

K Ply Agreed Order and Interim Action Plan

October 22, 2012

Olympic Medical Center

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Overview

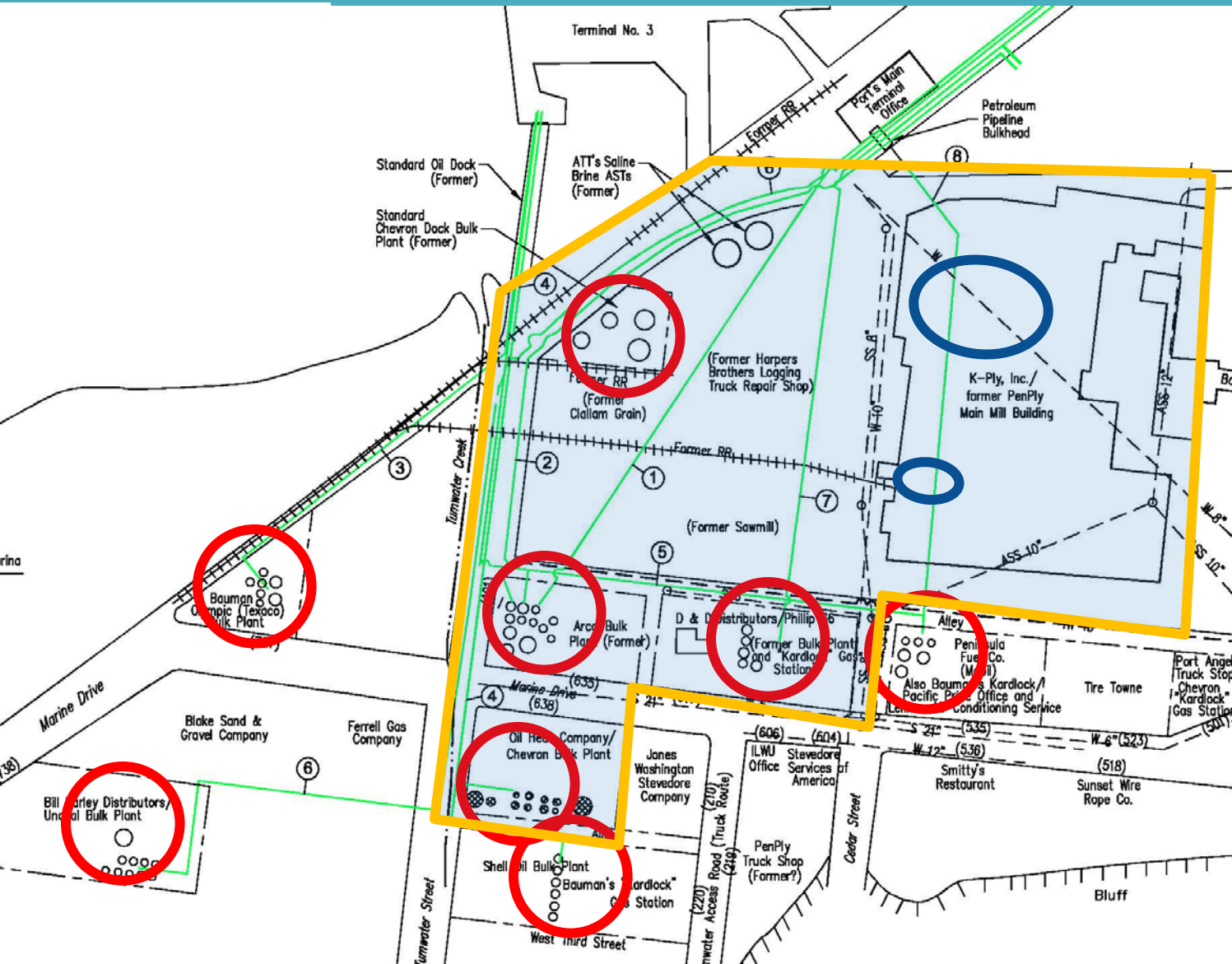
- Site background
- Site investigation and known contamination
- Agreed Order
- Interim Action work plan
- Paying for cleanup: remedial action grants



