FY2018 Superfund Division Operating Plan

September 14, 2017

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The Superfund Division's primary goals are 1) clean up contaminated sites, protecting human health and ecosystems, restoring these sites to their full potential, and 2) prevent, plan for, and respond to releases. From high profile NPL cleanups and seasonal natural disaster responses to everyday community involvement and planned risk management inspections, our staff are working to prevent contamination, clean up hazardous waste, and prepare and respond to emergencies. Described briefly below are our planned accomplishments in five sub-objectives, taken from the 2018-2022 EPA Strategic Plan Framework:

I. Revitalize Land and Prevent Contamination

Our removal and remedial cleanup work ensures communities are protected from direct exposure to contaminants, have safe drinking water, and are informed and involved through the entire cleanup process. We work with communities and stakeholders to plan and implement activities that promote redevelopment and economic growth at our private, federal facility, and Brownfields sites. Our work protects communities and prevents exposure to heavy metals contamination, hazardous vapor intrusion, radiation, and protects precious water resources. Planned accomplishments for FY18 in this top-priority area include completing 30 Removal Actions, completing 11 Remedial Action Projects, finalizing 10 Records of Decision, and completing 10 Brownfields cleanups.

The following FY18 actions in our Removal, Remedial, Site Assessment, and Brownfields Programs support Objective 1.3 "Revitalize Land and Prevent Contamination" of EPA's FY2018-2022 Strategic Plan Framework.

- **Vapor Intrusion Investigations:** Complete four of the 23 planned or ongoing vapor intrusion investigations on private and federal facility sites in FY18.
- **Aerojet:** Oversee vapor intrusion investigations at more than 150 buildings on the Aerojet facility and in the neighboring community. To date, thirteen on-site areas have been identified with TCE levels requiring immediate mitigation. A long-term management plan for VI at the site will ensure site workers are protected and mitigation measures are working.
- **San Gabriel Valley, Area 1:** Continue addressing elevated PCE vapor intrusion levels around Hytone Cleaners and other source areas through source control and mitigation measures. A vapor intrusion Remedial Investigation/Feasibility Study (RI/FS) and Record of Decision (ROD) will allow for additional vapor intrusion investigations and expedited response, when necessary, across the South El Monte OU.
- **Triple Site:** Continue vapor intrusion outreach and sampling at homes, and develop long-term monitoring plans. Mitigation systems have been installed at 21 of the 275 buildings that have been sampled to date.
- **Preventing Lead Exposure and Contamination:** Evaluate soil lead contamination in West Oakland, including a Site Inspection and pilot urban metals background study. We will Inform the national policy discussion on protective lead screening and cleanup levels, including bioavailability data. We will begin an EPA regional task force that will collaborate with state and local agencies to understand and address risk factors outside of CERCLA regulatory authority.

