



# Citizens for a Healthy Bay

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A tax-exempt  
501(c)(3) Washington  
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Joyce Mercuri, Site Manager  
Department of Ecology  
PO Box 47775  
Olympia, WA 98504-7775  
*Submitted electronically*

Re: Superlon Plastics Co Inc Ditch Interim Action Work Plan and SEPA Determination

Dear Ms. Mercuri,

Thank you for the opportunity to comment on the Ditch Interim Action (IA) Work Plan and SEPA Determination for Superlon Plastics Co Inc.

Citizens for a Healthy Bay (CHB) is a 30-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in south Puget Sound. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

Staff and expert members of the Policy and Technical Advisory Committee with CHB have reviewed the proposed IA work plan and related materials. Our comments are outlined below.

### **Background**

The Washington State Department of Ecology (Ecology) is leading the cleanup process for soil, groundwater and standing water contamination at the Superlon Plastics site. The site was formerly a lead-arsenate pesticide plant, followed by a lumber company and wood treatment facility. Superlon Plastics bought the site in 1972 to manufacture plastic piping. Ecology discovered soil and groundwater contamination at the site in 1990. Since then, several contaminants about state cleanup levels in soil, groundwater and standing water have been found. These contaminants include metals, gasoline and diesel range hydrocarbons, semi-volatile organic compounds and volatile organic compounds.

## General Comments

Overall, the work plan needs to include much more detail on the methods used in confirmational sampling, excavation, and disposal. Without these details that we outline below, we cannot assess this plan for its compliance with state law, nor the earlier Agreed Order:

- Where is the excavated material being disposed, and what thresholds are being used to make that determination?
- What are the excavation and sample units being used?
- No information is provided on the type of backfill to be used. Will there be any specified requirements other than sampling to ensure it is not contaminated?
- What is the container that the excavated material will be transported in?
- Is any of the excavated material being dewatered? If so, how will the contaminated water be sampled and disposed of?
- Will the excavation reach the parent material? Has the parent material been contaminated?
- Will a barrier be placed in the ditch when the bottom is reached?
- What is the mitigation plan for wetlands that will be destroyed from excavation?

## Recommendations

In addition to clarifying the methods of the workplan, we recommend the following strategies for this IA:

- All excavation should be gridded and then sampled;
- Given that drainage from the site will end up in Commencement Bay, marine and freshwater water quality standards need to be compared and whichever is more protective should be utilized;
- While using XRF to sample excavated materials, it is extremely important the material is dry, otherwise the results will be erroneous. Calibration is crucial for correct results;
- Composite sampling conducted by an actual technician – rather than samples grabbed from an excavator bucket – are a best practice and should be utilized.

Thank you for the opportunity to comment on the proposed IA workplan for Superlon Plastics. Please contact Erin Dilworth at [edilworth@healthybay.org](mailto:edilworth@healthybay.org) or 253-383-2429 (ext. 3) should you have any questions about our comments.

Sincerely,



Erin Dilworth  
Policy & Technical Program Manager  
Citizens for a Healthy Bay