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Oregon Natural Desert Association

Via First Class Mail & Email to [kawabata.sylvia@epa.gov](mailto:kawabata.sylvia@epa.gov)

Ms. Sylvia Kawabata

Manager for Site Assessment Brownfields Unit

Office of Environmental Clean Up, ECL-076

1200 Sixth Avenue, Suite 900

Seattle, WA 98101

**Re: Alkali Lake Waste Dump**

Dear Ms. Kawabata:

I am a staff attorney with the Oregon Natural Desert Association (ONDA). I write to you on behalf of ONDA and its members that live in and around the Alkali Lake in Lake County, Oregon. On September 3, 2009, the Crag Law Center submitted comments on ONDA's behalf to the Oregon Department of Environmental Quality in opposition to the proposed consent decree between the DEQ and Bayer CropScience. I have enclosed a copy of these comments for your information.

ONDA is very concerned about the potential for the incredibly high levels of pollution at the site to harm both the environment and people that live, work and play in the area. On hot days in the summer, local citizens have reported actually smelling the pollution – which means that it is volatilizing into the air. The area is also known for frequent dust storms that have the potential to carry contaminants long distances and the science tells us that dioxin binds readily to dust. As a result, ONDA and its members and supporters that live in the area are very concerned about:

- The impact of the chemicals volatilizing into the air and being carried to nearby population centers.
- The potential impact on the ecology of the region, including snowy plovers, eagles, other migratory birds and the desert Tui Chub
- The lack of an adequate assessment of baseline hydrogeology in the area.
- The lack of adequate data regarding the extent of groundwater contamination including both horizontal and vertical migration.
- The lack of adequate data regarding soil contamination.
- The lack of adequate data regarding surface water and sediment contamination.
- The lack of adequate data regarding air contaminants.
- The potential release and exposure of the chemicals in the event of an extended drought or significant geologic activity.

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ONDA has also heard from many local citizens who share our concerns. Local citizens have repeatedly asked DEQ to conduct a thorough investigation of the site and to propose options that clean up the problem. ONDA has carefully reviewed the risk assessment that DEQ has prepared and submits that it is inadequate.

For these reasons, ONDA requests that the EPA require the DEQ to perform a thorough site evaluation of the nature and extent of the contamination at the site and the risk to both human and ecological receptors. Specifically, ONDA requests that EPA order both a fate and transport evaluation and a feasibility study for the clean up options.

Thank you for your attention to this important matter. Feel free to call me directly if I can answer any further questions.

Sincerely,



Mac Lacy