



May 8, 2013

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Atlanta Federal Center
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Atlanta, Georgia 30303-8960

Subj: Remedial Alternative Screening Technical Memorandum Terry Creek OU1 RI/FS,
Terry Creek Dredge Spoils Superfund Site – EPA ID: GAD982112658, Brunswick, GA

Dear Mr. Martin:

Please find Environmental Stewardship Concepts' comments on the above referenced document below.

Sincerely,

Peter deFur
President

Laura Williams
Senior Environmental Scientist



**Environmental Stewardship Concepts, LLC Comments on:
Remedial Alternative Screening Technical Memorandum Terry Creek OU1 RI/FS**

The document is organized and prepared in a manner unlike most other RI/FS reports that are common for CERCLA sites throughout the agency. Important information is found in appendices and would be better at least summarized, if not actually presented in the main body of the report.

Institutional controls need to be addressed and are not presented or discussed. If contamination is left on site, then some sort of institutional controls are required.

The report relies on using only a single remedial option at a time, rather than combinations of technologies/methods. An example might be to combine sediment removal with containment.

The report indicates that redirecting flow during construction is not practical, but other larger projects have used this approach successfully and the Terry Creek RI/FS should consider this option as well.

The considerable discussion over toxicity values for toxaphene presents an issue that remains unresolved. EPA needs to take a position on this matter and insist that the values developed and used by EPA are the ones that the company will ascribe to and use.

In a similar manner, the methods for measuring toxaphene present an issue that needs to be resolved by the Agency. It is unclear what EPA testing method was used for "Method 1 Technical toxaphene" and no explanation is given to how "Method 2 Total Area Under the Curve (TUAC)" was calculated. Hercules did run some samples under Method 8276, which is a more improved method over Method 8081 for testing for weathered toxaphene, but these results are not given in the report. Hercules needs to use Method 8276 for the remaining samples.

The RI/FS report basically discounts or ignores the chemicals besides toxaphene that are present as site contaminants. This omission underestimates the risks from chemicals to humans and ecological receptors.

The RI/FS is correct that there is not enough sediment deposition to apply any form of natural recovery (an unproven approach for many situations, especially with chemicals that do not degrade naturally).

Alternative and *in situ* methods could have been considered in the FS part of the report, but were completely absent. New methods may have advantages that are not possible with conventional approaches.

The approach for the Triple Box Culvert is not entirely logical. The culvert has to be mechanically cleaned out, using some dredging methods, thus this step needs to be



incorporated in the alternatives in a fundamental manner, rather than considering it an option.

Before discounting sediment removal as an option, the report and Focused FS need to evaluate dredging the upper portion and capping the lower portion or new methods of sediment removal, *in situ* treatment and other combinations. The entire section seems more based on a prior assumption that sediment removal was not desirable, for whatever reasons, and therefore was removed out of hand.

Table 7 presents the alternatives, but is not informative and is, in places, misleading. The presentation of alternatives as "easy, moderate or difficult" is not something we have seen before and is simply unclear. Similarly, the costs need to be something other than "high, medium, and low". The text of the report did not clearly indicate the weir would be removed under all options.

Ultimately, none of the alternatives will bring this site to a conclusive cleanup if the ongoing source of toxaphene is not remediated successfully, and this report does nothing to address this most important issue.