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PROGRESS REPORT NO. 22

TO: Kevin Rochlin – U.S. Environmental Protection Agency (EPA), Region 10 (R10) - via Email
Monica Tonel – EPA, R10 (via Email)

FROM: Marko Adzic – Teck Cominco American Incorporated (TCAI)

CC: David Godlewski – TCAI (via Email)
Bruce Duncan – EPA, R10 (via Email)
David Charters – EPA, Headquarters (via Email)
Lucinda Jacobs – Integral Consulting Inc. (via Email)

DATE: May 14, 2008 **FILE NO:** 1-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study (RI/FS) - Progress Report No. 22 Month Ending April 2008

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

In support of preparing future sampling and analysis plans (SAPs), EPA and their human health contractor (i.e., Syracuse Research Corporation [SRC]) prepared and submitted a memorandum outlining human health (HH) risk based concentrations (RBCs) for surface water, fish tissue, and sediment. Based on this information and in conjunction with technical input received at the March 2008 technical workshop, and as requested, a draft copy of the 2008/2009 surface water quality study will be submitted to EPA on June 2, 2008. Similarly, information outlined within the aforementioned RBC memorandum, will enable TCAI to work on and complete draft versions of the beach sediment and fish tissue sampling plans. In light of the June 2, 2008 deadline however, the surface water SAP is of primary importance.

A summary of activities (e.g., deliverables) completed to date, and those anticipated within in the near future, are presented within Table 1 below.

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Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status	Issues	Estimated Completion Date [1]
1.	2005 Field Data Transfer	Complete	None to report at this time	July 31, 2006
2.	Technical Memorandum[2.]	Complete	None to report at this time	October 27, 2006
3.	Draft RI/FS Work Plan	Draft submitted	None to report at this time	December 28, 2006
4.	Sampling and Analysis Plan (SAP)[3.]	Draft submitted	None to report at this time	February 26, 2007
5.	Health and Safety Plan	Complete	None to report at this time EPA does not approve Health and Safety Plans	February 26, 2007
6.	Cultural Resources Coordination Plan	Draft submitted	None to report at this time[4.]	February 26, 2007
7.	Revised RMAO Memorandum [5.]	Complete	None to report at this time	March 11, 2007
8.	Additional Trail Data	Complete	None to report at this time	May 6, 2007[6.]
9.	April Workshop Summary	Complete	None to report at this time	July 12, 2007
10.	Revised RI/FS Work Plan	Draft submitted	None to report at this time[7.]	September 21, 2007
11.	Screening Level ERA[8.]	Draft submitted	None to report at this time	March 11, 2008[8.]
12.	Surface Water SAP	On-Going	None to report at this time	June 2, 2008
13.	Phase 2 Beach SAP	On-Going	None to report at this time	June 2008
14.	Fish Tissue SAP	On-Going	None to report at this time	June 2008
15.	White Sturgeon Surface Water Toxicity SAP[9]	On-Going	None to report at this time	May 2008

Notes:

1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.

2. As outlined within the Agreement, the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.

3. The *2007 Sediment Investigation of Beaches and Depositional Areas* Sampling and Analysis Plan (SAP) was submitted under Paragraph 13 of the Agreement.

4. TCAI has been informed that revisions to the draft cultural resource coordination plan will be required. Per EPA's September 19, 2007 letter from Kevin Rochlin to Marko Adzic, the plan needs to provide a detailed description of the sampling program and the methods to be employed to secure samples. This cannot be done until a sampling plan is approved, or until EPA determines that a sampling plan is acceptable for cultural resources review.

5. The draft technical memorandum on risk-based management action objectives (RMAOs) was revised per EPA's January 16, 2007 comments.

6. Following a request outlined by EPA in a letter dated February 1, 2007 (received on February 5, 2007) TCAI has compiled additional information on the Trail Facility so as to

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assist in the identification of chemicals of concern (COIs) as outlined within Paragraph 24 of the Agreement. An electronic version of the deliverable was forwarded to EPA on May 6, 2007 with hard copies delivered shortly thereafter. In addition, a second deliverable identified as "*Business Confidential"* information was submitted to EPA legal counsel under separate cover on May 7, 2007 by Pillsbury Winthrop Shaw Pittman (i.e., TCAI legal counsel) on behalf of TCAI.

7. An electronic copy of the work plan has been provided to facilitate modifications of the document by EPA

8. ERA = Ecological Risk Assessment
   SAP = Sampling & Analysis Plan

9. As noted during the March 2008 technical workshop the draft SAP is for work being conducted in Canada and will be provided to EPA for informational purposes. Results of the study will be treated in a similar matter as other peer reviewed papers.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.

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