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- **Bercovich Smelter**: Conduct a small removal action to remove legacy lead contamination from historical smelter operations in residential yards, in an under-served neighborhood in Oakland, CA.
- **AMCO – West Oakland:** Complete thermal treatment of the source area which eliminates the vapor intrusion risk to on-property commercial tenants and residents living in homes near the former plant property in this environmental justice community. We will also continue the operation of the source area treatment which removed 20,000 pounds of contamination in FY17.
- **Motorola 52nd Street:** Oversee the OU2-wide vapor intrusion investigation. Indoor air sampling is planned where soil gas data indicates there are residential, school, and hospital areas with the potential for vapor intrusion.
- **Iron King Mine:** Complete the Feasibility Study for the source facilities, drainages, and 1900s-era dam which are attributed to the high levels of lead and arsenic on the site.
- **Argonaut Mine**: Work closely with DTSC to coordinate activities between the Dam retrofit project and the NPL site RI/FS to address soil and surface water contamination that poses a direct exposure threat.
- **New Idria Mine Site**: Plan and issue Administrative Order on Consent with the potentially responsible party which will result in the initiation of a Remedial Investigation and Feasibility Study to address legacy mercury contamination.
- **Sulphur Bank Mercury Mine Site**: Continue tribal-specific human health risk assessments in adjacent tribal communities to determine the appropriate cleanup level that will be fully protective. Upon completion, we will draft a Proposed Plan for the mine property operable unit.
- **Addressing Emerging Contaminants:** Sample untreated groundwater and treated drinking water for PFOA and PFOS at eight private NPL sites in California and Arizona where groundwater treated by the remedy is served as drinking water to over 1.5 million households. The sampling will determine whether these contaminants are present and pose a direct exposure threat via the drinking water on these sites.
- **United Heckathorn:** Complete a Focused Feasibility Study and the Proposed Plan to evaluate cleanup options for the site and propose EPA's preferred cleanup alternative. This work is the culmination of years of investigation and sampling events.
- **E.D. Coat Facility**: Conduct a large-scale removal action if the property owner declines to address the threat to human health and the environment due to the electroplating hazardous waste at the facility in West Oakland.
- **San Carlos Apache Drum Roundup**: Remove a large number of steel drums, linked to legacy herbicide spraying operations identified on the San Carlos Apache reservation in San Carlos, AZ.
- **Eureka Smelters:** Continue the large-scale, residential lead and arsenic-contaminated soil removal actions at the Eureka Smelters Site in Eureka, NV.
- **Lake of the Woods Radium Site:** Conduct a small removal action to address threats from radioactive wastes at this site in Kern County, CA.
- **Doeskin Road Abandoned Chemicals:** Conduct a removal action to address threats from hazardous chemical wastes at this site in San Bernardino County, CA.
- **Tuba City Dump Site:** Complete and sign a Record of Decision for the Tuba City Dump Site.

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- **Northeast Churchrock mine:** Complete the Remedial Design for the final remedy at the Northeast Churchrock mine site, estimated to cost $44.3M. Initiate a Groundwater study
- **Quivira Mine Site:** Complete EE/CAs for the Quivira Mine Site, Mac and Black Jack Mine Sites, Ruby #2 Mine Site, and the Mariano Lake Mine Site.
- **Contaminated Structures Removal Actions:** Continue our work addressing human health risk at residential and ceremonial structures and residential yards on the Navajo Nation, that are contaminated with radium from legacy uranium mining.
- **Navajo Abandoned Uranium Mines Site Investigations:** Site Investigations of AUMs on Navajo land that are slated for completion in 2018 include the 46 priority mine sites identified as posing the greatest risk, the 34 Tronox mine sites within Region 9, and the 32 mine sites Under the Freeport-McMoran settlement.
- **Western Agency Enforcement Actions:** Complete two enforcement actions in Western Agency for removal site evaluations.
- **Haystack Mine Site:** Enter an enforcement agreement to complete an EE/CA for this site.
- **Brownfields**: Work with other federal agencies, state and local government and private partners to improve communities' quality of life through economic investment. In FY18, we will complete 10 cleanups, and 200 assessments.
- **Hunters Point Naval Shipyard**: Conclude an intensive effort with the Navy and State to evaluate any residual radiation that the Navy's contractor may have left behind as a result of blatant falsification of data by the contractor. This accelerated effort will address any areas requiring remediation so the community trust in the cleanup is restored and the land can be transferred for redevelopment.
- **McClellan Air Force Base**: Continue community redevelopment through privatization for sites included in previous decision documents. Two final decision documents are currently in development under FOSET 1 and FOSET 2.
- **Partial Deletion of Pacific Coast Pipeline Site**: EPA has determined that the soil cleanup conducted in 2013 and 2014 achieved the cleanup specified in the 2011 Record of Decision Amendment. The necessary institutional controls have been placed in the form of Land Use Covenants filed with the Ventura County Recorder's Office.
- **Partial Deletion of Aerojet Site:** Consider a partial deletion for soil media of two small (3.8 and 1.7 acres) non-contiguous parcels within Operable Unit 5, pending results of a vapor intrusion evaluation. If study shows mitigation measures are protective, EPA will ask the State of California to record a Land Use Covenant requiring mitigation systems for any occupied structure.
- **Tucson International Airport Area (TIAA):** Finalize the ROD Amendment for the groundwater plume north of Los Reales Road. The ROD Amendment will establish a cleanup value for 1,4-dioxane and will include the addition of an advanced oxidation treatment plant, which will help supply the City of Tucson with potable water.
- **NASA Jet Propulsion Lab**: Sign the Final ROD that establishes the final cleanup standard for perchlorate in groundwater and confirms that the point of use groundwater treatment for perchlorate and VOCs at two public water supply systems should continue operating per prior interim action RODs.
- **Anaconda Copper Mine Site:** Significantly advance or complete remedial investigations and risk assessments for several operable units, including OU-1 Groundwater, OU-3 Process Area, OU-4a Evaporation Ponds, and OU-7 Wabuska Drain. Initiate and possibly complete remedial design for the OU-8 Arimetco remedy.

