



Citizens for a
Healthy
Bay

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February 5, 2018

Nicholas Acklam
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775
Nicholas.Acklam@ecy.wa.gov

Re: Comment on Naval Reserve Center Tacoma: Environmental Cleanup
Determination (Cleanup Site ID #3017)

Executive Director
Melissa Malott

Dear Mr. Acklam:

Thank you for providing the opportunity to review and comment on the proposed environmental cleanup determination for the Naval Reserve Center (NRC) cleanup site ("the site,") near the Hylebos Waterway in Tacoma.

Board of Directors

Jeff Barney
Brice Boland
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Citizens for a Healthy Bay (CHB) is a 28-year-old environmental organization whose mission is to represent and engage people in the cleanup, restoration and protection of Commencement Bay, the 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 governments to prevent pollution and make our community more sustainable.

Staff and expert members of CHB's Policy and Technical Advisory Committee have reviewed the proposed cleanup determination and related materials. Our comments are outlined below.

Background

The NRC site is a voluntary cleanup site located at 1001 Alexander Avenue in Tacoma. A portion of this site extends onto the site of Puget Sound Energy's proposed LNG plant. In the 1990's it was discovered that the soil and groundwater was contaminated by petroleum from fuel storage tanks previously on the property.

The owners of the site worked with the Washington State Department of Ecology (Ecology) to remove the contaminated soil and treat and monitor the groundwater.

Through soil and groundwater tests, Ecology has determined that all cleanup goals for the site have been met, no further action is necessary, and is thereby proposing to remove this site from the statewide Hazardous Sites List.

Comments

Citizens for a Healthy Bay requests that there be ongoing monitoring with public notification of the results and that Ecology does not waive their right to re-list the NRC site or that there is a re-opener clause. If there will not be any continued monitoring at the site, it must be made clear why that is the case. Our concerns about the NRC site are outlined below.

First, the data from the PCB removal in 1996 was supposed to be provided in Attachment 3. However, that attachment only has 1993 data. The 1996 PCB data must be added and made available for public review. Additionally, the comment period ends in January 2018, not 2017 as stated on the proposed removal document.

Secondly, it is unclear whether sufficient confirmation samples were taken for the 1993 remediation samples and the confirmation of 2017 cleanup samples.

Lastly, are there any Environmental Covenants or institutional controls, including groundwater use restrictions, for the site? This is particularly important to CHB since the background materials state there is groundwater and sediment contamination on and adjacent to the site from the Occidental Chemical Superfund site and the greater CB/NT Superfund site.

CHB thanks Ecology for their work in cleaning up this contaminated site. We look forward to staying engaged in cleanup sites in the Tacoma Tidelands to move towards a cleaner, healthier future.

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Naval Reserve Center Tacoma cleanup.

Sincerely,

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

Melissa Malott
Executive Director, Citizens for a Healthy Bay
mmalott@healthybay.org, (253) 383-2429