

Barbara Menne

Thank you for the chance to comment on the Occidental Feasibility Study. My comment letter is attached.

Sincerely,
Barbara Menne

April 6, 2017

Kerry Graber, Site Manager
Washington State Department of Ecology
PO Box 47775, Olympia, WA 98504-7775
Kerry.graber@ecy.wa.gov



Re: Public Comments on Feasibility Study, Occidental Chemical Corp. Superfund Cleanup

Thank you for giving me the opportunity to provide comments on the Occidental Chemical Superfund cleanup, the worst contamination left in Commencement Bay.

My name is Barbara Menne and I live in the North End of Tacoma and have lived in Tacoma for 23 years. I have a Master's degree in Geology and am a librarian. I have a long connection with this area and am deeply concerned about toxic contamination from the Occidental Chemical Corporation.

Part of what I love about Tacoma is its story of moving from a historical legacy of industrial pollution to a community with a revitalized connection to its waters. Commencement Bay, including the Hylebos Waterway, is a source of pride for both myself and the larger community and it deserves a full and long-lasting cleanup.

The contamination from Occidental is staggering. Hundreds of thousands of pounds of toxic, cancer-causing chemicals are spread under the site, the Hylebos Waterway, and potentially Commencement Bay.

In order to cut costs, Occidental Chemical Corporation is setting the stage to be able to walk away from this mess without a comprehensive cleanup. Occidental is proposing a cleanup plan that would leave nearly two thirds of their pollution in the ground – highly toxic pollution right underneath a vulnerable aquatic ecosystem.

Doing the MSP level clean-up to remove 42% of the pollution in the groundwater is inadequate. As a geologist, I am very aware of the potential for future changes in site conditions. Landslides and earthquakes can shift land itself and change pressure gradients within the plume area in the site so that contaminants could migrate and pose new hazards. As much pollution as possible should be removed in this phase of the clean-up to prevent future problems.

Occidental's suggested clean-up plan is absolutely not acceptable - this is not acceptable for me, for my family, for my community, or for my environment.

We cannot afford to let Occidental walk away from their pollution history :

- They must be held accountable for the most complete and quickest cleanup possible.
- I urge Ecology to choose a cleanup plan that removes as much toxic pollution as possible, as soon as possible. We cannot wait another 20 years to get results.
- Further, Occidental must provide for future certainty of their responsibility and solvency. So they should create a performance bond, reserve account or an equivalent fund to ensure that cleanup costs will be covered regardless of the company's future financial status. Ecology has the authority to order this via a unilateral order.

Occidental should not be able to argue that it's too big of a mess – they created it and they should clean it up. For the safety of our environment, Ecology needs to hold them fully accountable for a real cleanup to the “maximum extent practicable” as required by the Model Toxics Control Act. What Occidental is proposing is unacceptable. We cannot allow the profits of polluters to outweigh the importance of environmental protection.

Sincerely,

Barbara Menne
1415 N Anderson St, Tacoma 98406
menneb@harbornet.com