

JDB Site: Cherokee Co., KS
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 Break: 3.4 on #3/4
 Other: Comments
 Turn-Around Time (Response Needed By): 10-24-91

Item: Letter to EPA With Memo
 Date: October 24, 1991
 Subject: Minutes of 10/2/91 Mtg. on RAOs and Screening

FILE INFORMATION
 Job No.: 20239 010-019
 Date: _____
 Review Call Scheduled For: _____

0737



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 SUPERFUND RECORDS

DAMES & MOORE

- | | | |
|--|---|---|
| <input type="checkbox"/> Anderson, F. | <input type="checkbox"/> Janowski, B. | <input checked="" type="checkbox"/> Pigeon, P. |
| <input type="checkbox"/> Cavanaugh, J. | <input checked="" type="checkbox"/> Krieger, G. | <input type="checkbox"/> Polivka, B. |
| <input type="checkbox"/> Condran, M. | <input type="checkbox"/> Lamb, G. | <input checked="" type="checkbox"/> Quinlan, B. |
| <input type="checkbox"/> Crouse, M. | <input checked="" type="checkbox"/> Langley, L. (Files) | <input type="checkbox"/> Schmidt, M. |
| <input type="checkbox"/> Daniele, D. | <input type="checkbox"/> Larson, J. | <input type="checkbox"/> Sitler, K. |
| <input type="checkbox"/> Efseaff, D. (SAC) | <input type="checkbox"/> Lincicome, D. | <input type="checkbox"/> Strait, C. |
| <input type="checkbox"/> Greenslade, B. (PHX) | <input checked="" type="checkbox"/> Longwell, D. | <input checked="" type="checkbox"/> Warren, D. |
| <input type="checkbox"/> Hamilton, C. | <input type="checkbox"/> Lowe, J. (SAC) | <input type="checkbox"/> Yeates, B. |
| <input type="checkbox"/> Hasan, N. | <input type="checkbox"/> Marshall, B. | <input checked="" type="checkbox"/> Jackson, D. |
| <input type="checkbox"/> Hettinger, L. | <input type="checkbox"/> Moreno, J. | <input checked="" type="checkbox"/> Fischer, R. |
| <input checked="" type="checkbox"/> Hinrichs, D. | <input checked="" type="checkbox"/> Munter, F. | _____ |
| <input type="checkbox"/> Jaffe, J. | <input type="checkbox"/> Owen, L. | _____ |

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 OCT 28 1991
 REMD SECTION

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October 24, 1991

U.S. EPA
726 Minnesota Avenue
Kansas City, KS 66101

Attention: Mr. Steve Sanders
Remedial Program Manager

RE: Minutes of October 2, 1991 Meeting
Baxter Springs/Treece Subsites
RI/FS - Step II


Gentlemen:

On October 2, 1991, EPA, CH2M Hill, Dames & Moore, and the Baxter Springs/Treece Subsites Participating Group met to review the Task 4d Technical Memorandum: Remedial Action Objectives and Technology Screening. Transmitted herewith are the minutes of that meeting. Please call me with any additions or revisions to the minutes.

Also, if EPA has selected a date for issuance of written comments on the document, please call me with that information which will aid our planning for future interim deliverables.

Sincerely,

DAMES & MOORE


Paul E. Pigeon
Project Manager

PEP/lkl

cc: Richard Glanzman, CH2M Hill

Enclosure

DENVER OFFICE

MEMORANDUM

ACTION

INFO

TO: See Distribution Sheet

FILE: 20239-010-019

X-REF:

DATE: October 24, 1991

FROM: Paul Pigeon, Project Manager ^{PEP}

DATE REQUIRED BY:

SUBJECT: Minutes of Meeting on RAOs and Technology Screening, October 2, 1991

Meeting Participants:

U.S. EPA

Steve Sanders, EPA RPM
Dick Glanzman, CH2M Hill (EPA Contractor)

Baxter Springs/Treece Participating Group

Barry Sams, NL Industries
Mark Logsdon, ABC, Inc. (for AMAX)
Michael Peceny, Fluor Daniel
Gary Uphoff, EMS, Group Representative

Dames & Moore

Paul Pigeon
Dave Hinrichs

Paul Pigeon presented the major points of the draft remedial action objectives (RAOs) section of the Task 4d Technical Memorandum (submitted September 24, 1991).

- The memo provides revisions to the Step I FS document (dated September 18, 1990) based on site-specific Step II RI data collection and the baseline risk assessment.
- Considerable re-structuring has been presented in the RAOs section:
 - Surficial materials is a new media category encompassing mine/mill material accumulations and soils.
 - RAOs are now being proposed, as needed, to address "existing conditions," in which complete pathways to receptor population exposure are being identified in the RI and risk assessment, and to address "future potential conditions" in which receptor exposure could occur in the future if contact with the particular environmental media changes.
 - The concept of short-term versus long-term achievement of the RAOs, with long-term not necessarily being a definable point in the future, will be utilized where practical engineering controls with short, definite schedules for achieving clean-up do not appear available to reach the RAO.

