



Tacoma Coal Gas Responsiveness Summary

Comment Period: August 5 – September 3, 2018

Cleanup Site ID: 3675
Facility ID: 1249
Address: 22nd and A Street, Tacoma, WA
County: Pierce

Document for review and comment

Agreed Order

Background

The Tacoma Coal Gas plant operated between 1884 and 1924. After it closed, property owners removed above-ground structures and covered the site with fill. Remaining contaminants in soil and groundwater are typical of coal gasification plants and include: Polynuclear aromatic hydrocarbons, and BTEX (benzene, toluene, ethylbenzene, and xylene).

Ecology received one comment during the comment period.

Prepared by

Marv Coleman
Cleanup Project Manager

Sheila Coughlan
Public Involvement Coordinator

Melissa Malott

Please send receipt of the attached comments to edilworth@healthybay.org



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August 31, 2018

Marv Coleman
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Washington State Dept. of Ecology
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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

RESPONSE TO CHB COMMENTS ON TCG AGREED ORDER --

Public comments to the Tacoma Coal Gas Plant Agreed Order were received from Citizens for a Healthy Bay (CHB). No other comments or questions were received from members of the public or other organizations/agencies.

CHB offered two comments, summarized below, followed by Ecology responses to them:

1. *CHB requests that the AO specifically state monitoring of newly installed wells may be required to monitor groundwater.*

Response: Any wells installed for monitoring will be monitored for the established contaminants of concern on a schedule that is stated in the pertinent Remedial Investigation and subsequent Cleanup Action Plan Work Plans. Monitoring performed up to this point has been set up and approved in this manner and future work will be provided for in a similar manner. RI/FS and CAP documents, including the approved monitoring plans and schedules will be subject to public comment when they are received by Ecology. The response to the following comment provides a related explanation –

2. *Additionally, CHB requests that the AO provides the timeline that the PLPs will be required to continue monitoring activities.*

Response: Orders and Decrees provide requirements for PLPs to generate certain documents and perform certain administrative actions according to general schedules and timelines – an example of this is item C below, copied from the TCG AO. More specific schedules and timelines, for specific required activities at the site, are included in the documents that will be submitted and approved in accordance with the order. Examples of how this is integrated into the Order or Decree are shown in items A and B, below. It is important to note that these subsequent documents, that come out after the Order or Decree has been established in law, become “integral and enforceable parts of the Order.” This is key language that gives the requirements of subsequent documents the same force

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as if they were included in the order itself. Items A and B are copied from the TCG AO, also.

A. The remedial investigation schedule of work performance and list of deliverables will be described in the Final RI Work Plan and is incorporated by reference as an enforceable

part of this Order. Deliverables shall include provisions for progress reports, QA/QC protocols and documentation, as built documentation, sampling and analysis plan, and health and safety plan.

B. All plans or other deliverables submitted by PLPs for Ecology's review and approval **under the Scope of Work and Schedule** [emphasis added] shall, upon Ecology's approval, become integral and enforceable parts of this Order.

C. Develop a RI/FS Work Plan: Develop and submit to Ecology an RI/FS Work Plan to perform agreed upon activities to finalize characterization of the Site and determine feasible options to perform remedial actions for the Site. Schedule: Draft RI/FS Work Plan submitted to Ecology within 90 days of Ecology approval of the Compilation of Existing Information and Data Gaps Analysis described in paragraph B above. Final RI/FS Work Plan submitted to Ecology within 60 days of receipt of comments on Draft RI/FS Work Plan by Ecology.

Thank you for your attention to this Ecology action and your comments and questions.