Tacoma-Pierce County
Health Department
Healthy People in Healthy Communities

April 27, 2017

Kerry Graber
Southwest Regional Office, HWTR Program
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Graber,

Thank you for the opportunity to review and provide comments on Occidental Chemical Corporation's Feasibility Study Report.

Healthy communities and a clean environment are a primary objective of Tacoma Pierce County Health Department (Department) in supporting efforts that provide a safe living environment and clean air and water.

The Department is concerned about the extensive soil and groundwater contamination at this site.

The protection of drinking water is of paramount concern to the Department. Drinking water wells are reportedly utilized at properties located along Marine View Drive. The proximity of these wells to the contaminated groundwater plume represents a public health risk. The Department has identified this as a significant data gap and would like this to be considered as a required element of additional investigation.

The protection of water quality in the Hylebos Waterway and Commencement Bay is also of concern to the Department. The restoration of water quality and sediment conditions to support full use and public access of these marine waters for fishing, shellfish harvesting, swimming and other recreational uses is an objective supported by the Department.

A comprehensive and aggressive approach to site cleanup is needed to effectively remediate the largest amount of contamination in the shortest time possible, and the course of action supported by the Department. Source removal and treatment, combined with containment options should all be used as part of a comprehensive approach to support more effective protection of public health through a thorough and timely cleanup.

Source removal is important to an expedited remediation process. Removal of shallow contaminated soils (to a standard protective depth of 15 feet bgs), extracting soil vapor, as well as extraction and treatment of contaminated groundwater should all be components of a remediation plan. Dewatering may be necessary to excavate and remove contaminated soil present within shallow groundwater.

Treatment remedies should include aggressive methods to remove the most contamination in the shortest time span possible to restore the site and nearby waters to safe conditions for employment, general use, harvesting, and recreational activities.