



DEPARTMENT OF
ECOLOGY
State of Washington

Naval Reserve Center Hazardous Sites Delisting Responsiveness Summary

*Ecology's response to stakeholder
and public comments*

FSID: 93581722

CSID: 3017

March 2021

Publication and Contact Information

This document is available on the Department of Ecology's website at:
<https://fortress.wa.gov/ecy/gsp/sitepage.aspx?csid=3017>

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**Naval Reserve Center
Removal from the Hazardous Sites List**

*Ecology's response to stakeholder and
public comments*

Toxics Cleanup Program

Washington State Department of Ecology

Olympia, Washington

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Executive Summary

The Washington Department of Ecology (Ecology) held a public comment period and public hearing for the removal of the Naval Reserve Center cleanup site from Ecology's Hazardous Sites List, a statewide record of contaminated properties.

When fuel storage tanks were removed from the Naval Reserve Center site (site) in the 1990s, the Port of Tacoma (Port) who were the property owners found petroleum contaminated soil. The Port worked with Ecology under the Voluntary Cleanup Program to remove contaminated soil. After several soil and groundwater tests showed that the cleanup was successful, Ecology determined that no further cleanup was necessary and proposed to remove the site from the Hazardous Sites List (HSL).

The public comment period for removing (delisting) the site from the HSL started on December 21, 2017. It was originally set for 30 days, but due to a high level of interest from stakeholders and requests for a public meeting, Ecology extended the comment period end date to March 8, 2018. A public hearing was held on March 1, 2018. During the comment period and public hearing, Ecology received 28 written comments and one verbal comment.

This Responsiveness Summary contains Ecology's responses to comments about the delisting of the Naval Reserve Center site. Ecology appreciated the thoughtful contributions of the individuals and organizations who submitted comments. All comments were considered, however no substantive changes were made and the Naval Reserve Center site was removed from the HSL.

Site Information

The Naval Reserve Center Tacoma (site) is located at 1001 Alexander Avenue (property) in the Tacoma Tideflats and is owned by the Port of Tacoma (Port). It is designated with a land use of Military Bases and is zoned as Port-Maritime Industrial and Combined Shoreline. The property is located on two tax parcels that are approximately 10 acres in size. It is bound by the Hylebos Waterway to the north, East 11th Street and vacant land to the southeast, and Alexander Avenue and 15 acres owned by the Port to the southwest.

From the early 1900s to the end of World War II, the property was used for shipbuilding and woodworking plants. Between the end of World War II and 1996, there were various tenants and uses that included a joint-use facility for the Naval and Marine Corps Reserve, a fueling pier operated by Fletcher Oil Company, a drill facility to support Army, Navy, Marine Corps and Coast Guard Reserves, and for operation and repair of an oily waste barge. Over time, buildings and structures were constructed and demolished. The Port currently leases the site to Puget Sound Energy.

In 1993, the Naval Reserve Center decommissioned and removed six underground fuel storage tanks (USTs) and found petroleum contamination in the soil. In 1996, petroleum contamination was also found in the soil during the removal of two above-ground storage tanks (ASTs). In 1997, Ecology listed the site on the Confirmed and Suspected Contaminated Sites List (CSCSL) and the Hazardous Sites List (HSL) with a site hazard ranking of 3. In 2014, as part of a limited environmental site assessment, soil and groundwater samples were collected in the vicinity of the USTs that were removed in 1993 and included soil borings B-3, B-5, B-10 and B-25. Soil and groundwater samples were analyzed for gasoline, diesel, and oil-range hydrocarbons; benzene, toluene, ethylbenzene, and xylenes (BTEX); and semi-volatile organic compounds. Cleanup activities completed at the Site included:

- Excavation of approximately 166 tons of petroleum-contaminated soil following UST removal.
- Excavation of approximately 70 tons of petroleum-contaminated soil following AST removal.
- Tests of soil and groundwater for petroleum-related contamination (including gasoline, diesel, and oil-range hydrocarbons, BTEX, and semi-volatile organic compounds) to make sure no contamination remained at concentrations above Model Toxics Control Act (MTCA) cleanup levels.

In 2017, Ecology determined that the cleanup action met the substantive requirements of MTCA and issued a No Further Action letter to the Port. Ecology removed the site from the HSL in August 2018.

Response to Comments

Ecology accepted comments for the Naval Reserve Center proposed delisting from the Hazardous Sites List from December 21, 2017 to March 8, 2018.

The responsiveness summary consolidates the comments that either ask the same question or expresses similar concerns. It addresses 14 topic areas from the 29 comments received.

1. Adjacent contaminated sites
2. Cleanup actions, No Further Action letter, Hazardous Sites List delisting
3. Comment period, public hearing
4. Environmental covenants
5. Human health and the environment
6. Independent assessment
7. Liquefied Natural Gas (LNG) facility
8. Ongoing monitoring
9. Piecemeal cleanup sites
10. Polychlorinated Biphenyls (PCB) data
11. Public drinking water and private wells
12. Seismic activity and natural disasters
13. Transparency around cleanup and public notification
14. Voluntary Cleanup Program (VCP)

Table 1 provides a list of commenters, issues raised, and a cross reference to the relevant response. Ecology sought to provide a complete and comprehensive response to each concern.

Table 1. Summary of comments and response cross reference

Commenter	Issues raised	Responses
Anneliese Simons	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1, 2, 3, 7
Brian Gunn	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1, 2, 3, 7
Carol Kindt	LNG	7
Cindy Feist	Comment period, public hearing Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Seismic activity and natural disasters Voluntary Cleanup Program (VCP)	2, 3, 12, 14
Citizens for a Healthy Bay, Melissa Mallott	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Environmental covenants Ongoing monitoring PCB removal data	1, 2, 4, 8, 10
Claudia Riedener	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing Human health and the environment Independent assessment LNG Piecemeal cleanup sites Transparency around cleanup and public notification	1, 2,3, 5,6, 7, 9, 13
David Bluhm	Comment period, public hearing	3
David Strider (oral testimony)	Human health and the environment	5
Debby Herbert	Comment period, public hearing	3
Deborah Hill	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1,2,3,7
Diane Martin	Adjacent contaminated sites Cleanup actions Human health and the environment LNG	1,2,5,7
Don Steinke	Comment period, public hearing	3

Commenter	Issues raised	Responses
Heidi Vierthaler	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG Piecemeal cleanup sites Seismic activity and natural disasters Transparency around cleanup and public notification Voluntary Cleanup Program (VCP)	1,2,3,7, 9, 12,13,14
J McGourty	Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	2, 3,7
Joy Vartanian	Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing	2, 3
Julianne Gale	Comment period, public hearing LNG	3, 7
Kara Sweidel	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG Public drinking water and private wells Seismic activity and natural disasters	1, 2,3, 7, 11, 12
Lacey Reuter	Adjacent contaminated sites Comment period, public hearing Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Independent assessment LNG Piecemeal cleanup sites Transparency around cleanup and public notification Voluntary Cleanup Program (VCP)	1, 2, 3, 6, 7, 9, 13, 14
Lael White	Comment period, public hearing LNG	3,7
Michael Lafreniere	Comment period, public hearing LNG	3,7
Nanette Reetz	Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing Independent assessment LNG Piecemeal cleanup sites Transparency around cleanup and public notification Voluntary Cleanup Program (VCP)	2, 3, 6, 7, 9, 13, 14
Sandy Paul	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1,2,3,7

Commenter	Issues raised	Responses
Sierra Club, Tatoosh Group of Pierce County, Dorothy Walker	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing Human health and the environment LNG	1,2,3,5,7
Tracy Wiegman	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1,2,3,7
Teresa Catford	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG	1,2,3,7
Twylia Westling (2-comments)	Adjacent contaminated sites Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing LNG Transparency around cleanup and public notification	1,2,3,7,13
Valarie Peaphon	Cleanup actions, No Further Action (NFA) letter, Hazardous Sites List (HSL) Comment period, public hearing Voluntary Cleanup Program (VCP)	2,3,14
Yvonne McCarty, NE Tacoma Neighborhood Council	Comment period, public hearing Transparency around cleanup and public notification	3, 13

1. Adjacent contaminated sites

MTCA, Washington's cleanup law defines a site by the extent of the contamination, regardless of property boundaries or cleanup levels. Areas with contamination from different sources, with multiple responsible parties, are considered as separate sites if the contamination is not mixed or co-mingled. The two nearby, but separate cleanup sites are the Alexander Avenue Petroleum Tank Facilities (Alexander Tank Facilities; FSID 1377) and Occidental Chemical Corporation (Occidental; FSID 1212). The contamination from these sites did not co-mingle with the contamination on the Naval Reserve Center site. The Naval Reserve Center site is considered cleaned up based on MTCA standards.

