



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

OCT 26 1998

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Palos Verdes Shelf

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 removal action for the Palos Verdes Shelf. 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 response 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 proposed response actions. The board will review all proposed cleanup actions that exceed its established cost based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 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, and any other relevant factors.

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Generally, the NRRB makes "advisory recommendations" to the appropriate regional decision maker before the region issues the proposed response action for public comment. 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 response 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 informational package for the Palos Verdes Shelf and discussed related issues with EPA site manager Fred Schauffler on September 22, 1998. This was the first NRRB review of a proposed non-time critical removal action, pursuant to NRRB procedures adopted in October 1997. Based on this review and discussion, the NRRB offers the following comments.

- The board supports the region's efforts to address the contaminated sediments because of the DDT and PCB contamination levels at the Palos Verdes Shelf. The board also agrees with the removal approach proposed by the region, given the site-specific circumstances and the potential availability of clean sediments for capping from nearby navigational dredging projects.
- For this proposed action, the region seeks to prevent or reduce exposure to contaminants and prevent contaminant migration by constructing a cap over portions of the contaminated areas. The information presented to the board did not delineate the areas to be capped in terms of a risk reduction goal (e.g., DDT flux reduction in areas of high biological activity). The board recommends that the region more clearly explain how capping selected areas achieves risk reduction goals. The region should use this information to delineate the areal extent of the cap and to support the discussion on the cost effectiveness of this proposed action.
- The board recognizes the technical difficulties and uncertainties involving the effectiveness of sediment capping at great depths. However, the region has indicated that, in addition to modeling results demonstrating the likely effectiveness of capping, it has site-specific sediment characteristic analyses that suggest capping will be effective. The board recommends that the region summarize this information in the EE/CA supporting the decision.
- The board understands that the region's overall strategy for the site includes capping the contaminated sediments as an initial response action to reduce the exposure and risks associated with the sediments. The board further understands that the region would evaluate the effectiveness of the proposed capping action in achieving these risk reduction goals and, based on this evaluation, determine the need for further action. To perform this evaluation, the board recommends that the region identify in the EE/CA the performance criteria it would use to evaluate the cap effectiveness over time.

The NRRB appreciates the region's efforts to work closely with the state and community at this site. The board members also express their appreciation to the region for its participation

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in the review process. 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
J. Woolford
C. Hooks
E. Cotsworth
OERR Center Directors

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