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- **Copper Bluff Mine:** Propose this site to the National Priorities List in the Fall 2018. Acid mine drainage (AMD) that contains metals discharges directly downhill and into the Trinity River which supports a substantial fishery used by the Hoopa Valley and Yurok Tribes.
- **Stoker Chemical:** Remove the site in El Centro California from "proposed to NPL" status.
- **Pearl Harbor Naval Complex:** Sign the Harbor-wide Sediment ROD, which addresses PCB and other contaminated sediment across the 5000-acre harbor through focused dredging with enhanced natural recovery, activated carbon, and monitored natural recovery.
- **Palos Verdes Shelf:** Initiate a Focused Feasibility Study to evaluate final remedial alternatives, including capping, to go along with the effective Institutional Controls program that is already in place.

II. Enhancing Shared Accountability

As stated in the Administrator's Superfund Task Force Recommendations, making the Superfund process more efficient and promoting revitalization to gain long-term benefits for impacted communities must necessarily include building stronger strategic partnerships with key stakeholders across the Superfund process. We must deploy an assortment of partnership-building activities and engagement opportunities to increase the collaboration with, and impact of, our key stakeholders. Our oversight relationships with our federal, state, regional, and tribal partners are strengthened through joint planning, information sharing, and cleanup standards development. This strategy reduces conflict, enhances shared accountability, and results in effective and efficient oversight.

Our Brownfields Program awards Site Assessment, 128a and Multi-Site Cooperative Agreement (MSCA) grants to States and Tribes for preliminary assessments/site investigations, cleanups, and redevelopment of contaminated sites. Our staff work closely with grantees to provide technical and grants compliance assistance. In conjunction with our Region's grants management office to review grant applications, monitor and approve grant expenditures to ensure funds are utilized appropriately to meet overall grant program objectives.

The following FY18 activities support Objective 2.2 "Enhancing Shared Accountability" of EPA's Strategic Plan Framework:

- **Mine Site Contingency Planning:** Work with State Counterparts to monitor rainfall and the increased risk of overflow for all mine sites. We will develop contingency response plans that identify potential overflow scenarios and the recommended response, outreach, and communication actions.
- **Dispute Resolution:** Work with the State of California to resolve two formal disputes at Edwards Air Force Base. The resolutions will address technical impracticability decisions and the role of States in determining ARARs for toxicity-based cleanup goals.
- **Utilizing Lean Process**: Work with Arizona DEQ to implement their Lean program into our combined quarterly meetings with management and interactions with the site teams. We will also be using a Lean process to work with Stakeholders and the Responsible Party to streamline the RI/FS submittal and review process at the Leviathan Mine NPL site.
- **Mine sites prioritization (MINESHAFT)**: Continue our mining prioritization efforts with CA DTSC, USCOE, and USGS to focus Superfund removal and remedial resources. Initial efforts have identified various priority areas from 42,000 California mines. This year we will be focusing on 3

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gold mine "clusters" and one mercury mine cluster. We will be evaluating these areas for remedial and removal potential along with deferral to the State or USCOE.

- **CA Prop 1 Funding:** Collaborate with our state partners at CalEPA as the state directs $800 million in projects throughout California to support groundwater sustainability and resiliency in the face of potential natural disaster. These projects are on or near ten Superfund sites in southern California.
- **EPCRA Planning Support:** Collaborate with the State SERCs and LEPCs on a variety of hazardous chemical inventory and planning initiatives. The principal focus area will be TIER 2/emergency planning information gap analysis to help insure that first responders have response planning information on all hazards faced in their community.
- **CA Vapor Intrusion Guidance:** Continue to provide technical guidance for the CalEPA Small Building Vapor Intrusion Guidance.
- **Dispersants Use Policy:** Work with our partners in Hawaii to continue revising policies regarding the use of dispersants to combat oil spills in the Hawaiian Island marine zone. Our goal in 2018 is to complete our biological assessment as part of an Endangered Species Act Section 7 consultation by December 2018.
- **Navajo Nation EPA Capacity Building:** Fund IPA to facilitate capacity building within Navajo Nation EPA Superfund Program.