The Alexander Tank Facilities site was used for petroleum processing and storage. Soil and groundwater are contaminated with petroleum-related products such as benzene and diesel. Some of these contaminants are on the same parcel of land as the Naval Reserve Center site, but are not co-mingled with contamination at the Naval Reserve Center site. The Alexander Tank Facilities is a separate cleanup site, which is being managed by Ecology. Additional information can be found on Ecology's [Alexander Tank Facilities](#)¹ website.

Occidental was a former manufacturer of chlorine, bleach, and other chemicals for the paper industry. The groundwater is contaminated with chlorinated volatile organic compounds, dense non-aqueous phase liquid (DNAPL) consisting of concentrated tetrachloroethylene (PCE) and trichloroethylene (TCE), and elevated pH. The investigations for the Occidental site show that the groundwater pollution is moving toward Commencement Bay and the Hylebos Waterway, and not in the direction of the Naval Reserve Center site. Occidental is a separate cleanup site, which is being managed by Ecology. Additional information and maps of the Occidental site solvent plume can be found on Ecology's [Occidental](#)² website.

2. Cleanup actions, No Further Action letter, Hazardous Sites List delisting

MTCA defines a site by the extent of the contamination. For the Naval Reserve Center site, the petroleum contamination that spilled or leaked from storage tanks constitutes the site. The Port worked with Ecology under the [VCP](#)³ to remove the contaminated soil and sample soil and groundwater.

The Port used MTCA Method A cleanup levels for soil and groundwater to evaluate and determine standard points of compliance for the site. For soil cleanup levels, the point of compliance was from the ground surface to 15 feet below the ground surface (bgs). For

¹ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=743>

² <https://fortress.wa.gov/ecy/ecy/gsp/Sitepage.aspx?csid=4326>

³ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

groundwater, the point of compliance was from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by contamination. Cleanup activities included:

- Excavation of approximately 166 tons of petroleum-contaminated soil that followed UST removal.
- Excavation of approximately 70 tons of petroleum-contaminated soil following AST removal.
- Soil and groundwater tests for petroleum-related contamination (including gasoline, diesel, and oil-range hydrocarbons, BTEX, and semi-volatile organic compounds) to make sure no contamination remained above cleanup levels.
- Transport of petroleum-contaminated soils to a Tacoma firm that recycles it into asphalt.

In 2014, GeoEngineers conducted soil and groundwater tests for gasoline, diesel, and oil-range hydrocarbons, BTEX, and semi-volatile organic compounds. Puget Sound Energy paid for the tests as part of an environmental assessment for the Liquefied Natural Gas (LNG) project. Results were all below laboratory detection levels with no detectable amount of contamination from the storage tanks. Ecology believed the number of samples taken were sufficient and determined the cleanup met the substantive requirements of MTCA.

Ecology issued a No Further Action (NFA) opinion letter to the Port on April 19, 2017. The NFA letter was written to allow for reopening the site if it was later discovered that cleanup was not complete. Sampling data and the NFA letter can be found on Ecology's [Naval Reserve Center website](#).⁴

Ecology removed (delisted) the site from the Hazardous Sites List when it was determined that the site was longer a threat to human health and the environment.

3. Comment period, public hearing

The original dates for the comment period were from December 21, 2017, to January 22, 2018. Ecology apologizes for any inconvenience caused by having the comment period during the holidays.

Ecology is responsible for the misprint on the fact sheet stating the end of the comment period year as 2017 instead of 2018. Due to public interest, Ecology extended the comment period to

⁴ <https://fortress.wa.gov/ecy/gsp/sitepage.aspx?csid=3017>

March 8, 2018. We hope the extension provided everyone the opportunity to submit comments.

A public hearing was held at the Center at Norpoint in northeast Tacoma on March 1, 2018. Ecology chose to hold a public hearing instead of a public meeting so that the public had the opportunity to provide oral comments.

4. Environmental covenants

Restrictions on future land use are not required where the unrestricted soil cleanup levels are met at the point of compliance.

An environmental covenant is not required for the Naval Reserve Center site because the site meets MTCA cleanup requirements. All contaminated soil with concentrations greater than MTCA Method A cleanup levels was excavated and transported to an appropriate facility for disposal. The adjacent cleanup sites (Occidental Chemical Corporation and the Alexander Avenue Petroleum Tank Facilities) are separate sites that are actively being cleaned up under different legal agreements.

5. Human health and the environment

The HSL is a list of sites determined by Ecology to be a threat to human health and the environment. A site may be removed from the list only after it has met MTCA cleanup standards and requirements.

Eliminating all risks at a contaminated site is often not possible. When Ecology refers to a site as clean, it generally means that if contamination remains, it no longer poses an unacceptable threat to human health and the environment.

The Naval Reserve Center site was cleaned up for unrestricted land use even though the site qualifies as an industrial property. Unrestricted land use means the soil cleanup level is based on the reasonable maximum exposure expected to occur under residential land use conditions, which are the land use conditions requiring the most protective cleanup levels for humans, plants, and animals.

6. Independent assessment

MTCA provides a process to allow sites to be cleaned up independently without Ecology oversight and approval. Ecology implements this independent process through its VCP. While the cleanups are completed independently from Ecology oversight, Ecology ensures that the cleanup meets the requirements of MTCA by providing technical assistance and guidance through the cleanup process. It is designed to protect human health and the environment.

7. Liquefied Natural Gas (LNG) facility

Ecology's cleanup decisions are based on MTCA, the state cleanup law. MTCA is designed to protect human health and the environment.

Ecology can require potentially liable parties to conduct remedial actions for releases or threatened releases of hazardous substances. However, Ecology cannot go beyond the authority established in the law or require action that is not consistent with the rules. Once a site is cleaned up as defined by MTCA, Ecology is not involved in development decisions.

The Naval Reserve Center site is located on the same parcel that PSE is leasing from the Port for the LNG facility. MTCA requires responsible parties to report new contamination. PSE did not discover additional contamination during construction after the Naval Reserve Center site was cleaned up. Also, all LNG construction activities were regulated through a construction stormwater quality permit, which had measures in place to prevent the discharge of contaminated water.

While the plumes are in close proximity to the Naval Reserve site, neither the Occidental solvent groundwater plume nor the Alexander Tank Facilities petroleum plume are within the LNG tank footprint. Information regarding the location of the plumes informed PSE about how to configure their facility. Some of the LNG facility infrastructures such as parking and stormwater systems are in the vicinity of the Alexander Tank Facilities groundwater plume, but are not deep enough to intersect the plume. Ecology's site manager for the Alexander Tank Facilities coordinated with the Port and PSE during construction planning to ensure that the construction would not interfere with future cleanup options, or exacerbate the contamination problem. Also, during construction of the LNG facility, all water and soil generated from excavations were tested and disposed of appropriately.

PSE submitted permits for the LNG facility that were reviewed and approved by the City of Tacoma, US Army Corp of Engineers, US Coast Guard, City of Fife, Washington State Utilities and Transportation Commission, Department of Ecology, Washington State Fish and Wildlife, Federal Pipeline and Hazardous Material Safety Administration, and the Puget Sound Clean Air Agency.

8. Ongoing monitoring

Additional monitoring is not required for the Naval Reserve Center site because all contaminated soil with concentrations greater than the applicable MTCA Method A cleanup levels was excavated and transported to an appropriate facility for disposal. If new data show that contamination is present, Ecology reserves the right to rescind the No Further Action status.

9. Piecemeal cleanup sites

The Naval Reserve Center, Occidental, and the Alexander Tank Facilities are three different cleanup sites.

