



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 20, 2018

Lisa Wood, SEPA/NEPA Coordinator
WA State Department of Fish and Wildlife
Habitat Program, Protection Division
PO Box 43200
Olympia, WA 98504-3200

Dear Ms. Wood:

Thank you for the opportunity to comment on the determination of nonsignificance for the McNeil Island Shoreline Restoration Project (DNS 18-037) located on McNeil Island shoreline in Pierce County. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287

All removed debris and dredged material resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials.

TOXICS CLEANUP: Eva Barber (360) 407-7094

This proposed project is located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma.

Soil contamination from the former Asarco smelter poses a risk to human health and the environment. Children are at especially high risk from direct exposure to contaminated soil. Construction workers, landscapers, gardeners, and others who work in the soils are also at risk.

Ecology recommends that the Washington Department of Fish and Wildlife (WDFW) conducts the following actions, prior to initiation of grading, filling, or clearing in with upland areas of the project, especially the future estuary and creek restoration projects:

- Sample the soil and analyze for arsenic and lead following the [2012 Tacoma Smelter Plume Guidance](#). The soil sampling results shall be sent to Ecology for review. Contact the Technical Assistance Coordinator, Eva Barber, for assistance in soil sampling methodology.

- If lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels (Chapter 173-340 WAC); Washington Department of Fish and Wildlife shall develop soil remediation plan and enter into the Voluntary Cleanup Program with Ecology. For more information on the Voluntary Cleanup Program, visit Ecology's website at: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.
- Obtain an opinion letter from Ecology stating that the proposed soil remediation plan will likely result in no further action under MTCA.
- Prior to finalizing site development permits, obtain a "No Further Action" determination from Ecology indicating that the remediation plans were successfully implemented under MTCA.
- If soils are found to be contaminated with arsenic, lead, or other contaminants, extra precautions shall be taken to avoid escaping dust, soil erosion, and water pollution during grading and site construction. Site design shall include protective measures to isolate or remove contaminated soils from public spaces, yards, and children's play areas. Contaminated soils generated during site construction shall be managed and disposed of in accordance with state and local regulations, including the Solid Waste Handling Standards regulation (Chapter 173-350 WAC). For information about soil disposal contact the local health department in the jurisdiction where soils will be placed.

For assistance and information about Tacoma Smelter Plume and soils contamination, the applicant shall contact, Eva Barber with the Toxics Cleanup Program at (360) 407-7094 or via email at Eva.Barber@ecy.wa.gov.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(MLD:201802945)

cc: Derek Rockett, SWM
Eva Barber, TCP
Doris Small, Habitat Restoration Coordinator, WDFW (Contact)