

The Lands Council

The Lands Council appreciates the opportunity to comment on the RI/FS for the BNSF Railway Black Tank Property. We note that the May 2017 publication lists June 22, 2017 as the end of the comment period.

We support a timely and thorough clean-up, and are concerned that the site and plume sits above the Spokane Valley-Rathdrum Prairie aquifer. While the report states that the heavy oil tends to stay on top of the groundwater with little mixing, we note that the aquifer levels rise and fall through the year, creating the potential for some mixing in the smear zones.

In order to ensure the best and most timely clean-up remedy, we support Option D, Bioventing/biosparging and steam-enhanced extraction. This would result in a more timely (10 Years), and enhanced clean-up, compared with the Option B Preferred by the PLP) cleanup, which would take up to 14 years to clean-up.

We would also note that Option E, which would be a \$25 million dollar cleanup and take only 7 years is of interest and we hope that the pro's and con's of this approach will be carefully considered.

We value the efforts of WA Ecology to keep this project moving forward, and look forward to seeing a draft clean-up action plan.

Sincerely,

Mike Petersen, Executive Director