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

Dec. 9, 2004

MEMORANDUM

SUBJECT: CSTAG Updated Recommendations on the Kalamazoo River Contaminated Sediment Superfund Site

FROM: Stephen J. Ells ***/s/ Stephen J. Ells***
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Contaminated Sediments Technical Advisory Group (CSTAG)

TO: Shari Kolak, Site Project Manager
Region 5

Background

OSWER Directive 9285.6-08, *Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites* (Feb. 12, 2002), established the CSTAG as a technical advisory group to "monitor the progress of and provide advice regarding a small number of large, complex, or controversial contaminated sediment Superfund sites." The main purpose of the CSTAG is to help Regional site project managers appropriately manage their sites throughout the Superfund process in accordance with the 11 risk management principles set forth in the OSWER Directive. The Directive also stated that the CSTAG should provide annual follow-up on these sites until the ROD is signed and then periodically thereafter until all the remedial action objectives have been met.

On October 12, 2004, the CSTAG met in Fairhaven, MA and the site project manager provided us an update on the progress being made at the site. This meeting included a discussion of how the previous CSTAG recommendations were being addressed by the project manager.

CSTAG Updated Recommendations

Based upon the information provided to the CSTAG, we believe that most of our previous recommendations are being considered, and we anticipate that the site project manager will continue to address the 11 risk management principles throughout the rest of the remedy evaluation and selection process. We do, however, offer the following additional comments for consideration. The project manager should provide a short response to the CSTAG within 60 days. As with the initial recommendations, this memorandum, and the Regional response will be posted on the CSTAG web site.

Principle #1, Control Sources Early

- The groundwater contribution of PCBs to the river appears to be a continuing data gap for both landfills and floodplain deposits. Consider additional evaluations to determine if PCBs in groundwater are or will be a significant source to surface water.

Principle #2, Involve the Community Early and Often

- The CSTAG commends the site team for developing fact sheet and other notices and posting them on the Kalamazoo River Project web site and for conducting a public workshop on modeling. We encourage the team to continue this practice on other important issues that may arise.

Principle #3, Coordinate with States, Local Governments, Tribes, and natural Resource Trustees

- In light of reported funding constraints by the State and the long term nature of remedy decision-making at this site, the CSTAG encourages the Region to ensure that fish consumption advisories are as effective as possible by educating the public about the existing fish consumption advisories and by posting new fish consumption advisory signs that are easier to understand. To the extent possible, this should be done in coordination with the State.

Principle #6, Carefully Evaluate the Assumptions and Uncertainties Associated with Site Characterization Data and Site Models

- Currently, emphasis is being placed on collecting data for the fate and transport and bioaccumulation models. While this is important, data collection needs should not be limited to this, but should focus also on answering the most significant remaining questions concerning the conceptual site model as a whole. Other empirical data may be important for decision-making at the site that are not related to the models.
- The Region should clarify the questions that the models are being developed to answer and address how the uncertainty in the modeling results will be described, and to the extent possible, quantified.
- Since the fate and transport model being developed for the site is a modified version of the Agency's EFDC model, the CSTAG supports the Region's decision to have the newly developed or modified model components (e.g., new computer code) peer reviewed before deciding to use the model, in order to assess whether the new or modified components are operating as intended.
- In future update meetings, summaries of important data such as the major exposure parameters used in modeling, PCB and sediment loadings from floodplains and ungaged tributaries, the key uncertainties in the baseline data, and the human health and ecological risks should be presented and discussed as part of the briefing to the CSTAG.

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