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Kerry Graber
Site Manager
Washington State Department of Ecology
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RE: Occidental Chemical Draft Feasibility Study Public Comment

Dear Ms. Graber,

Thank you for providing me with the opportunity to comment on the Draft Feasibility Study for the Occidental Chemical Corporation Tacoma (Toxic Cleanup/Superfund) Site (OCCI)

The perspective from which I provide comment is that of 22-year resident whose single family dwelling is located approximately 0.6 miles from the OCCI site. My modest residence is above the bluff and is very close to the Hylebos waterway. My neighborhood is frequently plagued by chemical and petro-chemical odors, dust, and other materials wafting up the hill. In addition, loud noises throughout the day and night are commonplace - the type of which make the walls, pictures, and windows in my home shake every week, sometimes multiple times a week. While all of these issues are not necessarily directly related to the issues at the OCCI site, when looking at how health, property value, and enjoyment of residence is affected, as well as that of my neighbors, I think it is important for you to understand the totality of the issues that plague residents living in such close proximity to this Superfund site.

I have attended open houses and have provided verbal comment in reference to the Feasibility Study at some of the meetings held in my neighborhood. I would like to thank Ecology for providing information sessions concerning the OCCI site.

After reviewing the Draft Feasibility Study, I have the following suggestions, questions, and concerns:

The stipulations of MTCA notwithstanding, it is absolutely necessary to clean the OCCI site to the maximum extent possible. It is not suitable to scale back or limit the cleanup in any way whatsoever because of monetary cost for the cleanup. MTCA indicates cleanups are to be made to the "maximum extent practicable." The reason for maximum cleanup is clear: a price cannot be placed upon the environment, wildlife, natural resources, and human health affected by a site that has been allowed to

grow and manifest toxic, carcinogenic substances in the soil, the groundwater, below the Hylebos Waterway, and other areas that may not yet be known because of the movement of the hazardous underground plume.

The most stringent and effective methods for removing the toxic substances from this site must be implemented to mitigate the existing hazards. Further, remedial action which restores surface and subsurface soil in addition to underwater areas affected by the toxic plume must be made. This is the only reasonable cleanup plan that should be accepted.

The extraction method proposed for removing contaminated material associated with the OCCI site and the plume are inadequate. The extensive geographic area and complexity of the site, the underground plume, the proximity of the waterway, the potential for the plume to break through to the waterway are all reasons that extraction combined with other methods are needed. The current extraction method must also be changed to find a way to prevent mechanical problems during operation. Bigger is not always better. Different technology must be explored - either in conjunction with or in place of the extraction method currently proposed.

The proposed wall which has been listed as a method for mitigating and/or preventing the movement of toxins from soil to adjacent waterways is a nice idea in theory; however, there is inadequate detail about the realities of how this will be a viable method for preventing further contamination. For instance, soil and groundwater are not static. While a wall may prevent movement for a period of time, it does not ensure water that travels through contaminated soil on one side of a wall will not penetrate the depth of the wall and carry contaminants to the other side. There are no comparable studies of similar solutions, nor are long-term success rates for this type of remedy known. Furthermore, this remedy does not adequately account for sea-level rise associated with climate change, nor does it adequately account for seismic activity or potential lahars.

The size, severity, and level of toxicity, combined with the threats to the Hylebos Waterway and Commencement Bay are of such magnitude that evaluating each of the proposed remedies as a standalone, comprehensive cleanup strategy is severely flawed. As is the notion that some of the cleanup processes can be combined in a piggyback, or piecemeal fashion. The issues before us require that any and all cleanup solutions be examined thoroughly. We must consider the full breadth of each option. In other words, if Option A has three parts, and Option B has four parts, we must look at a variety of combinations of those parts if we consider combining them to be sure that we have effectively evaluated whether and how the parts will work together and if modifications are needed to accomplish the task at hand. As a nearby resident, I am not satisfied the current examination of cleanup methods proposed and it is imperative we implement the most comprehensive cleanup methods possible.

This site and the citizens of Tacoma need and require the Washington State Department of Ecology to require the most stringent cleanup possible without regard to cost. The company that operated on this site for many years, depositing toxic substances all the while, can and should bear the cost of the cleanup. While it is true that MTCA indicates the cleanup required for sites like these is not predicated on a property owner's ability to pay, clearly when a property is transferred to a company with far fewer assets when compared to the parent company's assets (and profits), minimizing the cost for said property owner should not be a consideration for the cleanup methods adopted.

Please, I implore the Department of Ecology to require the most comprehensive method possible. If this means investigating methods that are not currently proposed in the Draft Feasibility Study, I support being more thorough. We have only one chance to get this cleanup right. Let's make it right for the generations to come.

Thank you.

Shirley A. Low