

Memorandum

January 3, 2019

Re: Proposed dumping of dredge material in Beach City from the Area of Concern of the San Jacinto River Waste Pits Superfund site.

## Memorandum

To: *The people of Beach City and surrounding watershed*

Re: *Proposed dumping of dredge material in Beach City from the Area of Concern of the San Jacinto River Waste Pits Superfund site. USACE Permit Application #SWG-2015-00855*

From: *Concerned citizens of Beach City and City Council*

Written by: *Holly Winters Colquitt, MPA Environmental Science and Policy, Columbia University, School of International and Public Affairs*

### Overview

The company HOLTMAR has applied for an Application of Permission through the Army Corps of Engineers to dump dredge material from within the Area of Concern of the San Jacinto River Waste Pits Superfund site on McCollum Park Drive near Barrow Ranch subdivision, directly bordering McCollum Park.

### San Jacinto River Waste Pits Superfund Site and Area of Concern

Superfund sites refer areas that are highly contaminated with toxic substances. Superfund sites are placed on the National Priorities List by the Environmental Protection Agency (EPA); this denotes the site as among the most polluted areas in the United States. The San Jacinto River Waste Pits (SJRWP) is contaminated with, among other things, high level of dioxins. Dioxins do not dissolve, instead they build up in the soil. Likewise, they are not processed by the organisms that consume them. They build up and accumulate in fish and shellfish, potentially exposing humans to this toxin.<sup>1</sup>

The threat dioxins present to human health is immense. Dioxins are known to cause reproductive problems, developmental problems in fetuses and children, damage human immune systems, and cause cancer. Over 90% of human exposure to dioxins comes from eating fish and shellfish living in contaminated areas.<sup>2</sup>

### Proposed Dumping in Beach City

HOLTMAR is planning to dredge the sediment in the Area of Concern bordering the SJRWP. This means that although this area is not considered part of the Superfund site, there is real and technical concern of contamination from the site that could pose a great threat to humans and the environment. The SJRWP does not exist in a vacuum and is not completely contained. As in all waterways, waste and pollution freely flow. This gives us great cause for concern that dredge material from the Area of Concern may likewise hold toxins and pollutants that could be highly damaging to human and environmental health.

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<sup>1</sup> Galveston Bay Foundation, *San Jacinto River Waste Pits – Technical Assistance Webpage*, <https://galvbay.org/how-we-protect-the-bay/taking-action/sjrwp/>

<sup>2</sup> World Health Organization, *Dioxins and their effects on human health*, 4 October 2016, <https://www.who.int/news-room/fact-sheets/detail/dioxins-and-their-effects-on-human-health>

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Furthermore, we cannot stand for the proposed spoil area. HOLTMAR proposes to deposit the dredge material on a 3 acre lot on McCullum Park Drive adjacent to the highly residential subdivision of Barrow Ranch. The spoil site would border a park on one side and a home on the other with Trinity Bay behind it. Currently the lot has tree coverage that likely to be deforested to hold the material. Depositing the material here will rise the average elevation of this 3 acre lot by approximately 6 feet up to 10 feet depending on the quantity dredged as the permit allows for over dredging.

### Concerns

There are several concerns. *First*, our greatest concern is that the dredge material will likely threaten the health of our citizens and the environment in which we live. There is a potential risk of rain, wind, etc. carrying the contaminated soil into the path of our citizens: next door to the park, to the neighboring homes, into Trinity Bay, and into our groundwater.

*Second* and related to the first, we are concerned that this dredge material will compromise the integrity of our water systems. Through our groundwater and the bay. Most of Beach City's citizens are on private wells. If toxins from the dredge material seep into our groundwater, then it could reach our wells and harm our citizens. We cannot allow this to happen. We cannot sacrifice our right to clean and safe water. Moreover, the spoil site is located near Trinity Bay. This material could very easily be blown or washed into the bay, resting in

the sediment in the water and accumulating in the fish and shellfish which many of us eat.

*Third*, the spoil site could place the surrounding homes in greater danger of flooding through its elevation. By raising the elevation of the site by 6 feet to 10 feet, the 3 acres will be much higher than its neighboring park and homes. Rain events may cause that area to drain water (and soil) away into the street, homes, and park where children play. Additionally, the spoil site is in close proximity to the bay putting it at potential risk of storm surge. Storm surge events could potentially inundate the dredge material.

### Conclusion and Next Steps

To conclude, dredge material from the Area of Concern of the SJRWP Superfund site being placed in Beach City potentially threatens human and environmental health by exposing our citizens to toxins, it risks our citizens' drinking water and the Trinity Bay, and it creates potential flood risks to the people of Barrow Ranch and McCollum Park.

Concerned citizens of Beach City and the City Council vow to fight to protect our city by doing everything in our power to prevent HOLTMAR from depositing the dredge material in our city. In the coming days, the Army Corps of Engineers will open for public comment. At this time, we must mobilize our citizens to sign our petition, join our letter writing campaign, and help us get the word out.

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*We are publicizing dates as we know them. To keep in touch please call the City at (281) 383 3180.*