



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 6, 2015

Peter Huffman, Director
City of Tacoma Planning and Development
747 Market Street, Room 345
Tacoma, WA 98402

RE: Tacoma LNG DEIS

Dear Mr. Huffman:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Tacoma Liquefied Natural Gas (LNG) Project located at the Port of Tacoma, north of East 11th Street, east of Alexander Avenue, south of Commencement Bay, and on the west shoreline of the Hylebos Waterway as proposed by Tacoma LNG, Puget Sound Energy. The Department of Ecology (Ecology) reviewed the information provided and submits the following comments for the Draft Environmental Impact Statement (DEIS).

Toxic Cleanup

2.2.1.3, Liquefaction: This describes underground storage tanks. PSE has since informed us that the tanks will not be underground. This section should be corrected, and include a description of spill controls and containment for the tanks. The tanks should be identified on the map of site facilities.

2.2.1.7, Heavy Hydrocarbon Collection and Storage System: The section on heavy hydrocarbon collection and storage should include a discussion of spill controls and containment measures.

2.2.1.7, Buildings: The storage building overlies groundwater containing benzene above levels considered safe for potentially causing vapors at harmful levels. This building should not contain office space or other locations where people will regularly present, without first testing air quality.

2.3.1.1, Site Preparation: This section describes that contamination from neighboring sites may extend to locations within the construction footprint of the LNG facility and pipelines. The final EIS should include maps showing the location of the contaminant plumes compared to the construction footprints. This information will be needed by permitting agencies as the project plans are further developed. To my knowledge the construction footprint itself does not contain significant contaminated soils, and the petroleum-affected groundwater plumes in the vicinity largely do not encroach onto the subject property (however there were some exceedances of metals in groundwater from the 2014 investigation report). Ecology can assist PSE with contacts to get the most up to date information about the Occidental and Alexander Avenue Petroleum Tank Facilities plumes, and can assist with identifying the potential for contaminated sites to be in the path of the proposed pipelines. There are a multitude of cleanup sites and potential for contaminated soil and groundwater to be present in the pipeline pathway along Taylor Way and through Fife.

2.3.1.1, Demolition of in-water structures: This states that piles that break off during removal with the vibratory hammer would be cut off two feet below the mudline. PSE should consult with DNR and EPA about the best approach in this situation. Disturbing sediments 2 feet deep could potentially release buried contaminated sediments. In general, EPA should be consulted about all in-water construction in the Hylebos Waterway problem area.

2.3.1.1, Shoreline Improvements: Care must be taken when removing materials above existing timber bulkhead, and work should occur during low tides. It is not uncommon for debris and industrial fill to be present within and beneath historic shoreline rip-rap, so PSE should be prepared to remove such materials before placing the new backfill below the sheet pile wall.

The EIS should state how deep the sheet pile is planned and whether or not it will extend along the entire shoreline of the site.

2.3.3.1, General Pipeline Construction Techniques: Because of the potential for the pipeline to intersect with contaminated groundwater plumes on Taylor Way and in Fife, it may be necessary to consider special practices regarding how the trench is backfilled (to prevent creating a preferential pathway for groundwater pollution), worker training and certification to work in contaminated areas, and stormwater management.

3.1.1, Study Methodology: This section mentions a document titled "Geotechnical Engineering Services, Tacoma LNG Project (GeoEngineers 2015)." Ecology requests a copy of that report.

3.1.2, Model Toxics Control Act: A mechanism must be in place as part of the LNG facility development to be sure that cleanup considerations are included in site planning and that cleanup (if needed) would be conducted as a part of the site development. Furthermore, if any visual or

olfactory signs of contamination are detected during construction, Ecology must be notified, and measures taken to prevent releases to the environment and to clean up contamination.

3.1.3.2, Sea Level Rise: This section describes potential sea level rise in the vicinity of the LNG facility, but it does not indicate what the effects of sea level rise might be on the facility.

3.1.3.3, Groundwater: Refer to site investigation documents for the Occidental and Alexander Avenue Petroleum Tank facilities sites for more information on tidal influence on groundwater in this area.

3.1.3.4, Existing Contaminated Sites and Remedial Actions: It is not clear how, in the fourth paragraph, the Port's cleanup actions in the vicinity of Blair Hylebos peninsula specifically relates to this site.

3.1.3.4, Tacoma LNG Facility: It is recommended that the sites be referred to by the Ecology site names in addition to Port parcel numbers, and Include the facility-site ID (FSID) numbers for the contaminated properties, so that the reader could find them on Ecology's database (Naval Reserve Center, FSID 93581722; Tacoma Port Parcel 4, FSID 3831; Port Parcel 2 (aka Alexander Avenue Petroleum Tank Facilities –FSID 1377); Occidental Chemical Corp. FSID 1212; PRI (aka Glenn Springs Holdings – FSID 1246).