Timeline



Site Background

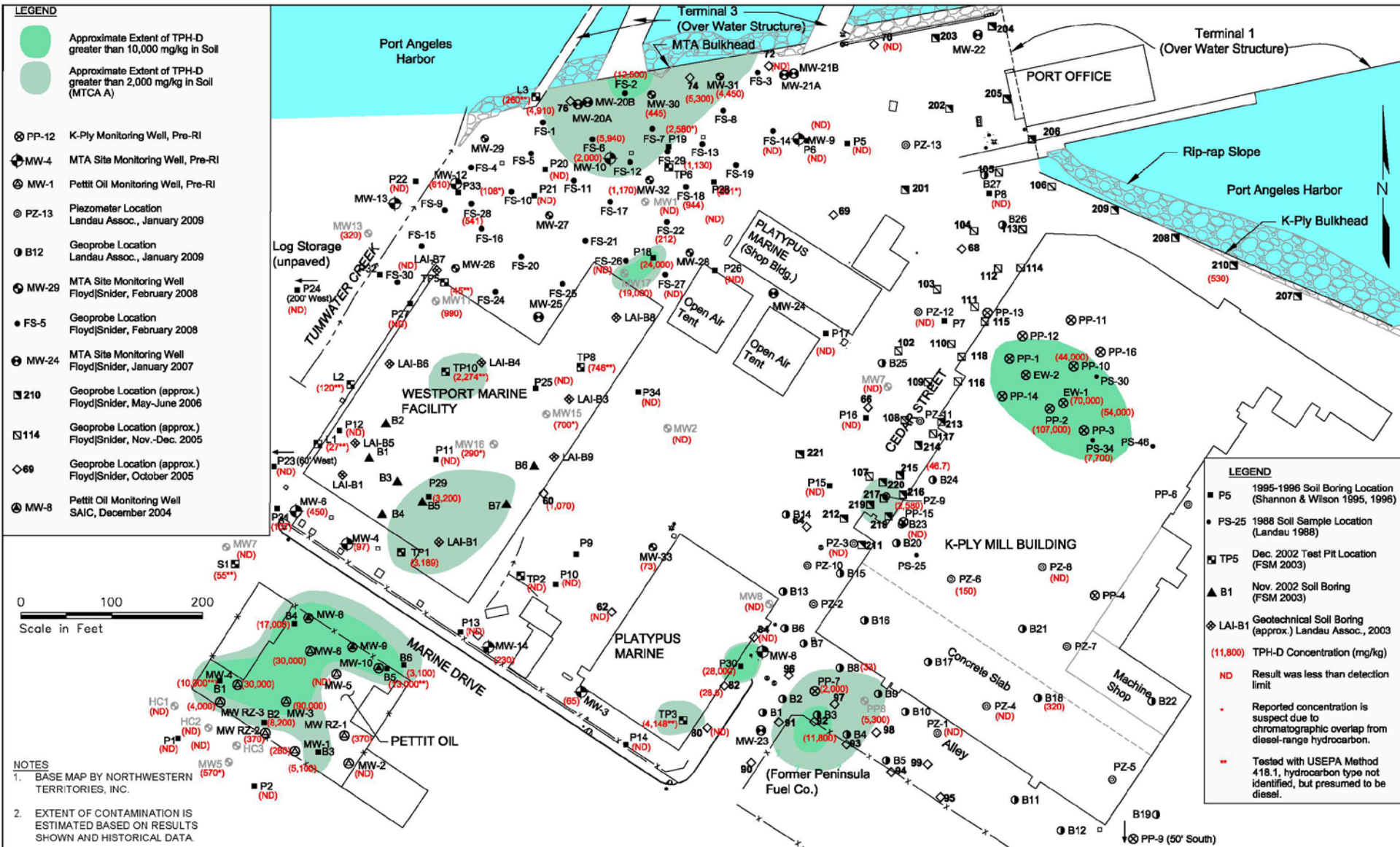


1920s – today:
Bulk fuel plants
