

November 24, 2008

Docket Coordinator, Headquarters
U.S. Environmental Protection Agency
CERCLA Docket Office (Mail Code 5305T)
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

FDMS Docket # EPA-HQ-SFUND-2008-0584

Attached are comments in support of the recommendation by the U.S. Environmental Protection Agency and Utah Department of Environmental Quality for adding the U.S. Magnesium site at Rowley, Utah into the National Priorities List.

These comments come from members of the public, environmental and conservation organizations who all share serious concern for the health of the Great Salt Lake Ecosystem in which we all live.

Comments are based on the expert reports referenced in the attachment and deal primarily with environmental contamination from chlorinated hydrocarbons at the site that are known to be highly toxic to wildlife and humans.

Thank you for this opportunity to support this very important effort.

Respectfully Submitted,

Lynn de Freitas, Executive Director, FRIENDS of Great Salt Lake

Bruce Heath, Executive Director, Great Salt Lake Audubon

Jason Kershaw, President, Lake Front Gun, Fur & Reclamation Club

Wayne Martinson, Important Bird Areas Coordinator, National Audubon Society

Don Paul, President AvianWest, Inc., and former avian biologist with the Utah Division of Wildlife Resources

Dr. Maunsel Pearce, Chair, Great Salt Lake Alliance, and member of The Utah Physicians for a Healthy Environment

Jack Ray, President, Utah Waterfowl Association

Bruce Waddell, duck hunter/duck club member, and former Environmental Contaminants Specialist ,US Fish and Wildlife Service

Richard West, President, Southshore Wetlands and Wildlife Management, Inc.

The League of Women Voters of Salt Lake

The League of Women Voters of Utah

LETTER SUPPORTING LISTING OF US MAGNESIUM FACILITY IN THE NATIONAL PRIORITIES LIST

FDMS Docket # EPA-HQ-SFUND-2008-0584

This letter supports the proposal by USEPA and Utah Department of Environmental Quality to list the US Magnesium site at Rowley, Utah on the National Priorities List (NPL). This conclusion is based on evidence cited below that major environmental contamination exists in the soil, waste water, sediment, and biota at the site and poses significant risk to wildlife and humans in the area.

The Expert Report of Beltman and Stackhouse (1) forms a basis for our decision to support listing in the NPL because of evidence for environmental contamination. The report is dated February 5, 2007 and titled “Environmental Endangerment at the US Magnesium Facility, Rowley, Utah. Review of this report documents that the facility location along the west side of Great Salt Lake provides significant exposure of resident, nesting, and migrating water birds and other wildlife to toxic levels of chlorinated hydrocarbons.

The report states that over 7000 birds representing 60 species were identified during one survey period in 2002 in the area of the facility. Birds were shown to be exposed to contaminated water and sediment in old and active waste ponds and connecting canals. Birds were frequently observed dipping their bills into contaminated water. High concentrations of chlorinated hydrocarbons (dioxins, PCBs, and hexachlorobenzene) were found in soil, sediment, plants, invertebrates, bird eggs, and mice. These contaminants are known to be toxic to wildlife, to bio-concentrate up the food chain and to persist in the environment for long periods of time. Eggs of American avocet, snowy plover, and horned lark showed elevated levels of all three chlorinated hydrocarbons.

The importance of Great Salt Lake to millions of water birds is well known. The lake has been designated as an important site in the Western Hemisphere Shorebird Network and contains a number of Important Bird Areas designated by National Audubon Society and

BirdLife International. As one example, the snowy plover has been listed as a species of “greatest conservation need” in the Utah Comprehensive Wildlife Conservation Strategy.

Human exposure to risky levels of dioxin and hexachlorobenzene were identified in another Expert Report by Dr Richard L. DeGrandchamp (2) dated 6 February, 2007. These substances are human carcinogens. Workers at the facility and their families are at risk.

Based on the above, there appears to be ample evidence in support of EPA and Utah Department of Environmental Quality’s decision to list the US Magnesium site at Rowley, Utah in the National Priorities List.

References (1) and (2) are found in complete form on the USEPA website:
www.epa.gov/region8/superfund/ut/usmagnesium.