



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 14, 2022

Gary Richards
U.S. Army Corps of Engineers - Kansas City District
Environmental Programs Branch, PME-S
601 East 12th Street
Kansas City, Missouri 64106-2824

Re: Comments on the American Lake Garden Tract (ALGT) portion of Third Installation-Wide Five-Year Review Report, Draft Final, Joint Base Lewis-McChord (JBLM)

- **Site name:** USAF MAFB American Lake Garden Tract
- **Site address:** 62abg Deev Mchord AFB, Tacoma, WA 98438-5436
- **Facility/Site ID:** 239
- **Cleanup Site ID:** 137

Dear Gary Richards:

The following are the Department of Ecology's comments on the above referenced document, focused on the ALGT portion of the JBLM periodic review report, hereinafter referred to as "the Report".

Overall, the Report appeared to be thorough and complete. The following are specific comments pertaining to the periodic review of the ALGT:

Page ES-5 Table ES-1.

Primary remedy components for ALGT were listed as:

Install and maintain groundwater extraction wells, including near areas of highest contamination, capable of capturing the groundwater contaminant plume. Install and maintain groundwater treatment systems, preferably carbon adsorption. Monitor performance of the P&T systems during remediation activities. Implement and maintain LUCs summarized in Table ES-2 with the overarching LUC objective to minimize exposure to contaminants during remediation.

As discussed later in the Report, the June 2020 Focused Feasibility Study (FFS) for ALGT indicated that the Groundwater Pump-and-Treat system has been out of operation since 2016 and Monitored Natural Attenuation was recommended as the preferred alternative for the remaining chlorinated volatile organic compounds (CVOCs) in groundwater. Table ES-1 should include the status of the remedy at the ALGT.

Remedial action objectives for ALGT were listed in Table ES-1 as:

To restore groundwater to its beneficial use, a drinking water source. The groundwater will be restored to levels consistent with state and Federal ARARs. Remediation levels will be attained throughout the contaminated plume.

This remedial action objective was also stated in the 2020 FFS for ALGT. As discussed later in the Report, the preferred remedy within the 2020 FFS was Monitored Natural Attenuation (MNA), which was stated to be protective of human health and the environment. However, it is unclear if groundwater restoration is the sole remedial action objective for the Site since no estimation of the restoration timeframe was included. An estimated restoration timeframe should be included in the Report to demonstrate that the selected remedial approach is consistent with the remedial action objectives.

Page ES-8, OU03, OU Protectiveness Statement, American Lake Garden Tract

The statement *“The remedy at MF-ALGT-LF-05, Area D/ALGT, currently protects human health and the environment”* should be supported by a map showing the area of contamination above cleanup levels and water supply wells in the area. Ecology’s GIS coverage shows Group A/B water supply wells in the vicinity of the Site as well as a wellhead protection area that includes this area. The Report discusses LUCs to ensure no drinking water supply wells are installed within 1000 feet of landfills; however, no discussion of existing water supply wells in the area was found. It is important to demonstrate the protectiveness of the remedy in preventing potential exposures to the groundwater contamination.

Page 5-1, AGLT, Section 5.1 Site Description

The last sentence of paragraph one states: *“Properties surrounding the site are connected to the local public water supply”*. Please specify the public water supply entity, where the water supply for that entity is from, and where nearest water supply wells are located. As discussed above, Ecology’s GIS system shows Group A/B wells and a wellhead protection zone in proximity to the Site. A map is suggested to clarify this concern, as discussed above in the comment for page ES-8.

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Contact Information

If you have any questions regarding this letter, please contact me via phone at (360) 628-1977 or at nicholas.acklam@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Nicholas M. Acklam". The signature is written in a cursive style with a long, sweeping underline.

Nicholas M. Acklam
Section Manager
Toxics Cleanup Program
HQ Cleanup Section

cc: Mark Mettler, JBLM Directorate of Public Works
Jason Cook, Ecology
Kerry Graber, Ecology
Amy Hargrove, Ecology