The Port cleaned up the Naval Reserve Center site under the VCP. The Occidental and Alexander Tank Facilities are formal cleanup sites under cleanup orders with the State that are more complex and require more time to resolve.

For VCP sites, the parties cleaning up the site generally set their own timelines so there is more flexibility on how long it takes. Ecology does not have the regulatory authority to enforce the cleanup, and is limited to providing technical assistance and guidance. However, the cleanup must meet all of the requirements of MTCA just like a formal cleanup site.

10. Polychlorinated Biphenyls (PCB) data

Ecology apologizes for not including the 1996 data in Attachment 3. The data can be reviewed on Ecology's [Naval Reserve Center website](#)⁵ or by contacting Ecology's Public Record Officer at (360) 407-6040 for a [public records request](#).⁶

Based on the analytical results of samples collected during 1993, 1996, and 2014, no additional sampling and analysis is required.

11. Public drinking water and private wells

The Naval Reserve Center site is located within the City of Tacoma municipal water service area that provides a reliable potable water supply. Drinking water supply wells do not exist at the site.

The adjacent Occidental Chemical Corporation site is subject to restrictive land use covenants. This includes the prohibition against groundwater extraction, supply, or use for drinking or other human consumption or domestic use of any kind. The Naval Reserve Center site groundwater is not considered a current or potential future use of drinking water.

You can learn more about Tacoma's drinking water sources at Tacoma Public Utilities [Water Source website](#).⁷ If you have a drinking water well we encourage you to visit Tacoma & Pierce County Health Department [Individual Wells website](#).⁸

⁵ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3017>

⁶ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁷ <https://www.mytpu.org/about-tpu/services/water/water-source/>

⁸ <https://www.tpchd.org/healthy-homes/drinking-water/individual-wells>

12. Seismic activity and natural disasters

Washington State contains several fault zones capable of producing large earthquakes, such as a Cascadia Subduction Zone earthquake. The Tacoma and Seattle fault zones are the two features most capable of producing earthquakes that could significantly affect the Port of Tacoma area.

Based on historical data, a magnitude 7 earthquake could result in significant shaking, liquefaction, land sliding, and tsunamis. The main concern would be the deposit of large volumes of sediment on site that could cause damage to structures.

According to Puget Sound Energy's LNG [Final Environmental Impact Statement](#),⁹ the LNG facility was designed to withstand the impacts of a geologic disaster.

13. Transparency around cleanup and public notification

The Tacoma Public Library was not available as a document repository during the comment period. Documents were available for review at Citizens for a Healthy Bay and were available electronically on Ecology's Naval Reserve Center website.

Ecology is required by the state cleanup law, MTCA to notify the public at specific points during the cleanup process. Information about removing the Naval Reserve Center site from the Hazardous Sites List was posted in:

- Ecology's site register
- Ads in the News Tribune
- Fact sheets that were mailed to interested parties, and to residences within ¼ mile radius of the site

Ecology also goes beyond the MTCA public notification requirements and maintains a site website, sends email notifications, and responds to comments.

All comments received (both written and verbal) will be available electronically as part of this Responsiveness summary and by hardcopy by contacting Ecology at (360) 407-6040.

Ecology welcomes feedback about other ways to share site cleanup information to make the process more transparent.

⁹ <https://cms.cityoftacoma.org/planning/pse/PSE LNG FEIS Chapter 3 revised.pdf>

14. Voluntary Cleanup Program (VCP)

There are two main options for cleaning up sites under the MTCA, Washington's cleanup law: Ecology-supervised (formal) cleanups and independent cleanups. The majority of cleanups in Washington are conducted independently. Whether a site is cleaned up with Ecology's supervision or independently, the cleanup must meet the requirements of MTCA. Cleanup projects must also comply with other state and local rules, such as [cultural resource regulations](#).¹⁰

The Naval Reserve Center site was cleaned up by the Port of Tacoma under the [VCP](#).¹¹ Several soil and groundwater tests showed that the cleanup was successful. Ecology has determined that no further action is necessary. A No Further Action (NFA) letter was issued to the Port on April 19, 2017.

¹⁰ <https://apps.ecology.wa.gov/publications/SummaryPages/1909059.html>

¹¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

Appendix A. Comments

Comment #1 – Heidi J Vierthaler

Dear Nicholas Acklam,

RE: Facility Site ID #: 93581722

Cleanup Site ID #: 3017

Site Name: Naval Reserve Center

I am writing to you with my grave concern for my former home of the Pacific Northwest, especially regarding the determination by Washington Department of Ecology (WDOE) that, "no further remedial action is necessary to clean up contamination at the [Naval Reserve] Site."

I want you to know a bit of the background of my concerns about this before I delve into the issue, that I spent many of my formative years in Seattle, growing up learning to respect our natural environment, and indigenous cultures, as a student at Summit K-12 Alternative School. I had a teacher there who taught us about her Haida heritage and we spent time at Camp Orkila on Orcas Island in the San Juan Islands in the Salish Sea, which I only recently learned is the First Nations name for the Puget Sound. I left with my family for the first time in 1980, right before Mount Saint Helens blew, and was homesick so I returned in June of 1988 and while I was there I was blessed to have visited Mount Saint Helens on a Field Trip with a friend and his UW Geology Course, so I know the raw power of the region. In August of 1990 I left to eventually earn my BA in Geography and Anthropology from the University of Southern Maine in 1994. I have not been able to return, and I am even more homesick for our Pacific Northwest Cradle. So when I heard of the Puyallup Tribe endeavoring to stop the LNG 253 Fracked Gas Refinery from being fully constructed and operable, especially after the company has ignored the fact that they don't have the proper legal permit, they will just pay the fine later, in the Puyallup Tribal Territories in Tacoma, Washington, it scared me, because they say that if an accident were to occur, like a tsunami or an earthquake, it would have a nuclear bomb like explosion many times more powerful than the one that hit Hiroshima. I know that this is highly probable, because I learned when I attended, in 1988, a Town Hall meeting hosted by former/ Congressman Jim McDermott who brought Scientists together to discuss that the region could experience a magnitude 9 point on the Richter scale Earthquake, any day now. I am thus terrified that if I were able to do so someday, that not only I won't have the pristine beauty to which to return home, but all of my friends, as well as everyone else who lives there will lose their sacred and secular way of life.

So I am respectfully requesting, if not beseeching, a public meeting regarding the pending decision to delist this site from the Hazardous Sites List.

I believe the action of potentially delisting this Hazardous Site requires further review and input by the public who have a definite and continuing interest in the status of this site.

I understand that the public may comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center, near the Hylebos Waterway at the Port of

Tacoma, online. However I believe the reasons for the public to weigh in on this decision at a public hearing are several and valid, but not limited to:

1. The site in question is now being used to build a Liquid Natural Gas facility that has yet to receive all required permits.
2. The clean up was limited to the site in question only and testing was done to 15 feet below ground surface if I read the No Further Action letter correctly. This seems like a very narrow area upon which to base delisting the entire Hazardous Waste Site.
3. The No Further Action Letter acknowledges the historic presence of other toxins and contaminants from the Occidental Chemical site on and adjacent to the Naval Reserve Site. If these contaminants are still there, why take the action of delisting the site?

Furthermore; my concern regards the "Listing of the Site" where you state, ".....Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including: - Hazardous Sites List. -Confirmed and Suspected Contaminated Sites List. and -Leaking Underground Storage Tank List. I am concerned about the multiple statements in your letter dated April 19, 2017, that limit WDOE's responsibility and burden to have complete knowledge of the effectiveness of the "voluntary clean-up". I am concerned about the language in this letter that indemnifies WDOE from any responsibility or legal action should harm come from the decision to de-list. This de-listing appears to rely upon the site owner's "voluntary" actions and studies for the basis. It appears that should the site still have contaminants, there would be no recourse for the public. Given the high stakes of this approach, it is critical that all interested parties, including Tribes, public health officials, and the general public, be fully informed and engaged before you make a decision.

