



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 6, 2014

Paul E. Kalina, P.E.
URS Corporation
1501 Fourth Avenue, Suite 1400
Seattle, WA 98101-3225

Re: Transmittal of Ecology Response to the *International Paper Responses to Ecology Responses to RI-FS Comments*, dated August 7, 2013, prepared by URS Corporation; Former Tacoma Metals Site, Agreed Order DE 97-5435, Facility/Site No. 1257, Cleanup Site ID No. 3910.

Dear Mr. Kalina:

Thank you for submitting the above-referenced responses to Ecology's April 8, 2013 response letter. Below are Ecology's comments on your responses.

1. Page 1 of 8, 1st paragraph (IP Comment No. 1, Page 1): Ecology agrees that the coking plant structures that were in the creosote plant area should be added to the following Remedial Investigation/Feasibility Study (RI/FS) Report figures: Text Figures 2 and 4; and Appendix C Figure 1-2.
2. Page 1 of 8, 2nd paragraph and Page 2 of 8 1st and 2nd paragraphs (IP Comment No. 1, Page 1): Response noted regarding coke manufacturing waste streams. However, the likelihood and/or amount of contribution to Site contamination from the coking plant is unknown because the length of time that the coking plant operated is unknown and it is unknown if there were any releases from the plant. Ecology still doubts that the coking plant was a significant source of contamination at the Site but the possibility of releases from it cannot be ruled out. However, the St. Paul & Tacoma Lumber Company was apparently involved in the coking plant operation. In the book "The Mill on the Boot, the Story of the St. Paul and Tacoma Lumber Company" by Murray Morgan (University of Washington Press 1982), it states that:

"St. Paul & Tacoma joined with the Northern Pacific in establishing the Wilkeson Products Company; its mission was to reopen the mines and build a coke plant in Tacoma. The War Production Board committed \$700,000 of the estimated \$900,000 capital requirement" (pp. 251-252). "Chauncey Leavenworth Griggs...served as secretary and project expeditor, coordinating the activities of the railroad and the lumber company with those of government agencies" (p. 252). "Appointed assistant secretary of the St. Paul & Tacoma in 1932, Chauncey Griggs was elected to the board on his father's death and served as secretary" (p. 252). "The Wilkeson resurrection did not give the coal and coke company eternal life. There were wrangles on the



board over the best methods of working the seams, which were broken by severe faulting. Griggs resigned from the company in 1943 and joined the army. The coke production enterprise was liquidated in 1944..." (p. 252).

3. Page 2 of 8 last paragraph and Page 3 of 8 1st paragraph (IP Comment No. 1, Page 1): Response noted regarding carcinogenic polycyclic aromatic hydrocarbon (cPAH) impacts within the gravel layer. Regarding Appendix C Figure 4-3, comparison of it with Appendix C Figure 4-1 shows that shallow metals and cPAH contamination are co-located at TP-16 and TP-40, which suggests that metals recycling operations may be the main source of contamination within the gravel fill layer.
4. Page 3 of 8, last paragraph (IP Comment No. 1, Page 1): Ecology agrees that the elevation of the creosoting plant is incorrectly shown on Appendix F Figures 3A, 3C, and 3D. The working surface elevation of the plant should be shown at an approximate depth of 5 feet. Also, the projection of the creosote plant should be removed from Figure 3B (cross-section BB-BB') because the plant location is greater than 60 feet away from the cross-section.
5. IP Response #1, page 4 of 8, 1st paragraph (IP Comment No. 1, Page 1): Ecology agrees that any former coking plant structures that existed within the cross-section lines of sections AA-AA', CC-CC', or DD-DD' (Appendix F Figures 3A, 3C, and 3D) should be added to the cross-section figures at the appropriate elevation. At a minimum, the octagonal tank foundation location (and correct elevation based on field observations of test pit TP-5) shall be added to cross-section DD-DD' (Figure 3D).
6. Page 4 of 8, 2nd paragraph, Figure 4 (IP Comment No. 1, Page 1): Ecology agrees that changes to this figure need to be made. The figure needs to clarify that "metals recycling affected soil area (upper fill area)" contamination includes metals, polychlorinated biphenyls (PCBs), cPAHs, total petroleum hydrocarbons (TPH), and benzene, toluene, ethylbenzene and total xylenes (BTEX); and that the "creosote-affected soil area" contamination includes BTEX, cPAHs, and naphthalenes. Former coking plant structures in the vicinity of the creosoting plant should also be shown on Figure 4 as suggested by IP.
7. Page 5 of 8 (IP Comment No. 2, Page 2): Please see above comments.
8. Page 5 of 8 and 6 of 8 (IP Comment No. 2, Page 2 last sentence and Page 3, first sentence): Please see above comments 4 and 5. However, Ecology still does not agree with the request to add similar cross-sections to Appendix C (see also above comment 2).
9. Page 6 of 8 (IP Comment No. 2, Page 3, Figure 4): Please see above comments.
10. Page 7 of 8 (IP Comment No. 2, Page 3, Cross-Sections in Appendix A): Response noted.
11. Page 7 of 8 (IP Specific Comments 1 and 5): Response noted. Ecology still does not agree that the date should be changed to 1922 without additional documentation.

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12. Page 8 of 8 (IP Specific Comment 6): Ecology agrees that the text should be changed to more specifically reference how the tanks are identified on the Sanborn map. The phrase "based on the available information" will be clarified or modified also.
13. Page 8 of 8 (IP Specific Comment 27): An explanation will be added to the text of how and why the conclusion was made that the source was creosote product.
14. Page 8 of 8 (IP Specific Comment 28): Response noted. However, Ecology still does not agree that changes need to be made to this section.
15. Page 8 of 8 (IP Specific Comment 30): Please see above Comment 1.

If you have questions about this letter, please contact me at (360) 407-6247 or via e-mail at steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Site Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

ST/ksc:Response to IP 12312013

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