



City of Tacoma  
Environmental Services Department

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WA State Department  
of Ecology (SWRO)

April 27, 2017

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

Subject: Occidental Cleanup Site  
Comments on Draft Feasibility Study and Related Documents

Dear Ms. Graber:

Thank you again for Ecology's efforts to move the Occidental Cleanup project forward and for bringing the draft Occidental Chemical Corporation Tacoma Site Feasibility Study and related documents forward for public comment. This letter contains the City of Tacoma's comments on the draft documents which we understand were completed by Occidental Chemical and others under Ecology oversight. We understand and appreciate that Occidental Chemical is cooperating in the work done to date, and is expected to continue this cooperation as the cleanup plan is finalized and implemented.

As stated in our previous comments on the Remedial Investigation, the City of Tacoma is proud of our continuing efforts to protect receiving waters and improve stormwater quality. We are particularly proud of the successful cleanup of the Thea Foss Waterway and the improvements to stormwater quality which are helping to maintain the success of the cleanup and preserve this important resource for the ecosystem and our community. Because of this success, we expect the same level of diligence and results from other parties whose past actions have left contaminants in our environment. We also expect the same level of regulatory rigor be applied to other sites like this which have remained contaminated for far too long.

The City of Tacoma understands that this is a complex cleanup site, and that there is a significant amount of contamination present onsite, offsite, and under the Hylebos Waterway. The City has reviewed the alternatives analysis and proposed cleanup plan presented in the Feasibility Study and further understands that removal of all contamination from the environment is not practicable, or warranted, to protect the public and the marine ecosystem. However, the City's expectation is that the cleanup plan selected for this site is aggressive so that risks for future exposure are minimized and the property can return to productive use.

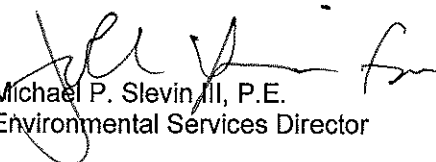
We therefore provide the following comments on the subject documents:

- Occidental should be held to the same standard that the City of Tacoma was held to for cleaning up the Thea Foss and other similar sites around Tacoma.
- As indicated above, the expectation is that the cleanup will allow for future economic use of the site and shall be done in such a way that the property is not limited for future uses. The contaminated soil mass near the surface should be remediated and free of contaminants so that new industry infrastructure (i.e., building footings, drainage structures, etc.) can be installed without further remedial activities.
- All potential exposure pathways must be fully evaluated and understood before cleanup so that the effects on human health and ecological receptors can be fully assessed, projected and monitored.

- We continue to have concerns about the northern edges of the contamination plumes. The bayward end of the plume must be monitored so that a response can be formulated in the event contamination discharges from the subaqueous sediments into Commencement Bay.
- There remains a need for biological testing to determine contaminant levels and potential for bioaccumulation in aquatic fish, shellfish, and resulting human impacts.
- Sediments at the sediment/water interface must continue to be monitored for effects on biological activity.
- Whatever methods are allowed by Ecology for cleanup, Occidental must provide adaptive management so that more aggressive treatment alternatives can be implemented in the event monitoring results and performance of the extraction treatment and containment systems implemented are not achieving agreed upon, stringent, performance milestones.

The City of Tacoma appreciates Ecology's intent to move the cleanup for the Occidental site forward. While we acknowledge the complexity and challenges of this site, we believe that it is past time to begin cleanup, to the extent feasible. We urge Ecology to require aggressive, practicable cleanup, as well as comprehensive monitoring and reporting to reduce risk to the environment and the public, and to allow this property to return to economic use.

Sincerely,



Michael P. Stevin, III, P.E.  
Environmental Services Director

MPS:MLH (Comments on FS.docx)

cc: Mary Henley, Environmental Services