at various
times

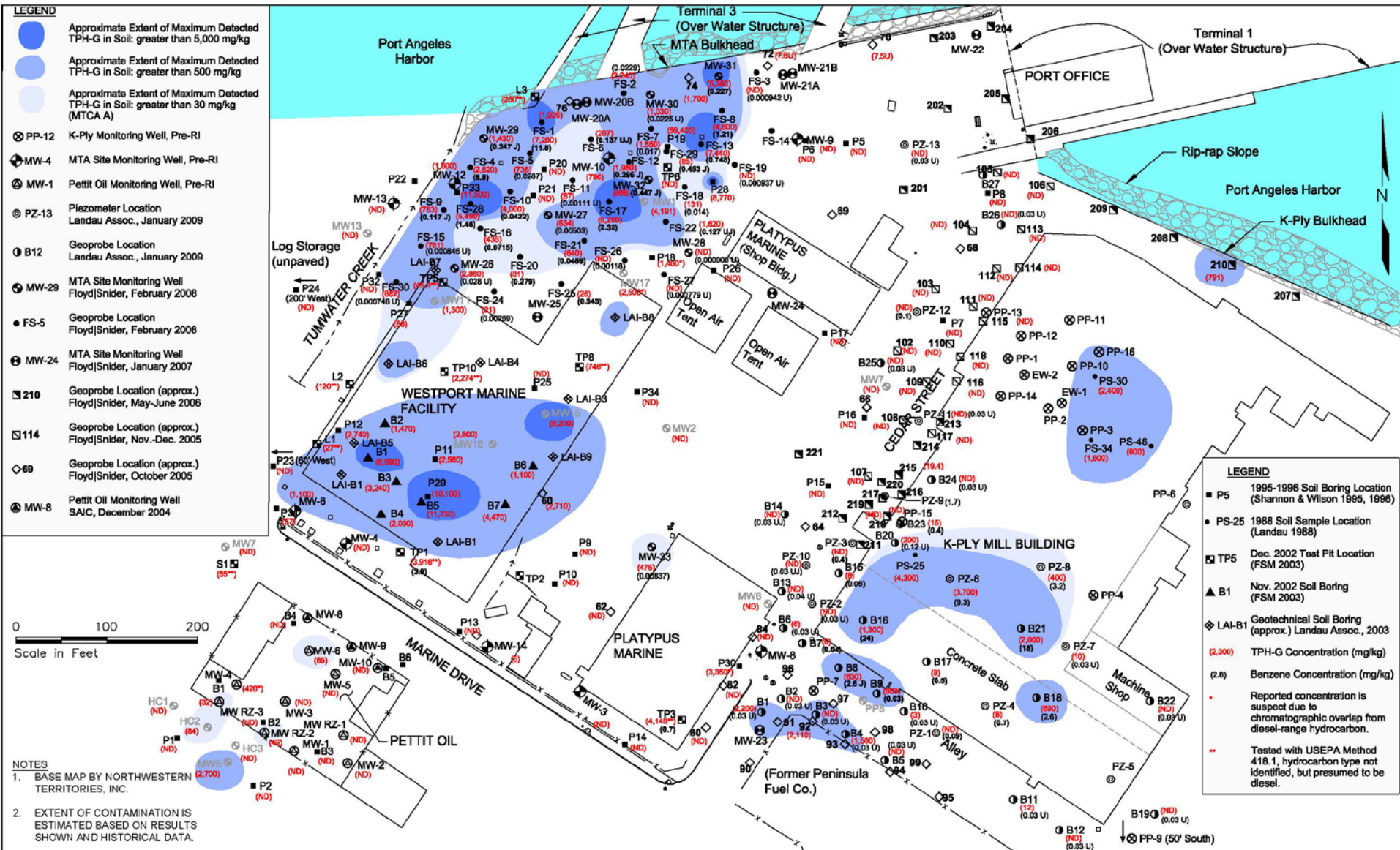
→ **1990 order:**
Rayonier
hydraulic oil
and PCP spill

