



The People's Task Force

Recommendations for the Future of Superfund

Voices from Contaminated Communities Across the Country

In response to the EPA Memorandum and Superfund Task Force:

We, the communities who have lived under the shadow of toxic contamination in our homes, workplaces, and schools, have formed the People's Task Force to respond to Administrator Pruitt's EPA Memorandum and Superfund Task Force, and voice our recommendations on the future of Superfund, based on our years of on-the-ground experience. The focus of Superfund cleanup must place public health as a priority, when weighed against private interests and money.

The memorandum, in line with its focus on streamlining the cleanup process, proposes reducing administrative and overhead costs. Such spending primarily funds two things: enforcement and community involvement. We strongly caution that these are not corners to be cut -- without proper oversight and public accountability, the Superfund would lose much of its remaining efficacy. Placing faith in responsible parties' remediation ignores that they have a vested interest in finishing as quickly and cheaply as possible, threatening the health of local communities.

Recommendations:

- There are already indications that polluting companies have changed their cleanup responses due to a perception that oversight will decrease under Administrator Pruitt. Devon Energy, which previously donated thousands to Pruitt, former Attorney General of Oklahoma, has recently backed off from settlement plans. According to the New York Times, Devon Energy "had been prepared to install a sophisticated system to detect and reduce leaks of dangerous gases"² for one of its gas plants, and "had also discussed paying a six-figure penalty to settle claims by the Obama administration that it was illegally emitting 80 tons each year of hazardous chemicals, like benzene, a known carcinogen." Since Pruitt's appointment, however, they now refuse to install emissions controls and are "re-evaluating their settlement posture."
- We are concerned over industry representatives calling for the development of exit strategies, usually including the removal of a site from the National Priority List (NPL). This may not sound

initially worrying, however, they simultaneously push for cleanup strategies that merely manage or contain toxic hazards, as opposed to complete removal or other permanent remedies (which are required by law to be considered under the Superfund Amendments and Reauthorization Act of 1986). When 'bandaid' methods are employed at NPL sites, or in situations where permanent treatment technologies do not exist, exit strategies will not be possible, as the sites require continual maintenance and monitoring. This is evident through the history of the Superfund: only 30% of the sites where construction is completed have been removed from the NPL, as the rest require long-term management. Thus, these two goals for which industry advocates are incompatible. If Responsible Parties want their sites to be delisted from the NPL, they must either pursue complete cleanup or accept the necessary continual oversight to ensure that toxic hazards are under control.

- The expansion of the Superfund Alternatives program, in which the responsible parties agree to cleanup a site and avoid being listed on the National Priority List, provides benefits to the polluter while hampering citizen participation that is provided for under the Superfund program. In particular, Technical Assistance Grants (when provided) are awarded by the responsible corporation rather than EPA, a neutral entity. The alternative approach came about primarily because responsible parties did not want their site added to the Superfund list because of the stigma it creates. Not only does this approach allow companies to avoid the perceived stigma associated with an NPL site, but it also allows companies to avoid listing an NPL site as a liability in its financial papers. This can have a significant impact, especially if the company is to be sold. This backroom cleanup alternative further raises our concern over decreased community involvement and the lack of sufficient EPA oversight.
- The directive on stakeholder relations gives no mention of the primary stakeholders under the Superfund program - the communities whose lives and well-being are continually threatened. These communities have the right to information and input on these decisions upon which their health and welfare hinges. Economic development, while important to community revitalization, can never supersede public health.
 - Community Involvement Plans (CIP) must be drafted, finalized, and implemented.
 - Community Advisory Committees (CAC) must include real community members who live and work around Superfund sites, not just local government representatives. Local

knowledge offers indispensable on-the-ground insight and perspective, and we strongly support all stakeholders at the discussion table early in the process.

