



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

May 1, 2006

MEMORANDUM

SUBJECT: CSTAG Recommendations on the Portland Harbor Contaminated Sediment Superfund Site

FROM: Stephen J. Ells /s/ **Stephen J. Ells**
Leah Evison /s/ **Leah Evison**
Co-Chairs, Contaminated Sediments Technical Advisory Group (CSTAG)

TO: Chip Humphrey, Remedial Project Manager
Eric Blischke, Remedial Project Manager
Region 10

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 Superfund Remediation and Technology Innovation (OSRTI). The CSTAG received an update from the site team on February 14, 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. The remedial project manager should send a short written response to these recommendations to the CSTAG co-chairs within 60 days.

Recommendations

1. In making a final decision on sampling to be included in Round 3, CSTAG recommends that the site team consider what additional information is necessary to make remedy decisions and focus on collecting these data. For example, the site team should clarify how the collection of transition zone groundwater, bivalve, or stomach contents data would affect site remedy decisions.
2. CSTAG recommends that the site team consider conducting a sensitivity analysis of the food web model by varying input values for the components of the model to get a better idea of whether additional data collection will substantially affect model predictions and impact the selection of remediation goals. For example, collection of zooplankton and/or phytoplankton data may not affect remediation goals or remedy decisions.
3. CSTAG recommends that the site team work to integrate upland and river data in order to refine the conceptual site model (CSM) and evaluate whether sources are adequately controlled.
4. Although CSTAG understands that the site boundary will be described in the Record of Decision, we recommend that, to the extent possible, the Round 3 sampling effort consider potential sources of contamination at the upper end of the study area to clarify site boundary issues. CSTAG warns against an overly-broad definition of the site, which may lessen the site team's ability to design an effective remedy. CSTAG notes that, while it is important to be aware of contaminant contributions from outside the site, other authorities rather than expansion of the site may, in some cases, be the best way to address the contamination.
5. CSTAG recommends that the site team consider how post-remedial monitoring will be conducted (e.g., what species and what scale) to measure remedy effectiveness, and whether the RI data collection effort will provide an adequate baseline data set for comparison to post-cleanup data. If not, additional data should be collected for this purpose in the design phase.
6. CSTAG recommends that as remedy alternatives are evaluated, the site team include consideration of Confined Disposal Facilities (CDFs) in their evaluation of disposal options, for example, potential use of the T4 or Ross Island locations as CDFs.

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: Daniel Opalski, Region 10
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