



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

April 3, 2006

MEMORANDUM

SUBJECT: CSTAG Recommendations on the Montrose/Palos Verdes Shelf Contaminated Sediment Superfund Site

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

TO: Carmen White, Remedial Project Manager
Region 9

Background

OSWER Directive 9285.6-08, *Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites* (Feb. 12, 2002), established the Contaminated Sediments Technical Advisory Group (CSTAG) as a technical advisory group that will 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 of selected large, complex, or controversial sediment sites appropriately manage their sites throughout the Superfund process in accordance with the 11 risk management principles set forth in the OSWER Directive. CSTAG membership consists of one representative per Region, two from the Office of Research and Development, and two from the Office of Emergency and Remedial Response. The CSTAG was briefed by the site manager on February 15, 2006.

Based upon review of the new site information provided to us, the CSTAG offers the following recommendations in order to more fully address the 11 principles. The CSTAG expects that the remedial project manager will consider these recommendations as the investigations continue, as the conceptual site model is refined, and as remedial alternatives are developed and evaluated.

Recommendations

1. Given the complex hydrodynamics and potentially large scale of a remedial action at this site, CSTAG recommends that the site team consider a phased approach to the cleanup that uses adaptive management. For example, if capping is part of the selected remedy, it may be more cost-effective to obtain capping materials in smaller amounts over several years (especially if there is a possibility of beneficial use of clean materials from other dredging projects), rather than attempting to dredge a large volume for a one-time capping effort. Capping techniques could then be modified in subsequent years based on lessons learned in the previous years.
2. CSTAG supports the site team's decision to focus on evaluation of empirical data from field studies before deciding whether the use of complex three-dimensional hydrodynamic and sediment transport modeling is necessary because of the uncertainties associated with quantifying the driving forces for the highly variable barotropic, baroclinic and sub-tidal (meteorological) currents on the Palos Verdes shelf.
3. CSTAG recommends that the site team ensure that data quality (e.g., related to analytical variability, lipid analysis, contaminant measurement) is accurately reflected in any fish tissue contaminant trend analyses and that associated uncertainties are included when communicating trends to the public.
4. CSTAG recommends that the site team evaluate whether existing sediment PCB data are adequate to evaluate the potential effectiveness of the alternatives in the FS at reducing risk. Because more recent studies have focused on DDT, CSTAG is concerned that the PCB data collected several years ago may not be reflective of current conditions.
5. CSTAG recommends that the site team consider using ORD's Superfund Technical Support Center (STSC) to evaluate the toxicity of DDMU and its propensity to bioaccumulate. STSC can be reached by email at STSC.Superfund@epa.gov, or by phone at (513) 569-7300. Also see attached paper fyi.
6. Given the multitude of factors affecting biota recovery at this site, CSTAG recommends that the site team carefully consider the selection of Remedial Action Objectives for the site in order to ensure that they clearly state what is likely to be achievable based on actions at the site. It may also be useful to state what is not likely to be achievable based on actions at the site.
7. CSTAG recommends that when developing the Feasibility Study, the site team evaluate how the ongoing operation and maintenance of the sewer outfalls might affect cap effectiveness and long-term O&M costs. For example, CSTAG recommends that the site team evaluate whether possible limitations on capping the contaminated area near the diffusers might significantly reduce the risk-reduction potential of the capping alternative since it would continue to leave a significant amount of contamination available for biota

and/or whether those uncapped areas may lead to significant recontamination of capped areas.

8. CSTAG supports the Region's efforts to solicit expert review of the refined food web model used to make RAOs more technically sound.
9. CSTAG recommends that the site team consider how the long-term monitoring program will measure remedy effectiveness (*e.g.*, sessile organisms, sampling design), and whether additional data collection would be needed during remedial design to provide an adequate baseline data set for comparison to post-cleanup data.

Regional Response

Please send us a short written response to these recommendations within 60 days. If you have any questions or would like a clarification to any of these recommendations please call one of us (Steve 703-603-8822, Leah 703-603-9022).

cc: Keith Takata, Region 9
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