Your website also states: "A portion of this site extends onto the proposed site of the Liquefied Natural Gas (LNG) plant. However, the cleanup status of the Naval Reserve Center does not impact the development decisions of the LNG plant." It should. From what I understand, this whole area is still highly contaminated and overlaps onto the proposed PSE/LNG refinery facility. The entire site needs to be addressed as a whole, not piecemeal removal of some portions of the area from further cleanup and monitoring under the Superfund site status. Such piecemealing endangers the health and safety of the Puyallup Tribe, the people of Tacoma and the environments of the Hylebos waterway and the Salish Sea. We need you to ensure that the clean up status of the underlying Superfund Site absolutely be included in all development decisions regarding the proposed PSE LNG facility.

I have several requests:

1. Extend the comment period and hold a Public Meeting to share information and record verbal & written public comment before any further action on this proposed delisting. I ask for this so that all parties are able to make their comments in the manner in which they are most comfortable.
2. Add a Public Outreach section to the project webpage and post all noticing documents and dates for your outreach to Tribes, interested parties and the general public. Post all comments you have received on this proposed de-listing on the webpage for the Site. The public needs to be informed on what other commenters are asking and saying.
3. Order a full independent monitoring and assessment of all potential contaminants at the Site and disclose the findings to the Tribes, interested parties, and the public prior to the Public Meeting.

There is an awakened public, especially after the Methanol Plant defeat and now fight against the PSE's proposed LNG facility. We want to be informed in an honest and open dialogue.

I URGE you to hold this Public Meeting, present the information in a transparent and thorough manner, and take in all comments from the public and interested parties. You are our state agency that was created to protect our waters and environment. You are empowered by multiple federal laws to carry out your protective responsibility. We need you to protect the health and safety of the people of Tacoma and the environment of the Salish Sea.

Thank you for your consideration of this request, it is something that I gratefully appreciate.

If I can be of any further assistance, please contact me at

207-865-3571: Home/Voicemail

781-647-7648: Mobile/Text

(Unless urgent I prefer calls after 2PM Eastern Time), or at this email. Thank you.

I send my best wishes to you and yours.

Sincerely,

Heidi J Vierthaler

Quarry Ridge

60 Bow Street, Box #27

Freeport, Maine 04032

Comment #2 – Diane Martin

March 2, 2018

Nicholas Acklam, Site Manager
P.O. Box 47775
Olympia, WA 98504-7775

RE: Facility Site ID #93581722, Cleanup Site ID #:3017, Site Name: Naval Reserve Center

Dear Mr. Acklam,

Thank you for the opportunity to comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center. I reside in Tacoma and am concerned with the delisting of the contaminated site listed above.

This issue is particularly troubling as the site is part of the proposed site of Puget Sound Energy's LNG facility. Construction has already begun on the LNG and has the potential to disturb any contamination on the site.

From 1929 through 2002, the corporation of Occidental Chemical was the major contributor to the contamination of soil and ground water at the site. The Department of Ecology's subsequent investigation and clean up process lists the primary contaminants of the site, which include chlorinated volatile organic compounds (CVOCs), sodium hydroxide, sodium chloride (salt), metals, by-products of chlorinated solvent production, ply-chlorinated biphenyls (PCBs) and dioxin/furans. I was particularly concerned about the PCB contamination, as we know this particular toxic can stay within soil and ground water for decades. In addition, the toxic plumes from the Occidental Chemical site extend under the Naval Reserve Site.

It appears that delisting the site could have negative implications to the health of Port workers, residents of N.E. Tacoma, fish and marine wildlife around Commencement Bay.

This property should not be delisted as hazardous, further threatening the health of the tide flats workers, residents and the environment.

Sincerely,

Diane Martin
7322 N. Skyview PI E302
Tacoma, Wa 98406

Comment #3 – Citizens for a Healthy Bay

February 5, 2018

Nicholas Acklam

Washington State Department of Ecology

P.O. Box 47775

Olympia, WA 98504-7775

Nicholas.Acklam@ecy.wa.gov

Re: Comment on Naval Reserve Center Tacoma: Environmental Cleanup Determination (Cleanup Site ID #3017)

Dear Mr. Acklam:

Thank you for providing the opportunity to review and comment on the proposed environmental cleanup determination for the Naval Reserve Center (NRC) cleanup site (“the site,”) near the Hylebos Waterway in Tacoma.

Citizens for a Healthy Bay (CHB) is a 28-year-old environmental organization whose mission is to represent and engage people in the cleanup, restoration and protection of Commencement Bay, the 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 governments to prevent pollution and make our community more sustainable.

Staff and expert members of CHB’s Policy and Technical Advisory Committee have reviewed the proposed cleanup determination and related materials. Our comments are outlined below.

Background

The NRC site is a voluntary cleanup site located at 1001 Alexander Avenue in Tacoma. A portion of this site extends onto the site of Puget Sound Energy’s proposed LNG plant. In the 1990’s it was discovered that the soil and groundwater was contaminated by petroleum from fuel storage tanks previously on the property.

The owners of the site worked with the Washington State Department of Ecology (Ecology) to remove the contaminated soil and treat and monitor the groundwater.

Through soil and groundwater tests, Ecology has determined that all cleanup goals for the site have been met, no further action is necessary, and is thereby proposing to remove this site from the statewide Hazardous Sites List.

Comments

Citizens for a Healthy Bay requests that there be ongoing monitoring with public notification of the results and that Ecology does not waive their right to re-list the NRC site or that there is a re-opener clause. If there will not be any continued monitoring at the site, it must be made clear why that is the case. Our concerns about the NRC site are outlined below.

First, the data from the PCB removal in 1996 was supposed to be provided in Attachment 3. However, that attachment only has 1993 data. The 1996 PCB data must be added and made available for public review. Additionally, the comment period ends in January 2018, not 2017 as stated on the proposed removal document.

Secondly, it is unclear whether sufficient confirmation samples were taken for the 1993 remediation samples and the confirmation of 2017 cleanup samples.

Lastly, are there any Environmental Covenants or institutional controls, including groundwater use restrictions, for the site? This is particularly important to CHB since the background materials state there is groundwater and sediment contamination on and adjacent to the site from the Occidental Chemical Superfund site and the greater CB/NT Superfund site.

CHB thanks Ecology for their work in cleaning up this contaminated site. We look forward to staying engaged in cleanup sites in the Tacoma Tidelands to move towards a cleaner, healthier future.

Please contact me if there are questions regarding my comments. Thank you for the opportunity to provide feedback on the Naval Reserve Center Tacoma cleanup.

Sincerely,



Melissa Malott
Executive Director, Citizens for a Healthy Bay
mmalott@healthybay.org, (253) 383-2429

Comment #4 – Lacey Reuter

Dear Mr. Acklam,

I am a life-long resident of Tacoma, writing to you with a grave concern regarding the determination by Washington Department of Ecology (WDOE) that, "no further remedial action is necessary to clean up contamination at the [Naval Reserve] Site." My concern regards the "Listing of the Site" where you state, ".....Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including: - Hazardous Sites List. -Confirmed and Suspected Contaminated Sites List. and -Leaking Underground Storage Tank List. I am concerned about the multiple statements in your letter dated April 19, 2017, that limit WDOE's responsibility and burden to have complete knowledge of the effectiveness of the "voluntary clean-up". I am concerned about the language in this letter that indemnifies WDOE from any responsibility or legal action should harm come from the decision to de-list. This de-listing appears to rely upon the site owner's "voluntary" actions and studies for the basis. It appears that should the site still have contaminants, there would be no recourse for the public. Given the high stakes of this approach, it is critical that all interested parties, including Tribes, public health officials, and the general public, be fully informed and engaged before you make a decision.

Your website also states: "A portion of this site extends onto the proposed site of the Liquefied Natural Gas (LNG) plant. However, the cleanup status of the Naval Reserve Center does not impact the development decisions of the LNG plant." **It should!** From what I understand, this whole area is still highly contaminated and overlaps onto the proposed PSE/LNG refinery facility. The entire site needs to be addressed as a whole, not piecemeal removal of some portions of the area from further cleanup and monitoring under the Superfund site status. Such piecemealing endangers the health and safety of the Puyallup Tribe, the people of Tacoma and the environments of the Hylebos waterway and the Salish Sea. We need you to ensure that the clean up status of the underlying Superfund Site absolutely be included in all development decisions regarding the proposed PSE LNG facility.

