



Citizens for a
Healthy
Bay

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Thomas Middleton
Site Manager, Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775
Thomas.Middleton@ecy.wa.gov

Re: Comment on Sound Battery: Environmental Cleanup Determination (Cleanup Site ID 3646)

Executive Director
Melissa Malott

Dear Mr. Middleton:

Thank you for providing the opportunity to review and comment on the proposed environmental cleanup determination for the Sound Battery (SB) cleanup site (“the site”.)

Board of Directors

Jeff Barney
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Jerry Hallman
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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, including the 2015 Closure Report, the 2016 Groundwater Monitoring Plan, and the 2017 VCP Opinion. Our comments are outlined below.

Background

The SB site is a voluntary cleanup site located at 2310 East 11th Street in Tacoma. Batteries were manufactured on-site for several decades beginning in the 1940’s. Lead contamination has been found in soil and groundwater at the SB site. The owners of the site have worked with Ecology to remove contaminated soil and treat and monitor the groundwater – over 1,200 tons of contaminated soil have been removed as part of the cleanup.

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 the SB site is not taken off the Hazardous Sites List until after the five years of groundwater sampling have been conducted to ensure that the site has been adequately remediated. If Ecology does move forward with delisting, it is essential that Ecology does not waived any of their rights to re-list the site, we do not object to the action.

CHB also is concerned about the following issues with the SB site:

1. The remediation was confirmed using sidewall and bottom grabs from the excavations. While not required by MTCA, standard practice would have been to take composited samples for the confirmation sampling. It is possible that contamination areas were missed using this method. CHB asks that composited samples are taken to confirm Ecology's sampling did not miss any contamination areas.
2. No groundwater data from the long-term monitoring was provided. This information should have been made available as part of Ecology's delisting document. CHB requests that all long-term groundwater monitoring data already collected is made publicly available with the other delisting documents. We further request that there is ongoing public notification of the monitoring results and that CHB is notified when new monitoring results are available.

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 Sound Battery cleanup.

Sincerely,



Melissa Malott
Executive Director, Citizens for a Healthy Bay
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