- EPA transparency is critical to improving agency-stakeholder relations. Cleanup goals must be set in an explicit and interactive manner, beginning with the disclosure of all site information as soon as it is available.
- The health studies performed at Superfund sites are inadequate, often resulting in findings that are inconclusive and short-sighted. Exposure to environmental pollution must receive the same type of government response as infectious diseases or mass cases of food contamination, including a timely response. Objective, independent, thorough, long-term studies of residents' health conditions are crucial to determining appropriate cleanup strategies and monitoring response efficacy.
- We must reinstate the Polluter's Pay Tax if we are truly committed, as Administrator Scott Pruitt claims, to restoring Superfund cleanups "to their rightful place at the center of the agency's core mission."³ Most importantly, private investment and "alternative funding mechanisms" can't come close to compensating for the Superfund budget cuts and the high volume of abandoned sites.

¹<https://www.epa.gov/newsreleases/epa-announces-superfund-task-force>

²<https://newrepublic.com/article/142813/trumps-epa-set-break-major-promise>

³https://www.washingtonpost.com/news/energy-environment/wp/2017/05/11/epa-head-says-he-wants-to-prioritize-superfund-cleanups/?utm_term=.6a7ed4254adc

Signatures:

Advocates For Springfield, NY

Tara Aumner, Vice President
Springfield, NY

Alliance of Nurses for Healthy Environments

Peggy Berry
Mount Rainier, MD

Appalachian Sierra Club

Alexa Ross

Athens County Fracking Action Network

Roxanne Groff

Cease Fire Campaign

Laura Olah, Director

Center for a Competitive Waste Industry

Peter Anderson, Executive Director
Madison, WI

Center for Health, Environment & Justice

Lois Gibbs, Founder and "Mother of Superfund"

Center for Public Environmental Oversight

Lenny Siegel, Executive Director

Chesapeake Climate Action Network

Marjorie Wells
Takoma Park, MD

Chinese Staff & Workers' Association

Newtown Creek Superfund Site
Irene Shen
Brooklyn, NY

Citizens Against Rocky Flats Contamination

Greg Marsh, Exposure Scientist
Arvada, CO

Citizens Against Toxic Exposure

Escambia Treating Company Superfund Site
Francine Ishmael, Executive Director
Pensacola, FL

Citizens Coalition for a Safe Community

Paul V Ferrazzi, Executive Director
Los Angeles, CA

Citizens for Safe Water Around Badger

US Army Badger RCRA Site
Laura Olah, Executive Director
Baraboo, WI

Clean Water Action, New Jersey

Kim Gaddy, EJ Organizer

Clean Water for NC

Katie Hicks, Associate Director

Concerned Citizens for Nuclear Safety

Joni Arends, Executive Director
Santa Fe, NM

Concerned Citizens of Lake Township

Uniontown Industrial Excess Landfill Superfund Site
Chris Borello, President
Stark County, OH

Coshocton Environmental and Community Awareness

Nick Teti

Citizen Science Community Resources

Tonawanda Coke Inc. Superfund Site
Jackie James Creedon, Executive Director
Tonawanda, NY

Desert Citizens Against Pollution

Edwards Air Force Base Superfund Site
Jane Williams, Director
Edwards AFB, CA

Downwinders at Risk

Jim Schermbeck, Director
Dallas, TX

Edison Wetlands Association

Robert Spiegel, Executive Director
Edison, NJ

Environmental Stewards Consulting, Inc

Laura Williams, Executive Director
Richmond, VA

Equity for Children

Beatrice Mauger, Associate Director

Food & Water Watch

Gowanus Canal Superfund Site
Eric Weltman, New York Senior Organizer
Brooklyn, NY

Fort Ord Environmental Justice Network

Fort Ord Superfund Site
LeVonne Stone, Executive Director
Monterey, CA

Freshwater Future

Jill Ryan, Executive Director
Petoskey, MI

Friends United for a Safe Environment

Koppers Co. & Texarkana Wood Preserving Co
Superfund Site
James Presley, President
Texarkana, TX

Generation Now Network

Ochechi Joseph

**George Air Force Base Hazardous Toxic and
Radioactive Waste**

George Air Force Base Superfund Site
Frank Vera
Victorville, CA

**Georgia Research Environmental Economic
Network**

Hunter Army Airfield Superfund Site
Rev. Vernell Cutter
Hinesville, GA

Greater Birmingham Alliance to Stop Pollution

35th Avenue Superfund Site
Michael Hansen, Executive Director
Birmingham, AL

**Greenaction for Health and Environmental
Justice**

Hunters Point Naval Shipyard Superfund Site
Bradley Angel, Executive Director
San Francisco, CA

Greenpeace

Charlie Cray, Senior Research Specialist

HabitatMap

Michael Heimbinder, Executive Director
Brooklyn, NY

Hands Across the River Coalition, Inc.

