February 3, 2010 Upper Basin PFT Subcommittee Meeting

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The objectives of this meeting were to:

- Provide most recent EPA thinking on changes to the Proposed Plan/ROD Amendment
- Discuss adaptive management and implementation planning in context of changes to Proposed Plan and site characterization effort
- Discuss the various categories for sites, definitions for categories and criteria to be used to place sites in categories or move sites between categories
- Discuss specific sites and circumstances that will help inform the development of categories for the active facilities and sites where remediation has been performed
- Develop a list of action items and follow-up for the next meeting

UPDATE ON CURRENT THINKING ON CHANGES TO THE PROPOSED PLAN/ROD AMENDMENT

Comment Response Summary Document: Anne Dailey/EPA reported that the process to get all the public comments provided on the Proposed Plan scanned and entered into an electronic comment tracking system is continuing, but near completion. EPA received more than 6000 comments from about a 1000 commenters. Currently EPA is evaluating the comments to determine what changes may be appropriate to make to the cleanup plan. EPA will prepare comment responses to each comment. The Response to Comments will be issued to the public at the same time as the ROD Amendment. We anticipate these documents will be completed sometime in 2011.

Potential Changes to the Proposed Plan and ROD Amendment Approach: Bill Adams/EPA updated the PFT group on what approaches are being considered to developing the ROD Amendment in light of the public comments received. Bill emphasized that no decisions have been made and that EPA is evaluating many options, such as revising the remedial action for lining the SFCDR and groundwater collection in the Osburn area(discussion item below), as well as potentially structuring the Proposed Plan actions into sub-categories of priority and contingency actions (also discussed below). At this time, EPA has not set a definitive date for when the ROD Amendment would be issued, however, it could be issued sometime this fall 2011.

RECENT TECHNICAL EVALUATION OF OSBURN AREA IN CONTEXT OF CHANGES TO THE SOUTH FORK APPROACH

Jim Stefanoff/CH2M HILL summarized a recent analysis that was conducted to evaluate a more cost effective and/or phased approach to the planned action along the South Fork of the Coeur d'Alene River (SFCDR) between the towns of Wallace and Elizabeth Park. For this stretch of the SFCDR, the Proposed Plan included a river liner/groundwater collection drain of approximately 50,000 feet in length and removal of about 1 million cubic yards of contaminated flood plain sediments. As part of consideration of public comments, this component of the cleanup is being re-evaluated. One option under consideration is to scale back the collection of groundwater along the SFCDR and focus collection in the vicinity of the town of Osburn with a 4,600 foot long drain. Currently it is assumed that removal of the 1 million cubic yards of contaminated flood plain sediments would still be conducted, primarily to address human health concerns by reducing the transport of lead-contaminated sediment downstream. Plan view figures were shown (attached to these meeting minutes) that summarized groundwater dissolved zinc concentrations in the vicinity of Osburn and the locations of the longer and shorter lengths of collector drains being evaluated. Tables were also shown that compared cost and effectiveness of the two different approaches (also attached). The analysis indicated that the shorter collector drain (without the liner) would remove approximately 50 to 75 lbs/day of zinc whereas the longer drain/liner system has been estimated to remove 75 to 100 lbs/day of zinc. From a feasibility level cost perspective, the shorter drain is estimated at $21.4M (30-year net-present value including O&M); the feasibility level cost of the longer drain/liner system that is included in the Proposed Plan is $342.2M 30-year NPV. Based on the analyses conducted, it appears that the shorter drain remedial action approach is about 12 times more cost effective that the longer drain/liner system.

DISCUSSION ON ADAPTIVE MANAGEMENT AND IMPLEMENTATION PLANNING IN CONTEXT OF SITE CHARACTERIZATION

As an outcome of the December 7, 2010 PFT meeting, it was agreed to develop categories for the mine and mill sites included in the Proposed Plan that would reflect the site's particular risk, implementation priority, and/or management approach. The purpose of grouping the sites into subcategories would be to: guide responses to the comments received on the Proposed Plan; provide a means in the ROD Amendment to more clearly and explicitly describe the subset of high priority sites, their subsequent cost, and timeframe of implementation; describe more clearly how active facilities will be addressed in the CERCLA process; describe phased goals and interim benchmarks to address concerns with the long implementation time frame; and more clearly identify the subset of sites where further site investigation is necessary.

The preliminary categories discussed in the December 7 PFT meeting as having merit included:

<u>Priority Actions</u>

- Known sites that are well documented as high risk to human health and the environment and are generally in the focus areas of Nine Mile and Canyon Creeks and the Box (Priority Actions)
- Sites where existing information indicates a risk, but that additional data is needed to optimize selection of a cleanup option or remedial action approach (Priority Actions)

- Sites where additional information is needed to further characterize the level of risks to human health and the environment and determine the most appropriate type of action and the priority of that action

Contingent Actions

- Actively managed facilities
- Sites where some remediation has previously been conducted, but insufficient data exist to determine if the action is complete and functioning in accordance to its remedial action objectives.

It was also agreed at the December 7, 2010 PFT meeting that a subcommittee of the PFT members would continue to hone the definition/criteria of each group, and collaboratively work to place sites within each group.

One of the purposes of this February 3, 2011 PFT meeting was to discuss potential definitions/criteria/sites that would align with the "Contingent Actions" category --- "Active Facilities" and "Sites with Prior Remediation".

Summary of Discussions

Steve Hicks/CH2M HILL showed a flow chart of how the adaptive management process would be used to evaluate and align sites into the various categories and also distributed spreadsheets that summarized, on a watershed basis, the sites contained within each watershed and pertinent site-specific data that could be considered to align the site within a specific category. (Spreadsheets attached with these meeting minutes).

The spreadsheets included a preliminary "straw man" designation for sites which could be designated as Active Facilities and Sites with Prior Remediation (see color coding on the spreadsheets). The PFT group also discussed potential definitions/criteria for the 2 categories resulting in the following draft definitions:

Active Facilities: "the site owner is actively managing the risk of a release, or potential release, of a hazardous substance through mechanisms outside of CERCLA that enforce compliance for protection of human health and the environment." Examples of mechanism outside of CERCLA included the Bunker Hill Coeur d'Alene Basin ICP (Institutional Controls Program), an NPDES permit, an Operating Plan, a Stormwater Management Plan, etc."

Sites with Prior Remediation: could be prior CERCLA action (or partial action) or some other documented cleanup. It was suggested by a PFT member that for this category, the ROD Amendment could specifically define that if a property is listed in the ROD Amendment and a residential yard cleanup has already occurred on that site, that EPA's intent is not to re-remediate the cleaned up yard, but would address other site risks that may be on the property and may remediate those risks.

The PFT members then talked through each watershed and each site initially designated as either a potential Active Facility or site where prior remediation has occurred. PFT member feedback and additional site-specific information was recorded on the watershed tracking spreadsheets. The PFT feedback is shown on the spreadsheets appended to these meeting minutes.

Next Steps: EPA will schedule a meeting for potentially mid-March to continue discussions about how sites could be categorized, with a focus on the "Priority Actions" category.