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

April 3, 2006

MEMORANDUM

SUBJECT: CSTAG Recommendations on the Lower Duwamish Waterway Contaminated Sediment Superfund Site

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

TO: Allison Hiltner, 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 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 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 was updated by the site manager on February 14, 2006.

Based upon the review of the new site information provided to us, the CSTAG offers the following recommendations in order that the remedial project manager can more fully address the 11 principles. The CSTAG expects that the RPM 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. CSTAG recommends that the site team ensure that source control efforts are adequately documented including documentation of post-removal monitoring for the early actions.
2. CSTAG supports the allocation of additional resources to the source control efforts.
3. CSTAG recommends that the RCRA project manager for the Boeing Plant 2 area prepare a memorandum to document how OSWER's Directive 9285.6-08, *Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites*, has been considered in management of that area.
4. CSTAG commends the site team's efforts in community outreach, but recommends that the site team consider hosting an additional public information session regarding residuals, resuspension, and contamination outside the project area that are common during sediment remediation, and that the session include descriptions of possible mitigation measures that may be employed.
5. CSTAG recommends that the site team evaluate the area south of the Jorgensen early action and its potential for recontaminating adjacent removal actions planned in the area. CSTAG recommends that, to the extent possible, the site team ensure that the early actions planned will be protective over the long-term in light of localized sediment transport (*i.e.*, areas of relatively high contamination outside of the removal area have the potential to recontaminate removal areas).
6. CSTAG recognizes that capping or thin layer placement may be necessary as part of the final remedy at this site and if so, CSTAG recommends that the site team consider use of uncontaminated dredged material from the Corps navigational dredging program as a potential material source.
7. CSTAG recommends that the site team consider using a toxicity identification evaluation (TIE) to determine whether phthalates are the source of the observed toxicity at the storm drains and combined sewer overflows (*e.g.*, Duwamish/Diagonal). We recommend consulting Kay Ho at ORD's National Health and Environmental Effects Lab in Narragansett regarding TIE.
8. CSTAG recommends that the site team consider the results from the ongoing foodchain model sensitivity study to decide what level of accuracy is required for the PCB fate and transport model currently being developed. CSTAG also recommends that the site team evaluate how uncertainty in the results of the PCB fate and transport modeling and food chain modeling affects remedy decisions.

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: Dan Opalski, Region 10
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