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Capping harbor cost-effective

November 6, 2007

It is disappointing that Mary A. Gade, Region V Administrator for USEPA, has decided to continue a campaign of misinformation concerning Waukegan Harbor. We expect better of a former city resident and a public servant.

For an accurate and honest discussion of Waukegan Harbor we urge your readers to review the position paper posted on the city's Web site, www.waukeganweb.net. However, a number of errors and omissions in Gade's Oct. 30 letter require specific mention.

Gade states: "The federal government agreed to cover \$23.4 million of the estimated \$36 million cleanup cost." Gade decided not to mention that USEPA's cost estimate for the dredging project is now \$39 million (and \$44 million if the volume of dredged sediment increases by 20 percent, which we won't know until the dredging is completed). A dredging project the Army Corps of Engineers estimated would cost \$15 million in 2004 is now estimated to cost at least \$39 million. The city/local share will therefore be no less than \$14 million based on current estimates from the USEPA.

Gade states: "Nothing has been decided and there are no EPA documents advocating capping (the Harbor) as claimed (by the city)". The documentation demonstrating this is an outright misrepresentation of the facts will be found in the city's position paper. The truth of matter is that USEPA's own consultant conceded during a conference call on Sept. 4, 2007 that dredging will not achieve USEPA's cleanup objective for the harbor.

This fact was confirmed in the preliminary design USEPA provided to the city on Oct. 10, 2007. Such a large concentration of PCBs will remain after the harbor is "cleaned" (dredged) that USEPA's consultant has proposed placing a "cover layer" over portions of the harbor to "effectively reduce the residual PCB concentrations to the desired level...."

That layer, up to two feet thick, sounds a lot like a cap. What does all this mean to the taxpayers of the city? After spending \$14 million, the city will be left with a deep and dirty industrial harbor. What a bargain.

Gade states: "EPA is disappointed that Waukegan rejected an agreement that would have benefited the harbor, Lake Michigan and the local economy." Gade is evidently relying upon a discredited study paid for by USEPA that makes the ridiculous claim that dredging the harbor will increase property values in the "region" by \$800 million.

Gade does not explain how a deep industrial harbor will benefit Waukegan's economy. She does not explain why the city should spend \$14 million for the benefit of the few industries that remain on the lakefront. In sharp contrast to Gade's unsubstantiated hype, the position paper explains that the city's economic future is charted in "a master plan that will move the harbor from the 20th into a 21st century world economy."

Gade's focus should be a clean Harbor, not an industrial harbor. Gade should be an advocate for the environment, not harbor industry. Gade has ruled out placing an engineered cap over contaminated sediments not because a cap will not work, but because the cap will interfere with the large ships using the harbor. Gade has dismissed out of hand an alternative approach that Doug Scott, director of the Illinois Environmental Protection Agency, has described as an "accepted technological practice."

Gade also failed to mention that an engineered cap could be placed over the PCB contaminated sediments in the harbor for about half of the cost of the \$39 million dredging project. In March 2007, the city provided USEPA with a preliminary cost estimate of between \$10 and \$13 million to cap the sediments in the harbor.

Because the federal government would run the project, let's double this estimate to between \$20 and \$23 million. Even after inflating to federal government costs, an engineered cap would cost about half of the \$39 million dredging project. Why is Gade pushing a project that costs twice as much, may not work and conflicts with the city's lakefront redevelopment plan?

Gade's job is to focus the public on the best scientific solutions to environmental problems. Gade should be candid and tell the public that capping is a more reliable and cost-effective solution than dredging the harbor. Whether an engineered cap is a viable solution for the harbor is a scientific, not a political, question.

Let the public decide whether it makes sense to spend \$39 million-plus on a remedy that may not work or whether a more cost-effective and reliable alternative should be implemented. It is disappointing that Gade has decided to wade into politics and neglected her duty to provide the public with unbiased scientific information.

Gade's letter raises serious question about her impartiality and ability to solve this problem. It is time for our congressional delegation to cut through bureaucratic red tape and tell Gade to implement the most cost-effective, reliable and sensible remedy for Waukegan Harbor.

Richard Hyde is mayor of Waukegan. The letter also was signed by all the city's aldermen.

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