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February 12, 2026

Mark Sanborn, Regional Administrator
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Request for Immediate Re-evaluation of the Plymouth Harbor/Cannon Engineering Corp.
Superfund Site

Dear Regional Administrator Sanborn,

I am writing to amplify the concerns of my constituents in Plymouth, Massachusetts, regarding the environmental integrity and protective remedy of the Cannon Engineering Corp. (CEC) Superfund site. While this site was removed from the National Priorities List (NPL) in 1993, a major high-density residential development consisting of 165 units has been proposed on the immediately adjacent parcel (the former L. Knife facility).

There is significant community concern that the proximity of this development may jeopardize the containment of residual hazardous waste, creating new and unexamined risks to human health.

The introduction of high-density housing fundamentally alters the underlying exposure assumptions the EPA established during the initial cleanup. For decades, the Cannon site and surrounding properties were designated for commercial and industrial use, which assumes a limited presence of onsite workers and no permanent residents. The EPA's final Record of Decision (ROD) and subsequent deletions were predicated on these land-use restrictions.

As you are aware, the presence of a residential population, particularly one that may seek harbor access via the designated property, introduces an exposure pathway that was never fully accounted for in the original risk assessment. Given these material changes in land use, I urge the EPA to take the following immediate actions:

1. **Structural Integrity Inspection:** Conduct an immediate inspection to evaluate the current integrity of the existing cap. It is vital to ensure that the remedy remains protective against both recent environmental stressors (including sea-level rise and storm surges) and current adjacent site activity.
2. **Updated Risk Assessment:** Perform a formal re-evaluation of the site's risk profile in light of the proposed 165-unit condominium development. The EPA must determine if increased human activity, including potential trespassing or incidental contact by residents, requires more stringent controls or further remediation.
3. **Formal Opinion on Construction Impacts:** Issue an advisory to the Town of Plymouth regarding the risks of construction-related vibrations and dewatering. EPA must ensure that the heavy machinery and groundwater management required for a six-story residential project do not compromise the stability of the cap or the containment of hazardous substances.
4. **Property Security:** The Cannon property is inadequately fenced and walkers, hikers and bikers have unimpeded access. EPA should explore the feasibility of restoring fencing to minimize the disturbance of the former Superfund site.
5. **Public Community Meeting:** Organize a public forum in Plymouth to clarify the EPA's ongoing oversight. Residents deserve a transparent explanation of the EPA's role in the permitting process for abutting properties and a Q&A session to address public health concerns.

The EPA has a continued responsibility to ensure its past investments in remediation remain protective of the public. I look forward to your prompt response and a plan of action that ensures the safety of both current and future residents of Plymouth.

Sincerely,

A handwritten signature in blue ink, reading "William R. Keating". The signature is fluid and cursive, with the first name "William" being the most prominent part.

William R. Keating
Member of Congress