John Gear

As an engineer/attorney who spent a year as a Natural Resource Specialist working for Oregon Department of Energy on its team monitoring the Hanford cleanup, I became all-too familiar with (a) the extreme challenges of cleaning up dispersed pollutants in the environment, and (b) the powerful pull on public agencies to engage in buck-passing and to spend money on the greatest public relations benefit rather than on the greatest risk reduction and pollutant recovery activities.

That experience is why I ask that Ecology revise the Port of Olympia's clean up plan, -1-Amendment to the 2008 Agreed Order-1- to reflect the following:

- 1. Dredging should be focused on the hot spots with the highest level of contamination with the goal of maximal recovery of pollutants for safe containment over the long term. It is not an acceptable clean up plan for the Port to only dredge the navigational areas in Budd Inlet. The rising sea levels we will face for centuries means we should be doing everything possible to corral and contain the maximum mass of pollutants now, while they are more easily accessible (and aren't floating into currently developed areas in floods).
- 2. Since continuing surface dioxin contamination in Budd Inlet indicates it is likely from the Cascade Pole dredged material, multiple sampling should be taken using DNAPL protocols established by the Environmental Protection Act. This should not even need to be emphasized.