→ **2005 order:**
Marine Trades
Area order
with port and
Chevron

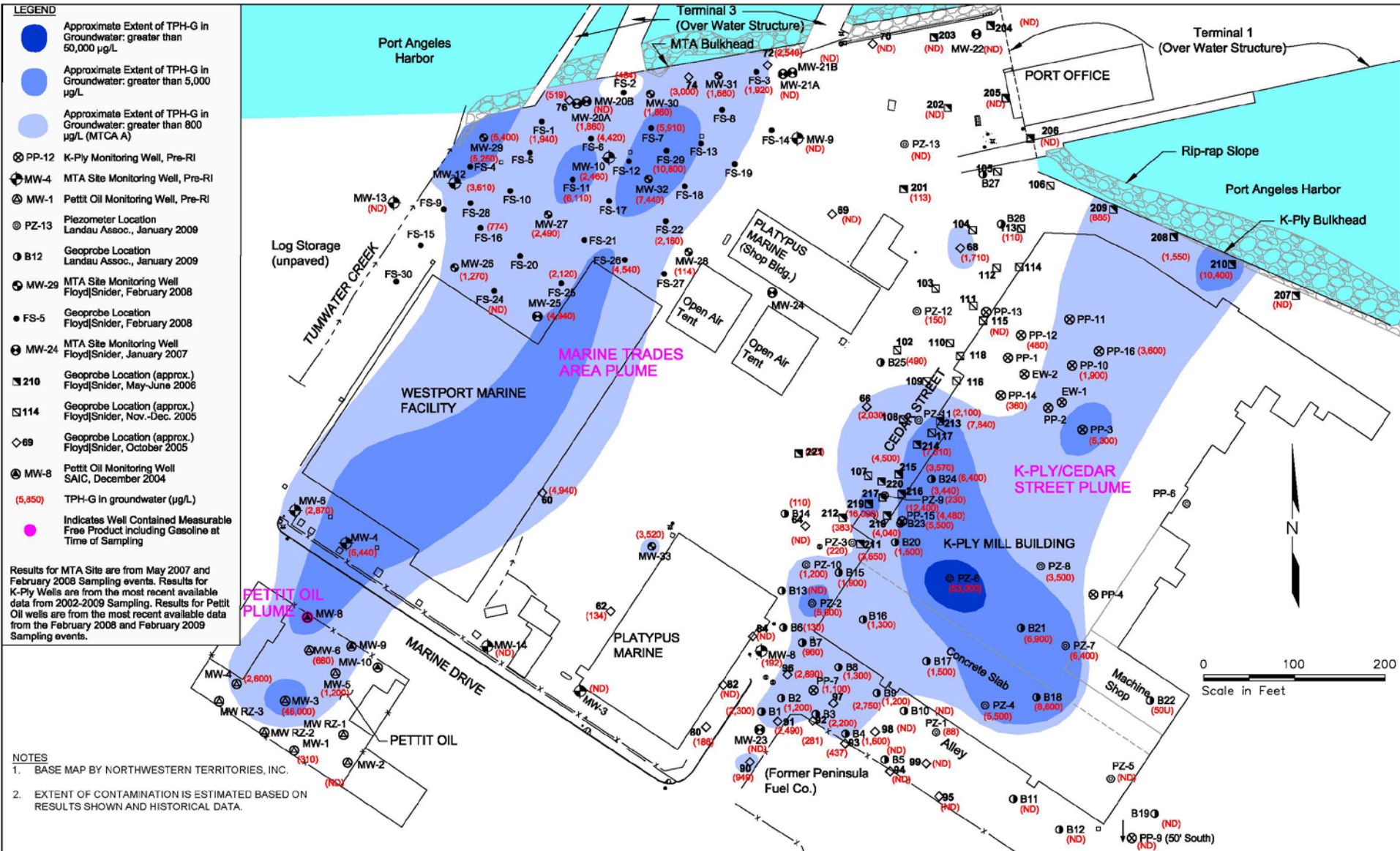
