



Citizens for a Healthy Bay

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Marv Coleman
Cleanup Project Manager
Washington State Dept. of Ecology
PO Box 47775
Olympia, WA 98504-7775
mcol461@ecy.wa.gov

Re: Comments on Tacoma Coal Gas Plant Agreed Order (AO) and Draft Public Participation Plan (dPPP)

Executive Director

Melissa Malott

Dear Mr. Coleman,

Thank you for providing the opportunity to review and comment on the Tacoma Coal Gas Plant AO and dPPP.

Board of Directors

Brice Boland

Sherrie Duncan

Bryan Flint

Jerry Hallman

Kelly McCord

Sheri Tonn

Citizens for a Healthy Bay (CHB) is a 28-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.

Staff and expert members of CHB's Policy and Technical Advisory Committee have reviewed the AO and dPPP. Our comments are outlined below.

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Background

The Tacoma Coal Gas Plant (hereinafter referred to as “the Site”) was in operation from 1884 to 1924 and manufactured natural gas from coal. As a result of manufacturing processes, the soil and groundwater at the Site are contaminated with Polynuclear Aromatic Hydrocarbons (PAHs) and BTEX (benzene, toluene, ethylbenzene and xylene) – long-term exposure to these contaminants are known to be detrimental to human and environmental health. The AO identifies the Washington Department of Transportation, the City of Tacoma, Puget Sound Energy, and PacifiCorp as the parties responsible (PLPs) for cleanup and monitoring.

General Comments

CHB is appreciative of the cleanup that has been completed at the Site thus far under the current AO, and looks forward to the final remediation that is being proposed in this draft AO. We are also appreciative that CHB is listed as a repository for cleanup documents, and look forward to receiving copies of the Remedial Investigation, Feasibility Study, and any interim action plans when they are available for public review.

CHB has two minor concerns with the AO. In the section “Work to be Performed”, the AO states that the PLPs must “conduct monitoring of wells that have been established in the upland and shoreline of the Site,” and that “continuation of sampling and frequency of sampling will be determined by consultation and consideration of sampling results by Ecology and the PLPs after each round of sampling.” CHB requests that the AO specifically state monitoring of newly installed wells may be required to monitor groundwater. Additionally, CHB requests that the AO provides the timeline that the PLPs will be required to continue monitoring activities.

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Tacoma Coal Gas Plant AO and dPPP.

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