I have several requests:

1. Extend the comment period and hold a Public Meeting to share information and record verbal & written public comment before any further action on this proposed delisting.
2. Add a Public Outreach section to the project webpage and post all noticing documents and dates for your outreach to Tribes, interested parties and the general public. Post all comments you have received on this proposed de-listing on the webpage for the Site. The public needs to be informed on what other commenters are asking and saying.
3. Order a full independent monitoring and assessment of all potential contaminants at the Site and disclose the findings to the Tribes, interested parties, and the public prior to the Public Meeting.

There is an awakened public, especially after the Methanol Plant defeat and now fight against the PSE's proposed LNG facility. We want to be informed in an honest and open dialogue.

I URGE you to hold this Public Meeting, present the information in a transparent and thorough manner, and take in all comments from the public and interested parties. You are our state agency that was created to protect our waters and environment. You are empowered by multiple federal laws to carry out your protective responsibility. We need you to protect the health and safety of the people of Tacoma and the environment of the Salish Sea.

Sincerely,

Lacey Reuter

Comment #5 – Dave Strider

Verbal comment



Dave Strider- Testimony.MP3

File: 180301_005
Duration: 0:07:57
Date: March 1, 2018
Subject: Public Hearing on Removing the Naval Reserve Center from the Hazardous Sites List.

Lisa Kean: I am Lisa Kean, Hearings Officer for this hearing. This evening we are to conduct a hearing about taking the Naval Reserve Center off the Hazardous Sites List. Let the record show that it is 7:38 p.m. on March 1, 2018, and this hearing is being held at Cascade Hall at the Center at Norpoint, 4818 Nassau Avenue NE, Tacoma, Washington, 98422.

Legal Notices of the Public Comment Period were published in the Washington Site Register December 21, 2017. In addition, notices of the Public Comment Period were mailed to about 460 interested people. Email notices were sent to 130 interested people and was also published in the Tacoma News Tribune on December 21, 2017. Notice of the Public Hearing was emailed and posted on the website and social media on February 21, 2018.

At this time, we do not have anyone signed up to testify. Is there anyone who did not sign up that wishes to provide testimony? Please raise your hand. Right here. If you want to come on up, please.

David Strider: Ok. I'll set this down here.

Lisa Kean: Ok. Please remember to state your name and your address before you start.

David Strider: My name is David Strider. My address is 4712 Court R, Tacoma. I'm just off the 48th and Portland, so I'm in the neighborhood, and I'm here to make a statement and I noticed tonight it was talking about decontamination.

Back in 1991, I ran for mayor in a small town and there was a business that I wanted to get cleaned up. It was a salvage yard and it was sitting right on top of the largest aquifer in the Miami Valley. Now, I'm from Ohio. I moved out here 21 years now going this year, and I lost the

election, but I stood firm on the ecology. And has anything been done? No. But there has been outbreaks of additional illnesses.

When somebody tells me that they've cleaned up the aquifer, being a farm-boy from Ohio, I had farmers ask me, "Why are my trees dying?"

"Because you're putting too many chemicals into the ground." These were farmers. Agricultural chemicals going into the ground. And I said, "Now you're putting a lot on there." I said, "You know this is going into your well system also?"

They said, "Yeah."

I said, "Have you had your water tested? Have you noticed any unusual growths on your livestock?"

"Well, yeah."

I said, "You need to have your water checked, because your animals were also drinking the same water."

Now, here I am, years later, here in Tacoma, Washington, and we have the water being, uh and the land being contaminated. And we have companies, corporations that are irresponsible for their actions. They make things, but they don't know how to clean it up. They don't know how to reengineer it. And everything is about the 'All Mighty Dollar.'

We cannot drink oil. We cannot. Can we grow crops down there on that plane? Can crops grow? That's the question on whether or not it's cleaned up or not. Can you grow crops down there to feed people? If you cannot grow crops or food for people, it is not safe for the rest of the environment. Let alone the environment that the contamination leaks in to the Puget Sound.

And I think that we as a community, we as an authority, I think that the Port Authority needs to exercise more control. I think that we need to have industry, if it's going to be in here, we need additional water treatment plants and we also need desalinization plants so that the residents of Pierce County and Tacoma and surrounding villages do not have to worry about excessive water hikes because industry's moving in. And now we are in direct competition with that industry or industries.

Industry is good. Jobs are good. But when no foresight is put into what is going to happen generations down the road, then we need to make sure that our leadership in this village, this town, this port, is also doing their job, their due diligence.

And, I'm also running for public office, federal office—US Senate, and I'm very big on the ecology. And so I'm hoping that the decertification of this land is only concluded after they can

show me that they've grown two seasons of crops. And I'll fight, you know. I'm gonna fight 'em. Ok.

Thank you for this opportunity for me to speak and I hope they take this well.

Lisa Kean: Thank you for your comment. Is there anybody else that would like to come up and testify?

If you would like to send Ecology written comments, please remember they are due, postmarked March 9, 2018. We accept written comments in the following ways. Here at the hearing, by mail to the Department of Ecology at P.O. Box 47775, Olympia, Washington, 98504-7775, online you can put a comment in using our online comment form at <http://wt.ecology.commentinput.com>. To get instructions on how to comment by mail or online please pick up one of the flyers on the back table. This information is also available on our website, or you can contact the Public Involvement Coordinator for this site, Sheila Coughlan, sheila.coughlan@ecy.wa.gov.

All testimony received at this hearing, along with all written comments received postmarked by March 9, 2018, will be part of the official hearing record for the de-listing of the Naval Reserve Center. Ecology will send notice about the availability of the response to comments to everyone that provided written comments or oral testimony on the site, everyone that signed in for today's hearing that provided an email address, and other interested parties on the agency's mailing list for this site.

The response to comments will, among other things, contain the agency's response to questions and issues of concern that were raised during the public comment period. If you would like to receive notice about its availability or a copy, but did not fill out a card or sign in, please see me after the hearing.

The next step is to consider the comments and make a determination whether to finalize the de-listing of the Naval Reserve Center. Ecology will look at the public comments, other appropriate documentation, and staff recommendations.

Ecology will make a decision about taking the Naval Reserve Center off the Hazardous Sites list. If we can be of further help to you, please do not hesitate to ask, or you can contact the Public Involvement Coordinator for this Site, Sheila Coughlan, at sheila.coughlan@ecy.wa.gov.

On behalf of the Department of Ecology, thank you for coming. I appreciate your cooperation and courtesy. Let the record show that this hearing is adjourned at 7:46.

Comment #6 – Lael White

Nicholas Acklam,

RE: Facility Site ID #: 93581722
Cleanup Site ID #: 3017
Site Name: Naval Reserve Center

I am writing to comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center, Port of Tacoma.

I am requesting that a public meeting be held regarding the intention to delist this site from the Hazardous Sites List. I am concerned about PSE building a huge LNG facility upon this toxic site which may remain a hazard to surrounding communities.

Lael White

WA State resident

Comment #7 – Dorothy Walker, Sierra Club Tatoosh Group of Pierce County



February 4, 2018

Nicholas Acklam, Site Manager
P.O. Box 47775
Olympia, WA 98504-7775
360-407-6347
Nicholas.Acklam@ecy.wa.gov

Re: Facility Site ID #: 93581722
Cleanup Site ID #: 3017
Site Name: Naval Reserve Center

Dear Mr. Acklam:

Please accept these comments on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center. I am commenting on behalf of the Sierra Club Tatoosh Group of Pierce County's approximately 2000 members who are concerned about protecting our environment and the safety and quality of life of our residents.

This site is particularly concerning because it is part of the site of the PSE LNG facility. This major construction effort has the potential to disturb any contamination on the site, not just petroleum pollution. Perhaps more hazardous, are the toxic plumes from the Occidental Chemical site which extend under the Naval Reserve Site. Delisting the site leaves the dangerous impression that the site is not contaminated.

From the information on Department of Ecology's web site:

“A portion of this site extends onto the proposed site of the Liquefied Natural Gas (LNG) plant. However, the cleanup status of the Naval Reserve Center does not impact the development decisions of the LNG plant.”

Logic says this should certainly impact development decisions for the LNG facility.

