UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 24 1997

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the Montrose and Del Amo Superfund Sites

FROM: Bruce K. Means, Chair
National Remedy Review Board

TO: Keith Takata, Director
Superfund Division
EPA Region 9

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Montrose and Del Amo Superfund sites near Los Angeles, California. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost (and thus potentially controversial) proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds $30 million, or (2) the preferred alternative costs more than $10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the site package for the Montrose and Del Amo Superfund sites and discussed related issues with EPA Remedial Project Manager Jeff Dhont and California Department of Toxic Substances Control representative Peter Garcia on April 22-23, 1997.

Based on this review and discussion, the NRRB supports the Region's preferred alternative, which includes early and long term performance objectives for groundwater restoration. The Board is aware that the Region's preferred alternative may trigger additional and costly supplemental treatment alternatives to address a potential State ARAR for para-chlorobenzene sulfonic acid (p-CBSA) reinjection. However, the Board believes that a careful design and phased implementation of the alternative can control potential costs associated with meeting this potential ARAR.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of California for their participation in the review process. In particular, the Board would like to thank Jeff Dohnt for his clear, thorough presentation and well organized review materials. We encourage Region 9 management and staff to work with their Regional NRRB representative and the Region 1/9 Accelerated Response Center at Headquarters to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
T. Fields
B. Breen
E. Cotsworth
M. Newton