

March 8, 2017

Ms. Kerry Graber, Site Manager  
Washington State Department of Ecology  
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Dear Ms. Graber,

Recently the City of Tacoma celebrated the 10 year anniversary of the Thea Foss Waterway Superfund Cleanup. As a former City employee managing Environmental Programs I can vouch for the time and resources dedicated to recovering and protecting the waterways and bay by City staff, CHB and many other organizations.

That's why it's outrageous to me that this cleanup project has languished. Excuses such as: it's too hard, it's too expensive, we don't know how to handle the caustic chemicals that MELT THE SOIL MATRIX... are unacceptable for this beautiful bay that is emerging as Tacoma's crown jewel.

I urge Ecology to insist that Occidental Chemical take the following minimum steps to ensure the protection of the bay and the citizens that live and recreate here.

1. Fully map the contamination plume. The extent of this plume in Commencement Bay is unknown. It is essential to know the full extent of the project area.
2. Once the full extent of the plume is known, monitoring must continue, to understand the plume's mobility.
3. Execute ongoing monitoring of the interface between the contamination and air and water. One limited pore water sampling event was conducted. Methods for this sampling need to be reviewed and improved and this process routinely repeated to ensure exposure pathways are controlled throughout the years of cleanup ahead.
4. Occidental Chemical proposes a remedy for the area of volatile organics using pump and treat technology. This should be considered the first of several Phases of the site cleanup effort.
5. Occidental Chemical proposes a wall to contain high pH chemicals. This should be considered an initial step necessary for containment while viable methods for treating, removing or stabilizing in place are investigated. Currently, there are many viable options for high pH cleanup that are being used around the country. This mass of caustic material must be closely monitored. Containment alone, must not be the final solution for this material.

Thank you Kerry for moving this process forward. I appreciate your efforts to protect the natural resources of Commencement Bay!

Sincerely,

Lorna Zarkowski Fuller, P.E.  
(formerly Lorna Mauren)  
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