New Bedford Harbor Superfund Site

Karen Vilandry

New Bedford, MA

Jesus People Against Pollution

**De-Listed Reichold Chemical Newsom
Brothers Superfund-Site**

Dr. Charlotte L. Keys, Executive Director

Columbia, AL

Kentucky Environmental Foundation

*Craig Williams, Chemical Weapons and
Fracking Program Director*

Louisville, KY

Late Bloomer Project

Melissa Leuthner

LEAD Agency, Inc.

Tar Creek Superfund Site

Rebecca Jim, Executive Director

Picher, OK

Lower East Side Organized Neighbors

Newtown Creek Superfund Site

Irene Shen

Brooklyn, NY

Maryland Environmental Health Network

Tamara Toles O'Laughlin, Executive Director

Baltimore, MD

Midwest Environmental Justice Organization

Maria Powell, President

Midwestern Ohio Occupational Health Nurses

Native Organizers Alliance

Judith LeBlanc, Director

Neighbors Allied for Good Growth

Newtown Creek Superfund Site

NuHart Plastics Superfund Site

Alan Minor, Board Member

Brooklyn, NY

Newtown Creek Alliance

Newtown Creek Superfund Site

Michael Heimbinder, Board Chairman

Brooklyn, NY

NYWaterProject

Michele Baker

Olympic Environmental Council

Darlene Schanfald, President

Oregon Physicians for Social Responsibility

Portland Harbor Superfund Site

Kelly Campbell

Portland, OR

Peaceful Skies Coalition

Carol Miller

Taos, NM

People for Safe Water

Tremont City Barrel Fill Superfund Site

Marilyn Welker, President

Tremont, Ohio

Philadelphia PSR

Walter Tsou, Executive Director

Philadelphia, PA

Port Townsend AirWatchers

Gretchen Brewer, Director

Port Townsend, WA

Protect All Children's Environment

CTS of Asheville Inc. Superfund Site
Elizabeth M.T. O'Nan, Director
Asheville, NC

Sellersville x 3

AMETEK U.S. Gauge / Radium Company of
America Superfund Site
Gregory Bulfaro
Sellersville, PA

Silver Valley Community Resource Center

Bunker Hill Superfund Site
Cass Davis, Paul Flory, Board Members
Kellogg, ID

San Jacinto River Coalition

San Jacinto River Waste Pits Superfund Site
Jackie Young, Executive Director
Highlands, TX

Save Our Sky Blue Waters

Lori Andresen
Duluth, MN

Sierra Club Northeast Florida

Jacksonville Superfund Site
Janet L. Stanko, Chair
Jacksonville, FL

Sierra Club Delta Chapter

William Fontenot, Vice Chair

STLMoms

West Lake Landfill Superfund Site
Pat Hanlon McHugh
Bridgeton, MO

Texas Campaign for the Environment

San Jacinto River Waste Pits Superfund Site
Robin Schneider, Executive Director
Highlands, TX

Texas Environmental Justice Advocacy Services

Yvette Arellano, Research and Policy Liaison

Texas Health & Environment Alliance, Inc

San Jacinto River Waste Pits Superfund Site
Jackie Young, Founder & Executive Director
Highlands, TX

Texas Low Income Housing Information Service

Josue Ramirez, Rio Grande Valley Co-director

The Carpe Diem Voice

Leslie Sheridan

Thunder Hill Park Alliance

Bob Moon, Founder
Columbia, MD

Toxics Action Center

Sylvia Broude, Executive Director

**Tri-Valley CAREs (Communities Against a
Radioactive Environment)**

Lawrence Livermore National Laboratory
Superfund Site
Marylia Kelley, Executive Director
Tracy, CA