

# **Citizens for a Healthy Bay**

Please see the attached comments from Citizens for a Healthy Bay.



Citizens for a  
Healthy  
Bay

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WA Department of Ecology  
Attn: Panjini Balaraju  
PO Box 47775  
Olympia, WA 98504-7775  
*Submitted electronically*

Re: BPA Tacoma Occidental sludge cleanup site periodic review

Dear Mr. Balaraju,

*Executive Director*  
Melissa Malott

Thank you for providing the opportunity to review and comment on the BPA Tacoma Occidental sludge cleanup site periodic review.

*Board of Directors*  
Desiree Wilkins Finch  
Barry Goldstein  
Anders Ibsen  
Jennifer Keating  
Melissa Nordquist  
Katy Stone  
Anne Taufen  
Sheri Tonn  
Alan Varsik  
Raeshawna Ware

Citizens for a Healthy Bay (CHB) is a 30-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 cleanup site periodic review. Our comments are outlined below.

The BPA Tacoma Occidental Sludge site was left contaminated with arsenic, lead, and volatile organic compounds (VOCs) above state cleanup levels after the BPA used waste materials from the Occidental Chemical Site (then Hooker Chemical) to fill low-lying areas on their property. Baghouse dust and shot were also disposed of at the site. While the environmental cleanup is considered complete and Ecology has determined the remedy remains effective in protecting public and environmental health, high levels of the above-mentioned contaminants are still found in the groundwater on site. To prevent exposure to contaminated groundwater, the site's Environmental Covenant (EC) prohibits any activity on the site that may undermine the integrity of the cleanup, and continued groundwater monitoring is required.

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In our review of the groundwater sampling report, it appears that the groundwater on site flows from the east toward the containment cell and from the west toward the cell – there does not appear to be any up-down gradient. **Based on that observation, Ecology needs to provide an explanation for why Well 1-20 - which is upgradient of the contamination - has the highest concentration of contaminants.** Further, the concentration of 1,2-Dichloroethane (DCE) in Well 1-10 shows a somewhat downward trend. However, the concentration continues to "jump" back above 100 ppm (parts per million), indicating no real change in concentration since the year 2000. **Additional work in the next five years should be done to ensure that the groundwater contaminant concentrations are actually decreasing.** Currently, it appears that factors other than natural attenuation are at play, causing these fluctuations in groundwater contamination. The conclusion that the remedy is protective is correct as the site is sitting in an industrial area and no one is drinking the groundwater. **However, data do not indicate that natural attenuation will bring the groundwater below standards, so Ecology needs to determine and explain the field conditions that seem to be causing the decline in groundwater contaminant concentration with the use of additional wells and analytes, including those for natural attenuation.**

Lastly, we recommend the EC for the site, which protects the constructed landfill and cap, remain intact indefinitely. We are aware of previous proposals to relocate the nearby rail line, which would have disturbed the landfill and cap, potentially releasing contaminants into both the groundwater and nearby surface water. We are concerned that similar proposals in the future will be introduced, and ask Ecology to ensure the EC remains intact and no leniency is given for development, even on a temporary basis.

Thank you for providing the opportunity to review and comment on the BPA Tacoma Occidental sludge cleanup site periodic review. Should you have any questions regarding our comments, please email Erin Dilworth at [edilworth@healthybay.org](mailto:edilworth@healthybay.org).

Sincerely,



Erin Dilworth  
Policy & Technical Program Manager



Melissa Malott  
Executive Director