From the PSE LNG FEIS, page 3.1-9:

“A preliminary review of the soil and groundwater analytical results from the site assessment suggests that groundwater contamination related to the former bulk petroleum storage facilities is present beneath the northern portion of the Tacoma LNG Facility site. Information from this investigation would be used to coordinate redevelopment plans in accordance with existing orders, restrictive covenants or other requirements associated with such remedial actions.”

It seems clear to us that delisting the site could indeed have negative ramifications in the future for the Port of Tacoma tideflats , the health of Port workers, residents of adjacent communities , fish runs and marine wildlife around Commencement Bay..

This property should not be delisted as hazardous and because of the implications for public health and safety, there should be a public meeting or meetings to hear and address concerns.

Sincerely,

A handwritten signature in cursive script that reads "Dorothy Walker".

*Dorothy Walker, Chair
Sierra Club Tatoosh Group of Pierce Co.
Dorothyw@centurylink.net*

Comment #8 – Cindy Feist

Dear Mr. Acklam:

I'm writing to you to request a public hearing re: removing the Naval Reserve Center from the list of Hazardous Sites. This superfund property is toxic and contaminated and the only cleanup effort that I'm aware of was done by volunteers.

The timing of this possible de-listing is suspicious as Puget Sound Energy now wants to build on this very site.

The public is not confident that the environmental cleanup that has occurred is sufficient to protect our health and safety as well as that of the Salish Sea. This area is at risk for earthquakes, tsunamis and lahars meaning a natural disaster could easily disrupt the soil. We need to know what chemicals are in that dirt.

Please schedule a public hearing to prove the science and ease our minds.

Sincerely,
Cindy Feist
Resident of Tacoma

Comment #9 – Sandy Paul

Dear Mr. Acklam,

RE: Facility Site ID #: 93581722

Cleanup Site ID #: 3017

Site Name: Naval Reserve Center

I note that the public may comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center, near the Hylebos Waterway at the Port of Tacoma.

I am respectfully requesting a public meeting regarding the pending decision to delist this site from the Hazardous Sites List. I believe the reasons for the public to weigh in on this decision are several and valid, but not limited to:

1. The site in question is now being used to build a Liquid Natural Gas facility that has yet to receive all required permits.
2. The clean up was limited to the site in question only and testing was done to 15 feet below ground surface if I read the No Further Action letter correctly. This seems like a very narrow area upon which to base delisting the entire Hazardous Waste Site.
3. The No Further Action Letter acknowledges the historic presence of other toxins and contaminants from the Occidental Chemical site on and adjacent to the Naval Reserve Site. If these contaminants are still there, why take the action of delisting the site?

I believe the action of potentially delisting this Hazardous Site requires further review and input by the public who have a definite and continuing interest in the status of this site.

Thank you for your consideration of this request.

Sincerely

Sandy Paul

4717 39th Street NE

Tacoma WA 98422

Comment #10 – Nanette Reetz

Dear Nicholas Acklam,

I am writing to you with a grave concern regarding the determination by Washington Department of Ecology (WDOE) that, "no further remedial action is necessary to clean up contamination at the [Naval Reserve] Site." My concern regards the "Listing of the Site" where you state, ".....Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including: -Hazardous Sites List. -Confirmed and Suspected Contaminated Sites List. and -Leaking Underground Storage Tank List. I am concerned about the multiple statements in your letter dated April 19, 2017, that limit WDOE's responsibility and burden to have complete knowledge of the effectiveness of the "voluntary clean-up". I am concerned about the language in this letter that indemnifies WDOE from any responsibility or legal action should harm come from the decision to de-list. This de-listing appears to rely upon the site owner's "voluntary" actions and studies for the basis. It appears that should the site still have contaminants, there would be no recourse for the public. Given the high stakes of this approach, it is critical that all interested parties, including Tribes, public health officials, and the general public, be fully informed and engaged before you make a decision.

Your website also states: "A portion of this site extends onto the proposed site of the Liquefied Natural Gas (LNG) plant. However, the cleanup status of the Naval Reserve Center does not impact the development decisions of the LNG plant." It should. From what I understand, this whole area is still highly contaminated and overlaps onto the proposed PSE/LNG refinery facility. The entire site needs to be addressed as a whole, not piecemeal removal of some portions of the area from further cleanup and monitoring under the Superfund site status. Such piecemealing endangers the health and safety of the Puyallup Tribe, the people of Tacoma and the environments of the Hylebos waterway and the Salish Sea. We need you to ensure that the clean up status of the underlying Superfund Site absolutely be included in all development decisions regarding the proposed PSE LNG facility.

Your informational factsheet on your website has these additional areas of concern:

1. The original mailing said that comments would be accepted until January 22nd, 2017 (not 2018) which caused confusion for many.
2. There was a lack of notice on the extension of public comments to February 5th, 2018.
3. The original mailing was sent out right before the Holidays (this is generally a very poor time to send out communications on important projects).
4. The project documents were on display in locations that were not accessible by the local Tacoma community (Gig Harbor and Olympia)

I have several requests:

1. Extend the comment period and hold a Public Meeting to share information and

record verbal & written public comment before any further action on this proposed delisting.

2. Add a Public Outreach section to the project webpage and post all noticing documents and dates for your outreach to Tribes, interested parties and the general public. Post all comments you have received on this proposed de-listing on the webpage for the Site. The public needs to be informed on what other commenters are asking and saying.

3. Order a full independent monitoring and assessment of all potential contaminants at the Site and disclose the findings to the Tribes, interested parties, and the public prior to the Public Meeting.

There is an awakened public, especially after the Methanol Plant defeat and now fight against the PSE's proposed LNG facility. We want to be informed in an honest and open dialogue.

I URGE you to hold this Public Meeting, present the information in a transparent and thorough manner, and take in all comments from the public and interested parties. You are our state agency that was created to protect our waters and environment. You are empowered by multiple federal laws to carry out your protective responsibility. We need you to protect the health and safety of the people of Tacoma and the environment of the Salish Sea.

Sincerely,

Nanette Reetz

NE Tacoma resident

Comment #11 – Teresa Catford

I request a public meeting regarding the decision to delist this site from the Hazardous Sites List.

The public needs to know how and when this site was cleaned up. There are major questions that deserve answers regarding this location and the LNG plant that is being constructed there without a permit from the PSCAA.

The site in question is right next to the Occidental Chemical superfund site. If these contaminants are still there, why take the action of delisting the site? And why all of a sudden now - after all these years?

Delisting this Hazardous Site should have a public hearing where the community can learn about and discuss what is going on. There are people living, working and going to school within a mile of this location. There are major safety concerns that have not been addressed and the public should have input into this decision.

Teresa Catford

Comment #12 – Brian Gunn

Dear Nicholas Acklam,

RE: Facility Site ID #: 93581722
Cleanup Site ID #: 3017
Site Name: Naval Reserve Center

I am respectfully requesting a public meeting regarding the pending decision to delist this site from the Hazardous Sites List. I believe the reasons for the public to weigh in on this decision are several and valid, but not limited to:

1. The site in question is now being used to build a Liquid Natural Gas facility that has yet to receive all required permits.
2. The clean up was limited to the site in question only and testing was done to 15 feet below ground surface.
3. The No Further Action Letter acknowledges the historic presence of other toxins and contaminants from the Occidental Chemical site on and adjacent to the Naval Reserve Site.

I believe the action of potentially delisting this Hazardous Site requires further review and input by the public who have a definite and continuing interest in the status of this site.

Thank you for your consideration of this request.

Brian L. Gunn

Comment #13 – Michael Lafreniere

I'm concerned that the unpermitted construction of a LNG facility is taking place in the Tacoma Tideflats on a toxic site that has not been properly delisted. I feel a public hearing is in order and that construction should cease unless and until it can legitimately established that this site is safe. A public hearing in order to take comments from the public on this issue that represents a risk to public health and safety, as well as risk to the environment.

Michael Lafreniere
815 N Proctor Street
Tacoma, WA 98406

Comment #14 – Julianne Gale

Dear Mr. Acklam,

Please hold a public hearing before delisting the the Naval Reserve Cleanup from the Hazardous Sites List. Given that this insufficiently cleaned toxic site overlaps with the insufficiently studied proposed PSE LNG facility construction, there is great potential for extreme danger to the public should the LNG facility have an explosion or leak into already contaminated soil.

