Date: 12/10/18

US Environmental Protection Agency
Attn: Portland Harbor Comments
805 SW Broadway, Ste. 500
Portland OR 97205

To whom it may concern,
I have several concerns in regard to EPA's implementation of new toxic levels for benzopyrene (a) also known as BaP, on the Willamette River superfund site.

The concerns are as follows:

Because the chemical is concentrated in a north Portland hotspot, it should be reduced to the same levels as the rest of the urban Willamette for the sake of equity in safety and river access.

There is no information on skin contact even though Cathedral and Kelley Point beaches are affected by a hotspot. There is no assurance that beaches or swimming would be safe.

Safety of all activities such as swimming, boating, recreation, and fishing, should be considered in interpreting the change, not just dock work.

Pollutant mixtures that can be more toxic than the original pollutant. EPA has not studied mixtures and cannot give assurance that they would be safe.

Breakdown byproducts can be more toxic than the original pollutant. EPA has not studied break down byproducts and cannot give assurance that they would be safe.

Wildlife should be considered when interpreting the change. Leaving the chemical in river sediments where the chain of life begins harms all wildlife.

Interpretation of BaP updated toxic values should help, not hinder the goal of a multi-use river as strongly expressed by the community in the Record of Decision. River access should be safe everywhere on the urban Willamette.

Thank you,

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St. Johns
Portland