



South Terminal Project Comments

Chuck Dade

to:

ElaineT Stanley

08/22/2012 01:51 AM

Hide Details

From: Chuck Dade <cdade@chuckdade.com>

To: ElaineT Stanley/R1/USEPA/US@EPA

To Whom it may concern;

Although I am aware of the many benefits that the South Terminal Project would bring to the area I can only support the project, if PCBs dredge material is removed from the harbor; NOT buried in CAD cells. It would be best to remove them off site out of New Bedford to a TSCA approved toxic waste site; though, temporary storage on shore locally would be better than permanent placement below the river bed.

With EPA as the overseeing authority (no matter how and who by it is implemented) they are the ones with the ethical and legal responsibility to ensure that this be carried out with regards to the public good and the public will. As such, no matter what limits any present record of decision may have, it is up to EPA to ensure and extend such that the end result makes those responsible (AVX et al) meet the full responsibility that they are truly up to and that true cleanup is COMPLETEable.

Beyond that, EPA as a public agency born to protect the environment for the public good must go further and take **all** of the steps necessary to **complete a remediation** not advance a cover up that just sweeps PCBs under the rug. Burying PCBs in the harbor would go against their mission. Hence, public funding by the federal government, through EPA, needs to be released or advanced so as to make sure that the project is able to be completed on time with the capability of **complete a remediation** still possible. Remediation through biological or other technologies will not be possible buried in a CAD cell.

What ever fiscal restraints may prevent the responsible parties from being able to make the funding possible in time "The United States of America" needs to step up and ensure that it cleans up this mess first and finally. They should provide advance funding to ensure that the nations greatest wind power endeavor is able to move forward on time without the leavings of old pollution as a hasteful by product.

--

I have been concerned with the environment for most of my life so I'm certainly behind enabling the advance of wind energy.

But we cannot forsake the proper remediation of the effluent (PCBs and more) of the errors in old purported advancements in technologies to hasten new purported advancements in technologies.

I would support the project for what it is trying to implement in terms of ocean commerce and offshore wind development but I can not support it as is.

To continue I think that there needs to be some adjustment on methodology of the cleanup and on how it is to be funded in order for it to be completed.

I have full expectations that this will be approved as-is despite any manner of protestations.

Having been to many EPA meetings I have seen how the EPA CAD cell program (in concert with Mass DEP) has metastasized and has continually grown to an increasing number of carcinogenic cells to be place permanently in the harbor despite decades of effort by the community to get them removed off site.

I have, also, seen how this was subtly slid in and forced through against public will and with minimal public knowledge, and how it was moved forward against the votes of local government (City Council). After seeing the dog and pony shows that they call public involvement (which failed to provide proper attention to effective outreach to a community historically deprived of environmental justice I have witnessed EPAs disrespect to the many requests for more Q& A time by the community leaders, as shown in their failing to accommodate those requests. In light of all of that it would be hard for me to have any other expectations but EPA MEPA et al to proceed without any regard for true democratic process..

In various presentations it was mentioned that certain archaeological considerations were pondered in the process. There was much ado about the remains of a shipwreck being discovered and how and what efforts the EPA was making to respect this archaeological find.

Ironically it's a very small piece of the bow of a boat they talked about. I didn't know whether to laugh or cry at the dark irony of this.

We oft forget that we are part of history and as such we yield anthropological artifacts ourselves. Burying PCBs in submarine vessels in areas of up to 6.8 acres where they can never be biologically remediated seems an extremely negative archaeological artifact for the future to discover later on. Certainly it will have a great deal to say about those who left it.

I find it ironic, paradoxical, even hypocritical to be asked to accept permanent contamination by PCBs to foster a green future.

At the meeting the EPA said they were not providing the funding.

The state said they are committed to the project but they don't know how they will come up with it yet.

The PCBs are AVX's responsibility and the EPA has authority to widen and enforce their funding the proper remediation.

Just as at the hearing the state made a committal to unknown funding for the South Terminal Project, the EPA should commit to removing PCBs to a TSCA site with the same resolve.

The government should step up through deficit spending if necessary and pay for the immediate

complete cleanup hauling it away and bill those responsible.

To say its not part of Superfund isn't written stone. It is EPA that hosted the meeting.

An new record of a new decision can and should be made that insures this is done right and not buried under a rug.

And there we were in another dog and pony show with the <1% billionaire and a host of supporting corporations trying to convince us to let it go as planned (burying the PCBs) and how they were going to save NB with jobs, jobs, jobs. All along the big wind energy deal he is trying to make was dependent on OUR public wind. As folklore has it that vampires have to be invited in. You heard the sales pitch and most of you fell for it.

I'm all for wind energy... but I'm not for the 99% getting the blood sucked out of them in the process. The Cape Wind project's projected price per kilowatt can be substantially reduced by a public power company.

The South Terminal Project was also with the full support of the Governor (through his agent that couldn't figure out how it was going to be funded but who was committed to it none the less).

This is NOT the first time Deval Patrick was involved with a big energy deal that hurt the public. This is the same Deval Patrick that was lead counsel of the Texaco-Chevron legal department while they sued Panasonic and Toyota to control a patent to stop the production of the E-95 nickel-metal hydride batteries that were used in powering the successful all electric RAV4-EVs setting electric car advancement back well over a decade in an age of global warming. In this age this technology should have been taken back by eminent domain. It was vital to the security of the country and the health of planet. But a government corrupted through lobbyists for fossil fuel, more respect for abstract persons than people and the taint of lucre in the election process keeps moving in an increasingly delusional manner.

This govenment needs to get it's priorities straight.

Wind power in public space should be a public project not sold off to 1%-ers in the same economic paradigm that brought us to the financial debacle we are in.

The South Coast, compariatively, is not rally asking for much when they still ask for a clean river.

For less than the cost of just one week of financing an endless war for oil in Afghanistan we can clean up the PCBs in the Acushnet river.

--

In no uncertain terms... I do NOT support the South Terminal Project as is and will not support it until the plan is changed such that the PCB dredge materiel is removed from the harbor.

Sincerely yours,

Chuck Dade