From: HarborComments
To: PortlandHarbor
Subject: Attn: Portland Harbor Superfund Comments, Reject Proposed Changes
Date: Monday, December 24, 2018 1:29:47 AM

From: (b) (6)
Sent: Friday, December 21, 2018 3:31 PM
To: HarborComments <HarborComments@epa.gov>
Subject: Attn: Portland Harbor Superfund Comments, Reject Proposed Changes

Dear Environmental Protection Agency,

I am writing to urge you to reject proposed changes to the 2017 Portland Harbor Superfund Cleanup Plan after more than 16 years of public process. The public has waited nearly two decades for the cleanup to begin and it is time to move forward with implementing the 2017 plan as written. The changes proposed in the "Explanation of Significant Differences" (ESD) that was released by the EPA in October 2018 would reduce the threat risk associated with carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and leave people, fish and wildlife at continued risk of unnecessary exposure to these toxic chemicals in Portland Harbor indefinitely. I am particularly concerned that the EPA is proposing to eliminate dredging and removal of approximately 17 acres of river bottom that are highly contaminated with cPAHs at NW Natural "GasCo Site" and the Port of Portland's "Terminal 4" as required in the 2017 plan. NW Natural and the Port of Portland have been two of the most aggressive advocates for a weaker cleanup plan and the proposed changes will save them $35 million in cleanup costs at the expense of the health of our communities and our environment.

There are many reasons that EPA should reject the changes proposed in the ESD: Leaving these contaminants in the river at the "GasCo site" and "Terminal 4" means that people and wildlife will continue to be at risk of exposure for an indefinite period of time. There is inadequate information about how these contaminants may migrate in our river over time and how they may interact with other toxic contaminants in the river. The procedure that EPA used to make these changes was done outside the normal process for amending a Cleanup Record of Decision and sets a bad precedent for other polluters to request changes to the cleanup plan in the future. The changes were not developed through a transparent inclusive process, but rather based on behind the scenes lobbying by two influential responsible parties with a long track record of advocating for a weak cleanup plan that prioritizes reduced polluter costs over public and environmental health. In 2017, the EPA chose a cleanup alternative that was far weaker than what the vast majority of the public who commented on the cleanup options supported. The changes being proposed now weaken that plan even further.

It's time for the EPA to move forward with the cleanup plan that was adopted, not work behind the scenes with polluters to weaken the plan. Implementation of the plan is already behind schedule. I appreciate that EPA has recently sent a strong message to responsible parties that they need to move forward expeditiously to develop cleanup agreements and start the cleanup process. However, the proposed changes undermine public confidence that EPA is committed to moving forward. After nearly two decades, EPA needs to focus all its resources on moving the 2017 plan to implementation and our river towards health. Please reject the changes in the ESD.

Thank you.

Sincerely,
(b) (6)
[redacted]
Portland, OR 97219