Mike Webb
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Kerry Graber, Site Manager
Washington State Department of Ecology
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Re: Comment on the RI/FS for the Occidental Chemical Site

Dear Ms. Graber,

I have chosen to provide written comment on the Occidental Chemical upland remediation plan selection even though I already testified at the hearing at Norpoint. At the hearing I was focusing on the need for a complete and rapid cleanup and the need for lower detection limits on data used for geospatial presentation. My current comment addresses my confidence that the Option M9 will produce a far better outcome than the MSP option.

I am a retired environmental chemist and have been a resident of Tacoma for twenty years. I participate as a volunteer with local environmental advocacy groups engaged in beach cleanups and water testing. Professionally I have thirty years of remedial action site experience, ten of which was in EPA Region 10. I have been intimately involved with a number of similar complicated volatile organic remediation projects directed by the Army Corps of Engineers. Many of the more complicated projects also involved guidance from experts from EPA that helped integrate advanced remedial technologies into the work plans. The EPA approach I saw implemented is referred to as a Dynamic Work Plan. By integrating active treatment approaches, relatively inexpensive innovative sampling and analytical strategies, and data-driven decision making in a dynamic, real-time fashion, very complicated site cleanups have been addressed effectively and at a lower cost than traditional approaches.

The strategic pumping approach, Option MSP, in my opinion has a low chance of controlling this site and its potential for fugitive emissions, particularly of vinyl chloride. The treatment strategies available within the Option M9, on the other hand, when used in combination have been shown effective for high dissolved concentrations of the chlorinated solvent compounds, and additionally for degrading vinyl chloride at the periphery using oxidative treatment technologies.

The Remedial Investigation did not identify areas of Dense Non-aqueous Phase Liquids (DNAPL), but that does not mean they do not exist given the complexity of the site. The zones of high concentration reported are in the range possible for sites that have DNAPL present. The M9 array of technologies includes thermal treatment that can be effective in eliminating DNAPL penetrating deeply into the saturated zone.

By utilizing the multiple treatment technologies available in the M9 option in a dynamic way that allows adjustment for various conditions found, including in the pernicious zone of high pH, Occidental will be rewarded with recognition for taking an effective approach. The Option MSP plan is doomed to fail and to produce continuing environmental impacts far into the future. Tacoma and Occidental need success, not a deteriorating sequence of consequences.

I believe aiming for a remedial project scope that includes the M9 remedial strategies and following the guidance of EPA Region 10 technical experts to coordinate multiple advanced remedial technologies at a single site will generate an end result Tacoma can live by (pun intended).

Sincerely,

Mike Webb