



# Citizens for a Healthy Bay

535 Dock Street

Suite 213

Tacoma, WA 98402

Phone (253) 383-2429

[chb@healthybay.org](mailto:chb@healthybay.org)

[www.healthybay.org](http://www.healthybay.org)

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A tax-exempt  
501(c)(3) Washington  
nonprofit corporation

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Andrew Smith

Washington State Dept. of Ecology

PO Box 47775

Olympia, WA 98504-7775

[Andrew.Smith@ecy.wa.gov](mailto:Andrew.Smith@ecy.wa.gov)

*Submitted electronically*

Re: Comments on Portac Inc Tacoma Site (aka Parcel 15) Agreed Order (AO), Remedial Investigation (RI), Feasibility Study (FS), Draft Cleanup Action Plan (dCAP), State Environmental Policy Act (SEPA) Checklist, and SEPA Determination of Non-Significance (DNS)

Dear Mr. Smith,

Thank you for providing the opportunity to review and comment on the Parcel 15 AO, RI, FS, CAP, SEPA Checklist, and SEPA DNS.

Citizens for a Healthy Bay (CHB) is a 31-year-old organization whose mission is to represent and engage people in the cleanup, restoration, and protection of Commencement Bay, its surrounding waters and natural habitat. We are a 501(c)3 nonprofit providing practical, solutions-based environmental leadership in the Puget Sound area. We work side-by-side with residents, businesses, and government to prevent and mitigate pollution and to make our community healthier and more vibrant.

Due to the volume of documents to review during a time of high permitting activity around Commencement Bay, CHB staff and expert members of CHB's Policy and Technical Advisory Committee have not been able to thoroughly review these documents, but are very familiar with the industrial activities on site and their associated contamination impacts. Our high-level comments are outlined below.

The likely contaminants at this site, based on other sites containing ASARCO slag, include arsenic, iron, calcium, and potentially significant concentrations of aluminum, antimony, barium, copper, lead, manganese, molybdenum, tin, titanium, and zinc, among other metals. *Ecology needs to ensure that the nature and extent of these contaminants are investigated.* Many of these contaminants are regulated by the Model Toxics Control Act (MTCA), and a thorough RI is needed to ensure the site is not in violation of MTCA standards.

The Washington Department of Health's Office of Drinking Water and the Fife Department of Public Works (Site ID 25050) show that groundwater at the site is contaminated with arsenic and is a human health concern. This groundwater is used for drinking water by a community that is largely composed of indigenous people, including members of the Puyallup Tribe of Indians. ***It is crucial that immediate action be taken to address this groundwater contamination, and ensure that it meets human health criteria.***

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Parcel 15 AO, RI, FS, CAP, SEPA Checklist, and SEPA DNS.

Sincerely,

A handwritten signature in black ink that reads "Erin Dilworth". The signature is written in a cursive, flowing style.

Erin Dilworth  
Policy & Technical Program Manager  
Citizens for a Healthy Bay  
253-383-2429 ext. 3  
[edilworth@healthybay.org](mailto:edilworth@healthybay.org)

cc: Char Naylor, Puyallup Tribe of Indians