3.1.3.4, Ongoing Investigation and Cleanup Actions: To be more useful for the purposes of the EIS and future permitting/planning, specific information about contamination on neighboring properties, *as it affects the subject site*, should be included. The general discussion of what is occurring on neighboring cleanup sites is not that helpful in terms of understanding potential environmental issues at the development site. Throughout these sections, please refer to the bulk petroleum facilities at the former PRI site and within Port Parcel 2 as the "Alexander Avenue Petroleum Tank Facilities" site.

3.1.3.4, Completed Cleanup Actions: This section should be more specific about what was done to clean up the releases for the USTs, whether confirmation sampling indicated the site was clean, and status of the site on Ecology's list of contaminated sites. For clarity, the discussion about the Hylebos Waterway cleanup in the vicinity of the site should be separate. Ecology is not aware of any 'ongoing' groundwater sampling for the Occidental site taking place in this area.

Also, there are several incorrect statements throughout section 3.1.3.4. It is recommended that the writers of the EIS contact Joyce Mercuri at 360-407-6260 to ensure correct references are made in the final EIS.

Water Quality

SEPA Fact Sheet, Required Approval and/or Permits: Indicate how many Construction Stormwater General Permits (CSWGP) will be applied for? Based on review, there are pipeline distribution systems that go beyond the Port of Tacoma. Will these be separate CSWGPs?

2.3.1.1, Stormwater Management: It is important to clearly identify areas where construction activities will overlap potential contamination. The EIS should include a map that shows the contaminated areas within the footprint of all ground disturbing activities, including staging areas, wheel washes, equipment storage, parking for construction workers, internal haul roads, etc. The EIS should also include a map that shows contaminated areas within the footprint of the excavation. A map should show contamination, concentrations of contaminants, any boring locations, and an overlay of the excavation proposed.

3.1.6.1, Erosion and Sediment Control: This section does not provide enough detail to understand how the stormwater will be managed. If there are both clean and contaminated soils onsite, will they segregate the clean from the contaminated stormwater? A map should show which Best Management Practices (BMPs) will be utilized on site to create this stormwater segregation (including flow paths to baker tanks for contaminated stormwater and/or dewatering water). Indicate whether or not any catch basins will be plugged during construction?

3.1.4.1, Groundwater: Discuss the potential effects on pH in groundwater with the installation of 4-6,000 grout columns.

3.3.4.1, Tacoma LNG Facility and TOTE Marine Vessel LNG Fueling System, Groundwater: In the third paragraph, this section talks about the use of a vibratory hammer during installation of the grout columns and that it wouldn't have any negligible effect on groundwater. Using a vibratory hammer on the shoreline could potentially displace sediments in waters. Address the potential effects of causing turbidity in nearby waters from using a vibratory hammer on and close to the shoreline.

3.3.6.1, Turbidity Minimization: This section is not consistent with table 3.3-1, turbidity. Figure out the appropriate waterbody classification and be consistent throughout the document.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various issues that may still need to be addressed in order to carry out the proposed action.

Tacoma LNG DEIS comments

August 6, 2015

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If you have any questions, please contact me at 360-407-7503 or kerry.carroll@ecy.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Kerry Carroll".

Kerry Carroll

Environmental Review and Transportation Section

ecc: Joyce Mercuri, Ecology
Carol Serdar, Ecology
Sonia Mendoza, Ecology
Brenden McFarland, Ecology
Shirley Schultz, City of Tacoma

June 9, 2015

Shirley Schultz
City of Tacoma
747 Market Street
Tacoma, WA 98402

RE Puget Sound Energy LNG Proposal SHR2015-40000246123

Dear ^{Shirley}MS Schultz,

The purpose of this letter is to express the Port of Tacoma's (Port) support for Puget Sound Energy's (PSE) Liquefied Natural Gas project on the Blair Peninsula.

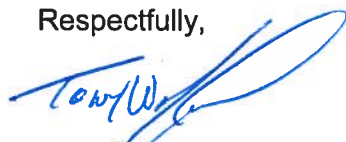
This project is ground breaking in the Pacific Northwest. It begins the transition toward clean fuels in the maritime industry. Totem Ocean Trailer Express (TOTE), a critical customer of the Port and important local employer, demonstrated bold leadership in choosing to redesign its fleet and infrastructure to make use of natural gas to meet EPA's coastal emissions reduction requirements. PSE's project makes that investment work.

