From: (b) (6)

Sent: Tuesday, September 06, 2016 2:41 PM

To: HarborComments

Subject: Portland Harbor Superfund Proposed Plan

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Portland, OR 97203

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I am a 69 yr. old resident of North Portland, having been born in Oregon and residing in or near Portland since 1961, specifically at my current residence since 1986. My wife of 20 yrs., Kathi, and I are regular users, often with grandchildren, of the Willamette R., and would use and enjoy it more were it not for the pollution that the Superfund designation is intended to address.

I specifically reject the adoption of Alternative I and advocate for the adoption of Alternative G+. In this I am in agreement with, at the least, PHCAG, Yakama Nation, and the Portland Audubon Society.

Alternative I proposes to dredge an inadequate acreage of contaminated riverbottom, 167 acres, as opposed to the 1000 acres proposd in Alt. G+. Alt. I also proposes an excessive reliance on MNR, which is only viable for pollutants subject to bacterial breakdown, such as PAH's, and is ineffective for remediation of PCBs, dioxin/furans, DD's and metals. According to information from P de Fur of Environmental Stewardship Concepts, there is absolutely no scientific evidence of any possibility of natural breakdown of these worst persistent pollutants in a water environment. Also, note that MNR has been the operative condition for decades, and despite this the site qualifies for Superfund listing.

In this same vein, I advocate for minimizing the amount of capped areas. I advocate for maximum, safe removal of pollutants and proper disposal in authorized facilities. I completely reject any proposal that includes CDF storage of toxic materials in any portion of the Willamette. This material needs to be permanently removed and not subject to recontaminating the Willamette, or the Columbia, due to flood or seismic events.

I also observe that the EPA assessment did not attempt to measure and account for the potential of current atmospheric release of PCBs.

I want to see all persistent pollutants removed from the river and not stored in or near the river.

I want the Portland harbor cleaned to the point that it is no more hazardous to consume resident fish from there than from any other portion of the Willamette downstream of Eugene.

I want the appropriate industrial PPRs to pay for their historical pollution of the river. It cannot be that the public bear the major cost of this necessary clean-up.

To the extent that MNR is adopted, there needs to be a permanent fund for monitoring results and paying for any recontamination.

All clean-up activities should comply with environmentally best practices and adopt more effective and cheaper emerging technologies as they may appear.

Sediment dredging, loading and hauling activities should have air monitoring to verify practices that limit/control the release of contaminants

While there is rational justification to subdivide the huge site into smaller units based on the type of contamination and remediation, the EPA should resist PPR efforts to use this as a strategy to weaken clean-up efforts.

Thank you,

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