

Foss Waterway Development Authority

Dear Ms. Graber,

Attached please find FWDA's comments to the Occidental Chemical Corporation Draft Feasibility Study for the Hylebos Waterway in Tacoma.

Please give me a call if you have any questions.

Sincerely,
Norman Gollub

Norman Gollub
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All e-mail communications with the Foss Waterway Development Authority are subject to disclosure under the Public Records Act and should be presumed to be public.



FOSS WATERWAY DEVELOPMENT AUTHORITY

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April 27, 2017

Ms. Kerry Graber
Southwest Regional Office, HWTR Program
PO Box 47600
Olympia, WA 98504-7600
Kerry.Graber@ecy.wa.gov

Re: Occidental Chemical Corporation – Draft Feasibility Study

Dear Ms. Graber:

Thank you for providing the Foss Waterway Development Authority (FWDA) the opportunity to review and comment on the Draft Feasibility Study for the Occidental Chemical Corporation Superfund site in Tacoma, Washington.

The FWDA has invested two decades in the revitalization of Tacoma's downtown waterfront, the Foss Waterway. The Superfund cleanup of the Foss has resulted in the restoration of fish and wildlife and activated human use of the Foss and all of Commencement Bay. The Foss has a significant residential community and is a tourist attraction with its museums and access to the water. The protection of our waters and human and aquatic health is of paramount importance to the FWDA.

The Foss Waterway and Hylebos Waterway are inextricably linked, so the fate of one carries heavy ramifications for the other. Because of this, we are gravely concerned about the shortcomings of the Draft Feasibility Study for the Occidental site.

Part of what makes the Foss Waterway and Commencement Bay so special is its history of overcoming a legacy of toxic contamination and polluted waterways to becoming a community re-establishing its vital connection to its waters. Tacoma's waterfront, including both the Foss and Hylebos Waterways, is a source of pride and identity for the FWDA and the broader Tacoma community and it deserves a solid and thorough cleanup plan.

FWDA members have reviewed the draft FS. Our concerns are as follows:

1. Occidental Chemical Corporation is proposing a minimal amount of cleanup that will leave the health of the Hylebos in doubt. The proposal would leave nearly two-thirds of highly toxic pollution in the ground, right underneath a vulnerable aquatic ecosystem.

2. The FS does not consider combining alternatives trying to find the best combination of actions.
3. No remedial alternative presented in the FS examines the removal of contaminants under the Hylebos Waterway. It is our understanding that the pollution extends 175 feet below ground elevation and includes chemicals that dissolve rock. The pollution plume has the potential to migrate especially should a seismic event occur. Mitigation certainly needs to consider this.
4. The proposed mitigation does not adequately addressing phasing. Removal of as much contamination as possible should be followed in a subsequent phase that includes porewater sampling under Commencement Bay to determine whether the site has impacted the Bay and to ensure the plume does not daylight somewhere. It should also implement pump-and-treat where pH currently precludes groundwater extraction. The selected remedy needs to be looked at with reasonable frequency.
5. The Tacoma Tidelands are unique and the potential for further contamination, especially from the Occidental contamination plume is very real. These contaminants are toxic to aquatic wildlife should they enter the water. This is why it is so important to address the sodium hydroxide that Occidental is essentially ignoring in their cleanup action options. Merely building a wall as proposed fails to adequately address this caustic soda. Containment alone cannot be the final solution for this material.
6. Occidental should be held financially responsible for current and future cleanup costs and financial mechanisms should be put in place to insure that the health of the Hylebos and Commencement Bay will not be placed in jeopardy at some future date.

Please contact me if there are questions regarding our comments. Thank you for the opportunity to provide feedback for the draft Feasibility Study. We look forward to a robust and thorough cleanup of the Occidental Chemical site.

Sincerely,

Norman Gollub
Executive Director
Foss Waterway Development Authority

Cc: FWDA Board of Directors