

Navigating ROD versus Early Action Cleanup Approaches and Adaptive Management

Jennifer Hagen (Jennifer.Hagen@obg.com) (OBG, Milwaukee, Wisconsin, USA)
Brian Bartoszek (Brian.Bartoszek@WECEnergyGroup.com) (WBS, LLC., Green Bay, WI, USA)
Marcus Byker (Marcus.Byker@OBG.com) (OBG, Chicago, IL, USA)
Rick Fox (Rick.Fox@OBG.com) (OBG, Milwaukee, WI, USA)

Background/Objectives. A portfolio of 20 former manufactured gas plant (MGP) sites, each with a sediment component, were entered into the United States Environmental Protection Agency (USEPA) Superfund Alternatives Site (SAS) Program to perform Remedial Investigations and Feasibility Studies (RI/FS). As noted in the July 2017 USEPA Task Force Report, remedial actions within the Superfund process can be slow. Strategies to expedite cleanups include early actions and adaptive management.

Approach/Activities. Three approaches have been implemented within the MGP program, to cleanup sediment. Approaches include: Record of Decision (ROD) Remedial Actions, Time-Critical Removal Actions (TCRA), and Non-Time Critical Removal Actions (NTCRA). Interim removal actions will also be discussed. This presentation will highlight the rationale and site characteristics for advancing each of the cleanup approaches.

Results/Lessons Learned. Advantages and disadvantages and rear-view thoughts of advancing each cleanup approach were evaluated. Cleanup approaches will be compared in terms of overall schedule, data needs, stakeholder involvement, the role of risk assessment, target cleanup levels/objectives, administrative costs and certainty with respect to final remedy and post remedy monitoring requirements. Adaptive management strategies to further expedite cleanups and achieve ROD objectives will also be discussed.