

# Koppers Superfund Site: Community Involvement in Remedy Selection

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EPA Technical Assistance Grant

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# Presentation

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- A. Technical Advisory Role and Status
- B. Soil Remedy
  - 1. Background
  - 2. Technical issues
  - 3. Process Challenges
- C. Source Area
  - 1. Current Conceptual Understanding
  - 2. Goals for Reduction of Toxicity and Volume

# Technical Advisory Team

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Commitment to

Providing the most accurate information to the public  
Attaining the best achievable remedy

# Technical Advisor – Role/Status

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- A. Technical Assistance Grants are available to qualified groups to hire an independent expert that “*can explain technical information and help articulate the community’s concerns*”
- B. The Koppers remedy is based on a complex set of documents and evaluations developed over the past 10 years.
- C. Collaboration with the LIT is needed to streamline reviews and provide accurate information to community members
- D. Community members can provide diverse opinions to EPA on the “best” cleanup

# Soil Remediation

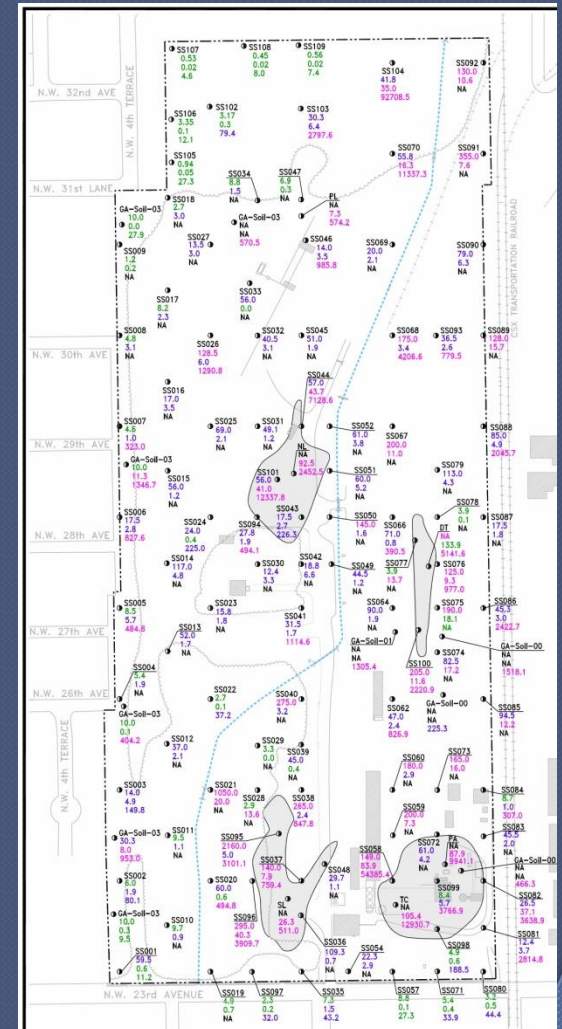
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Perspective on Risk and Proposed Remediation for Soils

# Making “Risk-Based Decisions”

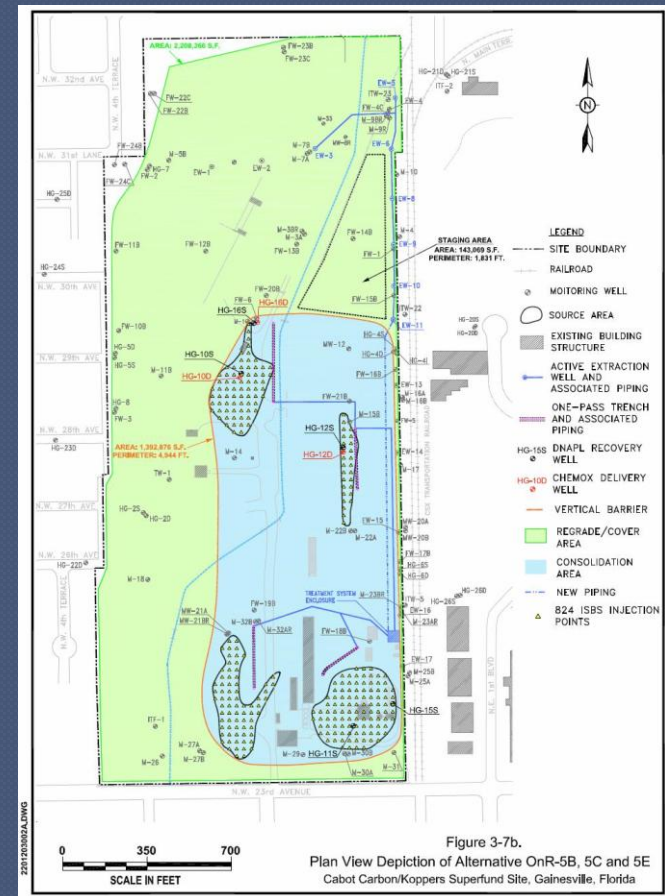
Articulating what is “clean”