Thank you for your time and consideration. If you'd like to discuss this further, I'd be happy to talk with you. You can reach me at 213-675-0098 or stagefrog2@gmail.com.

Sincerely,
Julianne Gale

Comment #15 – Debby Herbert

Dear Mr. Acklam,

I respectfully request there be a public hearing on this “No further Action” determination for the clean-up of this site.

Thank you.

Debby Herbert

Comment #16 – J McGourty

Dear Mr. Acklam;

I am concerned about the decision by the DOE to remove the Tacoma Naval Reserve Center cleanup site from the Hazardous Sites List. Minimally, I would like to request a public hearing on the issue. It is not clear to the public that the entire site is clean or that the cleanup has been comprehensive to the entire impacted soil and water in the area. It is particularly troubling that decisions made about a proposed LNG plant will not take into account potential damage or future cleanup that may be required, at great cost to taxpayers, as opposed to those responsible for the pollution. At a time when our federal government agencies are shirking their duty and responsibility to the American public, it is ever more important to maintain the integrity and responsiveness of our state agencies.

Thank you for your attention to this matter.

Comment #17 – Joy Vartanian

I am requesting a Public Hearing on this site/hazardous waste clean-up. As the Tacoma Tideflats have/had several SuperFund sites, before any further use of the site, protections against seepage into groundwater, etc, should be undertaken and information provided to the public in a hearing where questions can be answered.

Comment #18 – Valarie Peaphon

Hello Nicholas,

My name is Valarie Peaphon. I am a resident of Tacoma, WA and I'm concerned with the possible de-listing of a toxic superfund site. Please hold a public hearing so we can be assured this area has actually been properly remediated:

Why are you moving now to downgrade or de-list this site?

What cleanup goals were met?

What testing has been completed?

Who completed the testing?

When and where did the testing occur?

I understand any this was a voluntary cleanup site, who organized and oversaw the volunteers?

How many volunteers worked on the clean up effort?

What actions did they take to remediate the area?

Where did they take the contaminated soil?

How much soil was removed and relocated?

This is important to the health and safety of the community.

Thank you,

Valarie

Comment #19 – Twylia Westling

Dear Nicholas

First and foremost, I would like to request a public hearing regarding this project.

As you are likely aware, the public's interest in any and all toxic sites on the Port of Tacoma are elevated in urgency.

It is difficult to understand how this site can be considered 'cleaned up' when it is so close to the Occidental Chemical site, which we know is so grossly contaminated that a mitigation plan is difficult to decide.

While I might accept that a clean up at this site of petroleum products does not affect the proposed LNG plant, which is building without an approved safety analysis, the fact that the Naval Reserve site is in such close proximity to the Occidental Chemical site makes me wonder exactly why we are choosing to list this site as clean.

The fact sheet put forth by Ecology are sorely lacking in details.

Please consider my request for a public hearing.

Many of us in the community are tired of the onslaught of environmental degradation that the tideflats are subjected to.

Thank you for your time.

--

Twylia Westling, MPA

The 'i' is silent; I'm not.

Comment #20 – Claudia Riedener

Facility Site ID #: 93581722

Cleanup Site ID #: 3017

Site Name: Naval Reserve Center

Dear Nicholas Acklam,

I am writing you to urge you to hold a public meeting on the Naval Reserve Center delisting. From the documents provided it is not clear what has been done recently to remedy pollution on the site to warrant a removal from the toxic site list.

Over the last half year or so PSE removed truck after truckload of debris and soil from this site. Did this contribute to the delisting? If not, how was PSE allowed to do soil removal and building on this heavily polluted location?

Was the testing done by Ecology itself or by a firm PSE hired? If this was cleaned up voluntarily, who did it and who financed it and who supervised the results?

I am also concerned about the entire site, which includes Oxychem pollution that continues to migrate and is hard to track and impossible to clean up. Toxic chemicals don't respect fence lines nor property lines. Delisting the Naval site might give a false impression that no other toxins remain.

By only looking at the one small strip in the middle of the construction site Ecology is doing just what PSE has been doing this entire time.

Fragmenting the process, piece-mealing it together and disallowing a complete oversight on what's actually happening. PSE did this with the pipeline permits, which shockingly were handled by the Pierce County sewer department and done in many small increments. Sewer lines and high pressure gas pipeline feeding a massive refinery do not compare.

I am requesting these actions:

1. Please extend the comment period. The beginning date was right at Christmas. We've experience this timing on many instances before. It appears designed to let it slip under people's radar.
2. Please hold a public meeting. People have a right to know and the documentation with this call was lacking detail.
3. We need a public outreach section with all documents, actions and public comments. A clear time line and clear notification to all impacted neighbors, the Puyallup Tribe and the community.
4. We need a truly independent study. We have experienced Ecology acting very much in favor of PSE and basically ignoring our questions and ask for help. Without independent study there can't be trust in results. Delisting this site favors PSE and we must make sure it is done with transparency and all information.
5. Disclose any and all contaminant and toxins on the construction site in a clear and public way. Provide this info to the public before the public meeting.

Tacoma has the sad distinction of having the highest cancer and asthma rates in the state. Air quality is getting worse again and non-attainment is happening. We have well over a hundred years of horrendous toxic pollution. It is your duty to the people of Tacoma to take our concerns and our requests for information seriously. We don't trust the SEPA for LNG is handled properly by the city, who has a direct financial conflict of interest and whose mayor and several council wrote letters to support the LNG refinery long before the public ever heard any of it. A clear example is that for almost two years now many of us have continually asked for an SEIS and were met with dead silence from the city. Calls and e-mail to ecology also fall on deaf ears. PSCAA stepped up to their responsibility and are forcing an SEIS now.

We have to find a better way to allow the community to be informed.

Thank you for your consideration and I am hoping we will receive the answers we deserve.

Kind regards.

Sincerely,

Claudia Riedener

Tacoma

Comment #21 – Tracy Wiegman

Dear Nicholas Acklam,

I am writing to you with a lot of concern for the determination from the Dept. of Ecology stating that, "no further remedial action is necessary to clean up contamination at the Site." I do appreciate the statement contained in your no further action letter, "Please note the Tacoma Smelter Plume Facility, Port of Tacoma 721 Alexander facility and the Hylebos Waterway-Commencement Bay Nearshore Tidelands also affects parcel(s) of real property associated with this Site. This opinion does not apply to any contamination associated with these facilities." So my concern and confusion comes under the "Listing of the Site" where you state, ".....Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including: -Hazardous Sites List. -Confirmed and Suspected Contaminated Sites List. and -Leaking Underground Storage Tank List. My feeling is this is very misleading since, from what I understand, this whole area is still highly contaminated and overlaps onto the PSE/LNG refinery facility. I do not feel the clean up status has been adequately addressed in the development of the LNG Site.

My request is, before you end this comment period and finalize anything, you hold a Public Meeting to allow people to come and have their very important and concerned questions answered! I know I am not the only one requesting this. There is an awakened public, especially after the Methanol Plant defeat and now PSE's LNG and all the blatant disregard from City and Port Politicians for how the citizen's of Tacoma feel about our future. We want to understand. We want to be heard and taken seriously. We want to be informed in an honest and open dialogue.

I URGE you to hold this Public Meeting! Please be an agency that truly cares what the public thinks and be for the people and the Ecology.....be true to the name you represent!

With Sincere Hope,

Thank you for your time,

Tracy Wiegman

(A citizen of Tacoma and a worker in the Port of Tacoma)

Comment #22 – Anneliese Simons

Dear Nicholas Acklam,

RE: Facility Site ID #: 93581722

Cleanup Site ID #: 3017

Site Name: Naval Reserve Center

I am a state worker and citizen of Tacoma and have many concerns and worries about the pending LNG site that is directly impacting my community.

I note that the public may comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center, near the Hylebos Waterway at the Port of Tacoma.

I am respectfully requesting a public meeting regarding the pending decision to delist this site from the Hazardous Sites List. I believe the reasons for the public to weigh in on this decision are several and valid, but not limited to:

1. The site in question is now being used to build a Liquid Natural Gas facility that has yet to receive all required permits.
2. The clean up was limited to the site in question only and testing was done to 15 feet below ground surface if I read the No Further Action letter correctly. This seems like a very narrow area upon which to base delisting the entire Hazardous Waste Site.
3. The No Further Action Letter acknowledges the historic presence of other toxins and contaminants from the Occidental Chemical site on and adjacent to the Naval Reserve Site. If these contaminants are still there, why take the action of delisting the site?

