

## **Wyckoff Eagle Harbor Department of Ecology Generational Remedy Evaluation**

### **Project Objectives For Steering Committee Review on 9/14/09**

#### **OVERVIEW**

EPA is implementing a containment remedy at the Wyckoff Eagle Harbor site under CERCLA (Superfund). The containment remedy includes a perimeter wall, site cap, and groundwater extraction system to contain soil and groundwater contamination and mobile tar compounds. The containment remedy is necessary for near-term control of site contamination and protectiveness of human health and the environment.

The Department of Ecology agrees the containment remedy is necessary, but has concerns regarding the containment remedy that relate to long-term stewardship. Ecology has two primary concerns:

1. The long-term environmental consequence of leaving large amounts of mobile contamination at this site, especially given the important and sensitive location of the site on the shores of Puget Sound; and,
2. The financial burden that this action places on the state – an in-perpetuity obligation for active operation and maintenance, including periodic rebuilding of the remedy components.

Therefore, Ecology has made a commitment to evaluate potential remedial alternatives for Wyckoff soil and groundwater that would reduce the source or mobility of the contamination and that would remain protective of humans and the aquatic environment for future generations with little active management over the long term. The goal is that a “generational remedy” would minimize the potential for, and consequences of, a potential future environmental release, and significantly reduce long-term financial obligations to state government and burdens on the local community.

Ecology will undertake the Generational Remedy Evaluation over an approximate 9-month period in 2009-2010, with the assistance of a panel of regional and national experts, and a Steering Committee with community and tribal representatives.

Objectives are defined below for the 9-month Evaluation process – what Ecology hopes to achieve by the end of the evaluation.

Additionally, guiding principles for a “Generational Remedy” are defined – what the characteristics are of a remedy that would be protective for multiple generations with minimal on-going operations and maintenance costs.

## OBJECTIVES FOR THE GENERATIONAL REMEDY EVALUATION PROCESS

Objectives for the evaluation process include the following:

- Evaluate options for a “generational remedy” that could be protective for multiple generations with minimal on-going operations and maintenance requirements or costs (see “generational remedy” definition below).
- Work with the community to fully engage and look at the problem in a different way.
  - Form a community-based steering committee with membership from local government, Tribes and the community. The steering committee will provide input to Ecology in structuring the effort, in defining remedy objectives, selecting the expert panel, and reviewing outcomes. The steering committee provides an important reality check and knowledge of local goals.
  - Utilize an expert panel of national and local experts within the environmental cleanup field and other fields, experienced in the remediation of similar sites and large construction projects in challenging or constrained environments.
  - Provide information to the broader Bainbridge community about the generational remedy process, information developed, options under consideration, and resulting recommendations, including integrating public input into Steering Committee meetings, holding several community dialogue events, and providing other informal opportunities for information-sharing within the community as indicated by community interest.
- Recognize that this process is outside the regulatory framework. This is not about meeting regulatory cleanup standards, but about looking at concerns at the site from a viewpoint of future generations.
- The effort is not meant to replace EPA’s containment remedy which has been determined to be necessary for near-term control of the site.
- The outcome will be the identification of 1-3 primary alternatives for a “generational remedy”, and associated order-of-magnitude costs and schedule information.
- A document will be prepared defining generational remedy alternatives that can be used by agency management and political representatives to consider whether to pursue implementation of generational remedy components to supplement the EPA containment remedy.

This evaluation process is just a first step in a long process. Whatever alternatives are evaluated, they will likely be quite costly, and their implementation would require a sustained funding source. Given questions of funding, responsibility, and schedule, if a viable alternative is identified for pursuit, it would likely take quite a bit of time to develop an implementation strategy.

## **GUIDING PRINCIPLES FOR A GENERATIONAL REMEDY**

For this initial conceptual evaluation, the guiding principles for a Generational Remedy are described below. Each of the remedial alternatives identified through this evaluation should meet this list of guiding principles.

- The remedy evaluation will focus on the cleanup prism within the Former Process Area (FPA) or “The Point” at the site. The cleanup prism extends vertically to the upper aquitard unit and horizontally to the existing sheet pile wall (or a barrier, just outside of the existing wall). Diagrams to be developed to clarify this definition.
- Evaluate remedies that remove, treat, and/or significantly reduce the mobility of mobile contaminant sources (creosote product and creosote-soaked soils) within the FPA, so that remedy protectiveness is not reliant on long-term maintenance and rebuilding of containment structures or active pumping systems.
- Evaluate remedies that would significantly reduce the risk of a large-scale and unrecoverable release threatening humans and the aquatic environment if active operation and maintenance of systems at the site was terminated or significantly reduced, and no full-scale reconstruction of containment remedy components (extraction/treatment system and containment wall) was conducted.
- In defining such remedies, acknowledge the likelihood of significant earthquake and sea level rise to occur over generational time.
- Allow for open use by the public, including realization of the community’s plan for park use, and a healthy and sustainable terrestrial and marine ecosystem.
- Evaluate remedies that can be implemented at this location given currently available, readily obtainable and constructible infrastructure, including methods for waste transport and disposal.