- The "future potential" RAOs will be addressed primarily with no action or institutional control (IC) plans, which are likely to be judged fully protective of human health and the environment and cost-effective versus remedial plans involving engineering controls (ECs) and/or waste removal.
- RAOs for redeposited mine/mill materials have been deleted because the air quality modeling of vehicle-generated emissions is expected to indicate minimal excess risk and, as jointly decided by EPA and the Group during Step I, no additional consideration will be given to redeposited materials in the current FS process.
- No RAOs are proposed for the Roubidoux aquifer since no contamination pathways or exposures of receptor populations have been identified. Also, shallow perched zones of saturated Pennsylvanian Formation are not considered useable ground water, have no current users, and, thus, will have no RAO to protect potential users.
- The RAO addressing prevention of ground water releases to surface waters and associated surface-water quality impacts and ecological risks (page 5 of the Tech Memo) will only be applied within the subsites. Possible degradation of surface water quality outside the Baxter Springs/Treece subsites (e.g., Tar Creek in Oklahoma) will be considered when evaluating potential impacts of alternatives which are formulated to address the on-site RAO. However, an RAO has not been developed which would require remediation of existing off-site conditions.
- Pathways to aquatic and terrestrial biota are potentially considered complete relative to surface water and surficial materials media pending completion of the RI and ecological risk assessment work. Thus, related RAOs have been listed as addressing existing conditions in the Tech Memo.

EPA had the following oral comments on the RAOs section (with Group/Dames & Moore short responses in parenthesis):

- Arsenic should be added to the list of potential contaminants of concern (PCOCs) for the site, as arsenic concentrations greater than the primary drinking water standard of 0.05 mg/l have been detected in ground water in the subsites. (Dames & Moore thinks these detections have been in the Blue Mound Well on the Treece subsite, which is considered an upgradient well, in the shallow Boone aquifer. This will be checked.)
- Regarding the ground water RAO addressing existing conditions (page 5), EPA wants the RAO extended into Oklahoma indicating that ground water remedial actions in Kansas will not cause adverse impacts on surface waters in Oklahoma. EPA agreed that the RAO need not call for causing improvements in Oklahoma water quality via remedial actions on Kansas ground water. (Dames & Moore argued that non-degradation of water quality in Oklahoma is not an objective deserving of RAO status. All remedial alternatives must be reviewed to assure that they don't have negative off-site impacts; this will be accomplished in the detailed alternatives analysis.)
- Also, regarding ground-water RAOs, there was some discussion regarding the possible need for an RAO protecting the Roubidoux aquifer within the subsites. If needed, this would be a future potential RAO, as EPA acknowledges that the Roubidoux is not currently contaminated or threatened, based on what is now known. (Dames & Moore does not agree to setting an RAO for a resource that is not contaminated or threatened.) EPA felt that an institutional control approach might be appropriate.

- EPA/CH2M Hill will need to understand the concept of "hot spot areas" better before judging whether the RAOs for surficial materials are adequate. (Dames & Moore explained that "hot spot areas" refer to the worst case flotation tailings piles, TT-1 and TT-8, and the 95 percent UCL soils concentrations used in the baseline risk assessment analysis for surficial materials.)

Regarding Section 3.0, Technology Identification and Screening of the Memorandum, Dames & Moore described the reordering and renaming of some of the general response actions (GRAs) and associated technology categories which was conducted to conform with the revised RAOs and reduce redundancy in technology groupings. No details were provided on any of the technology screenings. Screening of the broad range of technologies in Tables 3-1, 3-2, and 3-3 of the memorandum will be documented in the FS, with detailed information presented in an appendix. EPA's only comment was that the lists of technologies considered look complete, thorough.

Regarding Section 4.0, Revisions to Site ARARs, Dames & Moore described the revision to chemical-specific ground-water ARARs necessitated by recent revisions to EPA drinking water standards. Particularly for lead, the primary MCL has been eliminated in favor of an "action level" which we are considering non-applicable; instead, we will use the State standard of 0.05 mg/l (the former MCL) as the ground-water ARAR. EPA says the Federal MCL still exists and agrees with the use of 0.05 mg/l as the ARAR, although some at EPA are saying the action level is relevant. Steve Sanders said the action level is 0.005 mg/l rather than 0.015 mg/l as stated in the memo.

Dames & Moore noted that an alternate list of surface water criteria will be prepared for protection of indigenous aquatic species at the subsites rather than using EPA's aquatic life criteria (ALC). This change would seem appropriate since there are fish populations in ponds with metals concentrations much higher than the ALCs. EPA had no immediate response to this.

Project Schedule

EPA/CH2M Hill said that providing substantive comments on the RAOs and baseline risk assessment documents was not possible without also having the draft RI for review of site conditions. The Group/Dames & Moore do not plan to release the RI to EPA until January 1992, the Work Plan date, because of all the additional data collection programs currently underway. EPA did agree to provide written comments on the Task 4d Tech Memo and Draft Baseline Risk Assessment documents with regard to the overall approach and format of the documents. No schedule was set for providing these comments.

PEP/lkl