I believe the action of potentially delisting this Hazardous Site requires further review and input by the public who have a definite and continuing interest in the status of this site.

Thank you for your consideration of this request.

Sincerely,

Anneliese Simons, MSW

2905 South 17th Street

Tacoma, WA 98405

253 573 0137

tacomasummer@gmail.com

Comment #23 – David Bluhm

Please hold public hearings and comment periods regarding the delisting of any Superfund, Brownfield or previously declared toxic site(s) within Washington state, City or Port of Tacoma - especially 1001 Alexander Ave, the current proposed site for Puget Sound Energy's 8 million gallon LNG site.

Thank you,

David Bluhm

Tacoma, WA 98406

Comment #24 – Kara Sweidel

Hello,

It has recently come to my attention that Ecology wants to delist the Hylebos waterway (where PSE plans to build a ticking time bomb on unstable land prone to earthquakes, and are building without all required permits) as a Superfund site. There should be a public hearing on this decision. I see from some documents that there is a public drinking water source only 1800 ft from this site, and would like to see further soil remediation done in order to protect that source, as well as protect the Salish Sea.

Page 10 of the No Further Action Letter mentions the presence of cPAHs "on and adjacent to the subject site". That doesn't sound clean to me. There should be more samples taken, as the sample size of 12 (from what I can tell, correct me if I'm wrong) seems very low for such a large site.

Thank you,

Kara Sweidel

Seattle, WA

Comment #25 – Don Steinke

Please hold a public hearing regarding the delisting of the Superfund site in the Tacoma waterway where the LNG terminal is being proposed.

Don Steinke

Vancouver WA

crVanWash@gmail.com

Comment #26 – Twylia Westling

Dear Nicholas,

After having discovered the administrative and procedural differences between a public hearing and a public meeting, I would like to resubmit with a request for a public MEETING on this topic.

Thank you

Comment #27 – Yvonne McCarty, NE Tacoma Neighborhood Council Chair

Dear Mr. Acklam,

I'm the Chair of the NE Tacoma Neighborhood Council, and I am writing to you to formally request a public meeting be held in the NE Tacoma community for the Tacoma Naval Reserve Center environmental cleanup status determination effort. I've been contacted by my community with complaints that there wasn't a public meeting opportunity, and that it appears that there was a lack of proper notice given to the broader community. There are questions about the actions that were taken to clean up the property, as well as the process for determining that this site is cleaned up suitability to consider removing it from the Hazardous Sites List.

When taking action on the Occidental Chemical property (immediately adjacent to the Naval Reserve Center), the Department of Ecology has conducted several public meetings to provide information and to take comment. I would hope that you provide this same opportunity for this action as well. Many of our citizens are just learning of this, and don't feel that they have adequate time to research and respond. Here are some additional areas of concern:

- The original mailing said that comments would be accepted until January 22nd, 2017 - which caused some confusion
- There was a lack of notice on the extension of public comments
- the original mailing was sent out right before the Holidays (generally - a very poor time to send out communication on important projects)
- The project documents were on display in locations that were not accessible by our community (Gig Harbor and Olympia)

This property is located inside the NE Tacoma Neighborhood Council boundary, and of anyone regionally, the hazardous status of this property would be of great concern to my community.

I look forward to your response, and would be happy to work with you to plan a public meeting in our community.

Sincerely,

Yvonne

Yvonne McCarty

NE Tacoma Neighborhood Council Chair

www.netacoma.net

253-219-0349

Comment #28 – Deborah Hill

Dear Nicholas Ackham,

RE: Facility Site ID #: 93581722

Cleanup Site ID #: 3017

Site Name: Naval Reserve Center

I note that the public may comment on the Department of Ecology's environmental clean-up determination for the Naval Reserve Center, near the Hylebos Waterway at the Port of Tacoma.

I am respectfully requesting a public meeting regarding the pending decision to delist this site from the Hazardous Sites List. I believe the reasons for the public to weigh in on this decision are several and valid, but not limited to:

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3. The No Further Action Letter acknowledges the historic presence of other toxins and contaminants from the Occidental Chemical site on and adjacent to the Naval Reserve Site. If these contaminants are still there, why take the action of delisting the site?

I believe the action of potentially delisting this Hazardous Site requires further review and input by the public who have a definite and continuing interest in the status of this site.

Thank you for your consideration of this request.

Sincerely,

Deborah Hill

Tacoma, WA

Comment #29 – Carol Kindt

1001 East Alexander Avenue is only part of the original clean-up site. A portion of this site extends right on to the land upon which PSE is building its LNG facility, absent all of the permits required. Until and unless this portion of land is adequately addressed in the SEIS now required by the Puget Sound Clean Air Agency, the public has a right to keep this site clean-up open. The public has never been adequately noticed nor informed about this latest commercial venture (originally the notice area was 400 feet, which included no residential area whatsoever). It is imperative that the Department of Ecology keep this open. It already failed to adequately protect the public by appointing the City of Tacoma City Council as the lead SEPA agency, which body never took air pollutant emissions into its FEIS. It took another state agency, the PSCAA, to require an SEIS. Please don't keep passing the buck on this.

Appendix B. Glossary

Agreed Order: A legal agreement between Ecology and a Potentially Liable Person or Party to conduct work toward a cleanup.

Clean up: Actions that deal with a release or threatened release of hazardous substances that could affect public health or the environment. Ecology often uses the term "cleanup" broadly to describe response actions or phases of cleanup.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions.

Confirmed and Suspected Contaminated Sites List (CSCL): A list that contains information about sites that are undergoing cleanup and sites that are awaiting further investigation and/or cleanup.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels.

Environmental covenant: A legally binding document that restricts activities or land use that could result in exposure to site contamination.

Groundwater: Water found beneath the earth's surface that fills spaces between materials such as sand, soil, or gravel. In some aquifers, ground water occurs in large enough amounts to be used for drinking water, irrigation and other purposes.

Hazardous Sites List (HSL): A statewide list of contaminated properties. Sites are ranked on a scale of 1 to 5. A score of 1 represents the highest level of risk and 5 the lowest. Ecology may remove or delist a site after determining that cleanup has met MTCA cleanup standards.

Independent cleanup: A cleanup that is conducted by property owners on their own or with help from the Voluntary Cleanup Program (VCP). Independent cleanups still meet MTCA standards, but property owners set their own timelines.

Model Toxics Control Act (MTCA): A law passed by Washington voter initiative in 1988. It requires the cleanup of contaminated soil and groundwater to protect people and the environment.

MTCA Method A: A cleanup method used during routine cleanup or on simple sites where there are not multiple contaminants, impacts to sediments or complex technical issues. There are obvious cleanup standards and reliable remedial options available to address the contamination on the site.

No Further Action Letter (NFA): A technical letter that describes what was done to clean up a site. It is issued by Ecology once it's determined that cleanup is successful. The NFA letter is written to allow for reopening a site if it is later discovered that cleanup is not complete.

Point of compliance: The point of compliance defines the place or places on a site where cleanup levels must be met.

Potentially Liable Person: Any individual(s) or company(s) potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology requires PLPs to clean up sites.

Repository: A file containing site information and reports for public review. It is usually located in a public building convenient for local residents, such as a public school, city hall, or library.

Responsiveness Summary: A summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments.

Risk: The probability that a hazardous substance, when released into the environment, will cause an adverse effect in the exposed humans or living organisms.

Site: Any area where a hazardous substance, other than a consumer product in consumer use, has come to be located.

Toxicity: The harm a substance causes to living organisms, including people, plants and animals, at a certain concentration.

Voluntary Cleanup Program (VCP): An independent cleanup option for cleanup sites. Ecology may provide technical assistance before or during the investigation or cleanup including assistance in identifying and applying regulatory requirements. Once the site is cleaned up, Ecology may issue a No Further Action (NFA) opinion if it determines that no further remedial action under MTCA is necessary at the site.