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Gina McCarthy
USEPA National Administrator
Environmental Protection Agency
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Washington, DC 20460

Dennis McLerran
USEPA Region 10
1200 Sixth Avenue
Seattle WA 98101

RE: The Lower Willamette Superfund Cleanup Plan

Dear Administrators McCarthy and McLerran:

I am writing on behalf on the NWToxic Communities Coalition (NWTCC), a nonprofit with members involved on hazardous waste cleanups in USEPA Region 10 States of WA, OR, ID and AK. This letter concerns the proposed cleanup plan of the Lower Willamette River Superfund site in Portland OR.

The NWTCC wants to emphasize that the impacted communities want their voices heard and their comments implemented in the cleanup plan. While Portland's Bureau of Environmental Sustainability's (BES) comment letter to EPA believe they are done so, in fact their letter is an example of government not representing the communities or environmental justice opinions or interests.

The community groups clearly want Alternative G with amendments, yet Portland City endorses Alternative I. If the City read what is stated in the proposed Plan, that only G and H is protective of human health, or if it had solicited any of the community groups opinions, then in order to protect its citizens the City should have chosen Alternative G.

The City's own May 2016 survey by Oregon Kitchen Table, garnering 2704 responses, 98% of

respondents agree that the River should be safe for fish and wildlife, 95% of respondents agree that the River should be as clean as possible, and 94% of respondents agree the industries that contaminated the River should clean it up. Alternative I does not match that feedback.

The Communities Recommendations from over 4500 out of about 5000

- Adopt Alternative G with enhancements to improve long-term effectiveness, cost effectiveness, increased treatment, reduced exposures and increased community acceptance. Pages 50-52 of the proposed Plan clearly show that Alternative I fails to protect human health and the environment. Only Alternative G or H meet these legal requirements. The same is true when evaluating long term effectiveness and permanence.

- Monitor air, water, odor and noise, daily, while in construction phase with quick testing turnaround and adjustments, particularly when near affected communities for quality of life. Twenty four (24) hour dredging could be acceptable with those caveats.

- Use new and emerging technologies, such as those developed by NASA , bio-remediation bacteria that works on PCBs and DDT's, and dewatering on barges.

- Ensure with oversight that the Oregon DEQ has all source controls in place to prevent current and future contamination to the river. Example: The tank farms with 95% of all fuel sources are located in Linnton/Willbridge on liquefiable soils at the River edge without adequate earthquake proofing. Unacceptable is DEQ's answer: "We will deal with it when it happens." An earthquake would result in a huge environmental catastrophe and recontaminate the River.

- More extensive natural hazard mitigation should be used in all remedies for earthquakes, flooding and climate change.

- Institutional controls (IC) do not work according to GAO. Therefore, cleanup goals should eventually eliminate use of ICs.

- Establish assurance bonds for any future cleanup that might be required and for potential recontamination.

- Consolidated disposal facilities (CDF) in or adjacent to the River should not be considered. Four (4) Portland neighborhood associations have passed resolutions against a CDF and a 2000+ signature petition has been gathered against CDFs and confined aquatic disposals (CAD) in the lower Willamette.

- Monitored natural recovery (MNR) with or without enhancements, a do nothing response, has not been shown to be effective. The Lower Willamette is only seasonally depositional in some places, and is affected by prop wash, tidal action, river current, flooding and earthquakes. Contaminated sediments will drift to the Columbia River. Therefore, EPA should have less reliance on MNR.

- Increase monitoring to annually, and have provisions in the ROD for actions if monitoring shows unsatisfactory performance results.

- Air volatilization of PCBs needs to be a consideration for removal of a larger volume of sediment. Dr. David Carpenter's studies have shown that residents living within 5 miles of a

water Superfund site are adversely effected by PCB exposure.

We emphasize that a good cleanup improves public health, lowers public health costs, will improve the area's and the State's economy, creates jobs, attracts industries vying for clean land, produces recreational opportunities and spending, and creates vibrant communities. In the long term, an effective cleanup is less expensive, minimizes monitoring, eventually lifts institutional controls, and lifts community spirits.

Ensure that the cleanup is done right the first time.

Darlene Schanfald

Darlene Schanfald, Chair