEER. 2016b. Health and Safety Plan for the Superlon Plastics Site Tacoma, Washington. May.

PERC/PIONEER. 2017a. Addendum 1 to the Feasibility Study for On-Property Soils and Perched Water for the Superlon Plastics Site, Tacoma, Washington. July.

PERC/PIONEER. 2017b. Remedial Design Report for the Superlon Plastics Site, Tacoma, Washington. July.

PERC/PIONEER. 2017c. Soil Volume Verification and XRF Demonstration for the Superlon Plastics Site, Tacoma, Washington. January.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. **No other proposal applications directly affecting the Property are pending government approval.**

10. List any government approvals or permits that will be needed for your proposal, if known.
- **Ecology's approval of Remedial Design Report**
 - **Ecology's approval of the Stormwater Pollution Prevention Plan and issuance of the Construction Stormwater General Permit**
 - **Ecology's completion of the SEPA Checklist**

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The project is being conducted to remediate (clean up) soil and perched water at the Property, which is located at 2116 Taylor Way, Tacoma, Washington in a highly industrial area of the Tacoma Tidal Flats between the Blair and Hylebos Waterways (see Figure 1). The cleanup activities are being conducted to address soil and perched water contamination caused by historical manufacturing operations and fill activities in the vicinity of the 3.1 acre property. During the project, the contaminated soil will be removed and perched water will be treated in order to achieve cleanup standards. The cleanup activities include the following:

- **Treating on-Property perched water in-situ using an additive that has been demonstrated to be effective;**
- **Excavating and disposing of soil with arsenic and lead concentrations greater than Property-specific remediation levels;**
- **Constructing a gravel cover on the Property; and**
- **Applying a Deed Restriction to limit the Property to industrial land use.**

During cleanup activities, approximately 12,000 cubic yards (or 19,800 tons) of contaminated soil will be excavated and disposed of off of the Property.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Property is located at 2116 Taylor Way, Tacoma, Washington. The Property covers 3.1 acres and is listed as tax parcel number 0321351042. The boundaries of the site have not been defined by

Ecology, but include Superlon (Figures 1 and 2). The Property is currently owned White Birch and operated by Superlon, an extruded plastic pipe manufacturer.

The Property is bordered by Taylor Way to the northeast, and a railroad right-of-way owned by the City of Tacoma Public Works and a small parcel of land owned by the Port of Tacoma to the north. The Property is bordered by Lincoln Avenue to the northwest and a Port of Tacoma property (previously leased and operated as the Holbrook Log Yard) to the south/southwest. The property is bordered by RTH Tacoma, LLC property to the southeast, which is leased by Gardner Fields Products, a roofing and waterproofing products manufacturing business.

8. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)? <1%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. The soil on the Property includes **fill** material with underlying silts and sands. The proposal will result in the removal of soil with arsenic and lead concentrations greater than remediation levels. The portions of the Property where the soil was removed will be backfilled with quarry spalls (for structural stability) and clean soil.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. There are no surface indications or history of unstable soil in the immediate vicinity.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The purpose of the excavation activities is to remove or treat contaminated soil and perched water at the Property so that it is protective of human health and the environment. Approximately 2.5 of the 3.1 acre Property will require remediation (see Figure 3). To complete the remediation, approximately 12,000 cubic yards (i.e., 19,800 tons) of contaminated soil will be excavated and disposed of off of the Property.

Excavations will be backfilled to the approximate pre-remediation grade using uncontaminated soil stockpiled during remediation activities and approximately 19,000 tons of clean backfill, quarry spalls, or clay purchased from a commercial vendor. The use of the stockpiled soil will be preferential to the use of imported gravel. Quarry spalls may be used as the base for the backfilled materials. The backfilled soil will be placed in lifts and loosely compacted using an excavator.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. **Erosion at the Property is unlikely. The Property is relatively flat and the number of excavation activities being conducted at the same time will be minimal. In addition, best management practices will be implemented to minimize and mitigate any potential erosion.**

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

Approximately half of the Property (i.e., the western and northern portion of the Property) is paved and this asphalt pavement will be removed during remediation activities. A new gravel sub-base and asphalt cover will be constructed as part of remediation activities to return the Property to its current condition. No new impervious areas are proposed.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: **The potential for erosion to occur is low since the property is relatively flat and the amount of excavations at any one time will be small. In addition, the Construction Stormwater Pollution Prevention Plan best management practices will be implemented to minimize and mitigate any potential erosion.**

