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Our thanks to the Department of Ecology for the work it has done, both to take charge of identifying the most appropriate cleanup plan for the Occidental Chemical Corporation's pollution in the Tideflats, and for creating a program to promote public participation in reviewing both the Remedial Investigation, and the draft Feasibility Study currently under consideration.

Tahoma Audubon has taken an active role in environmental stewardship in Pierce County, and in Washington State, for 50 years. We have a membership of 650, as well as thousands of supporters who participate in the programs we sponsor.

Despite more than a year of study, we find it difficult to identify all the components that would constitute adequate cleanup of the Occidental site. This inability is due not only to the fact that we are not chemical engineers, but also to the magnitude and diverse nature of the contamination, and to the significant number of remaining unknowns that characterize the site.

We appreciate that Occidental is accepting responsibility for the mess they left behind, but their preferred plan in the Feasibility Study, the MSP option, which would remove an estimated 41% of the pollutants over 20 years, is inadequate. It may be a good start, but in addition to selected groundwater pumping, Occidental should be compelled to pursue options that would efficiently remove remaining contaminants. Page 94 of the Feasibility Study presents other performance objective percentages. Why can't these be mandated?

If there are remedies that could be used to remove or neutralize high pH contaminants, or address the cleanup problem this caustic environment creates, these measures should be mandated. Expense should not be the consideration. Removal of pollutants is Occidental's responsibility, period.

The cleanup should be initiated in the near term, with a work timeline that requires that the cleanup be completed as soon as feasible. This site has been contaminated for going on 100 years, there are substantial seismic and hydrologic concerns, and the immediate area is actively used for industry and transportation. The pollutants are not confined to an isolated zone. The people of Tacoma need a resolution now, not in the distant future.

We ask that DOE ensure that cleanup measures meet the Remedial Action Goals.

Tahoma Audubon believes that the remediation plan should include:

- a robust, deep, and redundant containment wall around contaminated areas on the Tideflats
- the MSP plan for ongoing groundwater extraction, at a minimum
- shallow soil excavation: the depth should be based on the presence of toxic materials in concentrations that would be harmful to human health; an impermeable barrier that is readily visible should be installed on the bottom of the excavated pit
- a plan for ongoing comprehensive monitoring, not over a fixed period of time, but until the levels of contamination achieve a state that is protective of human health and the environment
- a plan for what steps will be taken if groundwater and soil vapor monitoring detect elevated levels of contaminants
- a secure form of financial assurance to support the remedial action regardless of Occidental's future financial health
- an additional reserve fund for addressing the caustic contamination, in the event that near term remedies are not mandated due to the perceived expense of adequate remediation in the high pH zone

We would like to suggest that DOE consult with US EPA staff, because they have considerable experience with cleanups of pollution sites such as Occidental's. We request that prior to reaching a decision on the remedial action to be taken, DOE submits the proposed remedy for review by EPA's Remedy Review Board for consistency with similar sites.

The Department of Ecology's job is to identify threats to the environment in which Washington State citizens reside, and implement effective steps to protect those resources. In this case, we need Occidental to proceed with as effective a remedy as possible in a timely manner, to protect our home from the mess they have created.

Thank you for your consideration of our concerns.

Bruce Hoefft
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