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## Statement by Curtis Robinhold, Port of Portland deputy executive director, regarding comments to the EPA Proposed Plan for the cleanup of the Portland Harbor Superfund site

Today we submitted comments to the U.S. Environmental Protection Agency about the Proposed Plan for the Portland Harbor Superfund site. (Note: <u>the executive summary of</u> <u>comments is attached</u>; full comments are available on request.) This marks the end of a 90-day public comment period providing the opportunity to weigh in with EPA about its proposal for cleaning up the Lower Willamette River.

It also marks a significant milestone for the Superfund process at Portland Harbor. From here, we can make progress toward the cleaner river that Portlanders deserve, or we can continue to be mired in process and disagreements over EPA's analytics. We are committed to a cleanup of Portland Harbor that protects the health of Portlanders and our environment, and to finding the most cost-effective way to achieve it. We have been engaged with this process for a long time, and because we live here too, many of our employees call the neighborhoods around the Harbor home. After studying the river and doing our own early cleanup work, we are ready for the next step.

Earlier in the public comment period, we shared with EPA significant concerns about its analysis and the technical foundations of the Proposed Plan (<u>See attached June 22, 2016 letter</u>). The comments filed today offer constructive and targeted modifications to the draft plan. These adjustments to EPA's approach will be equally protective for people and the environment, but will reduce risks sooner and at lower cost than EPA's proposed cleanup. The comments are focused in particular on specific cleanup proposals for Swan Island and our Marine Terminal 4. We ask EPA to provide us the flexibility to pursue these carefully crafted alternatives.

The costs to cleanup Portland Harbor are significant, at a time when our city and region are facing many critical affordability issues. Finding the most cost-effective way to achieve a protective cleanup is essential to us. Federal law prohibits us from using revenues from Portland International Airport to pay for non-airport expenses, such as the Portland Harbor cleanup. We must rely on our marine and industrial general fund, which is constrained; we will need new financing options to fund our portion of the cleanup. Therefore, we simply cannot support a more costly cleanup when an equally protective, more affordable solution is available.

Finally, we also informed EPA that we will not host a Confined Disposal Facility (CDF) at Terminal 4, an option offered in the Proposed Plan. We are not interested in taking on long-term

management of a facility that our neighbors adamantly oppose, and one with uncertain economics and risks.

Today we call on EPA to make our suggested modifications in its final decision for Portland Harbor. We believe EPA's current approach does not lead to a cleaner river anytime soon, only more delay. After 16 years, Portland deserves progress for the river at the center of its city.

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