To: Kluesner, Dave[kluesner.dave@epa.gov]
From: Joseph Nardone
Sent: Sun 5/4/2014 7:48:33 PM
Subject: Re: NorthJersey.Com Opinion: Alternate solution to Passaic River cleanup preferred

Thanks a lot for your quick response. Waiting til Wed. is no problem. Really appreciate what you're doing. Once again, Thanks a lot!
On Friday, May 2, 2014 1:50 PM, "Kluesner, Dave" <kluesner.dave@epa.gov> wrote:
Joe, when would you like the report? If you can wait til Wednesday perhaps Alice and I can arrange to bring a print copy with us to Newark so that you don't have to drive in to the city or incur printing fees.

From: Joseph Nardone <jsphnardone@yahoo.com>
Sent: Friday, May 2, 2014 11:36:20 AM
To: Kluesner, Dave
Subject: Re: NorthJersey.Com Opinion: Alternate solution to Passaic River cleanup preferred

Dave, does the EPA distribute printed copies of the FFS? Going on line I can download it but it will cost me over $6 to print it. If I need to visit EPA in NYC, no problem.
On Wednesday, April 30, 2014 12:57 PM, "Kluesner, Dave" <kluesner.dave@epa.gov> wrote:

http://www.northjersey.com/opinion/opinion-alternate-solution-to-passaic-river-cleanup-preferred-1.1005290

Opinion: Alternate solution to Passaic River cleanup preferred

04/29/2014
NorthJersey.com
By Jonathan Jaffe
Jonathan Jaffe is spokesman for the Lower Passaic Cooperating Parties Group.

THE RECORD recently hailed a plan recently released by the U.S. Environmental Protection Agency's Region 2 for a top-to-bottom cleanup of the lower eight miles of the Passaic River ("Editorial: Cleaning the Passaic," April 15).

There's one thing everyone can agree on: A sustainable remedy is sorely needed to fix the damage caused by the Diamond Alkali site in Newark, make the Passaic River better and accelerate the process of returning the Lower Passaic Watershed to the thriving center of recreation and commerce that it once was.

But there's ample concern over whether the EPA's proposed approach represents the best way to achieve a holistic solution to a multi-faceted problem.

The Lower Passaic Cooperating Parties Group (CPG) has been closely involved in efforts to develop a solution for years. We haven't just talked about its strong commitment to a cleaner and healthier Passaic River, but spent money on practical cleanup projects.

Meanwhile, Tierra/Maxus/Occidental, the primary responsible parties for the Diamond Alkali facility, are not part of the CPG, and have been glaringly absent from talks about the EPA's proposed eight-mile remediation plan.

The CPG, through constructive efforts like the Passaic River mudflat cleanup near River Mile 10.9 and Riverside County Park in Lyndhurst, has gained valuable experience about viable remediation strategies.

A river cleanup plan worthy of the name should be able to meet tough tests. Will it reduce human health risks without decades of dredging and delay? Will it improve recreational river use in the foreseeable future? Will it result in a river that is substantially cleaner?

Despite best intentions

It's hard to see how the EPA's proposed approach gets to "yes" on these major issues or others. And even with the best intentions, it doesn't advance matters to underestimate the extent or complexity of the problem, or the costs and time involved in what purports to be a solution.

The details show how formidable the challenge is. First, the EPA has proposed removing surface sediment contamination down to infinitesimally small levels in one part of the Passaic River, yet leaving contamination levels hundreds and thousands of times higher upstream and downstream. This raises real doubts that an area once cleaned will stay clean.

Second, the proposed plan calls for the removal of more than four million cubic yards of sediment in five years. Many experts predict this task could take at least 20 years if not far longer. The work would involve navigating numerous low bridges, narrow channels and boat traffic in one of the most congested parts of the country. The accompanying disruption could impair economic growth and limit recreational activity along the river for a generation.

Third, the proposal only focuses on the lower eight miles of the Passaic River, without adequately dealing with contamination north of Newark through Clifton. A bank-to-bank dredge as proposed by EPA along a designated section of the river may not even be protective of human health.

While respectfully disagreeing with the EPA on the best way to proceed, the companies in the CPG care about the river and the communities that surround it. Our cooperation is genuine.

We believe there is a better way, as the EPA's own guidance makes clear. Our alternative approach – commonly referred to as a sustainable remedy – removes the areas of highest surface sediment contamination in the lower 17 river miles.

The related work – taking just a few years to complete – would include community-based projects to further reduce health and environmental risk. Other ongoing sources of pollution would be addressed at the same time. And because the primary human health risk posed by contaminated sediment is through fish consumption, a sustainable remedy would include fisheries restoration.

Holistic approach

This is the type of holistic, adaptive approach that the EPA encourages in complex remediation efforts. It is well suited for heavily polluted river systems such as the Lower Passaic. It's an approach that communities, residents and all concerned parties that care about healing the river can rally around in a common, united effort.

We have come a long way since the Superfund program was established almost 35 years ago. New Jersey has made significant progress toward a cleaner, healthier environment. Wildlife has returned to the Passaic River. Recreational activities have expanded. But there is still much work to do. A sustainable remedy for the Passaic River is too important to put off any longer.

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