

Public comment of Steve Goldstein to the EPA on the Portland Harbor Superfund Site Proposed Clean-up Plan September 2016

I am a frequent kayaker and Willamette River user. I have been following the EPA process for cleaning up the Portland harbor superfund site closely for many months including meetings with the EPA and local government officials and actively volunteering as a member of the Oregon Sierra Club, SEIU Local 503, Audubon Society of Portland, Willamette River Keeper and the Portland Harbor Community Coalition.

I have reviewed the proposed Superfund plan released in June 2016 by U S EPA Region 10 and I am very disappointed at the quality of the analysis that seems inadequate in many respects to create the knowledge base for developing an adequate plan. The proposed plan does not appear to adequately remediate the toxicity of the site or protect the environment or human health in either the near or foreseeable future.

The Willamette River is the heart of the Portland Metro area. It needs to be cleaned up so that the fish are safe to eat for humans and other fish consumers and the toxics deposited over many decades no longer contaminate the soil, water and air in the area and pose a threat to human and environmental health.

I urge you to modify your proposal to adopt a ROD that includes adequate baseline studies on site, in the uplands and up and down river from the site to allow monitoring during and after the active remediation period so that the effectiveness of the cleanup can be accurately monitored and adjusted as needed.

Control of upland and upriver sources is necessary and incomplete.

Confined disposal facilities should be removed from the ROD since the state, the Port of Portland and the community have rejected the use of confined disposal facilities and are highly opposed to in water disposal of toxic laden dredged materials.

Compliance with all standards including drinking and clean water standards in the Clean Water act needs to be included in the ROD.

Earlier this year the EPA indicated that it was favoring alternative G as the most appropriate remedy for this superfund site. The current proposed plan favors alternative I. The plan document provides no scientific or technical rationale for this change of the plan from alternative G to alternative I.

Alternative G involved dredging 571.7 acres, excavating 139,000 cubic yards and capping 184.7 acres with enhanced natural recovery of 19.5 acres and 1,391 acres of monitored natural recovery.

Alternative I includes dredging 167.1 acres, excavating 103,000 cy, capping 64.1 acres, enhanced natural recovery of 59.8 acres and monitored natural recovery of 1,876 acres.

I am very concerned that the EPA has moved from favoring a plan with 571.1 acres dredged and 184.7 acres capped to a plan with only 167.1 acres dredged and 64.1 acres capped with no scientific or technical rationale for these changes. Since most of these pollutants have not been neutralized or capped by natural processes in the many decades since they were deposited and the EPA has noted that much of the river in this area is scouring and not depositional there appears to be no scientific rationale likely to account for these changes or for choosing so much monitored natural recovery.

I urge that the ROD be based on option G enhanced per the community concerns as the preferred option most likely to provide adequate remediation without requiring a later return to clean areas not adequately treated by the proposed plan. The clean up resulting from the ROD will be conducted under the principal that the polluter pays. Later clean up efforts will probably fall to local taxpayers to pay for the costs.

Since many of the pollutants (PCB's, Dioxans/furans, DDT's and metals) are known to resist degradation by natural processes the ROD needs to require and include the costs of monitoring pollution levels and solving problems for a greatly extended period at the expense of the polluters.

Tribal consultation and coordination has been inadequate and the plan needs to be modified to meet the needs of the tribes.

Environmental justice has been given little attention through out the process and the ROD needs to include actions to protect and benefit those communities who have suffered harm as a result of past and present practices.

I request that the ROD include: 1) Legally binding commitments for source clean up from the State of Oregon, 2) Performance bonds of the PRP's, 3) Habitat restoration fully paid by the PRP's, 4) Ongoing monitoring during the clean up of water, air, sound, soil, odor and fish tissues, and 5) comprehensive community involvement prioritizing the most impacted communities to include job training for local members of these most impacted communities.

I request a ROD that prioritizes creating a healthy environment for nature, fish and people the first time for the long term rather than a quicker, less expensive and less safe and secure option. The ROD should lead us to the day when fish advisories are no longer necessary for this stretch of the Willamette River and be based on best practices.

I oppose the use of separate operable units during this restoration. I believe that restoration can take place on differing timelines in different areas without the complexities and difficulties that the creation of separate operable units will bring to the process.

I do not believe that the proposed alternative will accomplish the goals of adequately reducing risks and addressing the major sources of contamination within the site. I believe that the proposed plan does far too little to meet the needs of the community for a safe and healthy urban area and a river area healthy for natural processes, recreation, housing and employment.

Thank you,

Steve Goldstein