Washington Stated Department of Ecology
Sediment Management Standards Rule
Review/Comment Form

Reviewer Name:	
Sections of Document Reviewed:	SMS sections 173-204-200, -500 - 590
Document Version/Date:	

Page Number	Line Number	Comment
9	8	The definition of "Active cleanup action" here does not include treatment as an option, whereas on page 19, line 116 it is included. This should be clarified for consistency, with treatment as an allowable option for consideration in cleanup decisions.
12	100	Should be revised to read, "…without <u>any</u> human intervention <u>other than control of sources of contamination</u>, to reduce…."
17	43	Unclear what the statement, "These expectations are non-binding…." means. Intended to mean not required or not applicable at all sites?
17	58-61	Note: Need to consider the scenario where the site being cleaned up is still a partial contributor of recontaminating contaminants. For example, if the site is an ongoing contributor of <u>any</u> phthalates or PAHs, and the cleanup area is subsequently recontaminated by those contaminants, the site owner must remain partially responsible for that recontamination.
18	69-70	In multi-season cleanup actions, natural recovery should begin 10 years from the <u>end</u> of the cleanup action. If the overall cleanup action includes both active and passive technologies there may be some temporary mobility of contaminants during active cleanup.
19	116-117	Statement, "Active cleanup actions are preferred over more passive action." should be stricken. Cleanup decisions should be made based on study, and if source control/natural recovery will achieve the project goals, it should be an equally acceptable option.
19	119	Ongoing sources should also include bank erosion, groundwater discharges, etc. rather than just focusing on stormwater and wastewater discharges.

Questions? Please Contact: Chance Asher – Phone: (360) 407-6914 E-mail: chance.asher@ecy.wa.gov

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