



Response to Comments on the
December 16, 2016 Email from OCC to Ecology Regarding
the December 9, 2016 Revised Feasibility Study
Received on January 18, 2017
Groundwater and Sediment Remediation
Occidental Chemical Corporation, Tacoma, WA

1 Restoration Timeframes

Response: OCC agrees to add discussion regarding difficulties in estimating restoration timeframes and the approach of using 100 years is a reasonable metric for comparing alternatives.

2 Performance Objectives and Standards.

Response: OCC agrees to add the pounds represented by the percent of CVOC mass outside the high pH (pH >10 s.u.) proposed to be removed by 2, 5, 10, and 15 years in Section 8. (Select Preferred Remedy) of the December 9, 2016 revised Feasibility Study (FS) based on additional modeling using EVS data to determine these estimates.

OCC agrees with the recommendation to delete the second last paragraph in Section 8. (Select Preferred Remedy).

OCC agrees to add discussion related to the limitations associated with the mass removal estimates to Section 8. (Select Preferred Remedy).

3 The "No Action VOC Mass Removal/Reduction Alternative"

Response: OCC has re-labeled this alternative as the No **Additional** Action VOC Mass Removal/Reduction Alternative to clarify that it means no additional action will be conducted beyond implementing a containment alternative as suggested in the Agencies' comments received on December 15, 2016 on the December 9, 2016 revised FS. OCC agrees to add a footnote in Table 6.1 clarifying the meaning of this alternative.

The No Additional Action VOC Mass Removal/Reduction Alternative represents containment only rather than targeting mass. However, OCC has assigned a mass to this alternative as requested.

4 Limitations Associated with Mass Removal Estimates

Response: OCC agrees to add discussion related to the limitations associated with the mass removal estimates in Table 6.3 to Subsection 6.2.9. (Disproportionate Cost Analysis) and to Section 8. (Select Preferred Remedy).