What should be evaluated in the FS?



# Soil Remedy Issues – “The Green Area”

- A. *Regrade and Cover?*
- B. Implications for Reuse and Institutional Controls
- C. Precedence
- D. What will it take to have the FS revised/amended?



# Source Areas

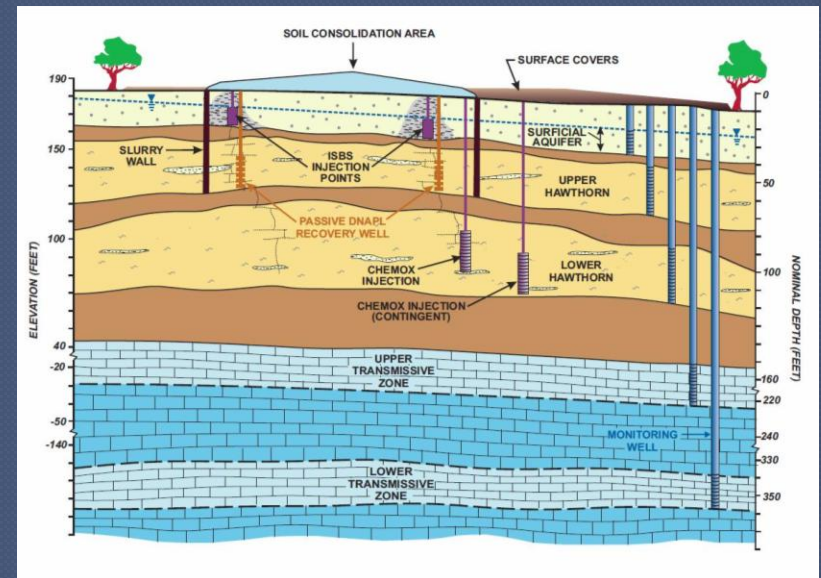
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Conceptual Understanding  
Reducing Toxicity and Volume



# Source Area Treatment

- A. Mistrust in technology screening process
- B. Options for more aggressive source treatment have been eliminated.
- C. Status
  1. Need more technical discussion with LIT
  2. EPA expert review of document



# Process

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Administrative Record  
Feasibility Study  
Institutional Controls  
Posting of Signs

# Administrative Record (AR)

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Section 113(k) of CERCLA

*defines the AR as the body of documents that "forms the basis" for the selection*

*does not mean that documents which only support a response decision are placed in the record*

Section 113(k)(2) of CERCLA requires that the public have the opportunity to participate in developing the administrative record for response selection.

Section 113(j)(1) of CERCLA provides that judicial review of any issues concerning the adequacy of any response action shall be limited to the administrative record.

# Other Process Issues

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- A. Basis for requesting addendum to the FS
- B. Justification for the level of analysis requested
- C. Community Involvement
- D. Placement of signs

# Requests of the City/County

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- A. Collaboration with the LIT to the technical information provided is as accurate as possible.
- B. Ongoing dialogue
- C. Support of community actions as appropriate (challenging the AR)

# Pat Cline/SEA

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