III. Increasing Transparency and Public Participation

Our work directly impacts communities, and therefore the importance of transparency and public participation is paramount. Throughout the remedial cleanup process, public participation opportunities are provided through the solicitation for public comments on key documents, community involvement and update meetings, availability of site file records, and online site profile pages. Our community involvement teams are actively engaged in our communities ensuring awareness of any risks, ways to minimize exposure, and to address public stakeholder concerns. Our staff are required to keep meticulous site records which are made available for public review. Draft Proposed Plans and decision documents are made available for public comment before feedback is considered and incorporated into later drafts.

The following actions are FY18 highlights of how we are supporting Objective 2.3 “Transparency and Public Participation” of EPA’s Strategic Plan Framework.

- **Revamped Site Profile Pages:** Train RPMs to update individual site profile pages where the public can easily access and understand the cleanup status of contaminated sites. Site file documents, decision documents, and other information will be available on the new site profile pages.
- **Superfund Records Management Training:** Provide Records Management training to ensure the site files, decision documents, and other records are accurately maintained and promptly made publicly available for review and comment as required by regulation and EPA policy.
- **Navajo Nation Community Involvement**: Continue consistent participation in regular Navajo, community, PRP, and trustee meetings. With the Community Outreach Network, we will host two 2-day community workshops on Navajo Nation to educate residents about radiation and uranium exposure, and AUM cleanup efforts. We will complete three draft Community

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Involvement Plans (CIP) for Tse Tah, Monument Valley, and Claim 28, and complete one CIP addendum for the Bonita Peak Mining District.

IV. Compliance with the Law

Our project managers and technical experts work directly with responsible parties to ensure compliance with CERCLA, the NCP, and applicable state/local regulations. We provide regulatory and policy guidance, technical assistance, and feedback through the entire remedial process to ensure compliance with the law and protective cleanups.

Another fundamental tenet of CERCLA is that the party responsible for the contamination should pay for the cleanup. We have a successful program in our region working with our Office of Regional Counsel for enforcement and cost recovery in accordance with CERCLA. This process involves a search for responsible parties, case development, and meticulous record keeping for all cleanup-related costs to ensure the correct dollar amounts are recovered from responsible parties. These efforts have resulted in over $20 million recovered in each of the last two fiscal years. We utilize consent decrees and other legal instruments to promote compliance and the cleanup of contaminated sites.

Our Clean Air Act 112(r) Program, promotes compliance through chemical safety and preparedness training, and Risk Management Plan inspections at chemical facilities.

The following actions in FY18 support Objective 3.1 "Compliance with the Law" of EPA's FY2018-2022 Strategic Plan Framework.

- **San Fernando Valley, Area 1:** Complete five settlements with two parties, totaling over $15 million of groundwater remediation work to be completed. Work on a comprehensive consent decree wrapping in another 8-15 parties, and another $60 million of work, is expected to be substantially completed by the end of FY18.
- **Rockets, Fireworks, and Flares Settlement:** End litigation, pending Court approval, that EPA joined in 2010. The settlement would require the defendant to pay $5.9 million to help fund the cleanup and partially reimburse EPA for investigation work at the Site. Cleanup of perchlorate and TCE contamination in soil and groundwater is underway in accordance with settlements reached in 2012 and 2013 with Emhart Industries and the Goodrich Corporation/UTC. The Consent Decree is expected to be entered in FY18.
- **Plumas Eureka Removal Site:** Recover approximately 50% of our costs from the California Department of Parks and Recreation for addressing risks from lead and arsenic contamination at the Plumas Eureka State Park in the California Gold Country.
- **Eureka Smelter Removal Site:** Pursue potentially responsible parties at the Eureka Smelter Site, Eureka, NV. The site has gone through multiple ownership changes, including foreign ownership, making this a challenging cost recovery case.
- **Commonwealth Utility Corporation, Commonwealth of the Northern Mariana Islands:** Include the Agency's cleanup costs at the CUC site in the U.S. Coast Guard's cost recovery referral to the Department of Justice.
- **Bercovich Smelter Site, Oakland, CA**: Pursue potentially responsible parties at this abandoned smelter site in Oakland CA, where residential properties adjacent to the smelter site are contaminated with lead.

