



## REGION 7

LENEXA, KS 66219

### **MEMORANDUM**

**SUBJECT:** Regional Response to CSTAG Recommendations on the Proposed Removal Actions, Big River Watershed Combined NPL Site Project, Big River Mine Tailings (BRMT) OU2 and SW Jefferson County Mining (SJCM) OU4

**FROM:** Danny O'Connor, Acting Branch Manager  
Lead Mining and Special Emphasis Branch

**TO:** Karl Gustavson, Chair, on behalf of the Contaminated Sediments Technical Advisory Group Office of Superfund Remediation and Technology Innovation

This point-by-point response is provided on behalf of the Region 7 Big River Watershed Project (BRWP) team to the recommendations provided in the Contaminated Sediment Technical Advisory Group (CSTAG) memorandum dated June 25, 2024, for the subject project. The BRWP includes the Big River Mine Tailings Operable Unit 2 and Southwest Jefferson County Lead Mining site OU4. The BRWP is a Tier 2 CSTAG site, and the contaminated sediment areas and actions are subject to CSTAG review per CSTAG's policies and procedures.

The CSTAG memorandum provides a brief description of the project area and final recommendations associated with the Milestone 4 meeting between the Region 7 and CSTAG on April 10-11, 2024. The project team's response is provided per the directive establishing the CSTAG policies and procedures for complex sediment sites.

### **RESPONSE TO RECOMMENDATIONS**

#### **1. River and bank early actions**

The region acknowledges CSTAG support regarding the proposed Removal Actions in the project area that focus on reducing migration of COCs from contaminated sediment and riverbanks to less contaminated or sensitive downstream areas and are intended to be consistent with a final remedial approach.

#### **2. Removal based RAOs**

The region understands and agrees with these recommendations. The revised EECA documents have removed the referenced RAO 1 and reference the release of COCs from riverbanks to the river instead of the watershed.

### **3. Prioritization of action areas**

The region understands and agrees with these recommendations, and we anticipate incorporating them into decision documents moving forward. The region's specific responses to the CSTAG recommendations are as follows:

- a. The region has revised the prioritization in the updated EECA documents to include updated locations and quantities for specific actions required in each reach. This will generally result in an emphasis on sediment removal in the upper watershed and an emphasis on bank stabilization in the lower watershed. These are based on a more detailed analysis of estimates in each project location which will be reflected in the revised total cost and quantities.
- b. As outlined in the revised EECA documents, the decision framework will be based on the prioritization described above, property access, updates to the mass budget model and supported by the monitoring plan.
- c. The region anticipates entering into a Memorandum of Understanding with the following agencies to help coordinate activities and streamline communication: U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service and the Missouri Department of Natural Resources. The region will hold multiple public availability sessions to communicate key decisions and solicit input from the community.

### **4. Effectiveness of remediation technologies**

The region understands and agrees with these recommendations, and we anticipate incorporating them into decision documents moving forward. The region is developing the rationale to distinguish the need for bedload collection and removal in the upper watershed versus overbank traps to collect suspended sediments in the lower watershed. See the regions response to 3(a) and 3(b) described above.

### **5. Alternative development**

The region understands and agrees with these recommendations, and we have removed MNR as a component of this action.

### **6. Removal alternative evaluation and selection**

The region understands and agrees with these recommendations, and we anticipated incorporating them into decision documents moving forward. The region will develop indicators of effectiveness that are relevant to the RAOs in the revised EECA documents. The region has revised the list of alternatives to include: 1) No Action, 2) Targeted Bank Stabilization, 3) Sediment Traps, Targeted Excavation/Dredging, 4) Targeted Bank Stabilization, Sediment Traps, Targeted Excavation/Dredging.

## **7. Monitoring**

The region understands and agrees with these recommendations, and we anticipate incorporating them into decision documents moving forward. The region plans to install additional monitoring stations within the project area that are in closer proximity to the action areas. Monitoring will be focused on COC flux and remedy effectiveness. The monitoring plan has been developed to incorporate NTCRA as well as the follow-on actions. Additional monitoring will be conducted as the actions progress.

## **8. Ongoing lead exposure in high-access areas**

The region understands and agrees with these recommendations. As stated previously the region is entering into a MOU with partner agencies to help coordinate activities and streamline communication. The region will continue working with local health departments to increase the awareness and education around lead exposure within the communities.

For any questions regarding this memorandum, please reach out to a member of the BRWP team: Jason Gunter, Greg Bach and Amanda Branson.