2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. **The only potential emissions to the air would be dust generated during remediation activities and exhaust from construction vehicles. The amount of emissions is not known but, is expected to be low.**

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. **No, there are no off-Property sources of emissions or odors that may affect the proposal.**

c. Proposed measures to reduce or control emissions or other impacts to air, if any: **Water will be used to control visible dust, if needed.**

3. Water

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. **The only surface water body on or in the immediate vicinity of the Property is an industrial stormwater ditch, which is located along the southwestern boundary of the Property (see Figure 2). Surface water in the ditch eventually flows into the Hylebos Waterway.**

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Soil excavation work will be performed within 200 feet of the industrial stormwater ditch. Releases to surface water during excavation activities are unlikely because the Property soil grade is higher than the ditch and it slopes toward the center of the Property, away from the ditch. The following best management practices were included in the Construction Stormwater Pollution Prevention Plan to minimize and/or mitigate any potential runoff to surface water:

- **Preserve vegetation / mark clearing limits**
- **Establish construction access**
- **Control flow rates**
- **Install sediment controls**
- **Stabilize soil**
- **Protect slopes**
- **Protect drain inlets**
- **Stabilize channels and outlets**
- **Control pollutants**
- **Control dewatering**
- **Maintain best management practices**
-

In addition, a Pollution Prevention Team will be established to provide oversight and guidance in implementing the Stormwater Pollution Prevention Plan.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. **No fill or dredge materials will be placed in or removed from surface water or wetlands.**

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. **No, the proposal will not require surface water withdrawals or diversions.**

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
No, the proposal does not lie within a 100-year floodplain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. **No, the proposal does not involve any discharges of waste materials to surface waters.**

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. **Groundwater will not be withdrawn from a well for drinking water or other purposes.**

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. **No waste materials will be discharged into the ground from septic tanks or other sources.**

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The source of stormwater is entirely rainfall. The Property has been graded to allow for all rainfall to sheet flow to the center of the Property, where it infiltrates the ground. Perched water (which is being remediated as part of this proposal is present in the vicinity of former Buildings A and B (see Figure 2).

2) Could waste materials enter ground or surface waters? If so, generally describe.
It is possible that waste materials could enter the ground or surface waters during cleanup activities; however, this project was designed to improve the environmental quality of the Property. Cleanup activities will not result in any further impacts to ground or surface waters.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. **No, the proposal does not alter or otherwise affect drainage patterns in the vicinity of the Property.**

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: **There are no proposed measures to reduce or control surface or groundwater. The Construction Stormwater Pollution Prevention Plan identifies measures to minimize and/or mitigate any potential runoff water.**

4. Plants

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation **blackberry bushes**

b. What kind and amount of vegetation will be removed or altered? **Blackberry bushes will be removed during remediation activities.**

c. List threatened and endangered species known to be on or near the site. **No threatened and endangered species are known to be on or near the Property.**

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **No landscaping is proposed for this project.**

e. List all noxious weeds and invasive species known to be on or near the site. **Noxious weeds and invasive species include blackberry bushes.**

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbird, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site. **No threatened and endangered species are known to be on or near the Property.**

c. Is the site part of a migration route? If so, explain. **No, the Property is not part of a migration route.**

d. Proposed measures to preserve or enhance wildlife, if any: **No measures are proposed to preserve or enhance wildlife.**

e. List any invasive animal species known to be on or near the site. **No invasive animal species are known to be on our near the Property.**

6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. The completed project will not have any energy needs.
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. **No, the project will not affect the potential use of solar energy by adjacent properties.**
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: **Energy impacts were considered when designing the remediation approach. The selected remedy will use less energy than some of the other options because there will be significantly less truck miles driven than would have been the case with other remedial alternatives (PERC/PIONEER 2017a).**

