

EPA Superfund Process – Removals and Remedial Options

This is a summary of information discussed during a conference call on 10/19/2005 between EPA Superfund Program and Great Lakes Program, and DNR Remediation and Redevelopment, and Water Programs regarding options for the **Estabrook Impoundment in Lincoln Park, Milwaukee County, Wisconsin.**

General information

Sites can be submitted to EPA Superfund for investigation and/or action by state and local governments as well as private citizens. EPA Superfund can choose to take a removal and/or remedial action if the site meets specific program criteria.

Sites considered for removal action must pose an “imminent and substantial endangerment” to public health, welfare or the environment, and have no other funding sources. Removal actions can be taken if an actual release or potential release to the environment occurs. Removal action sites may also be appropriate to move forward in the Superfund Process, through site assessment, Hazard Ranking System (HRS) scoring, proposal and listing on the National Priorities List, remedial study and decisions, and finally, allocation of federal monies for long-term cleanup work. The Superfund Remedial Branch is appropriate for long-term cleanup projects.

For more information, refer to the Remediation and Redevelopment publication “What is Superfund?” at <http://www.dnr.state.wi.us/org/aw/rr/archives/pubs/RR122.pdf> or EPA’s Superfund Division page at <http://www.epa.gov/region5/superfund/>.

Site Specific Application

For the Estabrook Impoundment PCB sediments, no responsible parties have been identified and the state environmental fund is not sufficient to take on a project of this magnitude. EPA’s Remedial program was allocated \$500 million nationwide for Federal Fiscal Year 2006. The estimated scope of this project is \$16 – 36 million. The estimated cost range is based on the cleanup levels of PCBs in sediment > 1.5 but < 50 ppm costing \$300/ cubic yard = \$6 million. For cleanup levels of > 50 ppm costing \$600/cubic yard, the estimate is \$36 million.

A big advantage of the Superfund process is that EPA is required to conduct a potentially responsible party (PRP) search. They have staff dedicated to this work whereas DNR does not. If PRPs are identified, EPA would give them the opportunity to conduct the remaining work under an administrative order or cost recover from the PRPs for past and future expenditures associated with the site.

Matt Mankowski of EPA’s Remedial Program believes this site may be appropriate for entrance into the Superfund Process to be listed on the National Priorities List for federal cleanup monies. A Quickscore would be needed to determine the sites ability to score for inclusion on the NPL.

- The Superfund Listing process can take 1-2 years, preparing the scoring package and documentation (with current data), proposal to the NPL, public comment and

final listing. Once the site is listed on the NPL, it is put in a nationwide queue for federal cleanup monies and is prioritized with other sites

- Early actions may be conducted at any point in the process by the Removals Program to remove “hot spot” sediments or take an interim action to respond to imminent threat issues, provided funding is available. However, removal of hot spots may also change the site conditions significantly so that the HRS score, needed to be eligible for federal monies, may be significantly lowered and may make the site ineligible.
- Once listed, there are specific requirements for remedial investigation/feasibility study, record of decision, final remedy selection, and remedial design once the site has been listed on the NPL. EPA or DNR may be the lead agency in this process. The other agency would be involved in reviewing and commenting on all documents and providing input into the process. It may take 2-3 years to get to the remedy selection.
- The remedial process requirements are found in the National Contingency Plan (NCP) and CERCLA process. Once the final remedy selection and monies are allocated, then the site cleanup begins. The remedial action could be spread out over 3 – 4 years, making a total of 10+ years to final site cleanup (not accounting for any unexpected delays).