



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

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April 28, 2026

Kevin Smith, P.E.
Tacoma Public Utilities
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RE: Ecology Comments on the Draft Feasibility Study Report

- **Site Name:** Riffe Lake/Kosmos Town Site
- **Site Address:** Kosmos Flats Area, Morton, Washington
- **Facility/ Site ID:** 61559576
- **Cleanup Site ID:** 9890

Kevin Smith (Project Coordinator),

This work is being done under Agreed Order No. DE 16955 (Agreed Order) between Washington State Department of Ecology (Ecology) and the City of Tacoma, Department of Public Utilities, Light Division (d.b.a. "Tacoma Power") and in compliance with the Model Toxics Control Act, Chapter 70A.305 RCW.

Thank you for submitting a draft of Riffe Lake/Kosmos Town Site's Feasibility Study Report. I was able to blindly conduct my own Disproportionate Cost Analysis (DCA) evaluation and agree that Alternative 1 is the apparent PMEP alternative. Please respond to or address the following:

1. **Section 2.2** – Add language outlining the total number of remedial technologies screen and total number thrown out.
2. **Sections 2.3.2, 2.3.3, 2.3.4, and 2.3.5** – Can you elaborate on how the protective cap would be fully disposed of without in-water work? Hydraulic Project Approval permit is listed as not needed in Table 4.
3. **Section 2.3.2** – What device, physical or legal, will guarantee that these wells are accessible if the water level is compliance monitoring associated with MNA possible long-term? What is the proposed monitoring schedule? Twice a year for two years, followed by monitoring every 18 months?

4. **Section 2.3.2** – Are institutional controls, such as environmental covenants, possible on parcels owned by Tacoma Power?
5. **Section 2.3.3** – Can you provide additional information on how enhanced in-situ bioremediation (EISB) injections or addition of oxygen release compounds (ORC) near the smear zone would work if the site became fully inundated shortly after construction.
6. **Section 2.3.4** – Does Regenesis, or other sources, have case studies that involve inundation or seasonal inundation? How would the permeable sorptive barrier (PSB) work if the current ground surface is submerged?
7. **Section 3.1.5** – Alternatives 2, 3, and 4 all include MNA and have long restoration timeframes. Please provide additional information on how Alternatives 2, 3, and 4 would be effective long-term.
8. **Section 3.4** – Sections 7.2 and 7.3 of the new PMEP guidance (pub no. 25-09-059) have guidance for evaluating tribal, vulnerable, and overburdened communities concerns of alternatives. Please add language to this section on how they were directly addressed during the DCA process. I understand public comment plays a role, but please add language identifying how they were and will be incorporated.
9. **Section 3.5.2** – Uneven weighting was used in your DCA (Table 10). I agree with your percentages used, but please provide rational for why the weighting is acceptable. Is the “(Ecology, 2025)” reference in this section supposed to be the now finalized PMEP guidance (publication number 25-09-059)?
10. **Additional Miscellaneous Items in the Attached Enclosure**

If you have any questions, please call me at 360-999-9590 or email me at cpen461@ecy.wa.gov.

Sincerely,



Cam Penner-Ash, LG
Cleanup Project Manager
Southwest Region Office
Toxics Cleanup Program

cc: Angie Goodwin, L.H.G., agoodwin@haleyaldrich.com
Marian Abbett, Ecology, mabb461@ecy.wa.gov
Ecology Site File