Site Investigation: TPH-Diesel in Soil



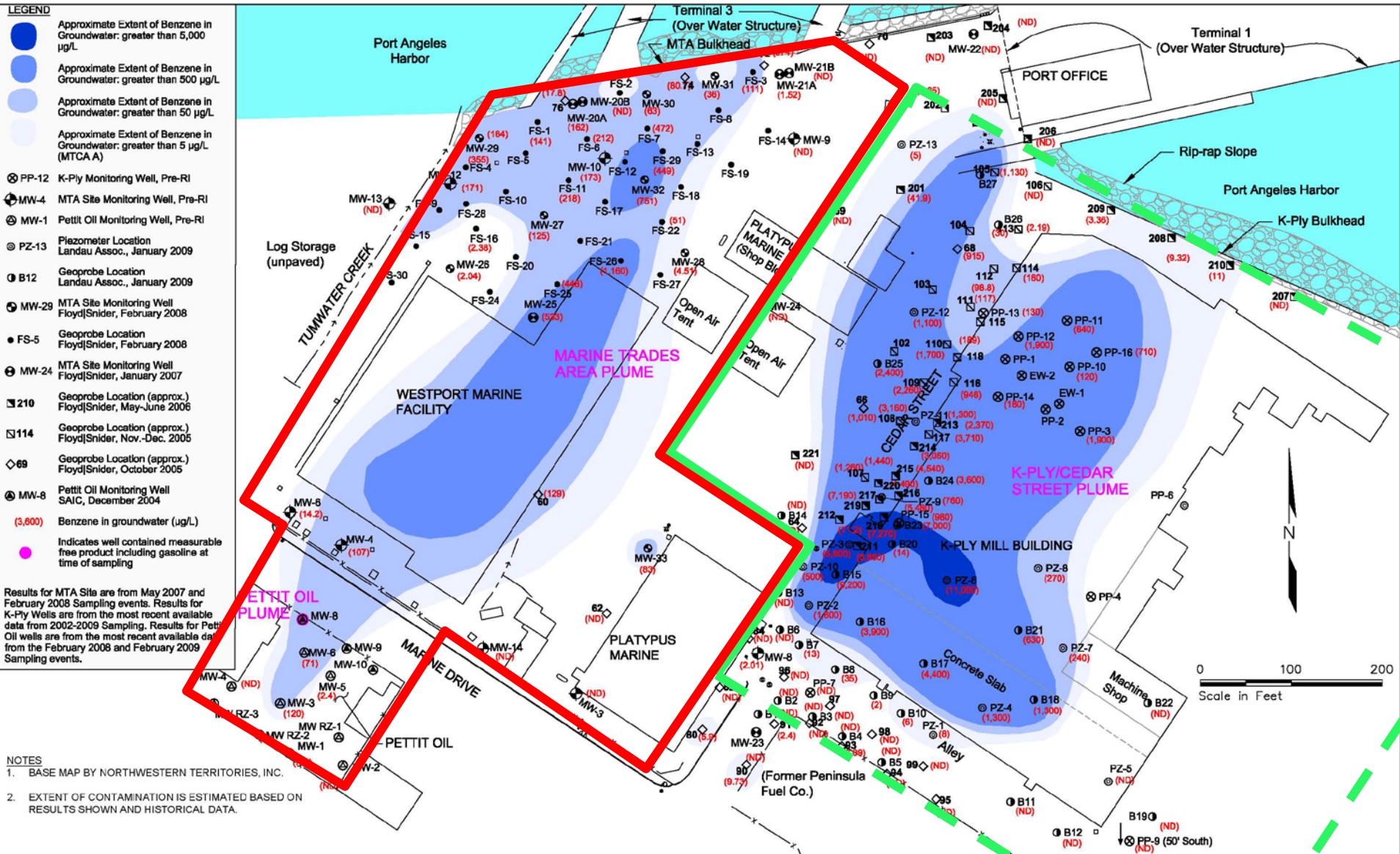
Site Investigation: TPH-Gasoline & Benzene in Soil



