

May 18, 2017

Administrator Scott Pruitt
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Administrator Pruitt:

We were heartened when, soon after assuming your office, you pledged continuing support for the nation's environmental cleanup programs, including Superfund. We ask you to demonstrate that support by lifting the deferral of the rule, "Addition of a Subsurface Intrusion Component to the Hazard Ranking System."

As you know, this rule, when it takes effect, will allow federal officials to consider subsurface intrusion, including vapor and liquid intrusion, when evaluating contaminated sites for addition to the Superfund National Priorities List (NPL). That rule was published in the January 9, 2017 Federal Register, but according to a notice in the March 20 Federal Register, its implementation has been deferred until May 22 at the earliest.

Subsurface intrusion is occurring at thousands of sites across the country. Hazardous volatile substances—substances known to cause cancer, birth defects, and other serious health problems—are migrating into our homes, workplaces, schools and daycare centers, recreational facilities, and places of worship. EPA has developed a robust program for addressing subsurface intrusion, and it is supporting the development of better science for the investigation, mitigation, and long-term management of subsurface intrusion.

At many sites, the subsurface intrusion response is proceeding effectively. Some of those sites are on the NPL for other reasons. Others are being overseen by state agencies or other EPA programs. But there are also significant unlisted sites where the resources and authorities of the Superfund program would strengthen and accelerate the environmental response.

EPA has been considering this rule for years. Its implementation will not create undue hardships for responsible parties. But it will heighten protection of our health, our families, and our property values while enabling the safe reuse of seriously contaminated property.

We urge you to lift the deferral and let EPA's professional career employees do their job.

Frank S. Anastasi, Principal, SCA Associates, Rockville Maryland

Herb Bernstein, Amherst, Massachusetts

William Berry, Restoration Advisory Board Member, Moffett Field, California

Chris Borello, President, CCLT/Uniontown IEL Superfund Site/Stark County
Concerned Citizens, Stark County, Ohio

Bob Bowcock, Erin Brockovich Foundation

Erin Brockovich, Environment and Consumer Advocate

Phil Brown, Director, Social Science Environmental Health Research Institute,
Northeastern University

Tracy Carluccio, Deputy Director, Delaware Riverkeeper Network, Bristol,
Pennsylvania

J.R. Capasso, Brownfields Coordinator, City of Trenton, New Jersey

Michael Collins, Publisher/Reporter, EnviroReporter.com, Santa Monica,
California

Ruth A. Cook, Carrollton, Texas

Joan Davidson, South Bay Open Space Task Force, Sierra Club, Palos Verdes,
California

Alayna Davis, Co-Founder, Testing for Pease, Portsmouth, New Hampshire

Ken Deschere, Webmaster, Ithaca-SHIP.org, Ithaca, New York

Edward J. Dlugosz, President, New Jersey Friends of Clearwater, Red Bank,
New Jersey

Gabriel Dunsmith, POWER Action Group, Asheville, North Carolina

Lisa Evans, Senior Administrative Counsel, Earthjustice, Marblehead,
Massachusetts

Nancy Foster, Hopewell Junction, New York

Joe Gardella, Distinguished Professor and John and Frances Larkin Professor of
Chemistry University at Buffalo, SUNY, New York

Debra Hall, Hopewell Junction, New York

Mandy Hawes, San Jose, California

Diane Henshel, Indiana University, Bloomington, Indiana

Jane Horton, Mountain View, California

ISIS Institute for Sciences, Amherst, Massachusetts

William Jhun, Tuckahoe, New York

Barry Kissin, Restoration Advisory Board member, Fort Detrick, Frederick,
Maryland

Marilyn Koenitzer, Corvallis, Oregon

Rudy La Marr, Co-Convener, Environmental Justice Collaborative, Orange
County, New York

Stephen Lester, Science Director, Center for Health, Environment & Justice, a Project of People's Action Institute, Falls Church, Virginia

Tim Lopez, President, Voluntary Cleanup Advisory Board, Denver, Colorado

Mindi Messmer, New Hampshire House of Representatives

Carol Miller, President, Peaceful Skies Coalition

Bob Moss, Board Member, Barron Park Association Foundation, Palo Alto, California

Kurt Muller, Hopewell Junction, New York

Robert D. "Dan" O'Brien, Fort Ord Citizens Advisory Group

Laura Olah, Executive Director, Citizens for Safe Water Around Badger, Merrimac, Wisconsin

Maria Powell, President, Midwest Environmental Justice Organization, Madison, Wisconsin

Lisa J. Riggiola, Executive Director, Citizens For A Clean Pompton Lakes, Pompton Lakes, New Jersey

Robert Spiegel, Executive Director, Edison Wetlands Association, Edison, New Jersey

Peter Strauss, PM Strauss & Associates, San Francisco, California

Eric Sunada, Executive Director, San Gabriel Valley Oversight Group, Alhambra, California

Andria Ventura, Toxics Program Manager, Clean Water Action

Frank Vera, www.GeorgeAFB.Info, Jamestown, California

Paul F. Walker, Director, Environmental Security and Sustainability, Green Cross International, Washington, District of Columbia

Alicia Weissman, Family Physician, Goshen, New York

Craig Williams, Chemical Weapons Working Group, Berea, Kentucky