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?
If so, describe.
No environmental health hazards will occur due to the cleanup activities. However, the Property is a MTCA hazardous waste cleanup site with soil and perched water contamination. Trained environmental technicians and scientists will be performing the work at the Property and measures will be taken to ensure that they are not exposed to the contaminated soil during cleanup activities. To ensure the safety of these workers, a comprehensive Health and Safety Plan was prepared specifically to address this work. In addition, all workers will be appropriately trained and certified and will be required to wear the appropriate personal protective equipment while conducted cleanup activities at the Property.
- 1) Describe any known or possible contamination at the site from present or past uses. **The Property is a MTCA hazardous waste cleanup site with arsenic and lead contamination in soil, perched water, and groundwater.**
- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. **The project was designed to account for the high pressure gas lines and other utilities along Taylor Way.**
- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. **No toxic or hazardous chemicals will be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

- 4) Describe special emergency services that might be required. **Emergency medical services may be required if someone is injured. A Property-specific Health and Safety Plan was developed for the project describing emergency procedures.**
- 5) Proposed measures to reduce or control environmental health hazards, if any: Daily safety meetings will be held and a safety officer will be on the property during all cleanup activities. In addition, **Personal Protective Equipment will be worn and the safety practices presented in the Property-specific Health and Safety Plan will be implemented during all cleanup activities.**

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **No types of noise exist in the area that may affect the project.**
- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. **There will construction equipment noise between the work hours of 7:00 am to 4:00 pm.**
- 3) Proposed measures to reduce or control noise impacts, if any: **No measures are proposed to reduce or control noise impacts. The noise associated with construction equipment is not expected to be excessive for an industrial area.**

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. **The current use of the Property and adjacent properties is industrial. The project will not affect current land use.**
- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to non-farm or non-forest use? **No, the Property has not been used as working farmlands or working forest lands.**
 - 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations such as over-size equipment access, the application of pesticides tilling, and harvesting? If so, how: **No, the proposal will not be affected/ will not affect surrounding working farm or forest land.**
- c. Describe any structures on the site. **The structures at the Property include two metal/wood framed buildings with sheet metal siding.**
- d. Will any structures be demolished? If so, what? **No structures will be demolished during the project.**

- e. What is the current zoning classification of the site? **The current zoning for the Property is industrial.**
- f. What is the current comprehensive plan designation of the site? **The current comprehensive plan designation for the Property is industrial.**
- g. If applicable, what is the current shoreline master program designation of the site? **The property is outside of the S-10-Port Industrial Area Shoreline District.**
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. **Yes, the industrial stormwater ditch on the southwestern boundary of the Property was identified on City of Tacoma maps as a wetland area. This area will not be impacted by the soil and perched water cleanup activities.**
- i. Approximately how many people would reside or work in the completed project? **No people will reside in the project area. Superlon currently employees approximately 12 people, some of which may work in the project area upon completion of the MTCA process.**
- j. Approximately how many people would the completed project displace? **No people will be displaced by the project.**
- k. Proposed measures to avoid or reduce displacement impacts, if any: **No measures are proposed to avoid or reduce displacement impacts because no one will be displaced during the project.**
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **The project is compatible with existing and projected land use for the Property.**
- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: **No impacts to agricultural or forest lands are anticipated for this project.**

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **Not applicable. The current and future land use for this area is industrial. No residential housing is anticipated for this area.**
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **Not applicable. The current and future land use for this area is industrial. No residential housing is anticipated for this area.**
- c. Proposed measures to reduce or control housing impacts, if any: **Not applicable. The current and future land use for this area is industrial. No residential housing is anticipated for this area.**

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? **Not applicable. No structures are proposed.**
- b. What views in the immediate vicinity would be altered or obstructed? **Not applicable. No structures are proposed.**
- c. Proposed measures to reduce or control aesthetic impacts, if any: **Not applicable. No structures are proposed.**

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **No light glare will be produced. Work hours will be between 7:00 am to 4:00 pm.**
- b. Could light or glare from the finished project be a safety hazard or interfere with views? **Not applicable. There will not be any light glare from the finished project.**
- c. What existing off-site sources of light or glare may affect your proposal? **Not applicable. No existing off-Property sources of light or glare will affect the proposal.**
- d. Proposed measures to reduce or control light and glare impacts, if any: **Not applicable. There will not be any light glare during this project.**

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? **Not applicable. No designated or informal recreation opportunities are in the immediate vicinity.**
- b. Would the proposed project displace any existing recreational uses? If so, describe. **Not applicable. The project will not displace any existing recreational uses.**
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **Not applicable. There are no proposed measure to reduce or control impacts on recreation.**

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe. **There are no buildings, structures, or sites eligible for listing on preservation registers.**
- c. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. **No historical landmarks or features are located on the Property (Historical Research Associates, Inc. (HRA).**

2010. Archaeological Reconnaissance and Historic Property Inventory for the Superlon Plastics Site, City of Tacoma, Pierce County, Washington. June).

