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Harris County
Public Health
Building a Healthy Community

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September 1, 2016

Ron Curry
Regional Administrator
United States Environmental Protection (EPA) Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Removal of dioxins from San Jacinto Waste Pits, Harris County, Texas

Dear Mr. Curry:

Harris County Public Health (HCPH) is writing in reference to the ongoing concerns linked to the San Jacinto Waste Pits. HCPH believes the total removal of the dioxin waste from the San Jacinto Waste Pits is the only remedy that can effectively and permanently address the continual potential for threat to human health and the environment in Harris County.

As you know, it is known that the now abandoned San Jacinto Waste Pits contain high levels of various contaminants including the extremely toxic cancer-causing compound 2,3,7,8 –TCDD. Due to river subsidence, a large portion of the Waste Pits are permanently submerged and often the entire site is completely inundated with high river flow. The dioxin-filled waste has been the source of potential exposure to the nearby residential communities through the waters and sediments.

The temporary armored cap installed in 2011 was meant to be a short-term solution that has proven to be vulnerable to both natural and unknown causes. For example, in just five (5) years, EPA has located several deficiencies in the cap where either the geotextile membrane or the rock was missing. It is unknown exactly how and for how long this particular site became exposed to the water and sediments. In the short period since its implementation, the cap has eroded significantly and has required repeated repairs. HCPH is concerned that future cap deficiencies will continue to occur, further exposing the local community to dioxins through the water and sediments. HCPH along with other county partners does not believe the armored cap is suitable as a long-term solution as it has already been shown to be compromised several times.

Further, the San Jacinto Waste Pits are also located in an area frequented by a variety of severe weather events. While little has been previously done to model the effect of hurricanes, tropical storms or flooding on the Waste Pits, the temporary cap may not effectively withstand such severe weather events that are common to the area. Any remedy that leaves the dioxin in place puts at risk the health of local residents in the event of a natural disaster.

HCPH is the local public health agency for the Harris County, Texas jurisdiction. It provides a wide variety of public health activities and services aimed at improving the health and well-being of the Harris County community.

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In conclusion, HCPH in concert with other county partners strongly feels that the dioxin waste should be entirely removed, thereby eliminating the continued risk of human exposure. Please feel free to contact HCPH for further questions on this important matter. Mr. Michael Schaffer, Environmental Public Health (EPH) Director, remains the point of contact for HCPH and can be reached at mschaffer@hcphes.org or 713-274-6300.

Sincerely,



Umair A. Shah, M.D., M.P.H.
Executive Director

cc: Les Becker, M.B.A., Deputy Director, Director of Operations & Finance, HCPH
Michael Schaffer, M.B.A., Director, Environmental Public Health, HCPH
Bob Allen, Director, Pollution Control Services
Vince Ryan, J.D., Harris County Attorney, Harris County Attorney's Office
John R. Blount, P.E., Harris County Engineer, Public Infrastructure
Mike Talbott, P.E., Executive Director, Harris County Flood Control District, Public Infrastructure
Dave Walden, Chief of Staff, Harris County Commissioner Precinct 2

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