It has been decades since the Blair Peninsula has seen this type of redevelopment. Given our collective efforts in clean-up, infrastructure and site preparation the area is ready for a future of clean port maritime industrial uses.

Redeveloping currently fallow/underutilized property on the Blair Peninsula will bring much needed family wage jobs to Tacoma, bring in tens of millions of dollars in new tax revenue to the City and help define the shape of modern, clean industrial uses. The City has shown great leadership in cleaning up Commencement Bay and transitioning to a new economy. The Port asks the City of Tacoma to show that same leadership in doing its part to ensure this project is successful.

Thank you for considering our comments. Please contact me if you would like to discuss the project further.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Tony Warfield', written over a blue line.

Tony Warfield
Senior Manager
Environmental Programs



TO: Shirley Shultz, Planning and Development Services

FROM: Stephanie Brock, Environmental Services, Site Development Group

SUBJECT: Shoreline/SEPA
File No. 40000246123
1001 Alexander Avenue E

DATE: 6/3/15

These comments/conditions are based on the following information provided for review:

- Application, SHR2015-40000246123, 3 pages, 5/6/2015
- Site Plan 1, 1 page, 5/6/2015
- Site Plan 2, 1 page, 5/6/2015
- Map of Flood Areas and Recharge Areas, 1 page, 5/6/2015
- JARPA for Tacoma LNP Facility, 323 pages, 5/6/2015
- Water Quality Protection and Monitoring Plan, 26 pages, 5/6/2015

1. **Storm and Sanitary Sewers**

Conditions:

- a. The proposal shall comply with all applicable requirements contained in the City of Tacoma Stormwater Management Manual, Side Sewer and Sanitary Sewer Availability Manual, Tacoma Municipal Code 12.08, Tacoma Municipal Code 2.19, Tacoma Municipal Code 10.14, Tacoma Municipal Code 10.22 and the Public Works Design Manual in effect at time of vesting land use actions, building or construction permitting.
- b. Any utility construction, relocation, or adjustment costs shall be at the applicant's expense.

Additional Information (applicable to building/development permits):

- c. Identify the 21-inch storm sewer pipe which runs across the southern lot (SAP6263919) on the site plans and ensure it is properly protected and all setbacks are complied with during planning and construction.
- d. Although the pipeline construction is not part of this permit review, it should be noted that it appears that there will be boring occurring within critical areas at a minimum of 4 locations (stream/culvert crossings). This will require additional permits, review, and potential mitigation.
- e. Additionally, it appears that as part of the pipeline construction street improvements and restoration will be needed to facilitate the construction. This will be reviewed and conditioned as part of the work order permit.
- f. As part of the site redevelopment, all broken, damaged, or hazardous sidewalk, and/or curb and gutter abutting the site shall be removed and new cement concrete curb and gutter constructed in its place to the approval of the City Engineer.

- g. As part of the site redevelopment, all non-conforming driveways will need to meet current standards, and all unused driveways shall be removed.
- h. A Work Order is required. A licensed professional civil engineer must submit the street plans for review and approval following the City's work order process. To initiate a work order, contact the Public Works Private Development at (253) 591-5760. A performance bond is required for all work orders per TMC 10.22.070.F.

MISCELLANEOUS COMMENTS

An online version of the City of Tacoma Stormwater Management Manual is available at <http://www.cityoftacoma.org/stormwater>.

An online version of the City of Tacoma Side Sewer and Sanitary Sewer Availability Manual is available at www.govme.org under the "City Information" tab on the left side of the screen.

An online version of the Public Works Design Manual is available at www.govme.org under the "City Information" tab on the left side of the screen.

If you have questions regarding these storm and sanitary sewer conditions, please contact Stephanie Brock at sbrock@cityoftacoma.org or 253-573-2315, Environmental Services Science and Engineering Division, Site Development Group.

May 19, 2015

Shirley Schultz
City of Tacoma
shirley.schultz@cityoftacoma.o

RE: SHR2015-40000246123; SR0187699
1001 E Alexandar AV, 31115 E 11th ST

Dear Shirley Schultz:

The Tacoma-Pierce County Health Department's Environmental Health Program received the above mentioned checklist on May 12, 2015 and has reviewed your proposal.

There are no objections to the proposal as presented.

Thank you for the opportunity to respond. If you have further questions, please contact me at (253) 798-2851 or by e-mail at bharp@tpchd.org.

Sincerely,



Brad D. Harp
Environmental Health Division

BDH:kv