Site Investigation: TPH-Gasoline in Groundwater

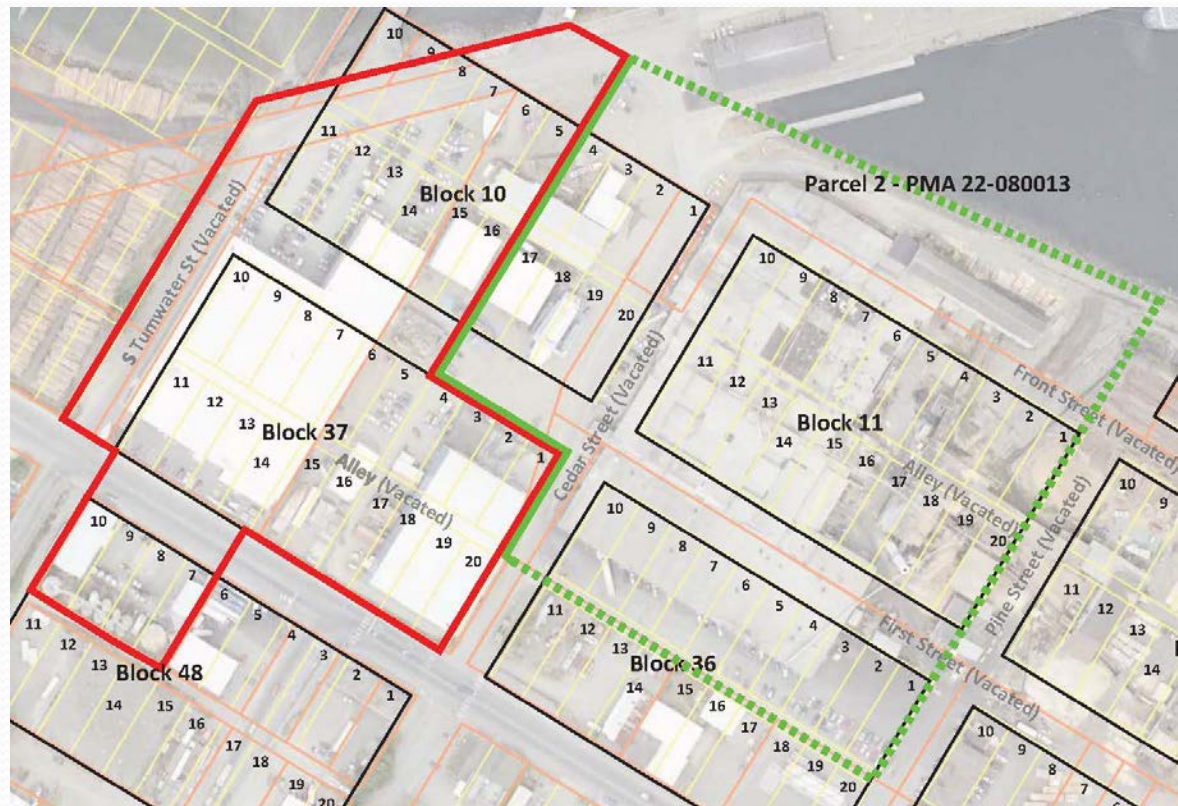


Site Investigation: Benzene in Groundwater



K Ply & Marine Trades Area Next Steps

- Split sites
- Amend agreed order for Marine Trades Area
 - Comment period later this fall
- New agreed order with port for K Ply



K Ply Investigation

- Known contamination:
 - Gasoline, diesel-, and oil-range petroleum hydrocarbons
 - Benzene, toluene, ethylbenzene, and xylenes
 - Pentachlorophenol (PCP)
- Next steps:
 - Re-evaluate history and use of property
 - Determine what information about contamination is missing and collect needed data

Agreed Order

- Requires port to:
 - Investigate the K Ply site to find the nature and extent of pollution on the site (remedial investigation)
 - Identify and evaluate cleanup options (feasibility study)
 - Develop a remedial investigation/feasibility study report
 - Develop a draft cleanup action plan describing cleanup methods and how they meet state standards
 - Do an interim action (partial cleanup)

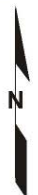
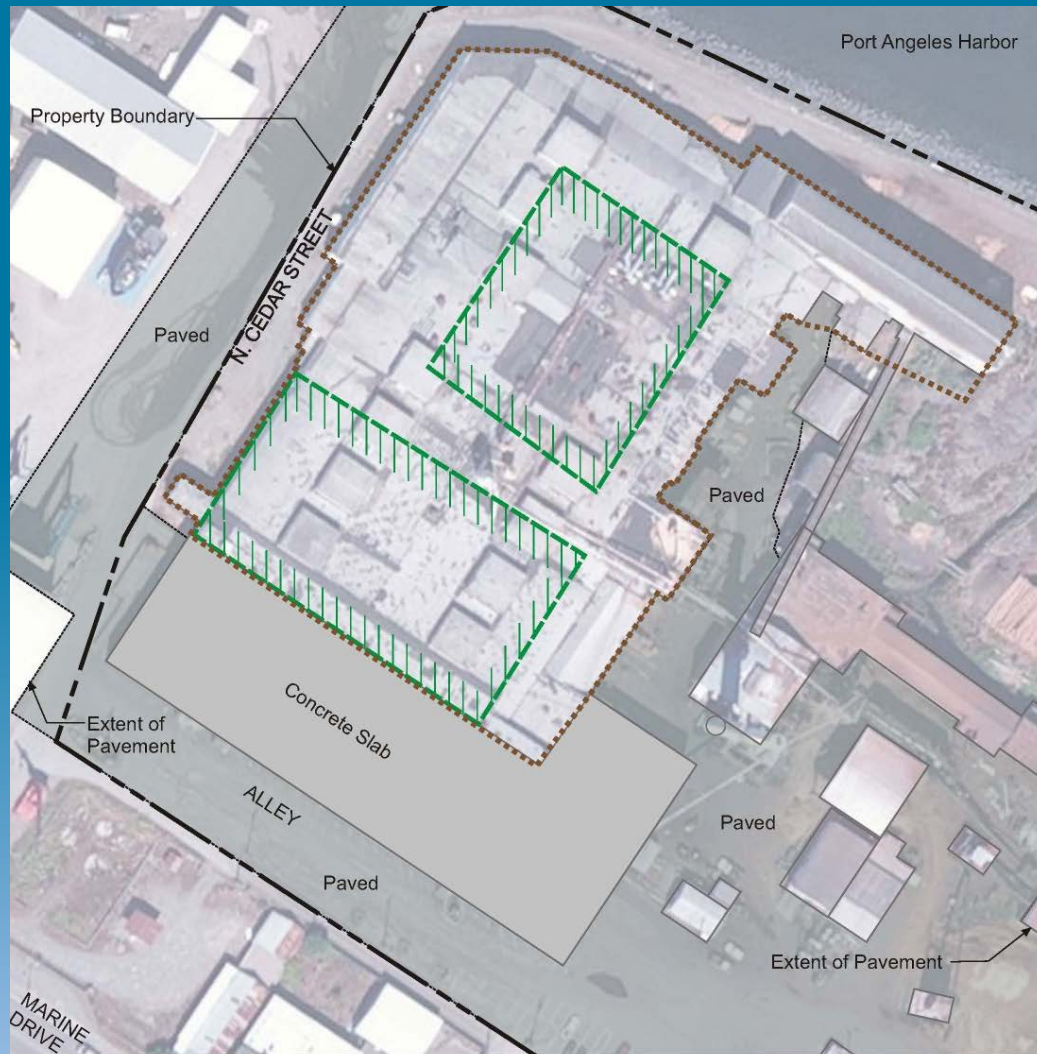
Interim Action



