

EPA Responsiveness Summary
Terminal 4 Removal Action
Portland, Oregon

Introduction -

This document summarizes and responds to the public comments submitted on the Engineering Evaluation and Cost Analysis (EE/CA) for the proposed Removal Action at the Port of Portland Marine Terminal 4 in Portland, Oregon.

The EE/CA was available for public review and comment from June 6 until September 7, 2005. Notice of this comment period was published in the Oregonian at the start of the initial 30-day public comment period. Notices announcing two subsequent extensions of the comment period were also published in the Oregonian. Additionally, notice of the comment period and a summary of the proposed EE/CA alternatives were described in a Portland Harbor Fact Sheet (June 2005) that was mailed to approximately 900 addresses.

Overview and general responses to all comments received

A total of eighty-nine responses were received during the public comment period. Seventy-four individuals, groups and businesses provided comments by letter and e-mail during the comment period. In addition, fifteen individuals provided spoken comment during the public meeting. Each submission was reviewed by the EPA project manager and other members of the Portland Harbor project team. Responses to all comments are provided below.

Many of the eighty-nine commenters provided feedback on more than one subject, resulting in over 450 specific comments.

CDF - One hundred forty-four comments referred to the proposed construction of a confined disposal facility (CDF) in Terminal 4 Slip 1. The largest group of these comments provided unqualified statements of opposition or concern about placing a CDF at Terminal 4. Many other respondents cited various reasons for having concern about the CDF. The most common concern stated was the ability of the CDF to withstand a catastrophic event such as earthquake or flood. Many respondents from the surrounding communities of St. Johns, Linnton and Cathedral Park, were opposed to the CDF because of the proximity to their homes. Other reasons cited by more than one respondent included leaching, erosion or leaking, the effect on fish and wildlife habitat, unknown or unspecified risk, and costs and economics. One comment stated support for the CDF.

EECA - Forty nine comments were about various aspects of the Engineering Evaluation and Cost Analysis. Several comments questioned how the alternatives were ranked, the adequacy of the analysis or the cost of the EECA or cleanup. Several comments identified missing information or requested additions they would like to see in the EE/CA. Approximately half of the comments related to the EE/CA asked for clarification or explanation from a specific page or section of the EE/CA.

Cleanup - Forty-four comments made generic statements about cleaning up the Willamette River, Portland Harbor or Terminal 4. About half of these comments expressed general support of EPA efforts to clean up the river. Several comments asked about the relationship of the Terminal 4 early action to the harbor-wide cleanup. Several comments identified cleanup concerns or priorities such as timing, cost, toxic materials, early actions, future use industrial use, contaminant migration, and objectives. (One comment asked EPA to continue this effort to clean up the Columbia and one comment support the OCEH plan to clean up the river.)

Landfill – Thirty six comments recommended that contaminated sediment dredged from the river should be disposed of in a hazardous waste landfill.

Alternatives – Thirty four comments related to alternatives presented in the EE/CA. Twenty-three comments were specific to the preferred alternative (Alternative C) identified in the EE/CA. Eight comments stated opposition to the preferred alternative, four comments expressed concern about the preferred alternative and the remaining comments related to the effect of the preferred alternative on fish, risk, cost or neighborhood concerns. Six comments urged EPA to select Alternative D and five comments asked to have additional alternatives developed.

Cost – Twenty four comments expressed concern over various aspects of the cost of the proposed action to the port or to the taxpayer.

Trust – Eighteen comments identified trust as an issue. Eleven comments talked about trusting the Port of Portland to do the right thing, three comments were specific about trust issues for EPA and four comments did not specify a party.

Disposal – Seventeen comments were regarding disposal of contaminated sediment and related issues such as capping, neighborhood concerns, and risk.

Monitoring – Fourteen comments questioned how the cleanup remedy would be monitored. One or more comments identified an aspect of monitoring such as fish and wildlife, strategy, or timing.

Public involvement – Twelve comments addressed the timing or adequacy of public involvement.

Risk – Nine comments identified risk as an issue or concern.

Dredging – Seven comments discussed dredging as part of the Terminal 4 Action. Three comments supported hydraulic dredging, and one comment was opposed to dredging.

Capping/Monitored Natural Recovery – Seven comments discussed capping and/or monitored natural recovery. Five comments supported these sediment cleanup tools and two comments opposed their use.

Economics - Four comments questioned the economics of the proposed action or analysis.

Other topics raised by one or two comments included: economics, mitigation, future use, treatment technology, air, human health, human use, neighborhood concerns restoration, sediment, and water quality.