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. **HRA conducted archival research and a reconnaissance-level archaeological resources investigation of the Property to assess potential impacts.**
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. **Not applicable. No historical landmarks or features are located on the Property based on HRA's archival research and reconnaissance-level archaeological resources investigation of the Property.**

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. **The Property is served by Taylor Way and Lincoln Avenue (see Figure 2).**
- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? **Pierce Transit Route 60 provides bus service in the vicinity of the Property. The nearest bus stop is at the Lincoln Avenue and Taylor Way Intersection.**
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? **The project will not have an impact on parking spaces.**
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). **The proposal will not require any new improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities.**
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. **No the project will not use water, rail, or air transportation.**
- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?
Trucks will be required to deliver backfill soil and other materials and to transport waste soil to the landfill. It is anticipated that trucks will be present at the Property approximately ten days each month. The anticipated maximum daily truck traffic will be 20 trucks between the hours of 7:00 am and 4:00 pm

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. The proposal will not interfere with, or affect, the movement of agricultural and forest products.

i. Proposed measures to reduce or control transportation impacts, if any: **The following transportation and traffic procedures were documented in the Remedial Design Report (PERC/PIONEER 2017b):**

- **Truck Access:** Haul trucks will enter the Property at the construction access control point gate (see Figure 4). The trucks will enter one at a time with the help of a remediation contractor-supplied spotter.
- **Traffic-Control Needs:** The need for traffic control will be based on the number of trucks entering and leaving the Property. If truck traffic is expected to exceed 20 trucks per day for more than five days, construction signage and active traffic control (i.e. flaggers) will be used to help the trucks enter and exit the Property and Taylor Way. Trucks waiting to be loaded will be directed to park within in the median of Taylor Way, making sure to not block access to neighboring properties.
- **Accident Prevention and Response:** All drivers will be informed of the nature of the materials to be hauled. In addition, all loads will be tarped before leaving the Property to prevent loss of material during transit. All loads leaving the Property will be provided with a non-hazardous shipping manifest. In the event of an accident or spill, the driver will be instructed to report the incident to an emergency response number listed on the shipping manifest, at which point the appropriate landfill agency will dispatch emergency spill response crews and notify PERC, Ecology, and either the Washington or Oregon Departments of Transportation (depending on the spill location).

Spotters: Spotters will be used to direct the movement and staging of trucks and other equipment.

- **Decontamination:** The wheels of the trucks that enter the Exclusion Zone will be cleaned with a brush or a power washer, and will exit the Property from the construction access control point gate at Taylor Way. The Exclusion Zone is presented on Figure 4.
- **Maintenance of Site Entry:** As a condition of the Construction Stormwater Pollution Prevention Plan, no visible soil or debris will be allowed along the entrance to the Property. When soil is being transported from the Property, the entryway will be swept when the trucks leave (if visible soil or debris is present), and periodically throughout the day.

15. Public Services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. **No, the project will not result in an increased need for public services.**

b. Proposed measures to reduce or control direct impacts on public services if any. **Not applicable. The project will not result in an increased need for public**

services.

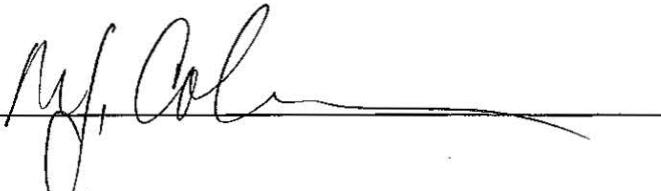
16. Utilities

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. **The proposed work does not include the installation of new utilities.**

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____



Name of Signee: Marv Coleman

Position and Agency/Organization: Cleanup Project Manager, Ecology – SWRO Toxics Cleanup Program

Date Submitted: 3/5/2018

C. Supplemental Sheet for Non-project Actions

(IT IS NOT NECESSARY TO USE THIS SHEET FOR THIS PROJECT/ACTION)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

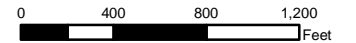
Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.



