

SIERRA CLUB



Rocky Mountain Chapter
777 Grant Street Suite 606 Denver, Colorado 80203 303 • 861 • 8819

Ms. Carol Browner, Administrator
Environmental Protection Agency
Washington, DC 20460

September 15, 1993

Dear Administrator Browner,

We are writing you concerning national EPA policy on acceptable cancer risks in relation to Superfund hazardous waste sites.

According to current EPA policy, it is acceptable for one person in 2,000 to develop cancer while living on or by a Superfund site. This policy also states that remediation of the contaminated site *need not be undertaken if risk is less than 1 in 2,000*. While the Rocky Mountain Arsenal Subcommittee, Rocky Mountain Chapter of the Sierra Club, understands you inherited this policy from the Bush administration, (who creatively interpreted the requirements of the National Contingency Plan, 30 CFR 300), *we ask that EPA policy be revised to REFLECT those criteria as discussed in the Code of Federal Regulations. In other words, we are asking for the EPA to return to its stated regulatory policy.* The RMA Subcommittee believes that revision of the NCP should be consistent with the Clinton Administration's environmental agenda which includes concern for public health and safety.

This policy came to the Subcommittee's attention through our involvement on cleanup issues at the Rocky Mountain Arsenal located near Denver, CO. The U.S. Army has proposed a very limited cleanup of the extensive contamination that has migrated offpost from RMA. In addition, the Army has interpreted the cleanup policy to mean that **NONE** of the offpost soil, surface water or sediment contamination needs remediation **EVEN THOUGH** several affected families had to be bought out, moved or had their homes demolished. Still more families are being affected on a daily basis by this policy by using bottled water purchased by the State of Colorado. As our Subcommittee understands the proposed RMA cleanup process, the policy has been interpreted to allow for only a fraction of the extensive groundwater contamination occurring offpost to be cleaned. A similar scenario is proposed for onpost



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cleanup, currently home to many species of animals and an eventual wildlife refuge.

In summary, we ask you to order a revision of the current EPA national policy on the level of acceptable cancer risk on Superfund sites. It may also be of interest to your office to know the State of Colorado also objects to current EPA policy.

Thank you for your attention to this grave matter.

Sincerely,

Sandy Horrocks, Chair, RMA Subcommittee, Rocky Mt. Chapter, Sierra Club

RMA Subcommittee:

Dorothy Colagiovanni

Steve Farley

Susan Maret

Angela Medbery

cc:

Janet Reno, U.S. Attorney General

David Vandenberg, Environmental Protection Agency

Gov. Roy Romer, State of Colorado

Ross Vincent, Chairperson, Rocky Mountain Chapter, Sierra Club

Diane Benjamin, Incoming Chair, Rocky Mountain Chapter, Sierra Club

John Wade, Conservation Chair, Rocky Mountain Chapter, Sierra Club