- The port will:
 - Tear down and remove mill structures
 - Use erosion and stormwater controls to keep contamination from moving into the harbor
 - Only remove contaminated soil if it is an immediate threat to human health or the environment
 - Take soil samples to confirm areas they need to stabilize
 - Cover and stabilize contaminated soil
 - Monitor groundwater and stormwater

Interim Action: Structure removal



Interim Action: Assessment & stabilization

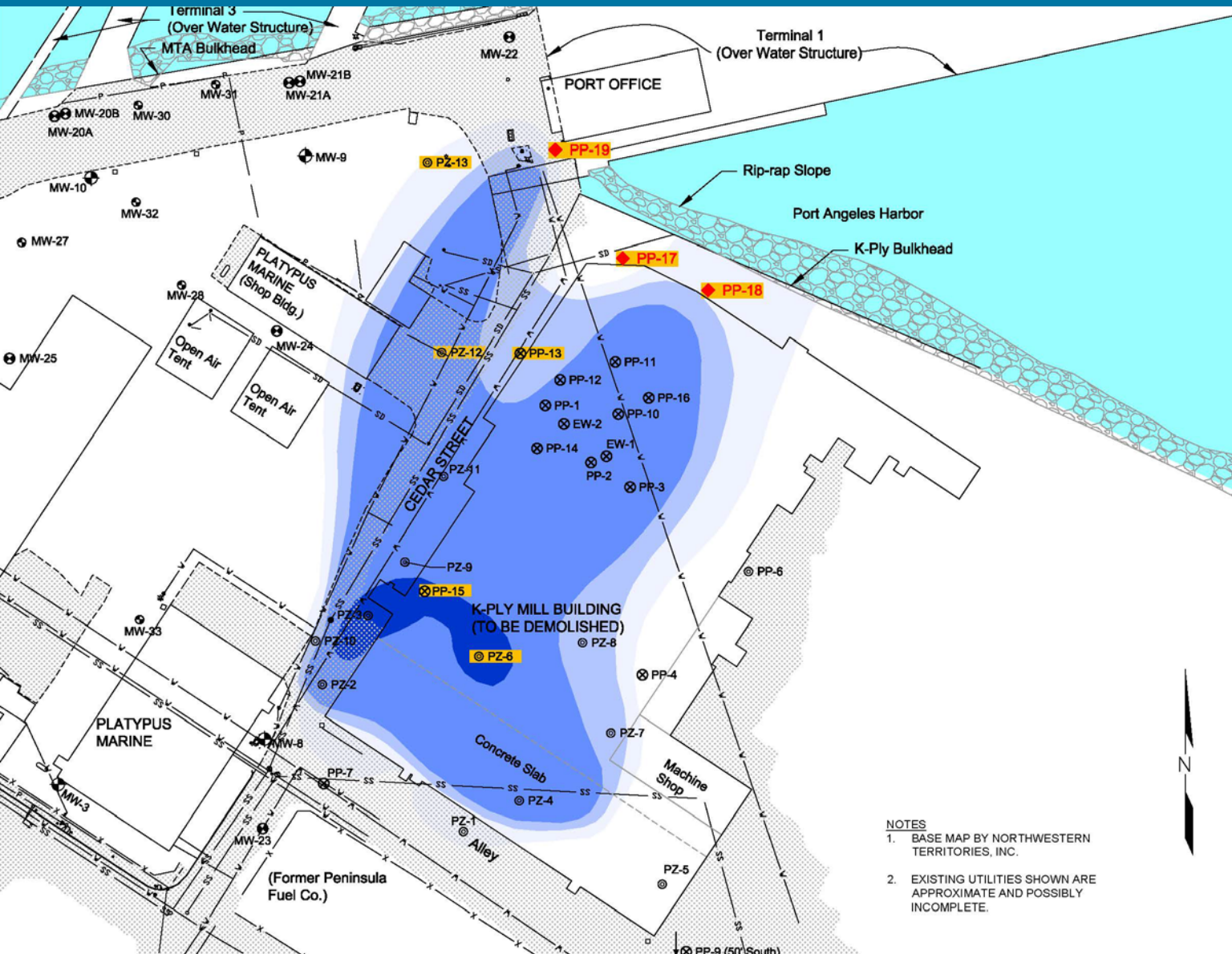


-  Exposed Soil Area¹
-  TESC Plastic Sheetting Area



Note:
1. Soil sampling will occur under the entire mill footprint during the Site Assessment.

Interim Action: Monitoring

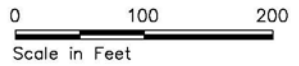
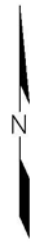


LEGEND

- ◆ PP-17 Proposed K-Ply Monitoring Well Location
- ⊗ PP-13 Indicates Interim Action Groundwater Monitoring Well Sample Location
- ⊗ PP-12 K-Ply Monitoring Well, Pre-RI
- ⊙ PZ-13 Piezometer Location Landau Assoc., January 2009
- ⊕ MW-8 MTA Site Monitoring Well, Pre-RI
- ⊕ MW-28 MTA Site Monitoring Well Floyd|Snider, February 2008
- ⊕ MW-24 MTA Site Monitoring Well Floyd|Snider, January 2007
- w — Water Line
- ss — Sanitary Sewer
- sd — Storm Drain
- x — Fence Line
- Approximate Extent of Asphalt, Concrete, or Other Impervious Surface
- Approximate Extent of Benzene in Groundwater: greater than 5,000 µg/L
- Approximate Extent of Benzene in Groundwater: greater than 500 µg/L
- Approximate Extent of Benzene in Groundwater: greater than 50 µg/L
- Approximate Extent of Benzene in Groundwater: greater than 5 µg/L (MTCA A)

NOTES

- BASE MAP BY NORTHWESTERN TERRITORIES, INC.
- EXISTING UTILITIES SHOWN ARE APPROXIMATE AND POSSIBLY INCOMPLETE.



Work schedule

Deliverable	Estimated due date
Interim action <ul style="list-style-type: none">➤ Building demolition➤ Site Assessment	Begins October 2012 <ul style="list-style-type: none">➤ Dec -June 2013➤ June 2013
Draft remedial investigation & feasibility study work plan due	August & October 2013
