Mitigated Determination of Nonsignificance (MDNS)
Tacoma Smelter Plume Interim Action Plan

Description of proposal
The Interim Action Plan describes how Ecology will clean up part of the Tacoma Smelter Plume and manage risk. contamination. The plan proposes a new yard sampling and cleanup program for residential properties in the highest contaminated zones. It continues the existing Soil Safety Program, which provides free soil sampling and cleanup for childcares, schools, parks, camps, and multi-family public housing. It also continues existing education and outreach, efforts to work with other government agencies, and encouraging cleanup during land development.

For more detail, please see the attached SEPA Checklist.

Proponent Washington State Department of Ecology, Toxics Cleanup Program, Southwest Region

Location of proposal, including street address, if any The Tacoma Smelter Plume covers over 1,000 square miles of parts of King, Pierce, Thurston, and Kitsap counties. For further detail, see the Tacoma Smelter Plume interactive map:
http://apps.ecy.wa.gov/website/facsite/viewer.htm?sp_area=Tacoma%20Smelter%20Plume

Lead agency Washington State Department of Ecology,

The lead agency for this proposal has determined that it does 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), provided the SEPA conditions listed below are used to mitigate potential adverse impacts. This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☐ There is no comment period for this MDNS.

☐ This MDNS is issued after using the optional MDNS process in WAC 197-11-355. There is no further comment period on the MDNS.

☒ This MDNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 60 days from the date below. Comments must be submitted by **December 20, 2011**.

Responsible official Rebecca Lawson, P.E., LHG

Position/title Section Manager, Toxics Cleanup Program Southwest Regional Office

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Date. 10/20/2011 Signature Rebecca S. Lawson

SEPA Conditions

Proposed measures to reduce or control erosion, or other impacts to the earth:

Erosion and soil stability issues will be addressed in two ways. First, contamination in steeply-sloped areas and bluffs will typically not be addressed using physical soil cleanup methods (excavation and removal, capping, or mixing). These methods could cause damage to the sensitive ecosystems, outweighing the benefits of reducing arsenic concentrations. These are also areas where human exposure is less likely. In most cases, human health can be protected using institutional controls, such as signage or educating residents about how to reduce exposure to soil contaminants.

Second, best management practices will be used during each cleanup, to minimize erosion and runoff. Any stockpiled soils will be covered during wet weather and surrounded by berms. Fill and remaining soils will be graded to minimize erosion and covered with stabilizing materials such as sod, plantings, permeable surfaces, or paving.

These measures are also recommended for local land use planners and developers doing sampling and cleanup during property development or major redevelopment.

Proposed measures to reduce or control emissions or other impacts to air, if any:

Fugitive dust will be controlled by watering down soils during the cleanup process. Ecology has found this method to be effective during past soil cleanup projects in the Tacoma Smelter Plume. Vehicle exhaust and greenhouse gas impacts can be reduced by minimizing truck trips. For example, the same truck that brings in clean fill can be used to take contaminated soils to the landfill. Routes can be planned to minimize the miles that need to be driven. Excavators and other soil moving vehicles will not be idled unnecessarily.

Air emission control measures will also be included in Ecology's guidance to property owners conducting cleanup during property development or redevelopment. Property redevelopment may sometimes involve removal of existing structures, which may release asbestos or other hazardous materials. Ecology will encourage property owners and developers to follow all applicable regulations and refer inquiries to Puget Sound Clean Air Agency.

Proposed measures to reduce or control surface, ground, and runoff water impacts:

Best management practices will include covering soil stockpiles and building berms around stockpiles and significantly sloped areas to prevent runoff. Physical soil cleanup will not be done in steeply sloped areas. Interceptor dikes and swales will be used to control runoff that does occur, and storm drains will be protected with filters or impounding areas. Mulching, matting, seeding, and preservation of natural vegetation will be used to prevent erosion. Vehicles and equipment will be washed before leaving the site.

Proposed measures to reduce or control environmental health hazards:

The purpose of this Interim Action Plan is to broadly reduce environmental health risks from arsenic from the Tacoma Smelter Plume. However, the proposed soil sampling and cleanup work has the potential to put workers, property owners, residents, and neighbors at a short term risk of exposure to arsenic. Ecology will require the following measures to limit human exposure and prevent the spread of contamination:

- Watering down soils to limit dust.
- Educating workers about limiting their exposure by using gloves, washing hands, and wearing protective clothing, and dust masks, if necessary.
- Washing truck wheels before leaving a contaminated property.
- Covering soils being removed from a contaminated property.

Proposed measures to reduce or control noise impacts, if any:

Work will be done only during normal business hours. An Ecology project manager will be available to assist with community concerns and needs throughout the cleanup process.

Proposed measures to reduce or control transportation impacts, if any:

Traffic impacts during soil cleanup will be mitigated by carefully planning truck routes to minimize miles driven, and informing neighbors when work is occurring and what roads may be impacted. Load out areas may be used to transfer soils from smaller trucks to truck-trailer combinations for long-haul transport to disposal facilities. An Ecology project manager will be available to assist with community concerns and needs throughout the cleanup process.