Legend

Property Boundary



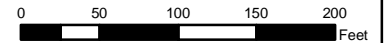
Property Location
 Superlon Soil and Perched Water Remediation Project Summary
 Superlon Plastics Property, Tacoma, Washington

Figure 1



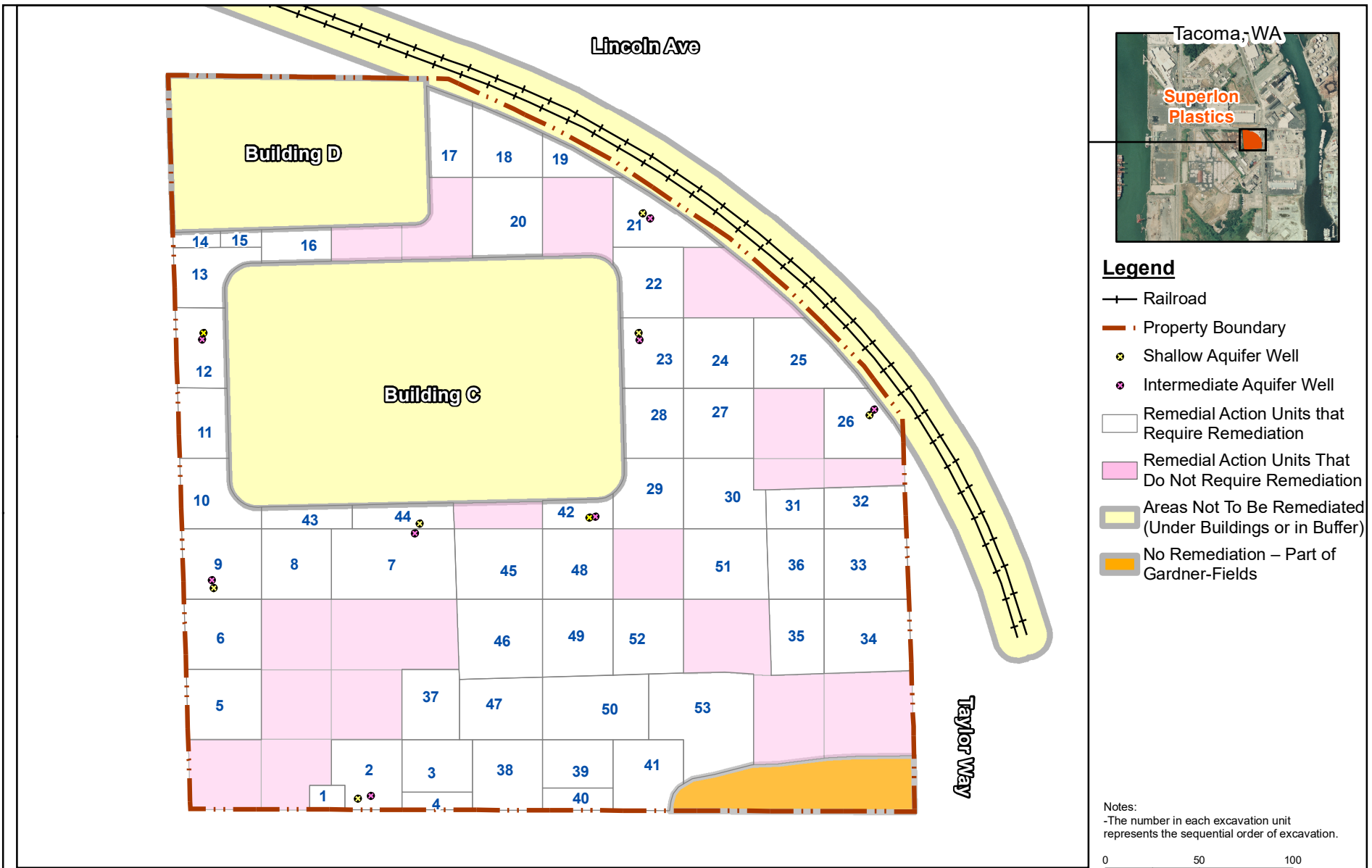
Legend

- OU 1
- OU 2
- OU 3
- OU 4
- OU 6
- Railroad
- Fence
- Ditch
- Property Boundary



