



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 15 1997

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on Operable Unit 2
of the Former Nebraska Ordnance Plant Site

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

TO: Michael J. Sanderson, Director
Superfund Division
EPA Region 7

Purpose

The National Remedy Review Board (NRRB) has completed its review of the selected remedial action at Operable Unit 2 for the former Nebraska Ordnance Plant site in Mead, Nebraska. 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 Nebraska Ordnance Superfund site and discussed related issues with EPA Remedial Project Manager Craig Bernstein and State of Nebraska Remedial Project Manager Troy Bredenkamp on July 29, 1997. Based on this review and discussion, the NRRB supports the Region's selected remedial action for this operable unit.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the selected remedy at this site. The Board members also express their appreciation to both the Region and the State of Nebraska for their participation in the review process.

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
J. Woolford
P. Nadeau