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- **Case Development:** Target significant cases for completion, including the Torrance Refinery, the national Chevron Refinery case, and multiple ammonia and chlorine sector cases.
- **Risk Management Plan Inspections:** Complete 30 Risk Management Plan Inspections in FY18 to support accidental release prevention of contaminants and compliance of Clean Air Act 112(r).
- **Chemical Safety Day Training**: Support compliance with Clean Air Act 112 (r), Accidental Release Prevention, Region 9 by partnering with Ammonia Safety Training Institute (ASTI) to deliver the Ammonia Safety Day training. This training brings first responders, industry, and regulators together to promote emergency management and to better prepare, prevent and respond to incidents at chemical facilities.

V. Improving Efficiency and Effectiveness

The growing complexity and challenge of our Division's work highlights the need to continually improve our efficiency and effectiveness. Development opportunities equip our workforce with the knowledge, skills and training needed for success. Mentoring and networking opportunities facilitate the sharing of best practices that will increase efficiency and effectiveness. Increasing the use of collaborative tools and technology will improve performance and decrease administrative burdens. Streamlining our FOIA process, and ensuring our workforce is prepared for a new Agency procurement process are among our improvement initiatives this year.

The following actions support Objective 3.4 "Improving Efficiency and Effectiveness" of EPA's Strategic Plan Framework.

- **Remedial Cleanup Program Training:** Implement rollout of program initiatives including the SFD Study Group and monthly training opportunities focused on areas of expertise critical to the RPM position. The program builds upon the existing environment of mentorship, knowledge transfer, and collaboration within the Division.
- **Management and Leadership Training:** Develop and coordinate training opportunities for supervisors and managers focused around leadership, communication, and organizational awareness.
- **FOIA:** Identify and secure additional resources to support the Division's work in responding to FOIAs. Establish increased management support of our FOIA work.
- **Remedial Acquisition Framework (RAF):** Prepare and train staff for the Agency FY18 rollout of RAF which will drastically change how remedial contracting is conducted and managed.
- **SFD SharePoint site:** Further develop the site to increase collaboration and efficiency. The SFD Training subsite and RPM subsite will be the focus for this year's development. Key goals include a Cleanup Site Directory and Training Portfolio Tracker.

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Appendix I: FY18 Key Metrics

Key Metric	FY18 Targets
Brownfields Properties Assessed	200
Brownfields Properties Cleaned Up	10
Risk Management Plan Inspections Completed	30
Removals Completed	16
Site assessments completed	80
Human Exposures Under Control Sites	0
Remedial Action Projects Complete	11
Construction Completions	2
Sites With Groundwater Migration Under Control.	0
Sites Ready for Anticipated Use Site-wide.	3
Records of Decision	10

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Appendix II: FY18 Grant Award Projections

State/Entity	PA/SI	128a State Response	MSCA
Arizona		$739,000	$400,000
Nevada	$125,000	$615,000	
California	$550,000	$1,000,000	$300,000
Hawaii	$275,000	$936,000	-
Gila River Indian Community		$180,000	-
Hoopa Valley Tribe		$134,000	-
Salt River Maricopa		$175,000	-
Tohono O'odham Nation		$153,000	-
Yurok Tribe		$277,000	-
American Samoa		$256,000	-
Northern Mariana Is.		$223,000	-
Guam		$218,000	-
White Mountain Apache Tribe		$94,000	-
San Carlos Apache		$48,000	-
Pyramid Lake Paiute Tribe		$10,000	-
Twenty-nine Palms Band of Mission Indians		$67,000	-
Elk Valley Racheria		$70,000	
Fort McDermitt Paiute-Shoshone		$70,000	
Walker River Tribe		$70,000	
Yerington Paiute Tribe		$70,000	
Navajo Nation		$200,000	

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