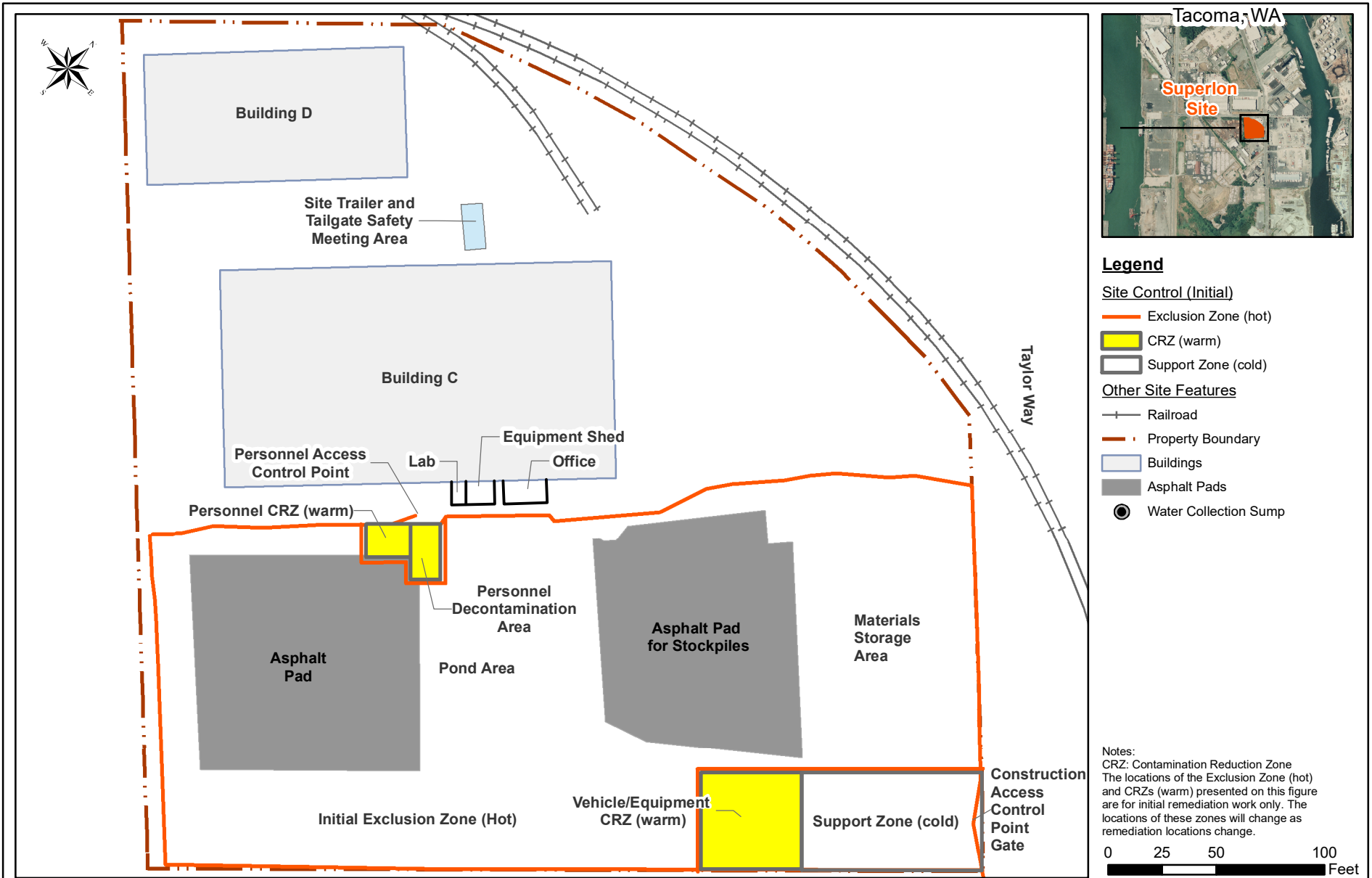
Property Features
 Superlon Soil and Perched Water Remediation Project Summary
 Superlon Plastics Property, Tacoma, Washington

Figure 2



Remedial Action Unit Locations
 Superlon Soil and Perched Water Remediation Project Summary
 Superlon Plastics Property, Tacoma, Washington

Figure 3



Property Plan
 Superlon Soil and Perched Water Remediation Project Summary
 Superlon Plastics Property, Tacoma, Washington

Figure 4