March 6, 2006

Martha Lentz
Office of Environmental Assessment
U.S. EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Lentz:

I retired from the Southwest Washington Health District in 2000. I worked for the SWHD from 1973 until retirement as a chemist and supervisor in the Environmental Health Division. For most of my career, my job was to monitor streams, rivers and ground water samples in Clark County and perform water quality testing on the samples. I worked closely with county engineers and health department sanitarians.

As a water quality specialist, have observed several things that cause me to feel that the sole source designation for Clark County is very important to our community. First of all, the soil in south Clark County is predominately Missoula outwash, which is excessively draining, gravelly soil. A study of Burnt Bridge Creek by environmental experts at Kramer, Chinn & Mayo considered this important because of the large number (approximately 7,000+) of septic systems in the basin. They recommended eliminating the septic systems in the 1976 study.

At this time very few septic systems have been eliminated. A recent trend study funded by the City of Vancouver showed that Burnt Bridge Creek water quality has not improved since the first study was conducted in 1976. Also, a Microbial Source Tracking Report showed up to 22% of the fecal bacteria in downstream locations are from septic systems. The greater concern is what has happened to the septic waste not indicated in Burnt Bridge Creek. It must be in the groundwater. Elevated nitrate levels in City of Vancouver water, as high as 4.31 mg/L according to the 2004 Water Quality Summary, indicate the septic contamination of the municipal water source. The City of Vancouver's water comes from nine well fields all located in the Burnt Bridge Creek basin.

Elevated nitrate levels in Clark County north of Burnt Bridge Creek at 119th Street are caused by animal waste sources north of 119th St. and east of 117th Ave. Nitrate-nitrogen levels as high as 50 mg/L were noted south and west of the animal waste source. Southwest is the predominate direction of the groundwater flow. Levels over the 10 mg/L maximum contaminant level are found in wells located on 99th Street. All of this points out that the groundwater is all one source.

Chromium perchlorethylene contamination has also been found to travel through the soil for long distances and these toxicants also contaminated City of Vancouver wells at Blandford as well as private wells. This all points to the need to designate the Troutdale System as a sole source aquifer and require adequate protection from known pollutants.

Sincerely,

Carl Addy, REHS (ret.)

3912 Clark Ave

Vancouver, WA 98661