UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

OFFICE OF THE REGIONAL ADMINISTRATOR

NOV 07 2019

Mr. Phil Rigdon
Superintendent, Department of Natural Resources
Yakama Nation
P.O. Box 151
Toppenish, Washington 98948

Mr. Richard Whitman
Director, Oregon Department of Environmental Quality
700 Northeast Multnomah Street, Suite 600
Portland, Oregon 97232-4100

Ms. Maia Bellon
Director, Washington Department of Ecology
300 Desmond Drive Southeast
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Superintendent Rigdon; Director Whitman; and Director Bellon;

Thank you for your October 10, 2019, letter requesting proposal of the Bradford Island facility, Multnomah County, Oregon, to the U.S. Environmental Protection Agency's National Priorities List. The EPA appreciates your concerns about the risks posed by the Site to human health and the environment. We support efforts to continue the remedial cleanup process initiated by the U.S. Army Corps of Engineers under the oversight of the Oregon Department of Environmental Quality and with the active participation of the Confederated Tribes and Bands of the Yakama Nation and the Washington Department of Ecology through the Bradford Island Technical Advisory Group.

The EPA has been involved with the Site over the last two decades and in recent years has participated in regular management level meetings with the Corps, Yakama Nation, ODEQ, and Ecology to keep apprised of Site progress. As you correctly noted, in 2008 the EPA evaluated the Site using the Hazard Ranking System based on the available information at the time. In August 2017, the EPA revised the HRS evaluation based largely on data from the Remedial Investigation, including biota sampling results, and determined that the Site does indeed pass the threshold for NPL listing consideration.

Adding a site to the NPL is a multi-step process involving progressive levels of review and approval both at the regional and national levels within the EPA, as well as the federal rulemaking processes for both proposed and final NPL sites. The most important initial internal step in this process is to convene a Remedial Decision Team meeting within Region 10 drawing on staff and management expertise to discuss the details of the Site and decide next actions to undertake. The EPA anticipates that the RDT meeting will take place by mid-January 2020. Your October 10th letter will be shared with the RDT. The EPA will also be reaching out to the Corps to obtain more detailed information regarding their perspectives on issues outlined in your request as well as funding priorities for the Site.

If Region 10 makes the determination to recommend the Site for proposed listing to the EPA Headquarters, the Region will prepare a detailed internal package in support of the HRS evaluation which will serve as the basis for proposing the Site in an NPL rulemaking in 2020. A proposed NPL rule will initiate a formal public comment period, and EPA will respond to all substantive comments before making the final determination to add a site to the NPL in a subsequent rulemaking action. For more details about the Superfund National Priorities List and process, please refer to our website at https://www.epa.gov/superfund/superfund-national-priorities-list-npl.

If you have any further questions as the NPL proposed listing process moves forward, please contact David Allnutt, the Acting Director of our Superfund and Emergency Management Division at (206) 553-2581, Wally Moon, Spill Prevention and Removal Section Chief at (206) 553-6323 or Ken Marcy, NPL Coordinator at (503) 326-3269 to discuss any aspects of the NPL proposal process.

Sincerely,

Chris Hladick
Regional Administrator

cc: Ms. Rose Longoria, Yakama Nation
Mr. Tom Zeilman, Yakama Nation
Ms. Rebecca Lawson, WA DOE
Mr. John Level, WA AGO
Ms. Leah Feldon, ODEQ
Mr. Gary Vrooman, ODOJ
Col. Aaron L. Dorf, USACE
Mr. Jeffrey Matson, USACE