

## PUBLIC PETITION FOR PRELIMINARY ASSESSMENT

Elin Miller, Regional Administrator  
United States Environmental Protection Agency, Region X  
1200 6<sup>th</sup> Avenue  
Seattle, WA 98101

August 20, 2007

Under the authority of CERCLA Section 105 (d), as amended, the petitioner,

(Name) : Dvija Michael Bertish, Columbia Riverkeeper, Rosemere Neighborhood Association

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We hereby request that Region X of the United States Environmental Protection Agency conduct a preliminary assessment of the known and suspected release of a hazardous substances, pollutants, or contaminants at the following location:

Former Superfund Site – Alcoa Aluminum (Vanalco)/Evergreen Aluminum, located at the Port of Vancouver, WA

**Petitioners are affected by the [release (or) threatened release] because:** The petitioners are water quality advocates working to protect natural resources in our community, and the site in question presents a substantial health risk for the public and the environment. This site may have been prematurely removed from the National Priorities List. For the past 10 years, after the site had been de-listed, the Washington State Dept. of Ecology has been aware that PCB's, TCE, PAH's, (among other contaminants) have been leaching into the Columbia River from a previously capped landfill, from a contaminated groundwater plume(s), and waste oil lagoons at this industrial site. Ecology explains that the groundwater plume(s) will not be pumped or treated. A US Army Corps of Engineers study in Spring 2007 indicated extremely dangerous levels of PCB's found in clams in the Columbia River at the Alcoa site – 3,500 ppb. These levels are higher than any other hotspot known in the state of Washington. During the past 10 years, Ecology has been attempting to negotiate cleanup levels with the polluter, but the contaminant has remained in the river all this time. Furthermore, the site is upstream and very near a flushing channel that feeds Columbia River water directly into the troubled system of Vancouver Lake, the subject of a \$20 million EPA Clean Lake Award for cleanup in the 1980's. Vancouver Lake was 303(d) listed by Ecology for excessive PCB's in fish tissue in 2004. It is possible that the PCB's from the Alcoa site migrated into Vancouver Lake. If and when the PCB problem is addressed at Alcoa, Ecology is concerned that dredging activities to remove the contaminated sediment may travel downstream into the flushing channel, and into the lake. Vancouver Lake is currently the subject of an inter-agency task force that has been charged to identify remedies for the lake's advanced eutrophication, poor habitat, sedimentation problems, and other urban issues such as stormdrainage and septic tank infiltration. The local health department has posted a health advisory in multiple languages at the Alcoa site warning visitors not to consume the contaminated clams – people are known to harvest clams from this area. In an unprecedented move, the Port of Vancouver has enacted a local property tax for the public to fund the purchase of the Alcoa/Evergreen property, and to build a railroad through the property to connect with other parcels that will be developed for industrial use in the future. It is not clear if the voting public is aware of the extent of contamination at the site to be purchased with private property taxes. Local citizens enacted a petition drive to bring the tax to a public vote, and the results of that ballot will be determined this week. The Alcoa site is upstream of public fishing and water recreation areas at Frenchman's Bar Park, and Vancouver Lake Park – both locations allow recreational water use and there is direct human contact with the water. The Alcoa site is situated within the Troutdale Aquifer System which is an EPA designated Sole Source Aquifer (the petitioners were the originators the Sole Source Aquifer petition as well). There are municipal water wells near the site. The Port of Vancouver plans to redevelop the site for industrial and water dependent use, including heavy shipping and the construction of a railroad. These activities could exacerbate and mobilize the contaminants in question. Since the EPA has made cleanup of the Columbia River a national priority, we believe this site begs for further EPA consideration. For these reasons, we ask the EPA to re-list the Alcoa/Evergreen Aluminum as a Superfund site on the National Priorities List, and to take the appropriate actions to aid in the remediation of these serious issues.

Type or characteristics of the substance(s) involved: PCB's, PAH's, TCE and others

Nature and history of any activities that have occurred regarding the release/threatened release: The sources of contamination are industrial landfills, aluminum smelter facilities (that are currently slated for demolition), and a groundwater plume from industrial waste. Please see attached Ecology fact sheet and media articles.

Federal, State and local authorities you have contacted about the release/threatened release and the response, if any: Washington State Dept. of Ecology, Paul Skillingstad, Industrial Section. Elaine Somers, NEPA officer for EPA Region X. Martha Lentz, Sole Source Office for EPA Region X, Candace Smith, EPA Region X; Yvonne Valleta, EPA Region X; Tom Taylor, Regulatory Project Manager, US Army Corps of Engineers; Patty Boyden, Environmental Officer, Port of Vancouver; Phil Trask, Vancouver Lake Watershed Partnership (interagency task force); George Medina, US Army Corps of Engineers; Katy Brooks, Public Relations, Port of Vancouver; Ron Wierenga, Clark County Hydrologist; Sylvia Kawabata, Manager of Assessment & Brownfields Program, EPA Region X; Dan Opalsky, EPA Region X; Dean Moberg, Federal Highway Administration; Marilu Soscia, EPA Region X; Loretta Callahan, City of Vancouver; Jonnie Hyde and Randy Phillips, Clark County Health Dept.