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Kerry Graber, Site Manager

Washington State Department of Ecology

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**Re: Public Comments on Feasibility Study, Occidental Chemical Corp. Superfund Cleanup Site on the Hylebos Waterway at the Port of Tacoma**

Thank you for moving ahead with the cleanup of this terrible example of industrial pollution, a superfund site in the heart of Tacoma.

Please accept these comments on behalf of the 1700+ members of the Sierra Club Tatoosh Group of Pierce County. We want to make it clear that Occidental Chemical’s proposed cleanup plan is not the maximum cleanup required by the Model Toxics Control Act and is totally inadequate.

Occidental Chemical Corporation is a very profitable company and should be required to complete the most comprehensive cleanup possible. If technology does not exist for a complete cleanup now, the company must remain liable for further cleanup as is feasible. Occidental must be required to create a performance bond, reserve account or equivalent fund to ensure that cleanup costs will be covered regardless of the company’s future financial status or ownership.

The extent and size of the two toxic plumes is simply mind blowing. They are not stationary, but apparently they extend under the adjacent site where Puget Sound Energy (PSE) is proposing to build a huge LNG plant putting the weight of 8 million gallons of LNG on top of the toxic underground plumes. PSE is actively drilling far into the ground for supports and getting ready to pour concrete; two activities which should never be allowed in the presence of Occidental’s mess. Do we know what toxins those augers are bringing to the surface and how the waste is being disposed of? If this waste is determined to be hazardous, it must be disposed of properly.

This is an earthquake zone, a lahar zone, an area that is largely fill subject to rising sea levels and landslides. We have toxic plumes capable of dissolving surrounding rock in an area prone to natural disasters. The catastrophic potential consequences to Puget Sound and all that is living in and near it really cannot be ignored. We ask you to do the right thing for Puget Sound and our community and hold Occidental Chemical accountable.

Sincerely,



Dorothy Walker, Chair

Sierra Club Tatoosh Group of Pierce County