

Port of Tacoma

I appreciate the opportunity to review Ecology draft guidance on how to address PCBs in building materials. Firstly, thank you for taking up this important issue. PCBs have been a problem at the Port of Tacoma, Commencement Bay and more broadly in the Puget Sound for generations. The Port has spent millions to cleanup legacy PCB in sediments in the Port's industrial waterways, and the City of Tacoma and private industry have spent millions more to clean up the other Commencement Bay Waterways.

After more than a decade of post cleanup sediment sampling, we have learned that PCB sources were not fully controlled before cleanup was implemented. Releases of PCBs, while at lower levels than in the past, continue. Staff at the Port have experienced finding PCB's in building materials above TSCA levels when planning building demolition project. Although banned more than 40 years ago, PCBs continue to exist in the upland environment, and continue to migrate to the Puget Sound Ecosystem.

The Port of Tacoma supports this guidance, and our current policies and practices align with this guidance. I provide one specific comment related to Sampling Plans on page 20. Building renovations are a common action, that often do not require city permits. Creating a sampling plan for every project and coordinating that with the EPA Region 10 coordinator for small, permit exempt projects will be burdensome. Anything Ecology can do to lessen the regulatory burden of this guidance will help to facilitate its adoption by the community.

An ounce of prevention is worth a pound of cure. Thanks for addressing this important issue.