



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 24, 2001

Reply To
Attn Of: ECL-113

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Coeur d'Alene Basin Superfund Site

FROM: Michael Gearheard, Director
Office of Environmental Cleanup
EPA Region 10

Ann Williams
for/

TO: Robin M. Anderson, Acting Chair
National Remedy Review Board

This memorandum serves as our interim response to the Chair's letter dated September 13, 2001, in which the advisory recommendations of the National Remedy Review Board, concerning the Coeur d'Alene Basin proposed remedial action, were provided. We thank the Board for its insightful reviews at the August 8, 2001 meeting. As was the case in the prior six Region 10 site reviews before the Board, we appreciate the feedback. Although we are not yet ready to provide our final response, I want to take this occasion to initially respond to a couple of the Board's recommendations prior to the start of our public comment period. Rather than respond individually to each of the Board's nine recommendations, I will describe our general response on the specific recommendations to limit the scope of our ecological remedy to an interim action for the first increment of work, thus allowing us to evaluate the effectiveness of our remedial actions and target future Records of Decision (ROD) on actions that show the greatest promise. Our response on the other recommendations will be provided after the close of the Proposed Plan public comment period.

Both the Board's recommendations and this interim response will become part of the Administrative Record and be available to the public as they consider our proposed alternatives for addressing basin-wide contamination issues. As the Board is aware, we have extensively involved affected Stakeholders and the public as we developed the remedial investigation, feasibility study and human health and ecological risk assessments, and set our priorities for this interim action. We hope that our public comment period will help us to further prioritize the necessary work and management approach for the Basin. Because we are very sensitive to the public's input in charting our path forward, we will not be able to fully judge the impacts of the Board's recommendations until after our receipt and evaluation of all comments. However, we

can now say that the Board's comments reinforced our determination to complete the ecological portion of the remedial action incrementally and utilize an "adaptive management" approach, whereby we will maximize the effectiveness of our limited resources in cleaning up the Basin. This approach will allow us to reassess which technologies are most appropriate and what results we should expect as we proceed to future phases of the ecological remedy. Based on the results of the feasibility study, Alternative 3 is the best balance of tradeoffs when comparing against the CERCLA criteria for a comprehensive remedy, and we are proposing to implement Alternative 3 incrementally. Our comprehensive evaluation of remediation alternatives for the Basin serves as a general framework for how we could remediate the Basin to meet CERCLA goals and objectives and, as a framework, insures that this interim remedial action is consistent with the long-term Basin-wide cleanup approach. Our adaptive management approach will allow us to gain practical experience when we implement this first interim remedial action before proceeding to additional phases of work, probably through future interim action RODs.

An excerpt of the Board's comment is as follows:

"...Since this first phase of the basin-wide ecological cleanup is expected to address only a portion of the basin-wide risk, the region should consider this an Interim Action decision. A better understanding of the additional work needed to address residual ecological risks in the basin will result from monitoring the success of this first phase of cleanup. The board also recommends that the decision documents explain how the proposed interim actions relate to the long-term, basin-wide goals for ecological protection, and the extent of risk reduction expected to be attained by this first phase of work."

We agree with this recommendation and will propose to only proceed with the first increment of Alternative 3 as an interim action, to address ecological risks. The interim action will be fully described in the Proposed Plan. The Proposed Plan will also include: (1) an explanation of how the interim action is related to Alternative 3, which is envisioned, at this time, as what will ultimately be required to achieve long-term protectiveness and compliance with ARARs; (2) the rationale for identifying the priority actions from Alternative 3 proposed for the interim action; and (3) an evaluation of the proposed interim action against the balancing criteria as outlined in the NCP. Although we plan to include a discussion in the Proposed Plan that explains our long-term vision for Basin-wide remediation, our proposal limits this interim action decision-process to this first increment. We will also include in the Proposed Plan a figure delineating the expected risk reduction for the interim action compared to the overall effort required in the long-term. The interim action is a necessary component of what is required to fully address basin-wide ecological concerns. This interim action is consistent with what we

proposed before the Board in terms of decreasing the threat to migratory birds, reducing contamination levels in selected tributary stretches to provide habitable waters for native fish and reducing the continuing downstream metals loading in the Basin. We will also provide tangible and well-defined cleanup goals, in the Proposed Plan, to allow the public to see what we expect to achieve with our proposed remedial action.

Another issue addressed by the Board concerns the suggestion that we provide additional detail on the technologies that were considered for each area which will be addressed in the first phase.

"... The board recommends that the region more fully detail the options considered for each area of the site to be addressed in the first phase, the estimated costs of such actions, and the decision making process that would be used to match source control technologies with site conditions during implementation of the remedy. This information should be assembled into distinct alternatives that address "first phase RAOs" which could then be more easily evaluated against the NCP's nine criteria. This more detailed information should be included in the decision documents for the site."

As we discussed at the Seattle meeting, we performed a Basin-wide comprehensive ecological risk assessment for the Coeur d'Alene Superfund Site. During this meeting, we provided the Board with source-specific cost and technology alternatives for selected watershed segments, e.g., Ninemile Creek. These source-specific actions add to higher levels of organization, i.e., segment, watershed, Conceptual Site Model and Basin. The remedial technologies as they apply to specific sources and contaminant types are addressed for each alternative and documented in the Basin-wide feasibility study. As recommended by the Board, the proposed sources included in this interim action are currently being identified and will be documented in the administrative record, Proposed Plan and Record of Decision. Relating the interim action to the 'bigger picture,' helps insure that we do not lose sight of the ecological remedial action objectives for the Basin while we establish necessary interim benchmarks for this first increment of work. These benchmarks are the remedial action objectives and remediation goals for this interim action. The interim action will start the remedial process, and help verify and adapt our decision logic during subsequent phases of the remediation of this 166-river mile long site.

As stated previously, this and other Board recommendations will be further responded to after we have factored in public comments and can better describe in detail our path forward.

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