Remedial investigation and feasibility study work	November 2013 – March 2014
Draft remedial investigation & feasibility report	October 2014 & February 2015
Draft cleanup action plan	May 2015

What happens next?

- Public comment period on agreed order and interim action
Oct 18 – Nov 19, 2012
- Ecology will:
 - Review and consider comments
 - Respond to comments in a responsiveness summary
 - Send responsiveness summary to those who commented and post it on our website
 - Make changes to the agreed order and work plans if needed based on public comments
- The port will:
 - Begin work on the interim action during the comment period
 - Do the investigation and feasibility study

Paying for Cleanup: Remedial Action Grants and Integrated Planning Grants

Remedial Action Grants

- Purpose: To help local governments investigate and clean up contaminated sites.
- Eligibility:
 - Local government Potentially Liable Person (PLP)
 - Conducting cleanup under a MTCA order or decree

Remedial Action Grants

- Available funding: typically a 50% match of eligible cleanup costs
- Local governments in economically disadvantaged counties may receive up to 25% more
 - Includes Clallam County
- Ecology's Director may alter grant match requirements under certain conditions

Remedial Action Grants

- Eligible costs include most investigation and cleanup costs.
- Ineligible costs include:
 - Most retroactive costs
 - Most operating and maintenance costs
 - Legal costs
 - Natural resource damage assessments



Integrated Planning Grants

- Purpose: To help local governments develop integrated project plans for cleanup and reuse of a contaminated site.
- Eligibility: Local governments
- Available funding: Eligible costs usually up to \$200,000

Integrated Planning Grants

- Generally, they cover, on a case by case basis:
 - Overall project scope
 - Budget and financial planning
 - Conceptual design
 - Initial stakeholder agreements
 - Boundary survey
 - Title reports
 - Cultural review
 - Habitat assessment and surveys
 - Phase I and Phase II Environmental Assessments



Questions?